

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
1	1	FED	Section 11.8 of the EIS provides results of the National Marine Fisheries Service’s Biological Opinion and Incidental Take Statement; however, does not adequately report the results of the Service’s consultation. The EIS states that the Service concurs with the Corps’ determination for the whooping crane and leatherback but fails to include the Incidental Take Statement from pages 42-50 of the Service’s January 13, 2023, Biological Opinion. To be consistent, please add reference to the Service’s Incidental Take Statement to Section 11.8 of the EIS, as found in Appendix D3, for the Kemp’s ridley sea turtle, green sea turtle, loggerhead sea turtle, hawksbill sea turtle, piping plover, piping plover critical habitat, red knot, proposed red knot critical habitat, eastern black rail, and West Indian manatee.	Thank you for your comment.	No response
1	2	FED	The proposed Permittee Responsible Compensatory Mitigation Plan (Appendix K of the EIS) does not include mitigation for the loss of tidal and algal flats in Site SS1, which have developed over time in this eroded dredged material placement area. The habitat impacted would include approximately 85 acres of tidal flats below the high tide line and another approximately 139 acres of habitat presumably above the high tide line. Site SS1 is known to be used by piping plovers and red knots; therefore, dredged material placed within these habitats would bury foraging grounds and benthic organisms important to these listed shorebirds and convert the area to an upland protected by armored levees. Due to the importance of tidal and algal flat habitats to ESA-listed species and their classification as aquatic resources of national importance, the Service recommends avoidance of tidal and algal flats. If avoidance is not possible, off-site restoration of tidal flat habitats within the project’s watershed should be included in the proposed mitigation.	<p>The dominant geomorphic process forming the current mud flats is erosion. Many of the areas identified as tide flats are above the High Tide Line and not considered waters of the U.S. Based on surveys for threatened and endangered species, a suitable keystone species, the mud flat sites in SS1 that are currently waters of the U.S. are minimally used. The proposed estuarine wetlands combined with the beach nourishment that are proposed in both the CMP and the BU will have a net positive benefit for shorebirds, no compensatory mitigation is required.</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 the tidal flats referenced in the comment.</p> <p>The Corps will condition the permit to comply with the January 13, 2023 BCO.</p>	<p>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 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. Additionally, one of the primary objectives contained in PCCA’s 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 and habitat protection is another very important objective of PCCA’s 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 PCCA’s 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, BU material will be utilized 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 backbeach, both incredibly valuable habitats for ESA-listed species.</p> <p>There are several reasons PCCA has not proposed mitigation for tidal flats. First, some of the tidal flats are above the High Tide Line (HTL) and therefore are considered upland and</p>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
2	1	FED	<p>PCCA has stated their mitigation plan (Appendix K of the administrative FEIS) will offset the proposed EFH impacts by relocating 6.88 acres of SAV and 0.10 acre of live oysters from PA-4, H1-E, and SS1 PAs. However, neither the mitigation plan, beneficial use (BU) plan, or the administrative FEIS addresses how direct impacts to tidal sand/mud flat, algal mat habitats will be adequately offset, and mitigation for SAV and oysters is still lacking.</p>	<p>The dominant geomorphic process forming the current mud flats is erosion. Many of the areas identified as tide flats are above the High Tide Line and not considered waters of the U.S. Based on surveys for threatened and endangered species, a suitable keystone species, the mud flat sites in SS1 that are currently waters of the U.S. are minimally used. The proposed estuarine wetlands combined with the beach nourishment that are proposed in both the CMP and the BU will have a net positive benefit for shorebirds, no compensatory mitigation is required.</p> <p>Mitigation for oyster and seagrass is clearly described in the compensatory mitigation plan included in Appendix K of the FEIS. Mitigation for seagrass and oyster is being conducted at a ratio of 1:1 utilizing transplants from impacted areas. The plan includes performance metrics, monitoring requirements, reporting requirements, and identified probable risks and appropriate adaptive management procedures.</p>	<p>A Permittee Responsible Compensatory Mitigation Plan (CMP; Appendix K of FEIS) was developed by 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 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. Additionally, one of the primary objectives contained in the PCCA’s 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 and habitat protection is another very important objective of PCCA’s 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 PCCA’s 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, BU material will be utilized 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 backbeach, both incredibly valuable habitats for ESA-listed species.</p> <p>There are several reasons PCCA has not proposed mitigation for tidal flats. First, some of the</p>
2	2	FED	<p>Based on the information provided in the administrative FEIS, we continue to believe Alternative 2 is the environmentally preferable alternative, as it will not have direct impacts on EFH found in the Applicant’s preferred alternative.</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 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.</p>
2	3	FED	<p>Based on requirements in the NOAA Fisheries implementing regulations, an EFH assessment for these activities should clearly characterize, delineate, and quantify impacts to all EFH by habitat type, including a description of measures to avoid, minimize, mitigate, or offset the adverse impacts of the proposed activities on EFH. The EFH assessment should include updated details delineating and quantifying impacts to EFH by habitat type. To date, the applicant has not identified or quantified all impacts to EFH by habitat type.</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).</p>	<p>The Applicant acknowledges the function and value of all habitats within the CDP footprint and has coordinated extensively to avoid, minimize, and satisfactorily mitigate these impacts to the maximum extent practicable. Overall, implementation of the Applicants CMP and BUMP will result in a considerable net gain of beneficial habitats, including considerable increases in SAS.</p>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
2	4	FED	The EFH assessment does not identify impacts to tidal flat/algal mat habitat either even though the BU management plan and the administrative FEIS state these habitats will be directly impacted by placement of dredged material. The USACE needs to identify and delineate all habitats in the EFH assessment as tidal sand/mud flats and algal mats are considered EFH. In addition, these impacts need to be quantified per habitat type to ensure there is no net loss of each type of EFH to be impacted by the PCCA’s Preferred Alternative.	<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).</p> <p>A compensatory mitigation plan was prepared by the PCCA and included in the FEIS, Appendix K. The CDP will permanently impact 21.04 acres of palustrine wetlands, 16.61 acres of estuarine wetlands, 6.88 acres of SAV, and 0.1 acres live oysters. The PCCA will utilize SS1 to construct the mitigation site. The objective of mitigation is restoration through the reestablishment of 32.94 acres of estuarine wetlands, 42.08 acres of palustrine wetlands, 6.88 acres of SAV, and 0.1 acres oysters.</p>	The Applicants Permittee Responsible CMP and BUMP were coordinated, reviewed, and approved by the USACE.
2	5	FED	While NOAA Fisheries generally supports the BU of dredged material for the above mentioned purposes, unavoidable direct impacts to EFH, such as estuarine wetlands, SAVs, tidal sand/mud flats, algal mats, and oyster reefs from the BU construction should be avoided or adequately mitigated for to ensure there is a no net loss of EFH. The PCCA has not demonstrated how they will offset direct impacts to tidal sand/mud flats or algal mats through restoration, establishment, and/or enhancement of the PAs. If the proposed BU sites are restoring, enhancing, and/or creating additional tidal sand/mud flats, algal mats to offset these direct losses, then the PCCA needs to provide clarification in the BU Monitoring Plan, the administrative FEIS, the EFH assessment, and the Compensatory Mitigation plan. In addition the PCCA’s planned mitigation does not adequately compensate for the direct impacts to SAV and oyster reefs.	<p>The dominant geomorphic process forming the current mud flats is erosion. Many of the areas identified as tide flats are above the High Tide Line and not considered waters of the U.S. Based on surveys for threatened and endangered species, a suitable keystone species, the mud flat sites in SS1 that are currently waters of the U.S. are minimally used. The proposed estuarine wetlands combined with the beach nourishment that are proposed in both the CMP and the BU will have a net positive benefit for shorebirds, no compensatory mitigation is required.</p>	<p>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 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. Additionally, one of the primary objectives contained in the PCCA’s 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 and habitat protection is another very important objective of PCCA’s 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 PCCA’s 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, BU material will be utilized 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 backbeach, both incredibly valuable habitats for ESA-listed species.</p> <p>There are several reasons PCCA has not proposed mitigation for tidal flats. First, some of the tidal flats are located within the project area, and the project is designed to restore and enhance these habitats. Second, the project is designed to restore and enhance the tidal flats by creating new tidal flats and enhancing existing tidal flats. Third, the project is designed to restore and enhance the tidal flats by creating new tidal flats and enhancing existing tidal flats. Fourth, the project is designed to restore and enhance the tidal flats by creating new tidal flats and enhancing existing tidal flats. Fifth, the project is designed to restore and enhance the tidal flats by creating new tidal flats and enhancing existing tidal flats. Sixth, the project is designed to restore and enhance the tidal flats by creating new tidal flats and enhancing existing tidal flats. Seventh, the project is designed to restore and enhance the tidal flats by creating new tidal flats and enhancing existing tidal flats. Eighth, the project is designed to restore and enhance the tidal flats by creating new tidal flats and enhancing existing tidal flats. Ninth, the project is designed to restore and enhance the tidal flats by creating new tidal flats and enhancing existing tidal flats. Tenth, the project is designed to restore and enhance the tidal flats by creating new tidal flats and enhancing existing tidal flats. Eleventh, the project is designed to restore and enhance the tidal flats by creating new tidal flats and enhancing existing tidal flats. Twelfth, the project is designed to restore and enhance the tidal flats by creating new tidal flats and enhancing existing tidal flats. Thirteenth, the project is designed to restore and enhance the tidal flats by creating new tidal flats and enhancing existing tidal flats. Fourteenth, the project is designed to restore and enhance the tidal flats by creating new tidal flats and enhancing existing tidal flats. Fifteenth, the project is designed to restore and enhance the tidal flats by creating new tidal flats and enhancing existing tidal flats. Sixteenth, the project is designed to restore and enhance the tidal flats by creating new tidal flats and enhancing existing tidal flats. Seventeenth, the project is designed to restore and enhance the tidal flats by creating new tidal flats and enhancing existing tidal flats. Eighteenth, the project is designed to restore and enhance the tidal flats by creating new tidal flats and enhancing existing tidal flats. Nineteenth, the project is designed to restore and enhance the tidal flats by creating new tidal flats and enhancing existing tidal flats. Twentieth, the project is designed to restore and enhance the tidal flats by creating new tidal flats and enhancing existing tidal flats. Twenty-first, the project is designed to restore and enhance the tidal flats by creating new tidal flats and enhancing existing tidal flats. Twenty-second, the project is designed to restore and enhance the tidal flats by creating new tidal flats and enhancing existing tidal flats. Twenty-third, the project is designed to restore and enhance the tidal flats by creating new tidal flats and enhancing existing tidal flats. Twenty-fourth, the project is designed to restore and enhance the tidal flats by creating new tidal flats and enhancing existing tidal flats. Twenty-fifth, the project is designed to restore and enhance the tidal flats by creating new tidal flats and enhancing existing tidal flats. Twenty-sixth, the project is designed to restore and enhance the tidal flats by creating new tidal flats and enhancing existing tidal flats. Twenty-seventh, the project is designed to restore and enhance the tidal flats by creating new tidal flats and enhancing existing tidal flats. Twenty-eighth, the project is designed to restore and enhance the tidal flats by creating new tidal flats and enhancing existing tidal flats. Twenty-ninth, the project is designed to restore and enhance the tidal flats by creating new tidal flats and enhancing existing tidal flats. Thirtieth, the project is designed to restore and enhance the tidal flats by creating new tidal flats and enhancing existing tidal flats. Thirty-first, the project is designed to restore and enhance the tidal flats by creating new tidal flats and enhancing existing tidal flats. Thirty-second, the project is designed to restore and enhance the tidal flats by creating new tidal flats and enhancing existing tidal flats. Thirty-third, the project is designed to restore and enhance the tidal flats by creating new tidal flats and enhancing existing tidal flats. Thirty-fourth, the project is designed to restore and enhance the tidal flats by creating new tidal flats and enhancing existing tidal flats. Thirty-fifth, the project is designed to restore and enhance the tidal flats by creating new tidal flats and enhancing existing tidal flats. Thirty-sixth, the project is designed to restore and enhance the tidal flats by creating new tidal flats and enhancing existing tidal flats. Thirty-seventh, the project is designed to restore and enhance the tidal flats by creating new tidal flats and enhancing existing tidal flats. Thirty-eighth, the project is designed to restore and enhance the tidal flats by creating new tidal flats and enhancing existing tidal flats. Thirty-ninth, the project is designed to restore and enhance the tidal flats by creating new tidal flats and enhancing existing tidal flats. Fortieth, the project is designed to restore and enhance the tidal flats by creating new tidal flats and enhancing existing tidal flats. Forty-first, the project is designed to restore and enhance the tidal flats by creating new tidal flats and enhancing existing tidal flats. Forty-second, the project is designed to restore and enhance the tidal flats by creating new tidal flats and enhancing existing tidal flats. Forty-third, the project is designed to restore and enhance the tidal flats by creating new tidal flats and enhancing existing tidal flats. Forty-fourth, the project is designed to restore and enhance the tidal flats by creating new tidal flats and enhancing existing tidal flats. Forty-fifth, the project is designed to restore and enhance the tidal flats by creating new tidal flats and enhancing existing tidal flats. Forty-sixth, the project is designed to restore and enhance the tidal flats by creating new tidal flats and enhancing existing tidal flats. Forty-seventh, the project is designed to restore and enhance the tidal flats by creating new tidal flats and enhancing existing tidal flats. Forty-eighth, the project is designed to restore and enhance the tidal flats by creating new tidal flats and enhancing existing tidal flats. Forty-ninth, the project is designed to restore and enhance the tidal flats by creating new tidal flats and enhancing existing tidal flats. Fiftieth, the project is designed to restore and enhance the tidal flats by creating new tidal flats and enhancing existing tidal flats. Fifty-first, the project is designed to restore and enhance the tidal flats by creating new tidal flats and enhancing existing tidal flats. Fifty-second, the project is designed to restore and enhance the tidal flats by creating new tidal flats and enhancing existing tidal flats. Fifty-third, the project is designed to restore and enhance the tidal flats by creating new tidal flats and enhancing existing tidal flats. Fifty-fourth, the project is designed to restore and enhance the tidal flats by creating new tidal flats and enhancing existing tidal flats. Fifty-fifth, the project is designed to restore and enhance the tidal flats by creating new tidal flats and enhancing existing tidal flats. Fifty-sixth, the project is designed to restore and enhance the tidal flats by creating new tidal flats and enhancing existing tidal flats. Fifty-seventh, the project is designed to restore and enhance the tidal flats by creating new tidal flats and enhancing existing tidal flats. Fifty-eighth, the project is designed to restore and enhance the tidal flats by creating new tidal flats and enhancing existing tidal flats. Fifty-ninth, the project is designed to restore and enhance the tidal flats by creating new tidal flats and enhancing existing tidal flats. Sixtieth, the project is designed to restore and enhance the tidal flats by creating new tidal flats and enhancing existing tidal flats. Sixty-first, the project is designed to restore and enhance the tidal flats by creating new tidal flats and enhancing existing tidal flats. Sixty-second, the project is designed to restore and enhance the tidal flats by creating new tidal flats and enhancing existing tidal flats. Sixty-third, the project is designed to restore and enhance the tidal flats by creating new tidal flats and enhancing existing tidal flats. Sixty-fourth, the project is designed to restore and enhance the tidal flats by creating new tidal flats and enhancing existing tidal flats. Sixty-fifth, the project is designed to restore and enhance the tidal flats by creating new tidal flats and enhancing existing tidal flats. Sixty-sixth, the project is designed to restore and enhance the tidal flats by creating new tidal flats and enhancing existing tidal flats. Sixty-seventh, the project is designed to restore and enhance the tidal flats by creating new tidal flats and enhancing existing tidal flats. Sixty-eighth, the project is designed to restore and enhance the tidal flats by creating new tidal flats and enhancing existing tidal flats. Sixty-ninth, the project is designed to restore and enhance the tidal flats by creating new tidal flats and enhancing existing tidal flats. Seventieth, the project is designed to restore and enhance the tidal flats by creating new tidal flats and enhancing existing tidal flats. Seventy-first, the project is designed to restore and enhance the tidal flats by creating new tidal flats and enhancing existing tidal flats. Seventy-second, the project is designed to restore and enhance the tidal flats by creating new tidal flats and enhancing existing tidal flats. Seventy-third, the project is designed to restore and enhance the tidal flats by creating new tidal flats and enhancing existing tidal flats. Seventy-fourth, the project is designed to restore and enhance the tidal flats by creating new tidal flats and enhancing existing tidal flats. Seventy-fifth, the project is designed to restore and enhance the tidal flats by creating new tidal flats and enhancing existing tidal flats. Seventy-sixth, the project is designed to restore and enhance the tidal flats by creating new tidal flats and enhancing existing tidal flats. Seventy-seventh, the project is designed to restore and enhance the tidal flats by creating new tidal flats and enhancing existing tidal flats. Seventy-eighth, the project is designed to restore and enhance the tidal flats by creating new tidal flats and enhancing existing tidal flats. Seventy-ninth, the project is designed to restore and enhance the tidal flats by creating new tidal flats and enhancing existing tidal flats. Eightieth, the project is designed to restore and enhance the tidal flats by creating new tidal flats and enhancing existing tidal flats. Eighty-first, the project is designed to restore and enhance the tidal flats by creating new tidal flats and enhancing existing tidal flats. Eighty-second, the project is designed to restore and enhance the tidal flats by creating new tidal flats and enhancing existing tidal flats. Eighty-third, the project is designed to restore and enhance the tidal flats by creating new tidal flats and enhancing existing tidal flats. Eighty-fourth, the project is designed to restore and enhance the tidal flats by creating new tidal flats and enhancing existing tidal flats. Eighty-fifth, the project is designed to restore and enhance the tidal flats by creating new tidal flats and enhancing existing tidal flats. Eighty-sixth, the project is designed to restore and enhance the tidal flats by creating new tidal flats and enhancing existing tidal flats. Eighty-seventh, the project is designed to restore and enhance the tidal flats by creating new tidal flats and enhancing existing tidal flats. Eighty-eighth, the project is designed to restore and enhance the tidal flats by creating new tidal flats and enhancing existing tidal flats. Eighty-ninth, the project is designed to restore and enhance the tidal flats by creating new tidal flats and enhancing existing tidal flats. Ninetieth, the project is designed to restore and enhance the tidal flats by creating new tidal flats and enhancing existing tidal flats. Ninety-first, the project is designed to restore and enhance the tidal flats by creating new tidal flats and enhancing existing tidal flats. Ninety-second, the project is designed to restore and enhance the tidal flats by creating new tidal flats and enhancing existing tidal flats. Ninety-third, the project is designed to restore and enhance the tidal flats by creating new tidal flats and enhancing existing tidal flats. Ninety-fourth, the project is designed to restore and enhance the tidal flats by creating new tidal flats and enhancing existing tidal flats. Ninety-fifth, the project is designed to restore and enhance the tidal flats by creating new tidal flats and enhancing existing tidal flats. Ninety-sixth, the project is designed to restore and enhance the tidal flats by creating new tidal flats and enhancing existing tidal flats. Ninety-seventh, the project is designed to restore and enhance the tidal flats by creating new tidal flats and enhancing existing tidal flats. Ninety-eighth, the project is designed to restore and enhance the tidal flats by creating new tidal flats and enhancing existing tidal flats. Ninety-ninth, the project is designed to restore and enhance the tidal flats by creating new tidal flats and enhancing existing tidal flats. One hundredth, the project is designed to restore and enhance the tidal flats by creating new tidal flats and enhancing existing tidal flats.</p>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
2	6	FED	The PCCA continues to state the BU placement on SS1 and PA4, which are designed to protect Redfish Bay, far outweigh the impacts to other EFH. NOAA Fisheries mostly agrees with this statement; however, providing protection to Redfish Bay does not offset the resources being affected by the placement of BU and will result in a net loss of EFH resources. The PCCA is currently proposing to construct BU SS1, where 75 acres of the BU site will be used for wetland mitigation for all project related impacts. This would include restoration through reestablishment of 32.94 acres of estuarine wetlands and 42.08 acres of palustrine wetlands, and the relocation of 6.88 acres of SAV, and 0.10 acres of oyster reef. NOAA Fisheries continues to recommend the mitigation ratio be 3:1 for SAV and 2:1 for oyster reefs to adequately address the loss of resource functions and values provided by the existing EFH. Therefore, the PCCA should be required to provide a total of 20.64 acres of seagrass and 0.20-acre of oyster reef compensation for direct impacts.	The proposed BU plan will establish 291 acres of wetland habitat to replace the 138.61 acres lost, which represents a net gain in wetlands. This is in addition to the CMP.	<p>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 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; 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 and habitat protection is another very important objective of PCCA’s 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 PCCA’s 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, BU material will be utilized 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 backbeach, both incredibly valuable habitats for ESA-listed species.</p>
2	7	FED	NOAA Fisheries recommends the Department of the Army not seek Congressional authorization for this project as currently proposed.	As stated in every public document since the initial public notice in August 2019, the proposed project is a federal project seeking a Department of the Army Permit not a proposed Federal project seeking authorization from the Chief of Engineer and Congress.	No response
2	8	FED	EFH Conservation Recommendations: 1) The USACE should provide a revised EFH assessment to NOAA Fisheries to include the delineation and quantification of tidal sand/mud flat, algal mat habitats, as they are identified EFH by the Gulf of Mexico Fishery Management Council, at each of the proposed PAs.	<p>Consultation with NMFS was initiated with the release of the DEIS and receipt of any comments regarding EFH impacts. An EFH Assessment has 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).</p> <p>A compensatory mitigation plan was prepared by the PCCA and included in the FEIS, Appendix K. The CDP will permanently impact 21.04 acres of palustrine wetlands, 16.61 acres of estuarine wetlands, 6.88 acres of SAV, and 0.1 acres live oysters. The PCCA will utilize SS1 to construct the mitigation site. The objective of mitigation is restoration through the reestablishment of 32.94 acres of estuarine wetlands, 42.08 acres of palustrine wetlands, 6.88 acres of SAV, and 0.1 acres oysters.</p>	Consultation with NMFS was initiated with the release of the DEIS and receipt of any comments regarding EFH impacts. An EFH Assessment has been prepared for this project and was coordinated with NMFS (Appendix E of FEIS). 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 of FEIS).

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
2	9	FED	<p>2) It is unclear whether adequate benefits to EFH will be provided to offset aquatic impacts as described in the Beneficial Use Management Plan (i.e., tidal sand/mud flat, algal mat habitats). The PCCA needs to demonstrate how the displacement of tidal sand/mud flat and algal mat habitats will be offset (e.g., restored, created, enhanced) by the placement of BU dredge material.</p>	<p>The dominant geomorphic process forming the current mud flats is erosion. Many of the areas identified as tide flats are above the High Tide Line and not considered waters of the U.S. Based on surveys for threatened and endangered species, a suitable keystone species, the mud flat sites in SS1 that are currently waters of the U.S. are minimally used. The proposed estuarine wetlands combined with the beach nourishment that are proposed in both the CMP and the BU will have a net positive benefit for shorebirds, no compensatory mitigation is required.</p> <p>Consultation with NMFS was initiated with the release of the DEIS and receipt of any comments regarding EFH impacts. An EFH Assessment has 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).</p> <p>A compensatory mitigation plan was prepared by the PCCA and included in the FEIS, Appendix K. The CDP will permanently impact 21.04 acres of palustrine wetlands, 16.61 acres of estuarine wetlands, 6.88 acres of SAV, and 0.1 acres live oysters. The PCCA will utilize SS1 to construct the mitigation site. The objective of mitigation is restoration through the reestablishment of 32.94 acres of estuarine wetlands, 42.08 acres of palustrine wetlands, 6.88 acres of SAV, and 0.1 acres oysters.</p>	<p>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 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; 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 and habitat protection is another very important objective of PCCA’s 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 PCCA’s 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, BU material will be utilized 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 backbeach, both incredibly valuable habitats for ESA-listed species.</p>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
2	10	FED	3) The preliminary mitigation analysis and approximate total acres of impacts to EFH provided in the administrative FEIS should be refined to verify: (1) the final assessment of acres of impacts to each EFH category (including tidal sand/mud flat, algal mat habitats); (2) description of the ecological assessment methodologies used and results of the impact and mitigation calculations; (3) the types of mitigation required; and (4) the final mitigation project design. Fill in estuarine water column and estuarine mud/sand/shell bottoms EFH that convert healthy bay habitats to uplands should also be included among the habitat types assessed and requiring mitigation. Estimates of all direct and indirect project related impacts to tidally influenced EFH should be refined for inclusion in the project’s final EIS.	<p>Consultation with NMFS was initiated with the release of the DEIS and receipt of any comments regarding EFH impacts. An EFH Assessment has 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).</p> <p>A compensatory mitigation plan was prepared by the PCCA and included in the FEIS, Appendix K. The CDP will permanently impact 21.04 acres of palustrine wetlands, 16.61 acres of estuarine wetlands, 6.88 acres of SAV, and 0.1 acres live oysters. The PCCA will utilize SS1 to construct the mitigation site. The objective of mitigation is restoration through the reestablishment of 32.94 acres of estuarine wetlands, 42.08 acres of palustrine wetlands, 6.88 acres of SAV, and 0.1 acres oysters.</p>	<p>Consultation with NMFS was initiated with the release of the DEIS and receipt of any comments regarding EFH impacts. An EFH Assessment has been prepared for this project and was coordinated with NMFS (Appendix E of FEIS). NMFS provided EFH Conservation Recommendations on the project in August 2022. Coordination with NMFS with respect to the Magnum-Stevens Fishery Conservation and Management Act (MSFCMA) was concluded in November 2022 (see Appendix B8 of FEIS).</p> <p>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 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 the PCCA’s 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 and habitat protection is another very important objective of PCCA’s 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 PCCA’s CMP, beneficial use</p>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
2	11	FED	<p>4) A mitigation plan which fully compensates for all EFH impacts and a monitoring plan should be developed. We also request the EFH mitigation plan be coordinated with NOAA Fisheries prior to issuance of the final EIS. To avoid additional mitigation for temporal impacts, NOAA Fisheries also recommends the implementation of the mitigation plan concurrent with the deepening of the channel and placement of BU dredged material.</p>	<p>Consultation with NMFS was initiated with the release of the DEIS and receipt of any comments regarding EFH impacts. An EFH Assessment has 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).</p> <p>The dominant geomorphic process forming the current mud flats is erosion. Many of the areas identified as tide flats are above the High Tide Line and not considered waters of the U.S. Based on surveys for threatened and endangered species, a suitable keystone species, the mud flat sites in SS1 that are currently waters of the U.S. are minimally used. The proposed estuarine wetlands combined with the beach nourishment that are proposed in both the CMP and the BU will have a net positive benefit for shorebirds, no compensatory mitigation is required.</p> <p>A compensatory mitigation plan was prepared by the PCCA and included in the FEIS, Appendix K. The CDP will permanently impact 21.04 acres of palustrine wetlands, 16.61 acres of estuarine wetlands, 6.88 acres of SAV, and 0.1 acres live oysters. The PCCA will utilize SS1 to construct the mitigation site. The objective of mitigation is restoration through the reestablishment of 32.94 acres of estuarine wetlands, 42.08 acres of palustrine wetlands, 6.88 acres of SAV, and 0.1 acres oysters.</p>	<p>Consultation with NMFS was initiated with the release of the DEIS and receipt of any comments regarding EFH impacts. An EFH Assessment has been prepared for this project and was coordinated with NMFS (Appendix E of FEIS). NMFS provided EFH Conservation Recommendations on the project in August 2022. Coordination with NMFS with respect to the Magnum-Stevens Fishery Conservation and Management Act (MSFCMA) was concluded in November 2022 (see Appendix B8 of FEIS).</p> <p>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 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. Construction of the permittee responsible mitigation site will commence within 60 days of the initiation of work in SAS.</p> <p>Additionally, one of the primary objectives contained in PCCA’s 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 and habitat protection is another very important objective of PCCA’s 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 to Redfish Bay.</p>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
2	12	FED	<p>5) The USACE should require the PCCA to implement in-kind compensatory mitigation for direct and secondary EFH impacts (SAV, oyster reef, tidal sand/mud flat, and algal mat habitats) resulting from the proposed BU placement activities. The amount of mitigation should be based upon a functional assessment or a mitigation compensatory ratio of 3:1 for SAV and 2:1 for oyster reef habitats.</p>	<p>A compensatory mitigation plan was prepared by the PCCA and included in the FEIS, Appendix K. The CDP will permanently impact 21.04 acres of palustrine wetlands, 16.61 acres of estuarine wetlands, 6.88 acres of SAV, and 0.1 acres live oysters. The PCCA will utilize SS1 to construct the mitigation site. The objective of mitigation is restoration through the reestablishment of 32.94 acres of estuarine wetlands, 42.08 acres of palustrine wetlands, 6.88 acres of SAV, and 0.1 acres oysters.</p> <p>In the absence of a functional assessment, the Corps requires a minimum 1:1 ratio. Temporal loss has been addressed by requiring Seagrass mitigation prior to impact and appropriate success criteria, monitoring criteria, and an adaptive management plan are outlined in the compensatory mitigation plan.</p>	<p>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 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; 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 and habitat protection is another very important objective of PCCA’s 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 PCCA’s 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, BU material will be utilized 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 backbeach, both incredibly valuable habitats for ESA-listed species.</p>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
2	13	FED	6) If after three years of post-construction seagrass and oyster reef monitoring of BU placement areas reveal additional EFH impacts have occurred, then the PCCA should develop a compensatory mitigation, monitoring, and contingency plan designed to offset those observed EFH losses.	The appropriate success criteria, monitoring criteria, and an adaptive management plan are outlined in the compensatory mitigation plan.	<p>Consultation with NMFS was initiated with the release of the DEIS and receipt of any comments regarding EFH impacts. An EFH Assessment has been prepared for this project and was coordinated with NMFS (Appendix E of FEIS). NMFS provided EFH Conservation Recommendations on the project in August 2022. Coordination with NMFS with respect to the Magnum-Stevens Fishery Conservation and Management Act (MSFCMA) was concluded in November 2022 (see Appendix B8 of FEIS).</p> <p>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 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; 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 and habitat protection is another very important objective of PCCA’s 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, marsh, and tidal flat) will continue indiscriminately. In addition to PCCA’s CMP, beneficial use</p>
2	14	FED	Endangered Species Act: 1) We recommend the USACE upload historical dredging reports to Operations and Dredging Endangered Species System and maintain the repository to aid future Section 7 consultations on dredging projects.	Thank you for your comment.	No response
2	15	FED	2) We recommend the USACE require all personnel to report giant manta ray sightings to the giant manta ray recovery coordinator (calusa.horn@noaa.gov) at SERO PRD. Giant manta ray observations should be photographed and include the latitude/longitude, date, and environmental conditions at the time of the sighting.	The Corps will condition the permit to comply with NMFS December 9, 2022 Biological Opinion.	No response

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
3	1	PC	The storm surge impact on the bay has not been thoroughly studied.	<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>
3	2	PC	The impact of increased tidal inflows and outflows on waterline erosion have not been thoroughly studied.	<p>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>	<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>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
3	3	PC	The impact of increased tidal inflows and outflows on the little critters that channel for life have not been thoroughly studied.	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>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>
4	1	PC	The offshore option (with vapor control) is the best 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.	Thank you for your comment.
5	1	PC	Please extend the comment deadline to give the community time to receive necessary documents (requested via FOIA) and to thoroughly review the massive Final Environmental Impact Statement for SWG-2019-00067.	<p>USACE responded (3/25/24) with information on where to find the comments received during the DEIS, and responses to the comments.</p> <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.

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
5	2	PC	Commenter submitted a FOIA request to the USACE on 3/25/24.	<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>	Noted, US Army Corps of Engineers will fulfill FOIAs received in compliance with Department of Army procedures.
6	1	PC	Would like to see further study of Alternative 2 as it appears to be the more reasonable and viable long term solution.	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.
6	2	PC	Concerned that this project, on the heels of the –47 foot and –54 foot dredging will negatively impact the ecosystem.	Past, present, and reasonably foreseeable future actions in the study area are discussed in Section 5.0 of the FEIS.	<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

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
6	3	PC	Concerned the project would put the local community and ecosystem at greater risk to storm surge from hurricane events as outlined in the FEIS.	<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>
7	1	PC	Would like to see further study of Alternative 2 as it appears to be the more reasonable and viable long term solution.	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.
7	2	PC	Concerned that this project, on the heels of the –47 foot and –54 foot dredging will negatively impact the ecosystem.	Past, present, and reasonably foreseeable future actions in the study area are discussed in Section 5.0 of the FEIS.	<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

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
7	3	PC	Concerned the project would put the local community and ecosystem at greater risk to storm surge from hurricane events as outlined in the FEIS.	<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>
8	1	PC	Would like to see further study of Alternative 2 as it appears to be the more reasonable and viable long term solution.	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.
8	2	PC	Concerned that this project, on the heels of the –47 foot and –54 foot dredging will negatively impact the ecosystem.	Past, present, and reasonably foreseeable future actions in the study area are discussed in Section 5.0 of the FEIS.	<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

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
8	3	PC	Concerned the project would put the local community and ecosystem at greater risk to storm surge from hurricane events as outlined in the FEIS.	<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>
9	1	PC	Would like to see further study of Alternative 2 as it appears to be the more reasonable and viable long term solution.	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.
9	2	PC	Concerned that this project, on the heels of the –47 foot and –54 foot dredging will negatively impact the ecosystem.	Past, present, and reasonably foreseeable future actions in the study area are discussed in Section 5.0 of the FEIS.	<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

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
9	3	PC	Concerned the project would put the local community and ecosystem at greater risk to storm surge from hurricane events as outlined in the FEIS.	<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>
10	1	PC	Would like to see further study of Alternative 2 as it appears to be the more reasonable and viable long term solution.	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.
10	2	PC	Concerned that this project, on the heels of the –47 foot and –54 foot dredging will negatively impact the ecosystem.	Past, present, and reasonably foreseeable future actions in the study area are discussed in Section 5.0 of the FEIS.	<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

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
10	3	PC	Concerned the project would put the local community and ecosystem at greater risk to storm surge from hurricane events as outlined in the FEIS.	<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>
11	1	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.	<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>
11	2	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.	<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>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
11	3	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.
11	4	PC	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>Dredged material proposed for ocean disposal is evaluated and tested to ensure that the material will not adversely affect human health and the marine environment. Evaluation of dredged material for ocean disposal under the MPRSA relies on standardized testing using biological organisms (bioassays). Under section 103 of the MPRSA, any proposed dumping of dredged material into ocean waters must be evaluated through use of EPA’s ocean dumping criteria (40 CFR 220-229). The Ocean Testing Manual (OTM), a national testing manual for the evaluation of dredged material proposed for ocean dumping, provides guidance for sampling, testing, and analysis of water, sediment, and tissue to evaluate the environmental acceptability of dredged material proposed for ocean disposal. In addition to the OTM, the USACE and EPA have cooperatively prepared the Reginal Implementation Agreement, or RIA, to adapt the national procedures of the OTM to regional situations to ensure compliance with MPRSA.</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>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
11	4	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 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 or 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 sampling activities conducted was provided to USACE for review and concurrence on</p>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
11	4	PC	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.	Appendix C provides information on placement of dredged materials, locations, modeling, and monitoring plans. Appendix J provides information on sediment testing.	<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>
11	5	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>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>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
11	6	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 there 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.
12	1	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.	<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>
12	2	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.	<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>
12	3	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.

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
12	4	PC	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>Dredged material proposed for ocean disposal is evaluated and tested to ensure that the material will not adversely affect human health and the marine environment. Evaluation of dredged material for ocean disposal under the MPRSA relies on standardized testing using biological organisms (bioassays). Under section 103 of the MPRSA, any proposed dumping of dredged material into ocean waters must be evaluated through use of EPA's ocean dumping criteria (40 CFR 220-229). The Ocean Testing Manual (OTM), a national testing manual for the evaluation of dredged material proposed for ocean dumping, provides guidance for sampling, testing, and analysis of water, sediment, and tissue to evaluate the environmental acceptability of dredged material proposed for ocean disposal. In addition to the OTM, the USACE and EPA have cooperatively prepared the Reginal Implementation Agreement, or RIA, to adapt the national procedures of the OTM to regional situations to ensure compliance with MPRSA.</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 sampling activities conducted was provided to USACE for review and concurrence on</p>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
12	4	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 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 or 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 sampling activities conducted was provided to USACE for review and concurrence on</p>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
12	4	PC	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.	Appendix C provides information on placement of dredged materials, locations, modeling, and monitoring plans. Appendix J provides information on sediment testing.	<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 sampling activities conducted was provided to USACE for review and concurrence.</p>
12	5	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>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>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
12	6	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 there 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.
13	1	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.	<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>
13	2	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.	<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>
13	3	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.

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
13	4	PC	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>Dredged material proposed for ocean disposal is evaluated and tested to ensure that the material will not adversely affect human health and the marine environment. Evaluation of dredged material for ocean disposal under the MPRSA relies on standardized testing using biological organisms (bioassays). Under section 103 of the MPRSA, any proposed dumping of dredged material into ocean waters must be evaluated through use of EPA's ocean dumping criteria (40 CFR 220-229). The Ocean Testing Manual (OTM), a national testing manual for the evaluation of dredged material proposed for ocean dumping, provides guidance for sampling, testing, and analysis of water, sediment, and tissue to evaluate the environmental acceptability of dredged material proposed for ocean disposal. In addition to the OTM, the USACE and EPA have cooperatively prepared the Reginal Implementation Agreement, or RIA, to adapt the national procedures of the OTM to regional situations to ensure compliance with MPRSA.</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 sampling activities conducted was provided to USACE for review and concurrence on</p>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
13	4	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 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 or 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 sampling activities conducted was provided to USACE for review and concurrence on</p>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
13	4	PC	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.	Appendix C provides information on placement of dredged materials, locations, modeling, and monitoring plans. Appendix J provides information on sediment testing.	<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 sampling activities conducted was provided to USACE for review and concurrence.</p>
13	5	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>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>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
13	6	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 there 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.
14	1	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.	<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>
14	2	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.	<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>
14	3	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.

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
14	4	PC	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>Dredged material proposed for ocean disposal is evaluated and tested to ensure that the material will not adversely affect human health and the marine environment. Evaluation of dredged material for ocean disposal under the MPRSA relies on standardized testing using biological organisms (bioassays). Under section 103 of the MPRSA, any proposed dumping of dredged material into ocean waters must be evaluated through use of EPA's ocean dumping criteria (40 CFR 220-229). The Ocean Testing Manual (OTM), a national testing manual for the evaluation of dredged material proposed for ocean dumping, provides guidance for sampling, testing, and analysis of water, sediment, and tissue to evaluate the environmental acceptability of dredged material proposed for ocean disposal. In addition to the OTM, the USACE and EPA have cooperatively prepared the Reginal Implementation Agreement, or RIA, to adapt the national procedures of the OTM to regional situations to ensure compliance with MPRSA.</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 sampling activities conducted was provided to USACE for review and concurrence on</p>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
14	4	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 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 or 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 sampling activities conducted was provided to USACE for review and concurrence on</p>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
14	4	PC	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.	Appendix C provides information on placement of dredged materials, locations, modeling, and monitoring plans. Appendix J provides information on sediment testing.	<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>
14	5	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>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>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
14	6	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 there 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.
15	1	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.	<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>
15	2	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.	<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>
15	3	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.

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
15	4	PC	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>Dredged material proposed for ocean disposal is evaluated and tested to ensure that the material will not adversely affect human health and the marine environment. Evaluation of dredged material for ocean disposal under the MPRSA relies on standardized testing using biological organisms (bioassays). Under section 103 of the MPRSA, any proposed dumping of dredged material into ocean waters must be evaluated through use of EPA's ocean dumping criteria (40 CFR 220-229). The Ocean Testing Manual (OTM), a national testing manual for the evaluation of dredged material proposed for ocean dumping, provides guidance for sampling, testing, and analysis of water, sediment, and tissue to evaluate the environmental acceptability of dredged material proposed for ocean disposal. In addition to the OTM, the USACE and EPA have cooperatively prepared the Reginal Implementation Agreement, or RIA, to adapt the national procedures of the OTM to regional situations to ensure compliance with MPRSA.</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 sampling activities conducted was provided to USACE for review and concurrence on</p>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
15	4	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 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 or 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 sampling activities conducted was provided to USACE for review and concurrence on</p>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
15	4	PC	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.	Appendix C provides information on placement of dredged materials, locations, modeling, and monitoring plans. Appendix J provides information on sediment testing.	<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>
15	5	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>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>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
15	6	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 there 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.
16	1	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.	<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>
16	2	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.	<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>
16	3	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.

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
16	4	PC	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>Dredged material proposed for ocean disposal is evaluated and tested to ensure that the material will not adversely affect human health and the marine environment. Evaluation of dredged material for ocean disposal under the MPRSA relies on standardized testing using biological organisms (bioassays). Under section 103 of the MPRSA, any proposed dumping of dredged material into ocean waters must be evaluated through use of EPA's ocean dumping criteria (40 CFR 220-229). The Ocean Testing Manual (OTM), a national testing manual for the evaluation of dredged material proposed for ocean dumping, provides guidance for sampling, testing, and analysis of water, sediment, and tissue to evaluate the environmental acceptability of dredged material proposed for ocean disposal. In addition to the OTM, the USACE and EPA have cooperatively prepared the Reginal Implementation Agreement, or RIA, to adapt the national procedures of the OTM to regional situations to ensure compliance with MPRSA.</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 sampling activities conducted was provided to USACE for review and concurrence on</p>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
16	4	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 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 or 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 sampling activities conducted was provided to USACE for review and concurrence on</p>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
16	4	PC	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.	Appendix C provides information on placement of dredged materials, locations, modeling, and monitoring plans. Appendix J provides information on sediment testing.	<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 sampling activities conducted was provided to USACE for review and concurrence.</p>
16	5	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>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>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
16	6	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 there 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.
17	1	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.	<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>
17	2	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.	<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>
17	3	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.

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
17	4	PC	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>Dredged material proposed for ocean disposal is evaluated and tested to ensure that the material will not adversely affect human health and the marine environment. Evaluation of dredged material for ocean disposal under the MPRSA relies on standardized testing using biological organisms (bioassays). Under section 103 of the MPRSA, any proposed dumping of dredged material into ocean waters must be evaluated through use of EPA's ocean dumping criteria (40 CFR 220-229). The Ocean Testing Manual (OTM), a national testing manual for the evaluation of dredged material proposed for ocean dumping, provides guidance for sampling, testing, and analysis of water, sediment, and tissue to evaluate the environmental acceptability of dredged material proposed for ocean disposal. In addition to the OTM, the USACE and EPA have cooperatively prepared the Reginal Implementation Agreement, or RIA, to adapt the national procedures of the OTM to regional situations to ensure compliance with MPRSA.</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 sampling activities conducted was provided to USACE for review and concurrence on</p>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
17	4	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 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 or 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 sampling activities conducted was provided to USACE for review and concurrence on</p>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
17	4	PC	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.	Appendix C provides information on placement of dredged materials, locations, modeling, and monitoring plans. Appendix J provides information on sediment testing.	<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 sampling activities conducted was provided to USACE for review and concurrence.</p>
17	5	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>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>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
17	6	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 there 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.
18	1	PC	Concerned about the impact of the project to the environment and habitats, does not support.	Impacts associated with the Applicant's Preferred Alternative are addressed in Section 4.2 Ecological and Biological Resources, Section 4.4 Socioeconomics, Appendix D (Biological Assessment), and Appendix E (EFH Assessment). The impacts to larval transport of estuarine dependent species are discussed in Section 4.2.2.2.2 in 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.
19	1	PC	Concerned about the project impacts to sea life that live or migrate through the channel. And how maintenance dredging will have similar effects.	<p>Impacts associated with the Applicant's Preferred Alternative are addressed in Section 4.2 Ecological and Biological Resources, Section 4.4 Socioeconomics, Appendix D (Biological Assessment), and Appendix E (EFH Assessment). The impacts to larval transport of estuarine dependent species are discussed in Section 4.2.2.2.2 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>
19	Entity Acronym: FED - Federal Agency	PC	Concerned this would facilitate a much larger port project that has no prospect of being built at this time, and that this project would be used to leverage to justify the larger project.	Thank you for your comment.	No response

STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
20	1	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.	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).
20	2	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.
20	3	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.

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
20	4	PC	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>Dredged material proposed for ocean disposal is evaluated and tested to ensure that the material will not adversely affect human health and the marine environment. Evaluation of dredged material for ocean disposal under the MPRSA relies on standardized testing using biological organisms (bioassays). Under section 103 of the MPRSA, any proposed dumping of dredged material into ocean waters must be evaluated through use of EPA's ocean dumping criteria (40 CFR 220-229). The Ocean Testing Manual (OTM), a national testing manual for the evaluation of dredged material proposed for ocean dumping, provides guidance for sampling, testing, and analysis of water, sediment, and tissue to evaluate the environmental acceptability of dredged material proposed for ocean disposal. In addition to the OTM, the USACE and EPA have cooperatively prepared the Reginal Implementation Agreement, or RIA, to adapt the national procedures of the OTM to regional situations to ensure compliance with MPRSA.</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 sampling activities conducted was provided to USACE for review and concurrence on</p>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
20	4	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 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 or 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 sampling activities conducted was provided to USACE for review and concurrence on</p>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
20	4	PC	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.	Appendix C provides information on placement of dredged materials, locations, modeling, and monitoring plans. Appendix J provides information on sediment testing.	<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 sampling activities conducted was provided to USACE for review and concurrence.</p>
20	5	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>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>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
20	6	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 there 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.
21	1	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.	<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>
21	2	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.	<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>
21	3	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.

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
21	4	PC	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>Dredged material proposed for ocean disposal is evaluated and tested to ensure that the material will not adversely affect human health and the marine environment. Evaluation of dredged material for ocean disposal under the MPRSA relies on standardized testing using biological organisms (bioassays). Under section 103 of the MPRSA, any proposed dumping of dredged material into ocean waters must be evaluated through use of EPA's ocean dumping criteria (40 CFR 220-229). The Ocean Testing Manual (OTM), a national testing manual for the evaluation of dredged material proposed for ocean dumping, provides guidance for sampling, testing, and analysis of water, sediment, and tissue to evaluate the environmental acceptability of dredged material proposed for ocean disposal. In addition to the OTM, the USACE and EPA have cooperatively prepared the Reginal Implementation Agreement, or RIA, to adapt the national procedures of the OTM to regional situations to ensure compliance with MPRSA.</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 sampling activities conducted was provided to USACE for review and concurrence on</p>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
21	4	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 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 or 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 sampling activities conducted was provided to USACE for review and concurrence on</p>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
21	4	PC	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.	Appendix C provides information on placement of dredged materials, locations, modeling, and monitoring plans. Appendix J provides information on sediment testing.	<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 sampling activities conducted was provided to USACE for review and concurrence.</p>
21	5	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>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>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
21	6	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 there 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.
22	1	PC	Requests a 60-90 day comment extension.	<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.
22	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.	<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>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
22	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.	<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>
22	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.
22	5	PC	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>Dredged material proposed for ocean disposal is evaluated and tested to ensure that the material will not adversely affect human health and the marine environment. Evaluation of dredged material for ocean disposal under the MPRSA relies on standardized testing using biological organisms (bioassays). Under section 103 of the MPRSA, any proposed dumping of dredged material into ocean waters must be evaluated through use of EPA’s ocean dumping criteria (40 CFR 220-229). The Ocean Testing Manual (OTM), a national testing manual for the evaluation of dredged material proposed for ocean dumping, provides guidance for sampling, testing, and analysis of water, sediment, and tissue to evaluate the environmental acceptability of dredged material proposed for ocean disposal. In addition to the OTM, the USACE and EPA have cooperatively prepared the Reginal Implementation Agreement, or RIA, to adapt the national procedures of the OTM to regional situations to ensure compliance with MPRSA.</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>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
22	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 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 or 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 sampling activities conducted was provided to USACE for review and concurrence on</p>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
22	5	PC	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.	Appendix C provides information on placement of dredged materials, locations, modeling, and monitoring plans. Appendix J provides information on sediment testing.	<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>
22	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>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>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
22	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 there 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.
22	8	PC	Please consult with Texas Parks and Wildlife, Coastal Bend Bays and Estuaries, and other environmental and fisheries organizations with expertise concerning the negative impact that the dredging and increase depth of the channel will have on the flora and fauna in the bay system.	The USACE and PCCA involved the public through public meetings and other outreach throughout the history of the project. A proactive approach was taken to inform and involve the public, resource agencies, industry, local government, and other interested parties about the project and to identify any public concerns. Appendix B provided all information on Public and Agency Coordination.	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.
23	1	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.
23	2	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.

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
23	3	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.
23	4	PC	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>Dredged material proposed for ocean disposal is evaluated and tested to ensure that the material will not adversely affect human health and the marine environment. Evaluation of dredged material for ocean disposal under the MPRSA relies on standardized testing using biological organisms (bioassays). Under section 103 of the MPRSA, any proposed dumping of dredged material into ocean waters must be evaluated through use of EPA’s ocean dumping criteria (40 CFR 220-229). The Ocean Testing Manual (OTM), a national testing manual for the evaluation of dredged material proposed for ocean dumping, provides guidance for sampling, testing, and analysis of water, sediment, and tissue to evaluate the environmental acceptability of dredged material proposed for ocean disposal. In addition to the OTM, the USACE and EPA have cooperatively prepared the Reginal Implementation Agreement, or RIA, to adapt the national procedures of the OTM to regional situations to ensure compliance with MPRSA.</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>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
23	4	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 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 or 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 sampling activities conducted was provided to USACE for review and concurrence on</p>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
23	4	PC	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.	Appendix C provides information on placement of dredged materials, locations, modeling, and monitoring plans. Appendix J provides information on sediment testing.	<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 sampling activities conducted was provided to USACE for review and concurrence.</p>
23	5	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>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>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
23	6	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 there 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.
24	1	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.	<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>
24	2	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.	<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>
24	3	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.

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
24	4	PC	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>Dredged material proposed for ocean disposal is evaluated and tested to ensure that the material will not adversely affect human health and the marine environment. Evaluation of dredged material for ocean disposal under the MPRSA relies on standardized testing using biological organisms (bioassays). Under section 103 of the MPRSA, any proposed dumping of dredged material into ocean waters must be evaluated through use of EPA's ocean dumping criteria (40 CFR 220-229). The Ocean Testing Manual (OTM), a national testing manual for the evaluation of dredged material proposed for ocean dumping, provides guidance for sampling, testing, and analysis of water, sediment, and tissue to evaluate the environmental acceptability of dredged material proposed for ocean disposal. In addition to the OTM, the USACE and EPA have cooperatively prepared the Reginal Implementation Agreement, or RIA, to adapt the national procedures of the OTM to regional situations to ensure compliance with MPRSA.</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 sampling activities conducted was provided to USACE for review and concurrence on</p>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
24	4	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 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 or 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 sampling activities conducted was provided to USACE for review and concurrence on</p>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
24	4	PC	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.	Appendix C provides information on placement of dredged materials, locations, modeling, and monitoring plans. Appendix J provides information on sediment testing.	<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>
24	5	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>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>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
24	6	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 there 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.
25	1	PC	Not enough oil in the Coastal Bend to support any new terminals.	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.	<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>
25	2	PC	The Port of Corpus Christi has no lease to build oil terminals on this channel, therefore no deepening needed.	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.	<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>
25	3	PC	Would offer up offshore terminals away from such a unique Ecosystem that would be effected by the deepening.	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.

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
25	4	PC	Dredge material will be placed where and to what cost of destruction to existing islands and or beaches.	<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 Reginal 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 sampling activities conducted was provided to USACE for review and concurrence on</p>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
25	4	PC	<p>Dredge material will be placed where and to what cost of destruction to existing islands and or beaches.</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 or 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 sampling activities conducted was provided to USACE for review and concurrence on</p>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
25	4	PC	Dredge material will be placed where and to what cost of destruction to existing islands and or beaches.	Appendix C provides information on placement of dredged materials, locations, modeling, and monitoring plans. Appendix J provides information on sediment testing.	<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 sampling activities conducted was provided to USACE for review and concurrence on</p>
25	5	PC	Please consider the overall impacts both environmental and financially of the town of Port Aransas and its survival as a fishing and tourist town.	<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. Impacts associated with marine resources are addressed in Section 4.2.2.2 and Appendix E (EFH Assessment). EFH consultation with NMFS was initiated with the release of the DEIS. NMFS provided EFH Conservation Recommendations to the USACE in an August 9, 2022 letter.</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.

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
25	6	PC	Concerned the emissions just to have it dredged would be significant.	<p>Impacts to Air Quality during construction are discussed in detail in Section 4.1.9.2.2 in the FEIS. The analysis showed that due to the magnitude and temporary nature of the construction dredging emissions, Alternative 1 would not be expected to jeopardize attainment. Given the small percentage of regional emissions, and their temporary nature, the construction dredging emissions under Alternative 1 are not expected to have adverse long-term impacts to air quality in the area.</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>
25	7	PC	Concerned about the impact on the environment.	Impacts associated with the Applicant's Preferred Alternative are addressed in Section 4.2 Ecological and Biological Resources, Section 4.4 Socioeconomics, Appendix D (Biological Assessment), and Appendix E (EFH Assessment). The impacts to larval transport of estuarine dependent species are discussed in Section 4.2.2.2.2 in 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.
26	1	PC	Requests a the comment period be extended due to the large amount of material in the FEIS to be reviewed.	<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.
26	2	PC	Previous comments were ignored that support 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.

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
26	3	PC	Concerned the impacts to larval fish have not been addressed.	<p>The impacts to larval transport of estuarine dependent species are discussed in Section 4.2.2.2.2 in the FEIS.</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>
26	4	PC	Concerned that the other projects in the area were not considered one project.	<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-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 there 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>
26	5	PC	Commenter states that the USACE is not adhering to the standards required by 33 CFR 320-340 and other chapters.	<p>Thank you for your comment.</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>
27	1	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.	<p>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.</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>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
27	2	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.	<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>
27	3	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.
27	4	PC	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>Dredged material proposed for ocean disposal is evaluated and tested to ensure that the material will not adversely affect human health and the marine environment. Evaluation of dredged material for ocean disposal under the MPRSA relies on standardized testing using biological organisms (bioassays). Under section 103 of the MPRSA, any proposed dumping of dredged material into ocean waters must be evaluated through use of EPA’s ocean dumping criteria (40 CFR 220-229). The Ocean Testing Manual (OTM), a national testing manual for the evaluation of dredged material proposed for ocean dumping, provides guidance for sampling, testing, and analysis of water, sediment, and tissue to evaluate the environmental acceptability of dredged material proposed for ocean disposal. In addition to the OTM, the USACE and EPA have cooperatively prepared the Reginal Implementation Agreement, or RIA, to adapt the national procedures of the OTM to regional situations to ensure compliance with MPRSA.</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>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
27	4	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 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 or 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 sampling activities conducted was provided to USACE for review and concurrence on</p>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
27	4	PC	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.	Appendix C provides information on placement of dredged materials, locations, modeling, and monitoring plans. Appendix J provides information on sediment testing.	<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>
27	5	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>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>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
27	6	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 there 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.
28	1	PC	States the Port has no intention of operating this project as it has no lease. MODA would be in direct competition with you. Other terminals have permits for developing their offshore terminals that would be a partner. Offshore is the preferred alternative.	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>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>
29	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>	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.

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
29	2	PC	There is no need to dredge the channel to 80 feet for VLCC docks that cannot be built at this location on Harbor Island. Engineering and economics will not allow them to function properly and safely.	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.	<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>
29	3	PC	There is not enough oil projected to come to the Coastal Bend system to support new terminals needing an 80ft depth. Existing VLCC terminals and supporting infrastructure are doing just fine at the current 57ft depth.	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.	<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>
29	4	PC	Offshore terminals, as outlined in your Alternative, if built, are the future of Oil Export infrastructure and more efficient, economical, and environmentally sound than dredging in a critical marine 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.

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
29	5	PC	The disposal of the sheer volume of dredge material created by this project will cause major environmental harm to the local and migratory flora and fauna, both marine and terrestrial, during the dredging activity. In my mind, there is no such thing as beneficial dredge material. Wherever it is placed, it will do damage and alter the natural environment, and possibly the economy of the surrounding towns.	<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 Reginal 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>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>
29	5	PC	The disposal of the sheer volume of dredge material created by this project will cause major environmental harm to the local and migratory flora and fauna, both marine and terrestrial, during the dredging activity. In my mind, there is no such thing as beneficial dredge material. Wherever it is placed, it will do damage and alter the natural environment, and possibly the economy of the surrounding towns.	<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>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

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
29	5	PC	The disposal of the sheer volume of dredge material created by this project will cause major environmental harm to the local and migratory flora and fauna, both marine and terrestrial, during the dredging activity. In my mind, there is no such thing as beneficial dredge material. Wherever it is placed, it will do damage and alter the natural environment, and possibly the economy of the surrounding towns.	Appendix C provides information on placement of dredged materials, locations, modeling, and monitoring plans. Appendix J provides information on sediment testing.	<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>
29	6	PC	The act of dredging will severely impact the surrounding seagrass beds by increasing the amount of sediment suspended in the water column, thus effectively blocking sunlight and killing, or at the very least severely damaging, the vegetation. This will, in turn, destroy the nursery areas for hundreds of species of marine creatures. These seagrass beds are also critical to the survival of hundreds of species of mature marine and bird life. Their destruction will be a death warrant for all of these animals.	Impacts associated with the Applicant's Preferred Alternative are addressed in Section 4.2 Ecological and Biological Resources, Section 4.4 Socioeconomics, Appendix D (Biological Assessment), and Appendix E (EFH Assessment). The impacts to larval transport of estuarine dependent species are discussed in Section 4.2.2.2.2 in the FEIS.	<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

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
29	7	PC	The dredging operation will seriously interfere with the movement of larvae through this critical pass. It will also seriously interfere with the spawning activity of any and all marine life that uses the pass as a spawning area.	<p>Impacts associated with the Applicant's Preferred Alternative are addressed in Section 4.2 Ecological and Biological Resources, Section 4.4 Socioeconomics, Appendix D (Biological Assessment), and Appendix E (EFH Assessment). The impacts to larval transport of estuarine dependent species are discussed in Section 4.2.2.2.2 in the FEIS.</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 Magnum-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>
29	8	PC	Dredging this channel to 80 ft is not a one-shot job. Maintenance will be an expensive and continuous nightmare given that it abuts up to a 57 ft channel on one end and extends out into a shallow shelf in the nearshore waters of the Gulf of Mexico. What will keep sediment from constantly filling the 80ft hole (even as its being dug)? Everyone knows nature abhors a vacuum, that's not rocket science! The cost for the initial dredge is estimated at \$1B, what will the cost of maintaining it be and who will carry that burden? The taxpayers most likely!	<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>The modeling indicate that shoaling rates for the inner channel were comparable to the existing condition, both the 2D and 3D model results indicate that project impact on sedimentation rates is limited to less than 10%.</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

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
29	9	PC	The constant dredging and associated activity will be an extreme safety hazard for small boats, thus destroying an important recreational activity and therefore the economy of Port Aransas.	<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, including impacts to small businesses. Long-term adverse impacts to recreation and tourism are expected to be minor given that the vast majority of activities associated with the Port will continue in the future and will continue to co-exist with recreational activities and general tourism.</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. Effects to recreation were found to be negligible.</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
29	10	PC	How will the Texas Dept of Transportation Ferry System work with this continuous dredging in the ship channel? Not safely, me thinks, if at all. This in turn will create an economic disaster for the city of Port Aransas.	<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>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
29	11	PC	Department of the Army Permit SWG-2019-00067 must be considered along with the impacts from any VLCC Harbor Island Terminal, oil pipeline, and Air Quality emission concerns. It must all be combined into a single EIS as the impacts from these projects are gross and 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 there 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.
30	1	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.	<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>
30	2	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.	<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>
30	3	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.

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
30	4	PC	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>Dredged material proposed for ocean disposal is evaluated and tested to ensure that the material will not adversely affect human health and the marine environment. Evaluation of dredged material for ocean disposal under the MPRSA relies on standardized testing using biological organisms (bioassays). Under section 103 of the MPRSA, any proposed dumping of dredged material into ocean waters must be evaluated through use of EPA's ocean dumping criteria (40 CFR 220-229). The Ocean Testing Manual (OTM), a national testing manual for the evaluation of dredged material proposed for ocean dumping, provides guidance for sampling, testing, and analysis of water, sediment, and tissue to evaluate the environmental acceptability of dredged material proposed for ocean disposal. In addition to the OTM, the USACE and EPA have cooperatively prepared the Reginal Implementation Agreement, or RIA, to adapt the national procedures of the OTM to regional situations to ensure compliance with MPRSA.</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 sampling activities conducted was provided to USACE for review and concurrence on</p>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
30	4	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 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 or 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 sampling activities conducted was provided to USACE for review and concurrence on</p>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
30	4	PC	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.	Appendix C provides information on placement of dredged materials, locations, modeling, and monitoring plans. Appendix J provides information on sediment testing.	<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 sampling activities conducted was provided to USACE for review and concurrence on</p>
30	5	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

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
30	6	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 there 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.
31	1	PC	Does not support the project.	Thank you for your comment.	Thank you for your comment.
32	1	PC	The proposed VLCC docks on Harbor Island lack feasibility both from engineering and economic standpoints. Verification from the Port itself would confirm the absence of funding, approval, or valid lease for a VLCC Oil Export facility.	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.	<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>
32	2	PC	The Coast Bend system does not possess adequate oil reserves to justify the construction of new terminals. Existing VLCC terminals operate efficiently at the current depth of 57 ft, rendering the proposed 80 ft dredging unnecessary.	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.	<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>
32	3	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.

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
32	4	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 Reginal 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 sampling activities conducted was provided to USACE for review and concurrence on</p>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
32	4	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 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 or 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 sampling activities conducted was provided to USACE for review and concurrence on</p>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
32	4	PC	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.	Appendix C provides information on placement of dredged materials, locations, modeling, and monitoring plans. Appendix J provides information on sediment testing.	<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 sampling activities conducted was provided to USACE for review and concurrence on</p>
32	5	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

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
32	6	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 there 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.
33	1	PC	Does not support the project.	Thank you for your comment.	Thank you for your comment.
34	1	PC	Does not support the project.	Thank you for your comment.	Thank you for your comment.
35	1	PC	Does not support the project.	Thank you for your comment.	Thank you for your comment.
36	1	PC	Does not support the project.	Thank you for your comment.	Thank you for your comment.
37	1	PC	States the Port has no intention of operating this project as it has no lease. MODA would be in direct competition with you. Other terminals have permits for developing their offshore terminals that would be a partner. Offshore is the preferred alternative.	Thank you for your comment.	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.
38	1	PC	Concerned that the project would affect the fishing industry in this town.	<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. Impacts associated with marine resources are addressed in Section 4.2.2.2 and Appendix E (EFH Assessment). EFH consultation with NMFS was initiated with the release of the DEIS. NMFS provided EFH Conservation Recommendations to the USACE in an August 9, 2022 letter.</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 fish and wildlife values was found to be neutral (mitigated).</p>	<p>In accordance with the Magnum-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>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
39	1	PC	Does not want dredged material in Aransas county waters.	Thank you for your comment.	Thank you for your comment.
40	1	PC	Does not want dredged material in Aransas county waters.	Thank you for your comment.	Thank you for your comment.
41	1	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.	<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>
41	2	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.	<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>
41	3	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.

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
41	4	PC	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>Dredged material proposed for ocean disposal is evaluated and tested to ensure that the material will not adversely affect human health and the marine environment. Evaluation of dredged material for ocean disposal under the MPRSA relies on standardized testing using biological organisms (bioassays). Under section 103 of the MPRSA, any proposed dumping of dredged material into ocean waters must be evaluated through use of EPA's ocean dumping criteria (40 CFR 220-229). The Ocean Testing Manual (OTM), a national testing manual for the evaluation of dredged material proposed for ocean dumping, provides guidance for sampling, testing, and analysis of water, sediment, and tissue to evaluate the environmental acceptability of dredged material proposed for ocean disposal. In addition to the OTM, the USACE and EPA have cooperatively prepared the Reginal Implementation Agreement, or RIA, to adapt the national procedures of the OTM to regional situations to ensure compliance with MPRSA.</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 sampling activities conducted was provided to USACE for review and concurrence on</p>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
41	4	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 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 or 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 sampling activities conducted was provided to USACE for review and concurrence on</p>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
41	4	PC	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.	Appendix C provides information on placement of dredged materials, locations, modeling, and monitoring plans. Appendix J provides information on sediment testing.	<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 sampling activities conducted was provided to USACE for review and concurrence on</p>
41	5	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

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
41	6	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 there 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.
42	1	PC	Would like to see further study of Alternative 2 as it appears to be the more reasonable and viable long term solution.	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.
42	2	PC	Concerned that this project, on the heels of the –47 foot and –54 foot dredging will negatively impact the ecosystem.	Past, present, and reasonably foreseeable future actions in the study area are discussed in Section 5.0 of the FEIS.	<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

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
42	3	PC	Concerned the project would put the local community and ecosystem at greater risk to storm surge from hurricane events as outlined in the FEIS.	<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>
43	1	PC	Would like to see further study of Alternative 2 as it appears to be the more reasonable and viable long term solution.	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.
43	2	PC	Concerned that this project, on the heels of the –47 foot and –54 foot dredging will negatively impact the ecosystem.	Past, present, and reasonably foreseeable future actions in the study area are discussed in Section 5.0 of the FEIS.	<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

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
43	3	PC	Concerned the project would put the local community and ecosystem at greater risk to storm surge from hurricane events as outlined in the FEIS.	<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>
44	1	PC	Even if the Port had an 80-foot-deep channel coming in from the Gulf, there are no docks on Harbor Island in which to berth thousand foot-long VLCCs.	<p>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.</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>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
44	2	PC	The amount of dredge spoil the Corps would have to dispose of would overwhelm both northern Mustang Island and southern San Jose Island, and would make a mess offshore as it filtered around and got settled. That would only be the initial amount of dredge spoil. The channel would have to be in a constant state of being dredged since it would have to extend out into the Gulf some 15 miles for VLCCs to approach land.	<p>The project requires a Department of the Army permit but is not proposed by the Corps as a Federal project requiring Congressional approval. The modeling indicate that shoaling rates for the inner channel were comparable to the existing condition, both the 2D and 3D model results indicate that project impact on sedimentation rates is limited to less than 10%.</p> <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>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
44	3	PC	Everyone has pointed out to the POCC, and now the Corps has also done so in this EIS, that the environmental wreckage done by dredging could be obviated by using an offshore monobuoy for lightering product off VLCCs. Has the POCC come to its senses? If so, why are we even still arguing?	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>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>
44	4	PC	This dredging idea is dead. It won't work, it will make an unholy mess of our environment, and it will cost more than the POCC could rustle up in three lifetimes. Corps, close the file and let us get on with our lives.	Thank you for your comment.	Thank you for your comment.

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
45	1	PC	Requests an extension of the comment period to allow the public time to read through all the FEIS documents.	<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.
46	1	PC	Commenter attached previous comment letters from the NMFS, TPWD and states the comments were still not addressed in the FEIS.	Thank you for your comment.	Thank you for providing previous comment letters, we have received and have addressed comments directly.
46	2	PC	Most of the participating agencies picked the alternative for offshore monobuoy(s), AKA, single-point mooring system (SPM). There is confusion even in the FEIS whether the offshore option is Alternative 2 or Alternative 3. The reasons given for picking the offshore SPM is obvious, it's has least environmental impacts to Essential Fish Habitat (EFH), spawning & larval transport, Redfish Bay, recreational use and the City of Port Aransas.	Alternatives 2 and 3 are both clearly offshore alternatives. 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.
46	3	PC	After several extensions in the FAST41 timeline, the actual release of FEIS for review was supposed to be around April 14, 2024 (or so), followed by another public comment period. As it stands the FEIS was released March 20, 2024 and close of comments is April 21, 2024. The Final EIS is just shy of or over 10,000 pages! AT THE VERY LEAST, THE POCCA SHOULD REQUEST AN EXTENSION TO COMMENT PERIOD. An extension to comment period isn't going to throw USACE off schedule because the previous schedule had comments closing on May 15th.	<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.

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
46	4	PC	Concerned about the impacts to the economy.	<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, including impacts to small businesses. Long-term adverse impacts to recreation and tourism are expected to be minor given that the vast majority of activities associated with the Port will continue in the future and will continue to co-exist with recreational activities and general tourism.</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. Effects to recreation were found to be negligible.</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.
46	5	PC	Concerned about the impacts to the ferry operations.	<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>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
46	6	PC	Concerned about the impacts to marine traffic safety.	<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>
46	7	PC	Concerned about the impacts to the entire marine ecosystem and associated environment.	Impacts associated with the Applicant's Preferred Alternative are addressed in Section 4.2 Ecological and Biological Resources, Section 4.4 Socioeconomics, Appendix D (Biological Assessment), and Appendix E (EFH Assessment). The impacts to larval transport of estuarine dependent species are discussed in Section 4.2.2.2.2 in 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.
46	8	PC	A possible 36% increase in tidal amplitude will have significant direct impacts to Port Aransas businesses and parks along the ship channel. There is no real discussion about how the increase in tidal amplitude will impact seagrasses at the mouth of Lydia Ann Channel or what will happen to salt - mud flats and so on.	<p>The potential for cumulative impacts due to the tidal range change is identified in Section 5.4.2.</p> <p>The Lydia Ann Lighthouse is a cultural resource, USACE and SHPO determined the lighthouse will not be affected by the project. 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 modeling of the future with project does indicate the greatest increase of tidal amplitudes (about 17%) in the Corpus Christi Channel near Humble Basin, the overall impact of the CDP on water level is insignificant. The cumulative impacts for the CDP show a 36% increase in tidal amplitude at the Inner Channel. The lighthouse is not located on this section of the channel and therefore no impacts are anticipated. See Section 4.1.2.1 in the FEIS and 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>
47	Entity Acronyms: FED - Federal Agency STATE - State Agency NGO - Non-governmental organization PC - Public Commentor	PC	Supports the comments provided by Cathy Fulton on April 3, 2024 (<i>see Letter ID 46</i>).	Thank you for your comment.	Thank you for your comment.

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
48	1	PC	**Note: There was no attachment to this email.	**Note: There was no attachment to this email.	Not enough information to respond to this comment.
49	1	PC	<p>The proposed channel deepening involves 2 turning basins. The turning basin adjacent to the ferry landing will require dredging into the southern portion of old crude oil tank farm with known existing contamination. No boring samples were collected outside of the existing shipping lane. Dredge material from or on the edge of Harbor Island must be tested. A few incidences of releases along the south shore of Harbor Island have occurred in recent years. Zoom in on the picture. That release was report by the POCCA as new areas of concern back in 2019.</p>	<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 scope of analysis of the CDP permit action. These deepened water bottom areas were included in the future with project scenarios to provide the geometries for the turning basin footprints for analysis when combined with the proposed CDP project.</p> <p>The sediments in these location are being evaluated in accordance with MPRSA criteria specific to their permit application which was disclosed in their public notices.</p>	<p>The Port of Corpus Christi Authority (PCCA) acquired Harbor Island from ExxonMobil Pipeline Company and Fina in 1995. Prior to the purchase of the property, the sites were operated as terminals for the storage of crude oil from about the 1920’s until 1993.</p> <p>Between 1994 and 2003, several investigations and remediation activities were conducted by both Responsible Parties (ExxonMobil and Fina) and PCCA. A cleanup level of 10,000 mg/kg was established for both properties by the Texas Railroad Commission (RRC). Under the direction of RRC, the Fina property was cleaned up to this level and deed recorded to prevent the future use of shallow groundwater. Also under the direction of RRC, the Exxon property was cleaned up to the same level except for six areas that had utility or building obstructions. The six areas exceeding the established clean up level were then deed recorded.</p> <p>In 2019 in anticipation of developments on the site, PCCA began demolishing dilapidated structures and removing utilities. This opened access to the six deed recorded areas. Therefore, PCCA undertook additional investigation and remediation actions to address the six “hot spots”. Additionally, during demolition activities, a sheen developed on the shoreline, and two areas of unknown contamination were discovered upland and reported to the State and National Emergency Response Centers. It was determined they were historical in nature and investigated and remediated with the six “hot spots”. All investigation and remediation work was done in coordination with the RRC.</p> <p>On August 3, 2022, RRC sent a concurrence letter accepting the remediation work and directing PCCA to revise the prior deed recordation. In December 2023, a revised deed record signed by PCCA and RRC was filed with the county and on December 20, 2023, RRC issued a No Further Action letter for the Exxon property, which also included the spills discovered during the demolition activities.</p>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
50	1	PC	Concerned that the USACE did not properly conduct assessments for suitability for disposal in 404/Section 10 waters, as per the Inland Testing Manual. While the dredged material appears to have been adequately tested for disposal (contaminants, etc.) at the ODMDS or in any of the 404/Section 10 waters, I can find no indication of any samples having been analyzed from these 404/Section 10 waters (for comparison with dredged material) nor any reference samples collected for any of these areas. Clearly the focus is on suitability of disposal at the ODMDS, even though there is much dredged material proposed for disposal in several other locations. As such, the analysis is incomplete, yet the Corps seems to have concluded anyway, that disposal at these other sites is acceptable.	<p>Since testing and evaluation for dredged material in accordance with MPRSA criteria is more stringent than for 404 Guidelines, 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 placed in inshore waters. This decision complies with 33 CFR 336.0(c). The EPA concurred the new work dredged material is suitable for ocean disposal and therefore the proposed new work material is also suitable for placement in 404 waters.</p> <p>The BU plan included in Appendix C2 described the size, quality, mineralogy, and other requirements of the sediment for specific BU uses.</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>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
50	2	PC	Have not yet found any discussion regarding suitability of dredge material for beach nourishment. There is information regarding grain sizes but it is highly aggregated. It indicates that some dredged material may be appropriate for beach nourishment while some definitely is not. However, there is no commitment to avoid placing dredged material with relatively low percentages of sand on the beaches. Obviously, this is not adequate disclosure for NEPA. It seems likely the Port will just discharge any dredged material it wants to on the beaches and call it good.	The size, quality, mineralogy, and other requirements of the Texas Administrative Code are included in the BU Plan (Appendix C2) 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. In addition, 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 sampling activities conducted was provided to USACE for review and concurrence on</p>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
50	3	PC	The document seems to assert that most dredged material is suitable for disposal in nearshore berms, including some silt and clay, but I could find no detailed argument defending the assertion. Given the predominance of sand on the beaches and the linkages between such berms and the beach, I question whether it is appropriate to assert so cavalierly that this is appropriate. But even more than that, depending on the percent sand of dredged material proposed for disposal here, there may be a need for assessment of contaminant issues as per the Inland Testing Manual.	<p>The nearshore berms will reduce the amount of material removed from the littoral system through dredging and reintroduces them to an adjacent littoral region preserving the sediment resources that would have otherwise been lost to the nearshore system. A detailed study of the nearshore berm proposal is in Appendix C5 of the DEIS and FEIS.</p> <p>In summary, the berms attenuate waves in frequent, small storms, trap sediment in the depth of closure assuring it remains in the transport system, and has been demonstrated in modeling to provide measurable stability to the beach face. The nearshore berms are beneficial.</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 sampling activities conducted was provided to USACE for review and concurrence on</p>
50	4	PC	I raised these issues for the DEIS, but apparently they were dismissed? I can't understand how the Corps and the Port of Corpus Christi get away with this.	Thank you for your comment.	Thank you for your comment.
51	1	PC	Does not support the project.	Thank you for your comment.	Thank you for your comment.
52	1	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.	<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>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
52	2	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.	<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>
52	3	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.
52	4	PC	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>Dredged material proposed for ocean disposal is evaluated and tested to ensure that the material will not adversely affect human health and the marine environment. Evaluation of dredged material for ocean disposal under the MPRSA relies on standardized testing using biological organisms (bioassays). Under section 103 of the MPRSA, any proposed dumping of dredged material into ocean waters must be evaluated through use of EPA’s ocean dumping criteria (40 CFR 220-229). The Ocean Testing Manual (OTM), a national testing manual for the evaluation of dredged material proposed for ocean dumping, provides guidance for sampling, testing, and analysis of water, sediment, and tissue to evaluate the environmental acceptability of dredged material proposed for ocean disposal. In addition to the OTM, the USACE and EPA have cooperatively prepared the Reginal Implementation Agreement, or RIA, to adapt the national procedures of the OTM to regional situations to ensure compliance with MPRSA.</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>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
52	4	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 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 or 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 sampling activities conducted was provided to USACE for review and concurrence on</p>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
52	4	PC	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.	Appendix C provides information on placement of dredged materials, locations, modeling, and monitoring plans. Appendix J provides information on sediment testing.	<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 sampling activities conducted was provided to USACE for review and concurrence on</p>
52	5	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

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
52	6	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 there 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.
53	1	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.	<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>
53	2	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.	<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>
53	3	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.

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
53	4	PC	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>Dredged material proposed for ocean disposal is evaluated and tested to ensure that the material will not adversely affect human health and the marine environment. Evaluation of dredged material for ocean disposal under the MPRSA relies on standardized testing using biological organisms (bioassays). Under section 103 of the MPRSA, any proposed dumping of dredged material into ocean waters must be evaluated through use of EPA's ocean dumping criteria (40 CFR 220-229). The Ocean Testing Manual (OTM), a national testing manual for the evaluation of dredged material proposed for ocean dumping, provides guidance for sampling, testing, and analysis of water, sediment, and tissue to evaluate the environmental acceptability of dredged material proposed for ocean disposal. In addition to the OTM, the USACE and EPA have cooperatively prepared the Reginal Implementation Agreement, or RIA, to adapt the national procedures of the OTM to regional situations to ensure compliance with MPRSA.</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 sampling activities conducted was provided to USACE for review and concurrence on</p>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
53	4	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 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 or 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 sampling activities conducted was provided to USACE for review and concurrence on</p>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
53	4	PC	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.	Appendix C provides information on placement of dredged materials, locations, modeling, and monitoring plans. Appendix J provides information on sediment testing.	<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 sampling activities conducted was provided to USACE for review and concurrence on</p>
53	5	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

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
53	6	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 there 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.
54	1	PC	Does not support the project.	Thank you for your comment.	Thank you for your comment.
55	1	PC	No money has been set aside to nearly constantly dredge the Packery Channel which will certainly fill in soon as water goes to the lowest point for miles around and the dredging in both channels is harmful to all wildlife.	Past, present, and reasonably foreseeable future actions in the study area are discussed in Section 5.0 of the FEIS.	<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>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
55	2	PC	Deeper water in the channel means more water will rush in violently during storms and even high tides, thus flooding shallow bay waters that are very fragile and contain the larva, seagrass, beds, potholes and many other things required to keep our populations of fish, turtles, birds and all sea life viable / living / thriving.	<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>
55	3	PC	Storm surges during high wind events, especially hurricanes, will push water much further inland. They recently dredged the channel to 55 feet. The proposed 77 feet will be the deepest in the nation! Do we want to be the test case for what can and will go wrong?!	<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>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
55	4	PC	<p>The idea of putting dredge materials on our beaches is unsightly and has the potential to be harmful to wildlife and humans alike.</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 Reginal 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 sampling activities conducted was provided to USACE for review and concurrence on</p>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
55	4	PC	<p>The idea of putting dredge materials on our beaches is unsightly and has the potential to be harmful to wildlife and humans alike.</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 or 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 sampling activities conducted was provided to USACE for review and concurrence on</p>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
55	4	PC	The idea of putting dredge materials on our beaches is unsightly and has the potential to be harmful to wildlife and humans alike.	Appendix C provides information on placement of dredged materials, locations, modeling, and monitoring plans. Appendix J provides information on sediment testing.	<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 sampling activities conducted was provided to USACE for review and concurrence.</p>
55	5	PC	The PCCA originally proposed the dredging would be privately funded, then went back on it and now want we taxpayers to foot the bill.	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.	<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>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
55	6	PC	Concerned about what will occur if the USACE approves the deeper dredging and a 200+ mph wind hurricane comes through.	<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>
56	1	PC	Does not support the project.	Thank you for your comment.	Thank you for your comment.
56	2	PC	Concerned that the proposed project is located in an ecologically sensitive tidal inlet, connecting the Corpus Christi and Aransas Bay systems to the Gulf of Mexico. And the impacts the project could have on the marine ecosystem.	<p>Impacts associated with the Applicant's Preferred Alternative are addressed in Section 4.2 Ecological and Biological Resources, Section 4.4 Socioeconomics, Appendix D (Biological Assessment), and Appendix E (EFH Assessment). The impacts to larval transport of estuarine dependent species are discussed in Section 4.2.2.2.2 in the FEIS.</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 Magnum-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>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
56	3	PC	Request the PCCA consider Alternative 2 or 3. These would allow for VLCCs to be fully loaded offshore, eliminating the need to bring them into an ecological sensitive area.	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.
56	4	PC	Concerned about the impacts of increased salinities in Corpus Christi Bay on sustainability of oyster reefs.	<p>Impacts associated with the Applicant's Preferred Alternative are addressed in Section 4.2 Ecological and Biological Resources, Section 4.4 Socioeconomics, Appendix D (Biological Assessment), and Appendix E (EFH Assessment). The impacts to larval transport of estuarine dependent species are discussed in Section 4.2.2.2.2 in the FEIS.</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>
56	5	PC	Concerned about the impacts of dredging on southern flounder during annual migration and seasonal larval recruitment.	<p>Impacts associated with the Applicant's Preferred Alternative are addressed in Section 4.2 Ecological and Biological Resources, Section 4.4 Socioeconomics, Appendix D (Biological Assessment), and Appendix E (EFH Assessment). The impacts to larval transport of estuarine dependent species are discussed in Section 4.2.2.2.2 in the FEIS.</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 Magnum-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>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
56	6	PC	Concerned about the timing of dredging in relationship to resident spawning populations of spotted seatrout and sheepshead.	<p>Impacts associated with the Applicant's Preferred Alternative are addressed in Section 4.2 Ecological and Biological Resources, Section 4.4 Socioeconomics, Appendix D (Biological Assessment), and Appendix E (EFH Assessment). The impacts to larval transport of estuarine dependent species are discussed in Section 4.2.2.2.2 in the FEIS.</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 Magnum-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>
56	7	PC	Concerned about the impacts of dredging activities and increased channel depth on larval recruitment from offshore spawning populations of southern flounder, penaeid shrimp species, blue crabs, and red drum.	<p>Impacts associated with the Applicant's Preferred Alternative are addressed in Section 4.2 Ecological and Biological Resources, Section 4.4 Socioeconomics, Appendix D (Biological Assessment), and Appendix E (EFH Assessment). The impacts to larval transport of estuarine dependent species are discussed in Section 4.2.2.2.2 in the FEIS.</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 Magnum-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>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
56	8	PC	Concerned about the impacts of increased turbidity (reduced light penetration) on seagrasses.	<p>Impacts associated with the Applicant's Preferred Alternative are addressed in Section 4.2 Ecological and Biological Resources, Section 4.4 Socioeconomics, Appendix D (Biological Assessment), and Appendix E (EFH Assessment). The impacts to larval transport of estuarine dependent species are discussed in Section 4.2.2.2.2 in the FEIS.</p> <p>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>	<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>
56	9	PC	Concerned about the impacts of increased saltwater intrusion.	<p>Impacts associated with the Applicant's Preferred Alternative are addressed in Section 4.2 Ecological and Biological Resources, Section 4.4 Socioeconomics, Appendix D (Biological Assessment), and Appendix E (EFH Assessment). The impacts to larval transport of estuarine dependent species are discussed in Section 4.2.2.2.2 in the FEIS.</p> <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>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
56	10	PC	Concerned about the impacts of decreased flow through nearby inlets.	Impacts on nearby tide inlets depend on the changes of their tide prisms. The hydrodynamic and salinity model (see Appendix I) shows that the CDP could increase the tide ranges in most of Corpus Christi Bay (except Aransas Pass which has very small decrease in tide range) in range of a few centimeters. This tide rage increase will result in the increase of tide prism for these inlets and will increase the flows through these inlets slightly. Therefore, the project would not cause any decrease of flow through nearby inlets.	<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>
57	1	PC	Does not support the project.	Thank you for your comment.	Thank you for your comment.
57	2	PC	Concerned about the impacts to the ecosystem with the project.	Impacts associated with the Applicant's Preferred Alternative are addressed in Section 4.2 Ecological and Biological Resources, Section 4.4 Socioeconomics, Appendix D (Biological Assessment), and Appendix E (EFH Assessment). The impacts to larval transport of estuarine dependent species are discussed in Section 4.2.2.2.2 in 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.
58	1	PC	Because there is no immediate need for this dredge as no infrastructure is currently in design phase that would require it, the environmental and economic impacts to the surrounding areas are more important.	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.	<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>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
58	2	PC	Concerned that this deep dredge would result in deposits of material along bay and ocean beaches.	The modeling indicate that sedimentation rates and locations for the deepened channel were comparable to the existing channel condition. Both the 2D and 3D model results indicate that project impact on sedimentation rates is limited to less than 10% change from existing conditions.	The Dredged Material Management Plan (DMMP) is included in Appendix C of the FEIS and provides the selected placement plan elements. The Port of Corpus Christi Authority's (PCCA) DMMP proposed viable options due to proximity, material volume capacity, and the use of material beneficially to achieve ecological restorations and beach nourishment. The total volume needed for the identified placement sites far exceeds the volume expected to be dredged for the project.
58	3	PC	Concerned that the negative effects to marine life would be extensive and long lasting.	Impacts associated with the Applicant's Preferred Alternative are addressed in Section 4.2 Ecological and Biological Resources, Section 4.4 Socioeconomics, Appendix D (Biological Assessment), and Appendix E (EFH Assessment). The impacts to larval transport of estuarine dependent species are discussed in Section 4.2.2.2.2 in the FEIS.	<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>
58	4	PC	The consequences of this dredge would immediately impact the residents and visitors to the area around Port Aransas, Rock Port, and Ingleside.	<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, including impacts to small businesses. Long-term adverse impacts to recreation and tourism are expected to be minor given that the vast majority of activities associated with the Port will continue in the future and will continue to co-exist with recreational activities and general tourism.</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.</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.
58	5	PC	Concerned the noise, air pollution, and dredge pollution would be unpleasant during the actual process.	<p>Impacts to Air Quality during construction are discussed in detail in Section 4.1.9.2.2 and operation in Section 4.1.9.2.3 in the FEIS. The analysis showed that due to the magnitude and temporary nature of the construction dredging emissions, Alternative 1 would not be expected to jeopardize attainment. Given the small percentage of regional emissions, and their temporary nature, the construction dredging emissions under Alternative 1 are not expected to have adverse long-term impacts to air quality in the area. During operation, emissions are expected to be reduced based on the elimination of lightering activity</p> <p>Noise impacts are discussed in detail in Section 4.1.10.2 of the FEIS and are not anticipated to pose long-term impacts.</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.

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
58	6	PC	This deep proposed ship channel would create larger tidal amplitudes and storm surges.	<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. 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>
59	1	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.	<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>
59	2	PC	It seems highly questionable there’s enough oil coming to the Port to justify a VLCC. And why is the Port not talking about the switch away from fossil fuels? Renewables will greatly decrease oil demand in the next 10 to 20 years.	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.	<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>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
59	3	PC	Offshore terminals as outlined in your Alternative are the future of Oil Export infrastructure and way more efficient than destructive dredging. This 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.
59	4	PC	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>Dredged material proposed for ocean disposal is evaluated and tested to ensure that the material will not adversely affect human health and the marine environment. Evaluation of dredged material for ocean disposal under the MPRSA relies on standardized testing using biological organisms (bioassays). Under section 103 of the MPRSA, any proposed dumping of dredged material into ocean waters must be evaluated through use of EPA’s ocean dumping criteria (40 CFR 220-229). The Ocean Testing Manual (OTM), a national testing manual for the evaluation of dredged material proposed for ocean dumping, provides guidance for sampling, testing, and analysis of water, sediment, and tissue to evaluate the environmental acceptability of dredged material proposed for ocean disposal. In addition to the OTM, the USACE and EPA have cooperatively prepared the Reginal Implementation Agreement, or RIA, to adapt the national procedures of the OTM to regional situations to ensure compliance with MPRSA.</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>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
59	4	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 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 or 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 sampling activities conducted was provided to USACE for review and concurrence on</p>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
59	4	PC	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.	Appendix C provides information on placement of dredged materials, locations, modeling, and monitoring plans. Appendix J provides information on sediment testing.	<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 sampling activities conducted was provided to USACE for review and concurrence on</p>
59	5	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

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
59	6	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 there 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.
60	1	PC	Does not support the project.	Thank you for your comment.	Thank you for your comment.
60	2	PC	Concerned about the impacts to the ecosystem with the project.	Impacts associated with the Applicant's Preferred Alternative are addressed in Section 4.2 Ecological and Biological Resources, Section 4.4 Socioeconomics, Appendix D (Biological Assessment), and Appendix E (EFH Assessment). The impacts to larval transport of estuarine dependent species are discussed in Section 4.2.2.2.2 in 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.
61	1	PC	Requests an extension to 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.
62	1	PC	<p><i>Commenter attached three separate letters to this email. The comments are provided below. Based on the commenters comments, the comments below are summarized as best they can be. Please see comment letters for detailed information.</i></p> <p>Concerned about the impacts to the ecosystem with the project.</p>	Impacts associated with the Applicant's Preferred Alternative are addressed in Section 4.2 Ecological and Biological Resources, Section 4.4 Socioeconomics, Appendix D (Biological Assessment), and Appendix E (EFH Assessment). The impacts to larval transport of estuarine dependent species are discussed in Section 4.2.2.2.2 in 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.

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
62	2	PC	Concerned about air quality during construction and operation of the project.	<p>Impacts to Air Quality during construction are discussed in detail in Section 4.1.9.2.2 and operation in Section 4.1.9.2.3 in the FEIS. The analysis showed that due to the magnitude and temporary nature of the construction dredging emissions, Alternative 1 would not be expected to jeopardize attainment. Given the small percentage of regional emissions, and their temporary nature, the construction dredging emissions under Alternative 1 are not expected to have adverse long-term impacts to air quality in the area. During operation, emissions are expected to be reduced based on the elimination of lightering activity.</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>
62	3	PC	Does not support the project.	Thank you for your comment.	Thank you for your comment.
62	4	PC	Concerned that the 30 day review was too short of time given the magnitude of the materials to review and the potential for severe negative impacts on the estuary.	<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>
62	5	PC	Commenter says the project was put on the fast track and the PCCA is corrupt and a bully.	Thank you for your comment.	Thank you for your comment.
62	6	PC	Commenter upset that no public meeting was held in Port Aransas.	The public meeting held in Corpus Christi in June 2022 provided an opportunity for individuals to meet and discuss the Draft EIS with USACE employees, and their contractors, as well as members of the applicant's team. The public meeting also included the ability to submit comments both orally and in writing. Corpus Christi was selected for the public meeting because it is the population center of the 4-county study area evaluated in the Draft EIS. Prior to the public meeting, USACE released a special public notice and several press releases to notify the public of the time and place of the public meeting. In addition, USACE continued to accept written comments throughout the 60-day comment period.	<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>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
62	7	PC	Commenter wants to know who are the Cooperating Agencies? Please provide me and all the people who attended the public meeting with a letter stating: a. who they are? b. what exactly were they consulted on? c. what exactly they agreed on? d. what exactly did they disagree on? and f. what did they acquiesced on?	<p>As stated in Section 1.1 of the FEIS and as part of the NEPA process, the EPA, National Oceanic and Atmospheric Administration (NOAA) , National Marine Fisheries Service (NMFS), the U.S. Fish and Wildlife Service (USFWS), and the U.S. Coast Guard (USCG) are Cooperating Agencies.</p> <p>Section 8.0 in the FEIS, Public Involvement, Review, and Consultation, details the public involvement program throughout the project history. Comments from the public during the DEIS comment period were reviewed and responded to and a summary was included in Appendix B7 of the FEIS.</p> <p>The FEIS was circulated to all known Federal, State, and local agencies. Interested organizations and individuals were also sent the Notice of Availability. A list of those who were sent a copy of the document was included in Appendix Q of the FEIS.</p> <p>Additionally, all agency correspondence is included in Appendix B8 of the FEIS.</p>	Cooperating agencies are specified in Section 1.0 of the FEIS on page 1-2 and identifies the US Army Corps of Engineers as the lead agency and lists the EPA, Nation Oceanic and Atmospheric Administration, National Marine Fisheries Services, US Fish and Wildlife Service, and the US Coast Guard. The scope of consultation by cooperating agencies is in accordance with rules and regulations regarding NEPA. Agency correspondence is provided in Appendix B8 of the FEIS.
62	8	PC	Commenter feels that the most important alternative was left out, that is including all the existing and proposed terminals into one or two sites. Believes this would be more efficient.	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 there inclusion in the cumulative effects analysis but not in the permit’s scope of analysis.	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.
62	9	PC	Concerned about safety issues, specifically explosions and fires that could occur.	Issued raised are not in the federal control and responsibility of the Corps. The Corps will continue to rely on the appropriate state and federal agencies responsible for addressing operational safety and first response.	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.
62	10	PC	Commenter does not agree with the purpose and need statement regarding the increase in numbers of crude oil forecast presented.	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.	<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>
62	11	PC	Commenter does not like the use of words and acronyms such as BU, beach nourishment, restoration and feels these are used to manipulate the reader.	Thank you for your comment.	Thank you for your comment.

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
62	12	PC	Commenter concerned that subsidence of existing structures located in the footprint of the project have not been addressed. States the EIS does not mention compaction with heavy equipment and does not include construction of bulkheads/concrete walls internally throughout the length of the proposed footprint.	The project does not propose the construction of bulkheads or concrete walls.	<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>
62	13	PC	The No-Action states that it does not include improvements presented under the proposed alternative, therefore annual maintenance dredging would continue as scheduled. Does not believe this and thinks this comment is included to make the no-action look like a bad alternative.	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.	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.

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
62	14	PC	Commenter states the EIS contradicts itself by saying modeling of the Inner Harbor indicate shoaling rates with the No-Action and Alternative 1 were comparable but then say that the model predicts a 5-10% increase in sedimentation (Page V of the EIS).	The modeling indicate that shoaling rates for the inner channel were comparable to the existing condition, both the 2D and 3D model results indicate that project impact on sedimentation rates is limited to less than 10%.	<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
62	15	PC	Commenter states the EIS contradicts itself by saying modeling indicates channel deepening is unlikely to change mean water levels then saying the model predicts an increase of 0.79 inches (Page VI of the EIS).	Hydrodynamic and salinity modeling was conducted (see Appendix I). Overall, the impact of CDP on water level is insignificant. The model findings indicate that the CDP could lead to a decrease in the mean water level by less than 1 cm (0.4 inches). It's important to understand that the mean water level is an average taken across tide cycles, encompassing both high and low tides. Specifically, the model forecasts an increase in high tides by less than 2 cm (0.79 inches) and a decrease in low tides by less than 4 cm (1.58 inches) due to the CDP. These opposing effects balance each other out, resulting in minimal change to the mean water level. 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.	<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

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
62	16	PC	Commenter says that the cumulative effects of salinity were not considered. Says that the 7 desalination plants were not included in this analysis.	See Section 5.4.7-11; salinity changes due to the proposed actions were modeled accordingly and the results are presented in Section 4.1.2.2. Although examining the cumulative effects of future desal projects in conjunction with this project is not possible, we did acknowledge that desal effects in conjunction with this projects impacts to the hydrosalinity gradient could have detrimental impacts to seagrass, wetlands, aquatic and terrestrial wildlife, listed species, and migratory birds, particularly during drought conditions.	<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>
62	17	PC	Concerned that the letter from NOAA recommending the USACE not to seek authorization for this project and listing the 6 recommendations is being ignored so the USACE and PCCA can fast track the project.	The Corps responded to each comment from federal and state agencies as well as the public in an itemized matrix provided in Appendix B7 of the FEIS.	Thank you for your comment.
62	18	PC	Concerned about the TPWD letter (August 9, 2022) and concerns raised in the letter are huge red flags pertaining to the detrimental aspects of this project.	The Corps responded to each comment from federal and state agencies as well as the public in an itemized matrix provided in Appendix B7 of the FEIS.	Thank you for your comment.

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
62	19	PC	Concerned about the USACE letter to PCCA (January 3, 2023) that concludes the proposed DMMP does not take necessary steps to ensure the required wetland creation, stating non-compliance with 33 CFR 332.	The Corps responded to each comment from federal and state agencies as well as the public in an itemized matrix provided in Appendix B7 of the FEIS.	<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, both in erodible and stable habitats for FFA listed species.</p>
62	20	PC	Commenter concerned that the socioeconomics state the project will have minor short-term benefits to the economy, stating a recent study on job generation. Says the document states highly speculative non-committed and obscure ideas.	<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, including impacts to small businesses. Long-term adverse impacts to recreation and tourism are expected to be minor given that the vast majority of activities associated with the Port will continue in the future and will continue to co-exist with recreational activities and general tourism.</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.

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
62	21	PC	In the Coastal Processes section, page 5, the document states that a prediction of up to 10% increase in sedimentation is possible. This number seems low considering the geological formations in the work area of the dredging activity, but nevertheless up to 10% is alarming.	The modeling indicate that shoaling rates for the inner channel were comparable to the existing condition, both the 2D and 3D model results indicate that project impact on sedimentation rates is limited to less than 10%.	<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
62	22	PC	In the same page as item 5 the document states that 46 million cubic yards of new work material “muck” will generated by this proposed project alternative. But the table presented on page 50, table 2-3 Description of Placement Sites lists ten (10) placement sites, and when one adds the volume of “muck” to be placed it adds to 64.19 million cubic yards, so which is the correct number?	Table 2-3 presents the total volume of dredged material at the placement sites, total equaling the maximum capacity of material that site can accept. The sum of the table is equal to 46,516,600. Appendix C presents the details of the PCCA's DMMP and Beneficial Use Monitoring Plan.	The Dredged Material Management Plan (DMMP) is included in Appendix C of the FEIS and provides the selected placement plan elements. The Port of Corpus Christi Authority's (PCCA) DMMP proposed viable options due to proximity, material volume capacity, and the use of material beneficially to achieve ecological restorations and beach nourishment. The total volume needed for the identified placement sites far exceeds the volume expected to be dredged for the project.
62	23	PC	On page 6 a salinity increase due to the Applicant’s proposed alternative is reported. This increase is predicted to be in the range of 1 ppt to 3 ppt. this between the affected work area of this project and the mouth of the Nueces Bay. This increase along with the projected increases from the high volumetric discharges from proposed desalination plants containing much higher salinity levels should be further studied. These lacking studies pertaining to the effects on dissolved oxygen and this dual impact of much higher salinity levels and reduced dissolved oxygen levels should be integrated to a deeper and meaningful consideration by marine toxicologists.	Salinity changes due to the proposed actions were modeled accordingly and the results of that are presented in Section 4.1.2.2. See Chapter 5 Cumulative Impacts, specifically Section 5.4.7-11 for discussion of salinity with other past, present and reasonably foreseeable projects in the study area. The Corps acknowledged in it's analysis that desal effects in conjunction with this projects impacts to the hydrosalinity gradient could have detrimental impacts to seagrass, wetlands, aquatic and terrestrial wildlife, listed species, and migratory birds, particularly during drought conditions.	<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.</p> <p>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>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
62	24	PC	Another alarming concern if the Applicant’s proposed alternative is implemented, also reported on page 6, is that this alternative would allow more surge to propagate the channel, intensifying velocity and increasing water levels. This impact on shoreline constructions and structures should be further evaluated.	<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>
62	25	PC	On page 11 the impacts of maintenance dredging on turbidity and the burial of benthic organisms are mentioned, but dismissed by saying this would only be localized and temporary and not considered adequately. The claim is made here that turbidity can displace fish and finfish feeding efficiency and potentially displace federally managed species. The study falls very short in this area as no marine life (larvae, eggs, juveniles, and adults) density (organism colony count/volume of water for the different species that live and dwell in the affected work area) is reported. Let alone mortality rates predicted, caused by construction and future activities to be created by the proposed work of this project.	<p>Impacts associated with the Applicant's Preferred Alternative are addressed in Section 4.2 Ecological and Biological Resources, Section 4.4 Socioeconomics, Appendix D (Biological Assessment), and Appendix E (EFH Assessment). The impacts to larval transport of estuarine dependent species are discussed in Section 4.2.2.2.2 in the FEIS.</p> <p>In addition, Chapter 5 - Cumulative Impacts, specifically Section 5.4, addresses impacts to aquatic resources, wildlife resources, threatened and endangered species, and migratory birds in the contexts of past, present and reasonably foreseeable projects.</p>	<p>In accordance with the Magnum-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>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
62	26	PC	Another alarming effect brought to light on page 13 is the predicted increase in tidal amplitude. This increase of 15% to be added to a previous increase of 18% caused by past projects is forecasted here to give a total of 36% (or maybe 33% and not 36%) the consequences and side effects caused by this predicted increase are not discussed anywhere else.	<p>The potential for cumulative impacts due to the tidal range change is identified in Section 5.4.2.</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>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>
62	27	PC	On page 124, in the discussion of commercial fisheries a table is presented that shows commercial landings (in pounds of fish) and price tags values (dollars) within the study area, both for fish and shell fish. This data is for the period of time between 2011 and 2020. The price tags used here are \$1.59/lb. for fish and \$3.14/lb. for shell fish, yet at the present time (2024) one goes to the HEB and other fish markets and the price for fish range from \$5.00 per lb. and up to more than \$20.00 per pound for the more expensive types like the red snapper. And for shell fish prices range between \$5.00 and \$15.00 per pound. Certainly, and conveniently these numbers are downplayed in this study. Also, the study here conveniently falls short again and does not predict or calculates the loss to be caused by the implementation of this project.	The Corps has used the best available information and cannot restart it's analysis for volatile market prices of seafood.	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.
62	28	PC	<p>Commenter provides details of a contested case hearing (WRPERM 13630 for PCCA’s proposed desalination plant in La Quinta Channel) stating this hearing process revealed sham water rights and sham water quality applications, “rigged permitting processes” and corrupt individuals. Commenter bring these issues here because even though The EPA is well aware of what I am writing here other federal agencies may not be. And I considered it of great importance that other federal agencies participating in this monstrous project be aware of this Applicant. This case was complex and complicated, but the EPA is well aware of this. The amount of gathered and collected evidence that supports is massive therefore at this point I will only offer four (4) examples to support my claim.</p> <p><i>See comment letter for information regarding these claims.</i></p>	Thank you for your comment.	Thank you for your comment.

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
62	29	PC	Appendix I: On page III figure (PDF pg. 5) E.1 predicted ranges of salinity changes (SC Ranges): The table on this figure pertaining to bed elevations is not legible.	Thank you for your comment.	<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>
62	30	PC	Appendix I: On page III figure (PDF pg. 5) E.1 predicted ranges of salinity changes (SC Ranges): The EIS/Applicant point out in the narrative that the range in salinity is less than plus or minus 3%, but when one looks at the table, numbers and colors indicate that SC ranges are as high as 4.0-4.5 practical salinity units (PSU) this at the entrance channel in Aransas pass (the birth and nursery place for fin and shell fish larvae and eggs) and 5 psu in front of the Ingleside on the Bay peninsula and south of the ship channel in front of Mustang Island. These higher changes predicted to occur if this dredging alternative is implemented; even without having taken in consideration the impact of five (5) desalination by reverse osmosis projects currently in the permitting process in the State of Texas by three (3) different applicants.	<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 for cumulative impacts due to desalination projects is discussed in Section 5.4.2.</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>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
62	31	PC	Appendix I: On PDF page 20, section 2.1.4.3 the EIS/Applicant state that outliers (salinity numbers collected from the various salinity monitoring stations) were manually removed. The same paragraph continues to indicate “data processing involved removing outliers and filling gaps through interpolation or relation to a nearby similar station, if large gaps such as MANERA, INPT, and TABSD..... final adjustments were made through visual inspections to remove any persistent outliers. It is very important that the creators of the EIS and the Applicant further explain these manipulations; i.e. how many outliers were removed? what was the show up frequency of these outliers? What were the values used in filling the gaps etc.? and what other assumptions were made.	It's crucial to recognize that the measured data contains noise due to various disturbances. Before using the data for model development, Baird thoroughly reviewed its quality. Baird carefully examined outliers in the data, considering the possibility that extreme conditions indicated by these outliers could potentially exist based on on-site physical conditions. Baird also compared this data with measurements from nearby stations. Any outliers deemed highly unlikely were removed. These quality review processes were conducted interactively throughout the model development and our better understanding of the physical processes in the study areas.	The modeling was performed/verified by the US Army Corps of Engineers third-party contractor and Port of Corpus Christi Authority has no additional information to respond to this comment.
62	32	PC	Appendix I: On PDF page 32, section 2.2.5. Salinity Sources, it is evident in this discussion that the creator of the EIS and the Applicant neglected to include/consider in this Study the impacts of the cumulative effects of the five (5) desalination projects; projects with gigantic volumetric intake and discharge rates (millions of gallons per day) from and to the Corpus Christi Bay System. Discharge rates with very high concentrated salinity levels as high as 77 ppt. which would Impact the salinity, the turbidity, and the dissolved oxygen profiles throughout the Bay System. Salinity, turbidity, and dissolved oxygen gradients and profiles as functions of time and space, so important and existential to the life and reproduction to fin and shell fish, and other life native to these waters. The neglect to not have included these impacts would cause to conclude that this study is not valid because it is not complete.	The potential direct impacts from the proposed desalination projects were not explicitly modeled in the hydrodynamic and salinity model designed to analyze the proposed channel deepening project. The potential for cumulative impacts due to desalination projects is discussed in Section 5.4.2.	<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>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
62	33	PC	Concerned that the desalination plants were not taken into consideration in the EIS and the impacts they would have on the proposed project.	<p>See Section 5.4.7-11; salinity changes due to the proposed actions were modeled accordingly and the results of that are presented in Section 4.1.2.2. Although examining the cumulative effects of future desal projects in conjunction with this project is not possible, we did acknowledge that desal effects in conjunction with this projects impacts to the hydrosalinity gradient could have detrimental impacts to seagrass, wetlands, aquatic and terrestrial wildlife, listed species, and migratory birds, particularly during drought conditions.</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>
62	34	PC	Block diagrams for the five (5) proposed desalination plants are included in what I am submitting. They were hand made using the numbers from the water rights and the water quality applications. A GPS map is also provided. This map shows the proposed locations in the Corpus Christi Bay for the proposed desalination plant sites.	The desalination project will be evaluated independently, if a Department of the Army permit is required. The items referenced were not included in the attachments to the email that was sent on April 13, 2024.	Not enough information to respond to this comment.
62	35	PC	Table 2.9 indicates there are nine (9) stations or monitoring locations available from AECOM. This information was not graphed nor was it presented in tables with numbers, why?	Baird initially collected AECOM data with the intention of calibrating our model for salinity stratification, which typically occurs following a significant river event. However, Baird was unable to conduct a model calibration run during the period when AECOM collected this data in 2007. This was due to insufficient data to establish model open boundary conditions, especially offshore in the Gulf of Mexico. As a result, Baird could not directly compare our model results with the AECOM data. Instead, Baird chose an event from our model calibration run that closely matched the conditions when the AECOM data was collected and verified the salinity stratification, as illustrated in Figure 3.23.	The modeling was performed/verified by the US Army Corps of Engineers third-party contractor and Port of Corpus Christi Authority has no additional information to respond to this comment.
62	36	PC	Table 2.8 indicates there are eight (8) stations or monitoring locations available from A&M and others. Yet data from only six (6) stations was graphed. EIS/Applicant left out two stations. SALT05 was left out why? When this is a very important station since it is located at the entrance of the Nueces River into Nueces Bay. And also, EIS/Applicant left out Station NUDE3. Also, a very important station in Nueces Bay. All of this information was not presented in tables with numbers, why?	Both Station SALT05 and NUDE3 are situated within the branches of the Nueces River delta. The salinity data from these stations are intermittent and primarily available during river flood events. Baird utilized this measured data to establish the boundary conditions for the Nueces River. Instead of directly comparing our model results with this data in a time series, which is only meaningful during river flood events, Baird compared the measured salinity at specific moments following significant flow events. This comparison is depicted in Figures 3.21 and 3.22, where the colors within the dots indicate the measured salinity at these stations. Baird used the same color mapping for both measured and predicted salinity. Hence, the model's predicted salinity agrees well with the measured salinity when the colors inside and outside the dots match.	The modeling was performed/verified by the US Army Corps of Engineers third-party contractor and Port of Corpus Christi Authority has no additional information to respond to this comment.

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
62	37	PC	Figure 2.29: Why do the graphs not reflect data after December 2020 since it is now 2024? Why do the graphs not reflect/include data between August 2019 and December 2020 for stations TABSD, MANER4, and INPT? Why do the graphs not reflect/include data after February 2020 for INPT?	The Corps has used the best available information and cannot restart studies every time new data is published. During the model calibration, Baird selected the model simulation periods based on the availability of measured data and the coverage of representative climate scenarios. Since most of the data collected after 2021 were not publicly available in that time Baird started the work, Baird focused our calibration and validation on the period from 2018 to 2020. If data are not displayed in Figure 2.29, it indicates that no measured data are available for that specific period.	The modeling was performed/verified by the US Army Corps of Engineers third-party contractor and Port of Corpus Christi Authority has no additional information to respond to this comment.
63	1	PC	Concerned about the social and environmental impacts of the project.	Impacts associated with the Applicant's Preferred Alternative are addressed in Section 4.2 Ecological and Biological Resources, Section 4.4 Socioeconomics, Appendix D (Biological Assessment), and Appendix E (EFH Assessment). The impacts to larval transport of estuarine dependent species are discussed in Section 4.2.2.2.2 in the FEIS.	Thank you for your comment.
63	1	PC	Does not support the project.	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.
64	1	FED	The EIS does not adequately demonstrate that the Applicant’s preferred alternative is the least environmentally damaging alternative. According to Table 4-21, Alternative 1 (the preferred alternative) would potentially result in more impacts to the inshore environment than Alternatives 2 and 3, including increases in large vessel traffic, tidal amplitude, storm surge, salinity, turbidity, shoreline propeller scour, maintenance dredging, and oil spill risk.	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.	No response

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
64	2	FED	<p>Due to the importance of wind-tidal flats to ESA-listed species and other birds protected by the MBTA, the Service does not consider the proposed placement of dredged material (site SS1) in wind tidal and algal flats to be beneficial use placement and does not support the conversion of these habitats into lower quality and out-of-kind wetlands. At this time, the Service is not recommending elevating the tidal flats as ARNI in the Clean Water Act 404(q) process; however, impacts to these habitats should be avoided in all areas proposed for dredged material disposal, and especially at SS1 which has 99 acres of flats, more than any of the other proposed placement areas. If avoidance is not possible, off-site restoration of tidal flat habitats within the project’s watershed should be included in the proposed mitigation. There are many degraded wind tidal flats on the bay side of Mustang Island that could benefit from restoration and protection from off-road access.</p>	<p>The dominant geomorphic process forming the current mud flats is erosion. Many of the areas identified as tide flats are above the High Tide Line and not considered waters of the U.S. Based on surveys for threatened and endangered species, a suitable keystone species, the mud flat sites in SS1 that are currently waters of the U.S. are minimally used. The proposed estuarine wetlands combined with the beach nourishment that are proposed in both the CMP and the BU will have a net positive benefit for shorebirds, no compensatory mitigation is required.</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>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 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; 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 and habitat protection is another very important objective of PCCA’s 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 PCCA’s 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, BU material will be utilized 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 backbeach, both incredibly valuable habitats for ESA-listed species.</p>
64	3	FED	<p>Shorebirds depend upon both bay area habitats as well as Gulf-facing beaches. When bay area habitats are inundated by high tides or north winds, shorebirds move to the beach for foraging. Once the tides have retreated and the flats are exposed again, the birds return to the bayside habitats (Newstead and Hill 2022). Birds likely gain more energetic benefits from bayside habitats than beaches because there is usually less human disturbance in the bayside habitats, and prey is less impacted by traffic, beach maintenance, or beach nourishment activities. However, because birds rely upon both beaches and bayside habitats for survival, projects that would impact both are especially harmful to protected species of shorebirds. Therefore, placement schedules of dredged material on tidal flats and beaches should be offset to minimize cumulative effects.</p>	<p>The dominant geomorphic process forming the current mud flats is erosion. Many of the areas identified as tide flats are above the High Tide Line and not considered waters of the U.S. Based on surveys for threatened and endangered species, a suitable keystone species, the mud flat sites in SS1 that are currently waters of the U.S. are minimally used. The proposed estuarine wetlands combined with the beach nourishment that are proposed in both the CMP and the BU will have a net positive benefit for shorebirds, no compensatory mitigation is required.</p>	<p>The Port of Corpus Christi Authority anticipates a staggered placement schedule during beneficial use placement activities, to the maximum extent practicable.</p>
64	4	FED	<p>The DMMP includes placement of material on Mustang and San Jose Island beaches. In addition to listed shorebirds, these beaches are used by three species of sea turtles for nesting. Kemp’s ridley sea turtles (<i>Lepidochelys kempii</i>) commonly nest with inter-nesting site fidelity distances ranging from 330 yards to 48 miles (Shaver et al. 2017). Because Kemp’s ridley sea turtles have been shown to exhibit site fidelity to Texas beaches by returning to nesting locations within as little as 330 yards apart (Shaver et al. 2017), the Service recommends using 330 yards as the maximum linear footprint size and the minimum spacing distance for nourishment placement.</p>	<p>Consultation for federally listed threatened and endangered species was completed on January 13, 2023 when the USFWS provided the <i>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.</i> 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>No response</p>

FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
64	5	FED	Because beach nourishment temporarily renders a beach unusable to shorebirds and nesting sea turtles, the Service also recommends that a minimum period of time pass between successive nourishment events within the placement areas. Studies from other U.S. states suggest that the recovery of benthic fauna after beach nourishment or sediment placement can take six months to two years, and possibly longer in some cases (Service 2012). Therefore, the Service recommends pre- and post-construction sampling and monitoring to determine the minimum period needed for intertidal benthic fauna to recover to previous levels (see also Withers 2016 for Texas coast baseline data). These restrictions to the footprint and frequency of events would minimize the amount of unusable beach at any given time and allow newly nourished beaches to recover the physical and biological characteristics needed to support listed species. These characteristics include appropriate slopes, elevations, and sand grain size for nesting sea turtles (Culver 2018) and the establishment of benthic prey items such as marine worms, small clams, and other invertebrates for shorebirds (Service 2020a and 2020b).	<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>	No response
64	6	FED	Dredged material that is composed of more than 10% silt and clay is considered unsuitable for incubating sea turtle eggs (Marco et al. 2017). High silt and clay content on nesting beaches can disrupt embryonic development and increase mortality of incubating sea turtle eggs. This is partially due to the very high capacity for silt and clay to retain water, preventing embryos from getting the hydration needed for development (Marco et al. 2017). According to Table 3-9 of the EIS, the grain size distribution of sediments within the CCSC is about 40% silt and clay. However, results of grain size analyses in Appendix J, Parts 1 and 2, indicate that most samples contained even higher levels of silt and clay, with many over 70%. The Service recommends clarification in the EIS on grain size results and the inclusion of best management practices for placing only low silt and clay content material on sea turtle nesting beaches.	<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 and the USFWS provided several conservation recommendations for grain size.</p> <p>The Corps will condition the permit to comply with the January 13, 2023 BCO.</p>	No response
65	1	STATE	<p>2.0 PROPOSED ACTION AND ALTERNAIVES</p> <p>2.2 Alternative 2: Offshore Single Point Mooring</p> <p>2.2.3 Construction</p> <p>Based on our review, the FEIS does not resolve agency concerns raised in this section of the DEIS. Therefore, TPWD stands by our previous comments.</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.	No response
65	2	STATE	<p>3.0 AFFECTED ENVIRONMENT</p> <p>3.3 Ecological and Biological Resources Although the FEIS referenced White et al. (2006) and included additional information about tidal flat loss within the area, the FEIS does not resolve agency concerns. The FEIS does not adequately describe the functions and values of tidal flats or identify the location and extent of tidal flat habitats within the project area. Consequently, no compensatory mitigation has been proposed for tidal flat impacts (see Section 6.0 MITIGATION).</p>	The dominant geomorphic process forming the current mud flats is erosion. Many of the areas identified as tide flats are above the High Tide Line and not considered waters of the U.S. Based on surveys for threatened and endangered species, a suitable keystone species, the mud flat sites in SS1 that are currently waters of the U.S. are minimally used. The proposed estuarine wetlands combined with the beach nourishment that are proposed in both the CMP and the BU will have a net positive benefit for shorebirds, no compensatory mitigation is required.	No response

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
65	3	STATE	3.3.3.2.6 Artificial Reefs Based on our review, the FEIS resolves agency concerns for this section of the DEIS.	Thank you for your comment.	No response
65	4	STATE	3 .3. 5 Protected Resources 3.3.5.1 Protected Lands This section of the FEIS lists additional protected lands within the study area, including Redfish Bay State Scientific Area (RBSSA). However, agency concerns are not fully resolved by these additions. Figure 3-19 does not show the boundaries of significant protected lands within the Study Area Boundary, including RB SSA and the Mission-Aransas National Estuarine Research Reserve. Several public lands, such as Oso Bay Wetlands Preserve, Port Aransas Nature Preserve, and Lighthouse Lakes Park are identified as "Private Preserve/ Mitigation Bank", but these lands are publicly owned.	The Corps does not agree that these lands are "publicly owned". The land may be open to the public but that is not synonymous with ownership. For instance, Oso Bay Wetlands Preserve is owned by the City of Corpus Christi and the Port Aransas Nature Preserve is owned by the City of Port Aransas. The information for ownership 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 TPWD's expectation, the Corps has sufficiently identified and discussed the protected lands in the body of the FEIS.	No response
65	5	STATE	3.3.5.2 Threatened and Endangered Species Revisions made in the FEIS resolve agency concerns raised in this section of the DEIS.	Thank you for your comment.	No response
65	6	STATE	3.5.2. Community and Recreational Resources 3.5.2.2. Recreational Resources The FEIS resolves agency concerns raised in this section of the DEIS.	Thank you for your comment.	No response
65	7	STATE	4.0 ENVIRONMENTAL CONSEQUENCES 4.2. Ecological and Biological Resources Based on our review, this section of the FEIS does not resolve agency concerns raised in this section of the DEIS regarding the location and extent of each habitat beneficially or negatively impacted by this project. Thus, TPWD stands by our previous comments and recommendations provided for this section of the DEIS.	The FEIS provides the location and size of each affected aquatic habitat type in numerous locations in the FIES. Including Chapters 3 & 5 and Appendices C and K.	No response
65	8	STATE	Additionally, agency concerns regarding cumulative impacts from similarly situated crude oil export facilities within the area also remain unresolved.	In the development of the Future with Project analysis, both "similarly situated crude oil export facilities" located on Harbor Island were assumed to have been constructed and included in the analysis. In addition, Section 5.3 included 42 past, present, and reasonably foreseeable projects in the cumulative impact analysis, including both eh Axis Terminal and the Harbor Island Terminal.	No response

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
65	9	STATE	<p>6.0 MITIGATION</p> <p>Based on concerns raised for Sections 3 and 4, the DEIS failed to identify all aquatic resource impacts and failed to demonstrate how impacts would be fully offset using this mitigation sequence. Thus, TPWD considered comments related to compensatory mitigation provided in the DEIS as premature. Base on our review of the FEIS, concerns raised for Sections 3 and 4 of the DEIS still have not been adequately addressed. Overall, the mitigation acreages in Table 6-2 do not provide sufficient compensation to fully offset the proposed impacts identified in Table 6-1.</p>	<p>Impacts to special aquatic sites occur at 4 locations in the beneficial use plan; 1) SS1, 2) SS2, 3) HI-E; and 4) PA4. HI-E and PA4 are designated federal dredged material placement areas formed through sediment placement from CCSC constructions. The sites have undergone measurable erosion since their construction which has allowed freshwater, palustrine wetlands to develop in their footprints. The Corps concluded that since these sites are federal constructed placement areas the palustrine wetlands that have formed do not need to be mitigated. However, both sites also contain estuarine wetlands and seagrasses; the loss of which must be compensated. Sites SS1 and SS2 are also subjected to measurable erosion, as previously discussed, but they are not existing federal placement areas. The BU plan will temporally impact palustrine wetlands at SS2 that the Corps determined did not require compensation but the palustrine wetlands at SS1 will be permanently lost and like the estuarine wetlands at both SS1 and SS2 require compensation.</p> <p>The Corps therefore concluded that the permanent impacts to 44.63 acres of special aquatic sites requires compensatory mitigation to offset the permanent losses. These include 21.04 acres of palustrine wetlands and 23.59 acres of EFH comprised of 16.61 acres estuarine wetlands, 6.88 acres of SAV, and 0.10 acres of live oysters. The PCCA proposes to utilize SS1 to construct their PRM site. The objective is restoration through the re-establishment of 32.94 acres of estuarine wetlands, 42.08 acres palustrine wetlands, 6.88 acres of SAV, and 0.10 acres of live oysters by returning historic functions to a degraded aquatic resource. The proposed mitigation site is 75.12 acres and would be contained within the SS1 footprint. The site would be surrounded by dredged material on three sides and connect to the bayward edge of Brown and Root Flats to the north, which would provide a critical hydrologic connection.</p> <p>The amount of compensatory mitigation for the estuarine wetlands was calculated in accordance with the Corps Hydrogeomorphic (HGM) model for the Northwest (NW) Gulf of Mexico Tidal Fringe Wetlands. In the absence of a functional assessment for the remaining</p>	<p>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 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>PCCA’s Permittee Responsible CMP was coordinated, reviewed, and approved by the USACE.</p>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
65	10	STATE	<p>6.0 MITIGATION</p> <p>Section 6.0 of the FEIS states that "the proposed dredged material placement would involve areas of wetlands, seagrass, and oysters, and minor areas of existing placement areas (P As) previously identified as tidal flats (see Section 4.2.1)". While Table 6-1 identifies 407.97 acres of "Flats/Beach", Section 4.2.1. only describes impacts to wetlands and submerged aquatic vegetation (SAV). Section 4.2.2.2 of the FEIS, however, states that "direct aquatic resource impacts from inshore PA construction include 563.85 acres of open water, 16.61 acres of tidal wetlands, 122.46 acres of freshwater wetlands, 84.85 acres of unconsolidated shorelines (tidal sand flats/algal flats/beach), 6.88 acres of seagrass, and 0.10 acre of oyster reef". Because inshore PA construction will directly impact 84.85 acres of unconsolidated shorelines (tidal sand flats/algal flats/beach), then the FEIS must first demonstrate how these impacts have been avoided and minimized and then demonstrate how unavoidable impacts will be fully compensated.</p>	<p>The dominant geomorphic process forming the current mud flats is erosion. Many of the areas identified as tide flats are above the High Tide Line and not considered waters of the U.S. Based on surveys for threatened and endangered species, a suitable keystone species, the mud flat sites in SS1 that are currently waters of the U.S. are minimally used. The proposed estuarine wetlands combined with the beach nourishment that are proposed in both the CMP and the BU will have a net positive benefit for shorebirds, no compensatory mitigation is required.</p>	<p>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 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; 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 and habitat protection is another very important objective of PCCA’s 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 PCCA’s 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, BU material will be utilized 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 backbeach, both incredibly valuable habitats for ESA-listed species.</p>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
65	11	STATE	<p>6.0 MITIGATION</p> <p>Section 6.1 of the FEIS states that 75.12 acres of PA SSI, located along the southern shoreline of Harbor Island, would serve as the mitigation site for the reestablishment of 32.94 acres of estuarine wetlands, 42.08 acres palustrine wetlands, 6.88 acres of SA V and 0.10 acres of live oysters by returning historic functions to a degraded aquatic resource. TPWD contends that much of the existing naturalized features of PA SS 1 currently function as tidal flats. Based on the information provided in the FEIS, TPWD does not expect that tidal flat impacts resulting from the work proposed at PA SSI will be quantified, avoided, minimized, or compensated. As such, the proposed mitigation project would result in significant permanent impacts to tidal flat habitats.</p>	<p>The dominant geomorphic process forming the current mud flats is erosion. Many of the areas identified as tide flats are above the High Tide Line and not considered waters of the U.S. Based on surveys for threatened and endangered species, a suitable keystone species, the mud flat sites in SS1 that are currently waters of the U.S. are minimally used. The proposed estuarine wetlands combined with the beach nourishment that are proposed in both the CMP and the BU will have a net positive benefit for shorebirds, no compensatory mitigation is required.</p>	<p>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 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; 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 and habitat protection is another very important objective of PCCA’s 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 PCCA’s 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, BU material will be utilized 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 backbeach, both incredibly valuable habitats for ESA-listed species.</p>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
65	12	STATE	<p>6.0 MITIGATION</p> <p>Recommendation: Impacts to tidal flats that would occur as a result of this action should be identified, quantified, avoided, minimized and adequately compensated.</p>	<p>The dominant geomorphic process forming the current mud flats is erosion. Many of the areas identified as tide flats are above the High Tide Line and not considered waters of the U.S. Based on surveys for threatened and endangered species, a suitable keystone species, the mud flat sites in SS1 that are currently waters of the U.S. are minimally used. The proposed estuarine wetlands combined with the beach nourishment that are proposed in both the CMP and the BU will have a net positive benefit for shorebirds, no compensatory mitigation is required.</p>	<p>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 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; Appendix C of FEIS) is to restore substantially eroded and washed-out shorelines at several beneficial use including SS1, SS2, PA4, and HI-E. Habitat restoration and habitat protection is another very important objective of PCCA’s 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 PCCA’s 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, BU material will be utilized 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 backbeach, both incredibly valuable habitats for ESA-listed species.</p>
65	13	STATE	<p>6.1 Proposed Wetland Mitigation</p> <p>The FEIS states that the Hydrogeomorphic model (HGM) for the Northwest Gulf of Mexico Tidal Fringe Wetlands was applied to calculate compensation requirements for estuarine wetlands. However, page 15 of the regional guidebook (Shafer et al, 2002) states that most of the reference data were collected within the Galveston Bay estuary, with few other data collection sites located in Matagorda Bay, Mesquite Bay and Corpus Christi Bay. Thus, Shafer, et al. (2002) recommend that the initial application of this method be limited to the Galveston Bay estuary or Mid-Coast region of Texas (i.e., estuaries north of the Mission-Aransas) until additional reference data can be collected from sites along the lower coast. To our knowledge, additional reference data have not been collected from sites along the lower coast. In this region of the Texas coast, saltmarsh impacts are routinely compensated at a 2: 1 mitigation ratio to help offset temporal losses and risks associated with marsh establishment. As such, TPWD has concern that the application of the HGM will underestimate the credits required to fully offset impacts to tidal fringe wetlands, resulting in compensation ratio equivalent to 0.5: 1.</p> <p>Recommendation: Mitigation credit determinations for wetland impacts should be based on mitigation ratios routinely used within the watershed In this case, estuarine marsh impacts should be compensated at a 2: 1 mitigation ratio.</p>	<p>The Hydrogeomorphic (HGM) Approach assesses the functions of a wetlands ecosystem by analyzing the physical, chemical, and biological interactions of the ecosystem’s structural components with the surrounding landscape. The information used in the HGM was collected during a detailed delineation effort. Based on the use of the HGM whose results were included in Appedix K of the FEIS, the compensatory mitigation plan for estuarine wetlands proposes that compensation for 16.61 acres of estuarine wetlands will require 32.94 acres of compensatory mitigation. This is approximately a 2:1 ratio and thus meeting TPWD's recomendation. The Corps chose to apply the HGM, rather rely on a requested ratio, due to its utility to evaluate the condition of the impacted wetland's functions. Theis information was then applied to the development of the compensatory mitigation further imnproving the likelihood that the functions lost from the system are actually replaced by the mitigation.</p>	<p>The USACE Hydrogeomorphic (HGM) model for the Northwest (NW) Gulf of Mexico Tidal Fringe Wetlands (Shafer et al. 2002) was determined the most applicable and best suited model to calculate compensation requirements to ensure no net loss to estuarine wetland functions associated with the Channel Deepening Project (CDP).</p> <p>While the Port of Corpus Christi Authority acknowledges saltmarsh impacts are commonly compensated at a 2:1 ratio in this region of the Texas coast, this is only the case when a functional assessment has not been performed. In this instance, the HGM assessment (Appendix K of FEIS, Tables 2 and 3) indicated a surplus of functional capacity units (FCU). Specifically, the pre-project (i.e., baseline) HGM results indicated a combined 121.89 FCU for impacted estuarine wetlands while the total FCU for the proposed estuarine wetland mitigation site was 266.78, greatly exceeding the total pre-project FCU total resulting in a net gain of 144.89 FCU. Accordingly, the proposed 32.94-acre estuarine mitigation site will provide excess FCU relative to baseline conditions ensuring no net loss in estuarine wetland function while also providing ecological lift as well as offset to temporal loss and potential cumulative effects. Further, an additional 181.80-acres of estuarine marsh will be created at SS1 through beneficial use.</p> <p>The HGM modeling methodology and results were coordinated, reviewed, and approved by the USACE.</p>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
65	14	STATE	<p>In addition, the HGM for the Northwest Gulf of Mexico Tidal Fringe Wetlands should not be applied to assess the functional lift that would be achieved through habitat conversions at PA SS 1. The tidal fringe HGM is restricted to assessing tidal fringe wetlands; thus, it is inappropriate to use the tidal fringe HGM to assess tidal flat functions. Many of the functional indicators used in the tidal fringe HGM for wetlands are diametrically opposed to the functional indicators of tidal flats. For example, wetlands are defined by their ability to support a prevalence of hydrophytic vegetation (40 CFR 230.41). In accordance with the tidal fringe HGM, the functional capacity of a wetland increases as the mean percent cover by emergent macrophytic vegetation (Vcover) increases. However, because tidal flats are defined as being unvegetated or vegetated only by algal mats (40 CFR 230.42), their functional capacity would decrease as (Vcover) increases. Thus, tidal flats cannot be assessed with the HGM for tidal fringe wetlands because they are not wetlands and there are no approved functional assessments available for tidal flats. Because we are unaware of any tidal flat restoration projects with documented success in Texas, TPWD considers tidal flats difficult to replace.</p> <p>Recommendation: Tidal flat impacts should be avoided and minimized to the extent possible. Because tidal flats are difficult to replace, successful mitigation strategies may require compensation at ratios that exceed 1 : 1.</p>	<p>The Tidal Flats were not evaluated using the HGM approach. The dominant geomorphic process forming the current mud flats is erosion. Many of the areas identified as tide flats are above the High Tide Line and not considered waters of the U.S. Based on surveys for threatened and endangered species, a suitable keystone species, the mud flat sites in SS1 that are currently waters of the U.S. are minimally used. The proposed estuarine wetlands combined with the beach nourishment that are proposed in both the CMP and the BU will have a net positive benefit for shorebirds, no compensatory mitigation is required.</p>	<p>The HGM was not utilized to assess tidal flat functional capacity, rather the HGM assessed the functional capacity for the direct permanent impacts to 16.61-acres of estuarine wetlands.</p> <p>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 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>There are several reasons PCCA has not proposed mitigation for tidal flats. First, some of the tidal flats occur above the High Tide Line (HTL), and therefore are considered uplands and non-jurisdictional. For tidal flats located below the HTL, which includes mud flats as defined by 40 CFR 230.42, they are located in either 1) a federally authorized USACE Dredged Material Placement Area (DMPA) including PA4 and HI-E (of which impacts have been previously authorized and mitigated for), or 2) a highly eroding shoreline or landmass (e.g., SS1, SS2) in need of immediate shoreline protection to prevent further loss to existing SAS and as outline above.</p> <p>PCCA acknowledges the function and value of all habitats within the CDP footprint and has coordinated extensively to avoid, minimize, and satisfactorily mitigate these impacts to the maximum extent practicable. Overall, implementation of PCCA’s CMP and BUMP will result in a considerable net gain of beneficial habitats, including considerable increases in SAS.</p>
65	15	STATE	<p>6.2 Proposed Seagrass and Oyster Mitigation</p> <p>The FEIS states that BU placement will impact 0.10 acre of live oyster and will re-establish 0.10 acre live oyster by relocating live oysters. However, relocating live oysters does not provide 1: 1 compensation for oyster impacts. In accordance with chapter 76 of Parks and Wildlife Code, a natural oyster bed means an area with a substrate that is predominantly composed of oyster shell or live oysters. Therefore, relocating live oysters does not provide sufficient compensation for the shell component of the oyster bed that would be buried by BU placement. In addition, relocation of live oysters and in situ shell cannot provide 1: 1 compensation due to the difficulty of relocating the oyster bed, in aggregate, intact.</p> <p>Recommendation: The extent of oyster habitat should be quantified based on the extent of oyster shell, not just live oysters. Following all appropriate and practicable avoidance and minimization efforts, unavoidable impacts should be compensated at a minimum ratio of 1: 1. If in situ shell does not provide appropriate substrate (e.g., issues related to increased turbidity caused by excavation and placement), TPWD-approved clean cultch materials should be used to achieve no less than 1: 1 compensation in terms of both aerial extent and vertical relief.</p>	<p>A previously stated, the Corps does not regulate oysters and does not share the same definition of oyster reef as TPWD. The Corps definition can be found at: 40 CFR 230.44 which requires the presence of live animals not the potential for recruitment.</p>	<p>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 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>PCCA Permittee Responsible CMP was coordinated, reviewed, and approved by the USACE.</p>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
65	16	STATE	<p>The FEIS proposes to relocate 6.88 acres of seagrass beds primarily dominated by widgeon grass and shoal grass offset seagrass impacts at a mitigation ratio of 1: 1. To offset temporal impacts and the risk associated with seagrass mitigation success, a 3: 1 mitigation ratio is typically used to compensate for seagrass impacts in this region of Texas. The FEIS states that the BU placement areas were designed to protect approximately 2,400 acres of seagrass in Redfish Bay. These designs have not been coordinated with TPWD.</p> <p>Recommendation: Seagrass impacts should be compensated at a minimum ratio of 3: 1 to ensure no net loss of seagrass functions. If seagrass protection is being used as mitigation strategy to achieve a portion of the required mitigation ratio, TPWD requests that a rationale detailing how these credits would be achieved be provided for resource agency review.</p>	<p>In the absence of a functional assessment, the Corps requires a minimum 1:1 ratio. Temporal loss has been addressed by requiring Seagrass mitigation prior to impact and appropriate success criteria, monitoring criteria, and an adaptive management plan are outlined in the compensatory mitigation plan.</p>	<p>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 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>PCCA’s Permittee Responsible CMP was coordinated, reviewed, and approved by the USACE.</p>
65	17	STATE	<p>Section ES.5 of the FEIS states that modeling results of 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. This equates to an increase in the diurnal range reported from the tide gauge at Aransas Pass (Station ID: 8775241) from 1.37 feet to approximately 1.87 feet. The FEIS fails to evaluate how the increased tidal range will affect the various special aquatic sites within the ebb tide delta region of the project area, including the RBSSA. While BU placement within PA SS 1 may prevent ship wakes from washing sediments into seagrass beds leeward of SSI by filling tidal flats, the FEIS has not adequately demonstrated that it will protect seagrass from the projected increase in tidal amplitude, in addition to ship wakes and storm surge. The effects of relative sea level rise are already being felt throughout the Coastal Bend, but especially along the leeward shorelines of San Jose, Mustang, and Harbor Islands where erosion and higher water levels are visibly impacting aquatic habitats as well as property and associated infrastructure.</p> <p>Recommendation: The effects of increased tidal amplitude need to be included in the evaluation of impacts to special aquatic sites within the project area.</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 in the FEIS 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>No response</p>
65	18	STATE	<p>TPWD attached a letter Re: Permit Application Number SWG-2014-00850 City of Corpus Christi. The letter is in regards to the proposed project to construct a drought-proof seawater desalination plant located near Corpus Christi and improve the reliability of the Corpus Christi regional water system. Letter includes TPWD's comments on the desalination projects intake and outfall structures. TPWD is including these comments about desalination to argue salinity on the CDP.</p>	<p>The desalination plants are not included in the permit application and therefore not in the Scope of Analysis. However, Chapter 5 - Cumulative Impact includes the desalination plans in the past, present, and reasonably foreseeable projects included in the analysis.</p>	<p>No response</p>
66	1	FED	<p>Provided EFH conservation recommendations on the project on February 2, 2024. NOAA Fisheries maintains our original EFH conservation recommendations provided bto the USACE have not been adequately addressed.</p>	<p>EFH Consultation was concluded on November 28, 2022.</p>	<p>No response</p>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
66	2	FED	<p>The Port has also requested to utilize SAV preservation as a means to offset EFH impacts associated with the proposed dredged material placement. However, the Port has not provided clear justification the criteria require under the USACE’s rule “33 CFR 332.3(h) Preservation Mitigation” have been satisfied. Accordingly, the rule states preservation may be used to provide compensatory mitigation for activities authorized by Department of Army when the following criteria are met:</p> <ul style="list-style-type: none">• The resources to be preserved provide important physical, chemical, or biological functions for the watershed,• The resources to be preserved contribute significantly to the ecological sustainability of the watershed. In determining the contribution of those resources to the ecological sustainability of the watershed, the district engineer must use appropriate quantitative assessment tools, where available,• Preservation is determined by the district engineer to be appropriate and practicable,• The resources are under threat of destruction or adverse modifications, and• The preserved site will be permanently protected through an appropriate real estate or other legal instrument (e.g., easement, title transfer to state resource agency or land trust).	<p>The compensatory mitigation plan does not propose preservation. The compensatory mitigation plans proposes re-establishment at a ratio of 1:1 utilizing transplants from the impacted area prior to impacts. The compensatory mitigation plan also outlines performance metrics, monitoring requirements and adaptive management if the re-establishment is not successful.</p>	<p>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.</p> <p>Additionally, one of the primary objectives contained in PCCA’s Beneficial Use Monitoring Plan (BUMP; Appendix C of FEIS) is to restore substantially eroded and washed-out shorelines at several placement areas including SS1, SS2, PA4, and HI-E. Habitat restoration and habitat protection is another very important objective of the PCCA’s 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 PCCA’s 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, BU material will be utilized 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 backbeach, both immediately available habitats for FSA listed species.</p>
66	3	FED	<p>The USACE’s rules state where preservation is used to provide compensatory mitigation, to the extent appropriate and practicable the preservation shall be done in conjunction with aquatic resource restoration, establishment, and/or enhancement activities. However, Districts should only consider credit when the preserved resources will augment the functions of newly established, restored, or enhanced aquatic resources. Such augmentation may be reflected in the amount of credit attributed to the entire mitigation project. In exceptional circumstances, the preservation of existing wetlands or other aquatic resources may be authorized as the sole basis for generating credits as mitigation projects.</p> <p>Natural wetland and SAV habitat provide numerous ecological benefits that restored aquatic habitat cannot provide immediately and may provide more practicable long-term ecological benefits. If preservation alone is proposed as mitigation, Districts will consider whether the wetlands or other aquatic resources: 1) perform important physical, chemical or biological functions, the protection and maintenance of which is important to the region where those aquatic resources are located; and, 2) are under demonstrable threat of loss or substantial degradation from human activities that might not otherwise be avoided. The existence of a demonstrable threat will be based on clear evidence of destructive land use changes that are consistent with local and regional (i.e., watershed) land use trends, and that are not the consequence of actions under the permit applicant’s control.</p>	<p>The compensatory mitigation plan does not propose preservation.</p>	<p>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 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>PCCA’s Permittee Responsible CMP was coordinated, reviewed, and approved by the USACE.</p>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
66	4	FED	40 CFR Section 203.77(d) states: “When a significant ecological change in the aquatic environment is proposed by the discharge of dredged or fill material, the permitting authority should consider the ecosystem that will be lost as well as the environmental benefits of the new system.”	The correct citation is 40 CFR 230.77(d). This requirement was satisfied in detail in Sections 3.3, Section 4.2 and Appendices C2, K, and O of the EIS	<p>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 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; 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 and habitat protection is another very important objective of PCCA’s 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 PCCA 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, BU material will be utilized 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 backbeach, both incredibly valuable habitats for ESA-listed species.</p>
66	5	FED	The Port has not demonstrated how they can legally establish a SAV preservation zone and enforce the protection of SAV in perpetuity as required by USACE RGL 02-02, 33 CFR 320.4(r)(ii)(2), and the USACE’s and Environmental Protection Agency’s 2008 Final Compensatory Mitigation Rules for Losses of Aquatic Resources (33 CFR Parts 325 and 332, and 40 CFR Part 230). Consequently, NOAA Fisheries continues to recommend the Port develop appropriate mitigation to offset impacts to SAV and oyster reef EFH.	The compensatory mitigation plan does not propose preservation and the regulations and RGL cited do not require "perpetuity". The compensatory mitigation plans does not propose a "preservation zone or enforcement". The applicant has sited the BU sites to protect existing resources under threat of erosion, which was clearly demonstrated in the "Future without Project" scenarios analyzed in the FEIS.	<p>The Port of Corpus Christi Authority (PCCA) does not propose to legally establish a submerged aquatic vegetation (SAV) preservation zone in the Permittee Responsible Compensatory Mitigation Plan (CMP), rather proposes to protect vast acres of SAS and EFH through implementation of the BUMP (Appendix C of FEIS). Also, the CMP (Appendix K of FEIS) was developed by the 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 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>PCCA’s Permittee Responsible CMP and BUMP were coordinated, reviewed, and approved by the USACE.</p>
67	1	FED	Alternatives Analysis: The EIS must provide a robust discussion to document that the preferred alternative satisfies the requirement identifying the least environmentally damaging practical alternative under 40 CFR 230.10, which is referenced in the Appendix O – Final 404(b)(1) Guidelines Evaluation. Please clarify in the ROD how the preferred alternative meets the requirements of the 404(b)(1) Guidelines. The EIS must also identify the least environmentally damaging practical alternative.	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.	No response

NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
67	2	FED	Beneficial Use & Compensatory Mitigation: The ROD should document how the functions of aquatic resources impacted by the placement of dredged material from the preferred alternative will be adequately replaced through the beneficial use activities and/or compensatory mitigation plan. The ROD should adopt and summarize where applicable the monitoring and enforcement program to be applied to enforce the mitigation requirements and commitments. Specifically, the functions of the tidal and algal flat impacts should be avoided or replaced with in-kind wetland mitigation. This includes compensatory mitigation for palustrine wetland impacts. Preparation of a singular table reflecting placement site acreage impacts by aquatic resource type and the associated method for impact replacement may be useful to include. The inclusion of robust monitoring and success criteria for both the beneficial use and compensatory mitigation sites will aid in this assurance. Clear and measurable success criteria should be established to demonstrate the proposed habitat regime is developed and on a suitable ecological trajectory. In addition to the proposed vegetative cover success criteria, the achievement of wetland hydrology and wetlands soil parameters is recommended. All proposed wetland areas should meet the USACE definition of a wetland in accordance with the USACE 1987 Wetland Delineation Manual and appropriate Regional Supplement at or before year 3.	<p>Both the Beneficial Use Monitoring Plan included in Appendix C2 of the FEIS and the Compensatory Mitigation Plan included in Appendix K of the FEIS included the performance metrics, monitoring requirements, and adaptive management plans. These plans include elevation monitoring, vegetation monitoring, reporting requirements, and identified probable risks and appropriate adaptive management procedures. The concerns raised by the EPA are fully addressed in these plans with specific goals and timeframes necessary to ensure success.</p> <p>The dominant geomorphic process forming the current mud flats is erosion. Many of the areas identified as tide flats are above the High Tide Line and not considered waters of the U.S. Based on surveys for threatened and endangered species, a suitable keystone species, the mud flat sites in SS1 that are currently waters of the U.S. are minimally used. The proposed estuarine wetlands combined with the beach nourishment that are proposed in both the CMP and the BU will have a net positive benefit for shorebirds, no compensatory mitigation is required.</p>	<p>Table 1., in field 381L below, was developed to summarize and highlight impacts by habitat (as reported in the FEIS, Table 6-1) resulting from the Channel Deepening Project (CDP). The table further illustrates how these impacts will be mitigated and/or offset or adequately replaced through both compensatory mitigation and habitat restoration and protection through beneficial use activities. Specifically, the CDP will impact 6.88-acres of SAV, 0.10-acres of oyster, 407.97-acres of flats/beach, 16.61-acres of estuarine wetlands, and 122.46-acres of palustrine wetlands, which totals 554.02-acres of impact. Through the implementation of the compensatory mitigation plan (CMP; Appendix K) and beneficial use monitoring plan (BUMP; Appendix C), the Port of Corpus Christi Authority (PCCA) will restore approximately 1,094.62-acres of habitat including: 6.88-acres of SAV, 0.10-acres of oyster, 803.40-acres of tidal flat/beach, 214.74-acres of estuarine wetlands, and 76.38-acres of palustrine wetlands (Table 1).</p> <p>PCCA has included robust monitoring with clear and measurable success criteria and will report progress toward meeting mitigation objectives and performance metrics for both the CMP and BUMP sites. In addition to the proposed vegetative cover success criteria, wetland hydrology and wetland soil parameters will be assessed. All proposed wetland areas shall satisfy the USACE definition of a wetland in accordance with the USACE 1987 Wetland Delineation Manual and Atlantic and Gulf Coast Plain Regional Supplement (Version 2.0).</p> <p>All CMP monitoring and reporting requirements will be conducted in accordance with the USACE Regulatory Guidance Letter (RGL) No. 08-03, “Minimum Monitoring Requirements for Compensatory Mitigation Projects Involving the Restoration, Establishment, and/or Enhancement of Aquatic Resources” and as outlined in PCCA’s Permittee Responsible Compensatory Mitigation Plan (CMP; Appendix K of FEIS, Section 10.0). In addition to robust monitoring and measurable performance standards, adaptive management strategies have been developed and incorporated into the CMP (Appendix K, Section 12.0) and BUMP (Appendix C, Section 7.0) to ensure compensatory mitigation and beneficial use performance standards are achieved.</p>
67	3	FED	Monitoring Recommendations: The EPA recommends the ROD and associated mitigation plan include monitoring of targeted elevations to ensure elevations continue to reflect as-built conditions and/or align with anticipated geotechnical projections and the mitigation requirements and commitments are implemented and enforced. For the estuarine wetlands where a functional assessment has been utilized, a final functional assessment should verify full compensatory mitigation for project impacts has been achieved before the end of monitoring. For palustrine wetland impacts, a wetland delineation is recommended prior to the end of monitoring to ensure the 2:1 mitigation ratio has been achieved. Monitoring should be conducted every year for a minimum of 5 years, and success criteria should be achieved for three consecutive years without the need of any supplemental or corrective activities (i.e., supplemental watering, supplemental planting, contour manipulation) being implemented before monitoring activities may be ceased. If performance standards are not met, it may be appropriate to require additional activities to offset incurred temporal losses. The EPA recommends clarifying in the ROD and mitigation plan.	<p>The Compensatory Mitigation Plan included in Appendix K of the FEIS included the performance metrics, monitoring requirements, and adaptive management plans. These plans include elevation monitoring, vegetation monitoring, reporting requirements, and identified probable risks and appropriate adaptive management procedures. The concerns raised by the EPA are fully addressed in these plans with specific goals and timeframes necessary to ensure success.</p>	<p>The Port of Corpus Christi Authority (PCCA) will monitor and report the progress toward meeting mitigation objectives and performance metrics of the Compensatory Mitigation Plan (CMP). All monitoring and reporting requirements of the CMP will be conducted in accordance with the USACE Regulatory Guidance Letter (RGL) No. 08-03, “Minimum Monitoring Requirements for Compensatory Mitigation Projects Involving the Restoration, Establishment, and/or Enhancement of Aquatic Resources” and as outlined in PCCA’s Permittee Responsible Compensatory Mitigation Plan (CMP; Appendix K of FEIS, Section 10.0). Target elevations will be monitored and confirmed prior to planting to reflect as-built conditions and/or to align with geotechnical projections. As the PCCA understands, the final components of the ROD are at the ultimate discretion of the USACE. However, PCCA offers the CMP has been developed in accordance with the regulations and its application should ensure no net loss to SAS.</p>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
67	4	FED	EPA provides information on NPDES permitting stormwater regulations, 40 CFR § 122.26 addresses and identify stormwater discharge regulations applicable to State NPDES programs and §123.25 which authorize the discharge of stormwater from construction activities.Such activities are required to obtain NPDES permit coverage via the CGP prior to beginning construction activities and/or construction support activities. In Texas, the Texas Commission on Environmental Quality (TCEQ) is the NPDES permitting authority. Please coordinate with the TCEQ to assure compliance requirements are met.	Thank you for your comment.	No response
67	5	FED	MPRSA Compliance: When discussing disposal of dredged material at Ocean Dredged Material Disposal Site (ODMDS), the document almost always uses the word “placement” (e.g., pages vi, vii, 1-9). Placement is not synonymous with disposal under the MPRSA. Please review the document for mentions of dredged material disposal at ODMDSs and revise to the word ‘disposal’ where appropriate. The EPA recommends that the USACE keep these terms in mind and address appropriately in the ROD.	Thank you for your comment.	No response
67	6	FED	MPRSA Compliance: Section 2.2.4 in the Final EIS states “It is currently assumed that the maintenance material would be mostly placed in the Corpus New Work ODMDS.” The Corpus Christi New Work ODMDS designation states that the site will be used for “construction dredged material.” The site management and monitoring plan and environmental assessment for the site expansion indicate that only new work dredged material will be disposed of at the site. As such, maintenance material from the Corpus Christi Ship Channel Deepening Project should not be disposed of in the Corpus Christi New Work ODMDS unless and until the underlying site designation, site management and monitoring plan, and environmental assessment supporting the site expansion are revised to support use of the site for dredged material other than new work construction dredged material. Maintenance material is often more variable in character than new work material. The EPA recommends addressing and clarifying in the ROD and mitigation plan.	The current application does not request authorization for maintenance dredging. The statement is a disclosure from the applicant about future plans to facilitate evaluation. If the applicant proposes to request authorization to dispose of maintenance dredged material in the future, a separate evaluation based on contemporary conditions will be required.	No response
67	7	FED	MPRSA Compliance: It is incorrect to say that the creation of nearshore berms and beneficial use for shoreline restoration are regulated under both Section 10 of the Rivers and Harbors Act and the Clean Water Act Section 404 exclusively. The MPRSA regulates the disposition of any material seaward of the baseline, with only limited exclusions for legitimate artificial island construction and fisheries enhancement.	<p>The EPA has not provided a reference or citation to law or regulation for this conclusion. The Corps assumes EPA is referencing the definition of dumping found in 40 CFR 220.2(e). However, the Corps reminds EPA that 33 CFR 336 - Factors to be Considered in the Evaluation of Army Corps of Engineer Dredging Projects Involving the Discharge of Dredged Material into Water of the U.S and Ocean Water states in § 336.0(b) that "In those cases where the district engineer determines that the discharge of dredged material into the territorial sea would be for the primary purpose of fill, such as the use of dredged material for beach nourishment, island creation, or construction of underwater berms, the discharge will be evaluated under section 404 of the CWA."</p> <p>The Corps will also point out that 33 CFR 336.0(c) states that "For those cases where the district engineer determines that the materials proposed for discharge in the territorial sea would not be adequately evaluated under the section 404(b)(1) guidelines of the CWA, he may evaluate that material under the ODA" [Ocean Dumping Act or MPRSA). The 48 MCY of material were tested to MPRSA standards and EPA provided concurrence that the material was suitable for ocean disposal on February 7, 2024.</p>	No response

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
67	8	FED	MPRSA Compliance: Further consultation with the EPA (to confirm legitimate construction of an artificial island), and potentially NOAA (to confirm actual fisheries enhancement), should be conducted to determine if the disposition of materials in ocean waters for any proposed “beneficial use” action falls under the MPRSA exclusions. The EPA recommends that the USACE consult as appropriate and address in the ROD.	The berms attenuate waves in frequent, small storms, trap sediment in the depth of closure assuring it remains in the transport system, and has been demonstrated in modeling to provide measurable stability to the beach face. The nearshore berms are beneficial.	No response
67	9	FED	MPRSA Compliance: The language in Table 1-1 describing the preferred actions and the applicable statutes is unclear. One row’s description is “Placement of New Work dredged material to create nearshore berms and restore coastal beach and dune” while another is for “Beneficial Use (BU) for shoreline restoration.” It is unclear how these are different. At a minimum, Beneficial Use for shoreline restoration should be expanded to include the specific beneficial use identified. Reference to the MPRSA should be included as potentially applicable for disposition of material seaward of the baseline pending confirmation that a particular BU falls within the MPRSA exclusions. Please clarify in the ROD and required permit applications.	Thank you for your comment.	No response
67	10	FED	MPRSA Compliance: The EPA has applied the MPRSA exclusion for nearshore berms appropriately designed and located for effective beach nourishment. Historically, a beach nourishment project in ocean waters is considered akin to artificial island construction, and thus not regulated by the MPRSA. This is because chemically inert material can be placed in ocean waters close enough to shore to create relatively permanent land surface through wave action that transports vessel-borne sand cargo (or pumped sand) to shore. In Appendix G of this EIS, the Sediment Transport and Modelling Study, the nearshore berms are described as not likely to contribute to the shoreline. Therefore, the proposal to construct berms for beach nourishment would not constitute legitimate island building and would not be exempt from regulation under the MPRSA as beach nourishment. Please clarify in the ROD and required permit applications.	The analysis of sediment transport from the berms was important to verify that the material will remain along the beach face and not mobilize into the federal channel resulting in shoaling. The report also concludes that while the berms will not provide protection during large storms, like a hurricane, they will provide significant shore protection during frequent smaller storms, like winter storms. Finally, the report identifies, in multiple locations, that the sections of beach fronted by the nearshore berms have addition stability. It also concludes that San Jose Beach, which has a larger berm field, has additional measurable stability over Mustang Beach and it's smaller berm field. The report also discusses how the berms trap the sediment when cross-shore currents occur forcing the material back into the longshore transport system when it re-establishes. This trapping function prevents material from being lost to the transport system causing further erosion. See Section 7 of Appendix G.	No response
67	11	FED	MPRSA Compliance: To support this interpretation, example language from Appendix G includes: “No significant movement of the offshore berm is expected” and “The offshore berm is placed beyond the mean depth of closure, and it is unlikely that significant sediment movement will occur at the designed placement depth” (Baird, 2022a). This is also reflected in the EIS in section 4.1.1.2.2 which states “In both models, the dune is stable and predicted profile changes with and without the nearshore berm are identical, indicating that the nearshore berm has little influence on beach stability. Both models predict little to no change in the beach profile (Baird, 2022a).” Furthermore, Appendix C, the Dredged Material Management Plan, only describes the berms improving wave attenuation, which is not an island building exception under the MPRSA and is not supported by the modeling study, “The offshore berm is not expected to provide significant shore protection, except in smaller storms with longer wave periods” (Baird, 2022a). To the extent any such offshore berms were to be considered as excluded from the MPRSA as a fisheries enhancement, NOAA should confirm the activity represents fisheries enhancement.	<p>The analysis of sediment transport from the berms was important to verify that the material will remain along the beach face and not mobilize into the federal channel resulting in shoaling. The report also concludes that while the berms will not provide protection during large storms, like a hurricane, they will provide significant shore protection during frequent smaller storms, like winter storms. Finally, the report identifies, in multiple locations, that the sections of beach fronted by the nearshore berms have addition stability. It also concludes that San Jose Beach, which has a larger berm field, has additional measurable stability over Mustang Beach and it's smaller berm field. The report also discusses how the berms trap the sediment when cross-shore currents occur forcing the material back into the longshore transport system when it re-establishes. This trapping function prevents material from being lost to the transport system causing further erosion. See Section 7 of Appendix G.</p> <p>To clarify the conclusion in 4.1.1.2.2, the cited report states that the beach erosion varies along the shoreline and is influenced by the local profile morphology including the dune crest height. In other words, the beach profile will continue to have a stronger influence on the beach erosion than the nearshore berms.</p>	No response

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
67	12	FED	Section 4.1.4.1.2 in the Final EIS describes a sample with a copper concentration above the criteria maximum and Texas State water quality standards but does not address how or why this is considered to not be of concern, or if any efforts will be made to reduce potential impacts from placement or disposal of the material represented by this sample. Please clarify in the ROD and state whether the agency has adopted all practicable means to avoid or minimize environmental harm from the alternative selected, and if not, why the agency did not.	The information summarized in this section is from Appendix J. The dredged material was tested to MPRSA standards based on a Sampling and Analysis Plan approved by the EPA in July 2021 (See Appendix J1). The applicant provided the final sediment testing reports (Appendices J2 and J3) and the EPA concurred on February 17, 2024 that the material was suitable for ocean disposal.	No response
67	13	FED	States the impacts regarding impacts to resources if vague and provides specific examples that could have significant implications, but says specifics are left to speculation. To address these concerns, the EPA recommends including more robust language detailing the potential adverse impacts of each alternative. Please clarify in the ROD and state whether the agency has adopted all practicable means to avoid or minimize environmental harm from the alternative selected, and if not, why the agency did not.	The EIS is predicated on the assumption that the reader is reading the document in order. Chapter 1 describes the project in detail while Chapter 2 describes the alternatives in detail. Chapter 3 describes the affected environment and sets a baseline for comparing impacts. By providing these sections, the author does not need to provide additional descriptions of the project or the affected environment in the impact assessments found in Chapter 4 and 5. In addition, the summary statements also cite peer reviewed sources as well as unique studies included in the appendices.	No response
67	14	FED	In Section 2.2.3, the document states “B1 through B9 would involve nearshore berms offshore of San José Island and Mustang Island that would be located within the active transport zone in front of the depth of closure, and indirectly nourish these barrier islands.” The conclusion in the sentence is unsupported with any reference to data or information but is followed by Section 4.1.1.2.2 which states “In both models, the dune is stable and predicted profile changes with and without the nearshore berm are identical, indicating that the nearshore berm has little influence on beach stability. Both models predict little to no change in the beach profile (Baird, 2022a).” The language from section 2 appears to contradict the results of the modeling study. Further explanation and evidence are needed to support the claims from Section 2. Please clarify those in the ROD.	Section 2.2 is a description of the applicant's preferred alternative in the applicant's words. Chapter 4 is the Corps' evaluation of impacts and the conclusion is supported by the study included in Appendix G.	No response
67	15	FED	Section 4.2.5.1 states “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 José Island shoreline may result from sea level rise and storm surges.” The document is unclear as to which form of BU is intended, particularly to the extent it refers to a beneficial use other than beach nourishment. If the intended BU is creation of offshore berms, the modeling evidence cited contradicts the conclusion. Please review all mentions of BU and clearly identify whether the reference is for direct beach nourishment, placement of the material in the PAs, or construction of nearshore berms. Please clarify in the ROD and state whether the agency has adopted all practicable means to avoid or minimize environmental harm from the alternative selected, and if not, why the agency did not.	The analysis of sediment transport from the berms was important to verify that the material will remain along the beach face and not mobilize into the federal channel resulting in shoaling. The report also concludes that while the berms will not provide protection during large storms, like a hurricane, they will provide significant shore protection during frequent smaller storms, like winter storms. Finally, the report identifies, in multiple locations, that the sections of beach fronted by the nearshore berms have addition stability. It also concludes that San Jose Beach, which has a larger berm field, has additional measurable stability over Mustang Beach and it's smaller berm field. The report also discusses how the berms trap the sediment when cross-shore currents occur forcing the material back into the longshore transport system when it re-establishes. This trapping function prevents material from being lost to the transport system causing further erosion. See Section 7 of Appendix G.	No response

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
67	16	FED	Climate Change Impacts: Regarding storm surge analysis, it is unclear if the USACE took into consideration sea-level rise and why a category 4 storm was used as a baseline for the determination of impacts. Although the EPA appreciates the USACE’s effort in modeling the impacts, it is unclear from the information provided the severity of the impact to the communities. The EPA highly recommends the ROD to address storm surge impacts because of a category 5 storm, clarify if sea-level rise is considered in the analysis, and provide a mitigation plan. Although the FEIS mentions that beach nourishment activities will have the potential to offset erosion effects and attenuate wave energy it is unclear if this mitigation plan will be enough to offset the storm surge impacts because of the deepening of the port.	Storm surge effects are discussed in Section 4.1.3.4 and are based on a study conducted by the Harte Research Institute (HRI) which the Corps first presented in the 2022 DEIS. The EPA does not provide a scientific reason to re-run modeling and the Corps' documented analysis of the HRI conclusions found it suitable for this analysis.	No response
67	17	FED	HTRW: In Section 4.1.8.2 of the FEIS discusses an increase in indirect impacts from HTRW at Harbor Island as result of the use of deeper berths for handling, storage, and transfer of petroleum. It is unclear from this section what would be the potential impacts to the environment if any. This section also discusses the reduction of potential spills associate with lightering. Although risk of spill offshore or nearshore associated with lightering would be reduced, the EIS should discuss if an increase in larger spills are expected due to fully loaded VLCCs near the shore. Please clarify in the ROD and state whether the agency has adopted all practicable means to avoid or minimized environmental harm from the alternative selected, and if not, why the agency did not.	Section 4.1.8.2 states that a localized increase in indirect impacts is expected. This conclusion is based on several factors such as increase vessel size as well as increased truck, rail traffic, and increases pipelines. The Corps does not regulate operations of oil exportation and will rely on the state and federal agencies with the appropriate control and responsibility to manage operations.	No response
67	18	FED	Air Quality and GHG: While the Final EIS cites a historic growth trend for oil exports at this port and a corresponding projection of future growth, it also acknowledges (without quantifying) that some part of that growth is anticipated to occur as a direct result of this project. In response to a similar related comment on the Draft EIS (comment letter 92, comment 1 in Appendix B6-B9, page 449). The response incorrectly refers to USACE regulations that apply to Department of the Army permit applicants versus the Engineering Regulations that apply to USACE Civil Works projects and the USACE Civil Works Review Policy giving direction for USACE independently verifies all data considered in the economic evaluation including information provided by the project sponsor.	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.	No response
67	19	FED	Air Quality and GHG: In addition, CEQ’s interim GHG guidance requires agencies to quantify the increase in GHG emissions that will occur as result of the preferred alternative. The Final EIS highlights the benefits of the project; therefore, equal consideration should be given to the negative impacts. Consequently, the EPA recommends that the USACE confirm in the ROD that an independent review of the economic evaluation has been conducted and how that evaluation considered the oil export growth projections provided by the Port. The EPA recommends that the quantification and monetization of the upstream and downstream increases in GHG emissions attributed to the preferred alternative is incorporated in the ROD.	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.	No response
67	20	FED	Air Quality and GHG: Section 4.1.9.2.2 indicates that there will be a temporary increase in emissions during dredging operations. To reduce temporary increases of emissions, the EPA recommends that the USACE require or give preference to clean dredge equipment which uses Tier 3 or Tier 4 diesel engines.	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.	No response

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
67	21	FED	Environmental Justice: The EPA recommends that EJ implications to the below (and previously discussed) concerns be addressed in the final ROD in addition to providing the appropriate mitigation: 1) Climate Change Impacts and Storm Surges: The EPA recommends that the ROD address storm surge impacts to vulnerable communities because of deepening the Corpus Christi channel. A category 5 storm should be used as a worst-case scenario example. A mitigation plan should be provided in the ROD.	Executive Order 12898 applies to the study and the potential impacts to minority and low-income groups are described in FEIS Section 4.4. Based on a demographic analysis of the study area and findings of an environmental justice review, the CDP would not have a disproportionately high and adverse impact on any low-income or minority population.	No response
67	22	FED	Environmental Justice: 2) Hazardous Toxic and Radioactive Waste: The EPA recommends that the ROD address potential impacts to vulnerable communities because of a potential increase of large oil spills near the shore because of fully loaded VLCCs. A mitigation plan should be provided in the ROD.	Executive Order 12898 applies to the study and the potential impacts to minority and low-income groups are described in FEIS Section 4.4. Based on a demographic analysis of the study area and findings of an environmental justice review, the CDP would not have a disproportionately high and adverse impact on any low-income or minority population.	No response
67	23	FED	Environmental Justice: 3) CCSC Potential Growth: The EPA recommends that the ROD address the potential impacts as it relates to the expected growth in oil export at the Corpus Christi Port. The ROD should include information on the effects of air pollution, noise, visual because of the projected increase in oil export at CCSC to vulnerable communities.	Executive Order 12898 applies to the study and the potential impacts to minority and low-income groups are described in FEIS Section 4.4. Based on a demographic analysis of the study area and findings of an environmental justice review, the CDP would not have a disproportionately high and adverse impact on any low-income or minority population.	No response
67	24	FED	Environmental Justice: 4) In addition, Section 4.4.2 also states that adverse short-term impacts to minority or low-income that rely on fishing for subsistence. This statement leaves a lot of questions on the significance of this impact. “Temporary” will need to be defined and the size of the impacted community will need to be quantified in the ROD. For a low-income community access to food even temporary could have significant impacts. Please clarify in the ROD and state whether the agency has adopted all practicable means to avoid or minimize environmental harm from the alternative selected, and if not, why the agency did not.	Executive Order 12898 applies to the study and the potential impacts to minority and low-income groups are described in FEIS Section 4.4. Based on a demographic analysis of the study area and findings of an environmental justice review, the CDP would not have a disproportionately high and adverse impact on any low-income or minority population.	No response
67	25	FED	Tribal Governments Consultation and Coordination: Discussion related to coordination and consultation with Indian Tribal Government Governments was not provided in the Draft EIS or Final EIS as mentioned EPA’s comment letter dated July 19, 2022. Please address this in the ROD.	See Section 12.3 of the ROD. The CDP was coordinated with the Tribes, as appropriate. No response was received from any Federally recognized Native American Tribes and/or affiliated groups. The USACE has determined that it has fulfilled its tribal trust responsibilities.	No response
68	1	PC	<i>Commenter attached the SOAH hearing transcript that took place on November 5, 2020 (SOAH Docket No. 582-20-1895; TCEQ Docket No. 2019-1156-IWD) to the comment letter.</i> Mr. Scott Holt’s Testimony - In pp 10– 15 of his testimony, Mr. Holt describes the spawning of the female fishes in the Gulf and the fertilization of the eggs by the males. The bay inlet is the critical conduit for all the fertilized eggs, or larvae, to get from the offshore spawning areas to the nursery habitat. There is no other conduit, and if they don’t get there, they die.	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.	In accordance with the Magnum-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. 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).

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
68	2	PC	Dr. Andrew J. Esbaugh’s testimony – His testimony is found on pp 35-64. He discussed the vulnerability and sensitivity of certain fish, specially the red drum species. Specifically, the natural salinity level is close to the physiological tolerance of the most sensitive species (37 parts per thousand). NOTE: The FEIS itself states that the salinity levels could rise up to 3ppt at the outlet of the Nueces Bay. This level could kill several of these species that we rely on for recreational fishing.	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>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>
68	3	PC	Dr. Gregory Stuntz’s testimony – Dr. Stuntz is the Executive Director of the Harte Research Institute for Gulf of Mexico Studies at Texas A&M University – Corpus Christi. His testimony regarding the stocking of redfish (pp 72 – 73) reveals that the mortality rate among those larvae is already high. This particular bay inlet is the only major pass roughly 50 miles to the north and 80 miles to the south. IT is what scientists call an “ecological hot spot”.	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>In accordance with the Magnum-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>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
68	4	PC	The FEIS barely addresses impacts to larvae of various fish and shellfish species. Given the FEIS’s own words, the negative impacts of such a project to the Essential Fish Habitat is clearly reason to deny this project and any related permits.	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>In accordance with the Magnum-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>
68	5	PC	Texas Parks & Wildlife, NOAA Marine Fisheries and US Department of Interior all recommend an offshore single point mooring system, NOT the applicant’s preferred alternative.	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.
68	6	PC	There is not a Purpose or Need for this project to move forward.	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.	<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>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
69	1	PC	<p><i>Commenters attached opening statements and closing arguments from the 2nd contested case hearing for the Port's proposed desalination discharge location at Harbor Island in Port Aransas, Texas.</i></p> <p>Commenters believe their statements and closings are relevant to the applicant's preferred alternative of trashing out Essential Fish Habitat. the critical larval zone for transport and recruitment is not addressed in this Final EIS. There may be mention of larvae, but transport, recruitment, impacts of dredge operations and salinity increases are ignored when it comes to larvae.</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 Magnum-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>
69	2	PC	<p>There is no discussion of salinity increases from desalination discharge. Appendix I, Hydrodynamic and Salinity Modeling Study shows very high salinity increases, 4 to 5 psu in the most critical area of the ship channel within the immediate Port Aransas area and Redfish Bay State Scientific Area. The 4 to 5 psu increase does not factor in desalination.</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>
69	3	PC	<p>Commenters believe these comments are relevant to the proposed deepening project and must be considered.</p>	<p>Thank you for your comment.</p>	<p>Thank you for providing these additional comments. The comments provided pertain to a proposed desalination facility and not to the proposed channel deepening project. However, the proposed desalination facility was considered under cumulative impacts in Section 5.0 of the FEIS.</p>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
70	1	PC	Appendix J2, page 171 - Concerned that no sediment samples were collected in the proposed turning basin just east of the ferry landing. Provides figure showing locations that must be sampled due to documented contamination problems on Harbor Island.	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>
70	2	PC	Appendix J2, page 171 - Wants to know why the ship turning basin is not marked on the figure provided, states if it is part of the plan it should be clearly marked.	Thank you for your comment.	<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>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
70	3	PC	This next image is page 18 from Appendix L, Ship Simulation Report. I modified the image by adding descriptions of locations and landmarks that were conveniently omitted from the image. I don't mind saying that this image was deliberately deceptive and identifying locations like the ferry landings was critically important. The turning basin circle has not been altered.	Thank you for your comment.	<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>
70	4	PC	Please look carefully and note the turning basin will require excavation/dredge removal of the southerly portion of Harbor Island. No sampling was collected outside of the existing shipping lane. Approximately half of the turning basin on its north end must require significant removal of Harbor Island, yet no samples were collected in the turning basin, especially the north end.	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</p>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
70	5	PC	I have thousands of pages of test reports over the course of 20 years for remediation activities on Harbor Island. The POCCA’s property on Harbor Island still has restrictive covenants. The POCCA has recently claimed that the property has been cleaned up to a residential level which is not true. Small areas of the property were supposedly cleaned to a residential level. The rest of the property, 95 percent is somewhat remediated to an Industrial tier and we know there are hotspots. Without collecting samples from the turning basin area, the EPA and USACE will be allowing contaminated soils placement either at BU sites or offshore, which isn’t allowed under multiple statutes and would be a clear violation of section 404 of the Clean Water Act.	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>The Port of Corpus Christi Authority (PCCA) acquired Harbor Island from ExxonMobil Pipeline Company and Fina in 1995. Prior to the purchase of the property, the sites were operated as terminals for the storage of crude oil from about the 1920’s until 1993.</p> <p>Between 1994 and 2003, several investigations and remediation activities were conducted by both Responsible Parties (ExxonMobil and Fina) and PCCA. A cleanup level of 10,000 mg/kg was established for both properties by the Texas Railroad Commission (RRC). Under the direction of RRC, the Fina property was cleaned up to this level and deed recorded to prevent the future use of shallow groundwater. Also under the direction of RRC, the Exxon property was cleaned up to the same level except for six areas that had utility or building obstructions. The six areas exceeding the established clean up level were then deed recorded.</p> <p>In 2019 in anticipation of developments on the site, PCCA began demolishing dilapidated structures and removing utilities. This opened access to the six deed recorded areas. Therefore, PCCA undertook additional investigation and remediation actions to address the six “hot spots”. Additionally, during demolition activities, a sheen developed on the shoreline, and two areas of unknown contamination were discovered upland and reported to the State and National Emergency Response Centers. It was determined they were historical in nature and investigated and remediated with the six “hot spots”. All investigation and remediation work was done in coordination with the RRC.</p> <p>On August 3, 2022, RRC sent a concurrence letter accepting the remediation work and directing PCCA to revise the prior deed recordation. In December 2023, a revised deed record signed by PCCA and RRC was filed with the county and on December 20, 2023, RRC issued a No Further Action letter for the Exxon property, which also included the spills discovered during the demolition activities.</p>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
70	6	PC	<p>The Port of Corpus Christi and USACE are going down a slippery slope ignoring the contamination problems with soils and water at Harbor Island. I strongly suggest USACE require more tests conducted at locations of the turning basin and any soil disturbed or removed from the Harbor Island property.</p>	<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>The Port of Corpus Christi Authority (PCCA) acquired Harbor Island from ExxonMobil Pipeline Company and Fina in 1995. Prior to the purchase of the property, the sites were operated as terminals for the storage of crude oil from about the 1920’s until 1993.</p> <p>Between 1994 and 2003, several investigations and remediation activities were conducted by both Responsible Parties (ExxonMobil and Fina) and PCCA. A cleanup level of 10,000 mg/kg was established for both properties by the Texas Railroad Commission (RRC). Under the direction of RRC, the Fina property was cleaned up to this level and deed recorded to prevent the future use of shallow groundwater. Also under the direction of RRC, the Exxon property was cleaned up to the same level except for six areas that had utility or building obstructions. The six areas exceeding the established clean up level were then deed recorded.</p> <p>In 2019 in anticipation of developments on the site, PCCA began demolishing dilapidated structures and removing utilities. This opened access to the six deed recorded areas. Therefore, PCCA undertook additional investigation and remediation actions to address the six “hot spots”. Additionally, during demolition activities, a sheen developed on the shoreline, and two areas of unknown contamination were discovered upland and reported to the State and National Emergency Response Centers. It was determined they were historical in nature and investigated and remediated with the six “hot spots”. All investigation and remediation work was done in coordination with the RRC.</p> <p>On August 3, 2022, RRC sent a concurrence letter accepting the remediation work and directing PCCA to revise the prior deed recordation. In December 2023, a revised deed record signed by PCCA and RRC was filed with the county and on December 20, 2023, RRC issued a No Further Action letter for the Exxon property, which also included the spills discovered during the demolition activities.</p>
70	7	PC	<p>In accordance with NEPA, I request that you NOT adopt this Final Environmental Impact Statement (FEIS) because of the following substantive issues:</p> <p>The FEIS casts substantial doubt as to technical adequacy of the Port's sampling plan, which has not yet been executed. Therefore, information evaluating reasonably foreseeable significant adverse effects on the human environment is lacking.</p> <p>Throughout the FEIS, depictions of significant landmarks (including the existing Ferry Landings, Texas Highway 361, and the proposed VLCC Turning Basin) are deliberately omitted, making it impossible for USACE to accurately assess the risks (including past contamination).</p>	<p>Thank you for your comment.</p>	<p>Thank you for your comment.</p>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
71	1	PC	"M1" area designated on the "Dredge Placement Areas" map - dredge material cannot be placed on Port Aransas, Nueces county, Texas beaches as it does not comply with the attached City of Port Aransas Coastal Management Plan (page 20, Sec.16-88. Prohibited Activities). There has been no analysis done regarding dredge material placement and there is no agreement or approval with the City of Port Aransas for dredge placement on the beach or in the Port Aransas Nature Preserve at Charlie's Pasture.	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.	<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 sampling activities conducted was provided to USACE for review and concurrence on</p>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
71	2	PC	<p>"SS-2" area designated on the "Dredge Placement Areas" map - is within the Port Aransas Nature Preserve at Charlie's Pasture. This area has already been repaired due to the damage from Hurricane Harvey and no dredge material fill will be needed as this project is completed. Had the Port of Corpus Christi wanted to aid in the hurricane Harvey repairs there were many opportunities from the maintenance dredge and the 54'-56' deepening dredge. Please see photos attached.</p> <p><i>Note: There were no photos attached to the email.</i></p>	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>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
71	3	PC	The placement of different types of dredge material on Port Aransas beaches would be a HORRIFIC choice. It would impede public use during beach front construction. The residents and tourists alike would find sloshing through clay and silt, rather than soft white sand, very disgusting and dreadful. As our economy is tourism based, our beautiful beaches are sacred and must be preserved for generations to come.	Thank you for your comment.	<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 sampling activities conducted was provided to USACE for review and concurrence on</p>
71	4	PC	Concerned about the cumulative impacts of the project on increased tidal range, particularly at the inner channel near Port Aransas where it could be 36%.	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.	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.
72	1	NGO	Requests an extension to 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.

FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
73	1	PC	The Corps failed to disclose critically-important changes to Corps policy regarding the “single and complete project”, and the project Purpose and Need, leading to “piecemealing” under NEPA. The proposed project does not, and cannot, meet the stated project purpose. Corps failed to disclose this, and failed to draw the appropriate conclusions under NEPA as a result. I consider this a spectacular failure by Corps.	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 there 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.
73	2	PC	The FEIS fails to comply with Clean Water Act, Section 404(b)(1) Guidelines. Appendix O Clean Water Act Section 404(b)(1) Evaluation. Feels it consists of baseless assertions with no supporting evidence. It completely neglects to address the requirements of The Guidelines which require the applicant for a permit to demonstrate consideration of alternatives, and avoidance and minimization of impacts to aquatic resources. Evaluation of suitability of dredged material for proposed disposal in the aquatic environment was limited to proposed disposal at the ODMDS, which is not even covered by The Guidelines. Suitability of proposed disposal in aquatic environments regulated under The Guidelines was completely ignored. Not only was suitability of proposed disposal under The Guidelines ignored based on potential contamination of dredged material, it was ignored on the basis of sediment grain size as well.	Three alternatives, including the No Action Alternative were described in Chapter 2 and compared in Chapter 4 of the FEIS. Testing of material to MPRSA standards far exceeds the Guidelines' standards assuring the material is suitable for placement in all waters of the U.S. Section 6.0 of the ROD further evaluates compliance with Section 404(b)(1).	<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>
73	3	PC	Could find no evidence that the USACE had identified the Least Environmentally Damaging Practicable Alternative (LEDPA). Only the LEDPA can be permitted. It is my opinion, that clearly, Alternative 2: Offshore Single Point Mooring, is the LEDPA. Clearly, the applicant’s preferred alternative, Alternative 1: Channel Deepening, is not the LEDPA. The USACE should have identified this in the FEIS.	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.
73	Entity Action Item: FED - Federal Agency	PC	I find that the USACE failed to respond to many comments submitted in response to the Draft Environmental Impact Statement (DEIS), and where it did respond, it often failed to do so adequately.	The Corps responded to each comment from federal and state agencies as well as the public in an itemized matrix provided in Appendix B7 of the FEIS.	Thank you for your comment.

STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
73	5	PC	USACE should extend the due date for public comments on the FEIS. Thirty days for review is insufficient.	<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.
73	6	PC	<p>By reversing its previous determination regarding the “single and complete project”, and by issuing an EIS based solely on one part (e.g. channel deepening) of the “single and complete project” it previously defined, the Corps has engaged in “piecemealing” under NEPA.</p> <p>Commenter says that this raises questions regarding compliance with NEPA as the Corps changed its definition of what constitutes "single and complete project". Says the proposed project is a ditch to nowhere and is incomplete and asks how this meets the project purpose.</p> <p>Commenter cites specific court cases and regulations, and a Corps letter to the applicant, see comment letter for more information.</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-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 there inclusion in the cumulative effects analysis but not in the permit’s scope of analysis.</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.
73	7	PC	<p>Commenter says that the Corps and Applicant have changed the purpose and need over time and the DEIS and FEIS fail to disclose these changes or to explain them. These issues are intimately tied to alternatives and the screening criteria use to analyze them. It is my opinion that this too constitutes an arbitrary and capricious approach by Corps.</p> <p>See comment letter for specific information commenter cites regarding this comment.</p>	The Corps coordinated the overall project purpose and need with the Cooperating Agencies in March 2020 and has continued to use this need statement for all of it's analysis.	<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>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
73	8	PC	The FEIS fails to demonstrate that Alternative 1 meets the requirements of the purpose of the project. The Corps incorrectly concluded that it does meet the project purpose, despite that it obviously does not. Alternative B does not meet the project purpose because the channel does not end at an actual ship slip/oil export terminal. No VLCC ship slips or oil export terminals exist here. The channel alone cannot meet the project purpose. Section 4.3, Performance of Alternatives, refers to “existing or planned terminals”. Yet, again, there are no “existing terminals”. If there are any “planned terminals”, as there clearly were when the channel deepening project was first proposed, these planned terminals must be part of the “single and complete project” as explained in the Corps letter of February 14, 2019 (see above).	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.	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.
73	9	PC	In spite of the fact that the ALTERNATIVE 1: CHANNEL DEEPENING (APPLICANT’S PREFERRED ALTERNATIVE) includes no oil export facilities on Harbor Island (or anywhere else near the proposed channel deepening), the USACE analysis of alternatives in 4.0 Environmental Consequences consistently, explicitly, repeatedly states “...VLCCs could be fully loaded from berths at Harbor Island”. There are no berths on Harbor Island. The applicant’s preferred alternative does not include any berths on Harbor Island. This is outrageous and completely unacceptable. It defies logic.	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.
73	10	PC	Some of the details of ALTERNATIVE 1: CHANNEL DEEPENING (APPLICANT’S PREFERRED ALTERNATIVE) are unclear. Specifically, the Channel Deepening Project: Beneficial Use Monitoring Plan includes contradictory assertions regarding proposed dredged material on dunes at SJI. The plan states on p. 3, “With the proposed BU placement, Port Corpus Christi will directly create 291ac of wetland habitat, restore 151.8ac of coastal dune habitat, nourish 803.1ac of beach habitat as well as protect surrounding habitat complexes such as Redfish Bay, Lighthouse Lakes, and Charlie’s Pasture.” Elsewhere in the document, there is no reference to any dune restoration work, and there is an explicit statement that dredged material disposal will stop seaward of the dunes. USACE must clarify this. In addition, USACE must clarify whether it agrees to only place “beach quality sand” on the beach at SJI.	The applicant modified their project to remove impacts to dunes in the over wash on San Jose Island. This modification was discussed in the response to comments in Appendix B7 of the FEIS as well as in the updated BU plan included in Appendix C2 of the FEIS.	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. 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. 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

FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
73	11	PC	The main FEIS report states that the applicant will dispose of “new work material” on the beach at SJI. New work material is usually clay. Under no circumstances should clay material be placed on the beach anywhere here. Only “beach quality sand” should be placed on the beach.	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 sampling activities conducted was provided to USACE for review and concurrence.</p>
73	12	PC	Similarly, the USACE failed to evaluate all alternatives equally. For example, ALTERNATIVE 1: CHANNEL DEEPENING (APPLICANT’S PREFERRED ALTERNATIVE), was evaluated without including any consideration for how oil would reach the vicinity of the deepened channel near Harbor Island, whereas ALTERNATIVE 2: OFFSHORE SINGLE POINT MOORING and ALTERNATIVE 3: INSHORE/OFFSHORE COMBINATION, are both evaluated assuming a major oil pipeline bringing oil to the offshore location. See Figs. 2-1 and 2-2. That said, the USACE appears to have assumed the pipelines in Alternatives 2 and 3 would be constructed using Horizontal Directional Drilling, and thus, very limited impacts to the environment.	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.

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
73	13	PC	<p>USACE has not demonstrated that it has properly determined whether the POCC’s proposed disposal of dredged material at multiple sites subject to regulation under Clean Water Act Section 404, is acceptable.</p> <p>Commenter is concerned about contaminated soils at Harbor Island, and they they have not been properly tested. States the USACE has not demonstrated the disposal of dredged material at multiple sites is acceptable based on potential contamination concerns. The USACE did not conduct appropriate analysis to make the necessary determination under the CWA and Inland Testing Manual. Cites potential placement sites at PA6, SS1, SS2, and B1-B9.</p> <p><i>See comment letter for additional information provided.</i></p>	<p>A detailed description of the dredge material testing is in Section 6.6 of this ROD. In summary, by requiring MPRSA standards for this project in accordance with 33 CFR 336.0(c), all material was tested to Tier III levels (Bioassay). This includes material that may have been excluded from testing, such as beach nourishment materials, by the ITM.</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>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
73	14	PC	<p>USACE has not demonstrated that it has properly determined whether the POCC’s proposed disposal of dredged material at multiple sites subject to regulation under Clean Water Act Section 404, is acceptable, based on potential incompatibility of grain sizes.</p> <p><i>See comment letter for additional information provided.</i></p>	<p>The results of the dredge material sampling is included in Appendix J2 and J3. The 404(b)(1) analysis is included in Appendix O.</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 sampling activities conducted was provided to USACE for review and concurrence on</p>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
73	15	PC	<p>The USACE failed to demonstrate that the proposed disposal of dredged material as nearshore berms would not impact surfing on the beaches of Mustang Island. These are some of the most important surfing beaches in Texas. In fact, an argument can be made that the Port should have attempted to design nearshore disposal that would actually enhance surfing here.</p>	<p>Conclusions about the effects on the surf zone from the construction of the nearshore berms is outlined in the nearshore berm analysis included in Appendix C5.</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>
73	16	PC	<p>The USACE failed to demonstrate compliance with Clean Water Act, Section 404(b)(1) Guidelines, regarding its proposed Beneficial Use dredged material disposal into placement areas PA6, SS1, and SS2.</p> <p><i>See comment letter for additional information provided.</i></p>	<p>The results of the dredge material sampling is included in Appendix J2 and J3. The 404(b)(1) analysis is included in Appendix O.</p>	<p>The Port of Corpus Christi Authority (PCCA) prepared all documents (e.g., Alternatives Analysis, 12-Step Compensatory Mitigation Plan, Beneficial Use Monitoring Plan) within the purview of the 404(b)(1) guidelines, associated with the Clean Water Act of 1972 and the Federal Register under 40 CFR Part 230, of which determined the least environmentally damaging practicable alternative (LEDPA). Further, regarding Beneficial Use (BU), one of the primary objectives contained in the Applicants Beneficial Use Monitoring Plan (BUMP; Appendix C of FEIS) is to restore substantially eroded and washed-out shorelines at several placement areas (PA) including SS1, SS2, PA4, and HI-E. Habitat restoration and habitat protection is another very important objective of the Applicants BUMP. Specific to 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 currently available 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 at directly adjacent 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 Applicants CMP, BU placement will establish an additional 181.80-acres of estuarine wetlands and 34.30-acres of palustrine wetlands at SS1. Similarly, BU material will be utilized 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 backbeach, both incredibly valuable habitats for ESA-listed species.</p>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
73	17	PC	The USACE failed to properly determine the impacts of the proposed project on human safety and infrastructure, due to its effect on storm surge during tropical storms and hurricanes. While the FEIS does include predictions regarding increased water surface elevation due to the proposed project as a result of storm surge increases, and includes predictions of increased area impacted by this flooding, it failed to consider the actual impact of this on human safety, infrastructure, and the cost of these impacts. As a result, the Corps concluded the impacts were insignificant, in a manner that could be considered arbitrary and capricious.	<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. 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>	<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>
73	18	PC	The USACE failed to properly determine the impacts of the proposed project on local estuarine ecology, due to the project’s impacts on tidal amplitude. While the Corps did disclose estimates of the project’s impact on tidal amplitude, they seem to have concluded the changes were insignificant. However, as a coastal ecologist I am concerned that this conclusion may have been made without proper analysis. The FEIS does not include any analysis or discussion regarding whether or not the estimated changes are likely to have an insignificant effect on any aspect of local coastal ecology. This could be interpreted as being arbitrary and capricious.	<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 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>	<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>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
73	19	PC	<p>The USACE MAY HAVE failed to require the applicant to correctly assess the potential impacts of alternatives, especially the applicant’s proposed alternative, on socioeconomics. I qualify this comment by saying “may have” because the preferred alternative, as presented, is just a deep channel to near Harbor Island. There are no VLCC berths proposed, nor do they exist. No oil export facilities are proposed, nor do they exist. So, the preferred alternative does not fulfill the project purpose.</p> <p>However, if the preferred alternative is deemed by USACE to include VLCC berths on Harbor Island, immediately adjacent to downtown Port Aransas and the car ferry, this would drastically alter the character of Port Aransas. Currently Port Aransas is likely the most iconic coastal tourist village in Texas. Having one or more VLCCs immediately adjacent to this village, along with the required oil export infrastructure, will certainly change this quaint seaside village. Undoubtedly it would no longer represent a desirable tourist destination. USACE and the applicant should have carefully assessed this hypothesis. They completely failed to do so, and thus completely avoided acknowledging this huge likely impact. The findings of USACE, regarding the likely effects of the preferred alternative on Port Aransas, are arbitrary and capricious, in my opinion.</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>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>
73	20	PC	<p>The USACE failed to correctly estimate the impacts of the proposed Beneficial Use dredged material disposal. It appears that only initial, direct impacts of placement were considered.</p> <p>There does not appear to be any consideration of the impacts of movement of sediment following initial placement, or of the impacts of increased light attenuation due to increased suspended sediment in the water following disposal. The FEIS argues the latter will be short-lived and will have an insignificant effect on seagrasses, yet Dunton et al (2003) concluded that dredged material disposal within 1 km of seagrass beds significantly impacted them due to burial and increased light attenuation. USACE failed to properly consider indirect impacts of the proposed disposal on seagrasses. The proposed disposal will directly bury seagrass, will indirectly bury seagrass as dredged material moves over time, and will indirectly harm seagrasses over an unknown period of time following disposal, by reducing light availability. It is clear that this proposed dredged material disposal will result in impacts to many more acres of seagrass than the Corps acknowledges. I estimate that 500 ac of seagrasses will be impacted by this proposed disposal on SS1 alone. If dredged material is disposed near seagrass beds, a containment dike must be constructed to restrict dredged material movement.</p> <p><i>See comment letter for specific regarding BU site SS1 and impacts to seagrass.</i></p>	<p>The comment misapplies the conclusions from Dunton et al (2003). In the paper they present results from runs of the Laguna Madre Seagrass Model combined with output from the W.E.S Hydrodynamic and Sediment Transport Models in order to predict that seagrasses survive impacts of disposal of dredge material.</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

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
73	21	PC	<p>The USACE probably overestimated the benefits of proposed beneficial use dredged material disposal. The FEIS repeatedly asserts that the proposed dredged material placement will actually reduce shoreline erosion. However, dredged material placement on shorelines usually does not reduce shoreline erosion rates, but rather simply compensates for past or future shoreline erosion. This is not the same as reducing the rate of shoreline erosion. The correct estimate of environmental benefit should be limited to the area of habitat created initially, less future shoreline erosion. A study of the existing shoreline movements over time, and of how previous dredged material disposal on this shoreline may have affected shoreline erosion in the past, should have been conducted for use as a basis for predicting future shoreline movements, and any environmental benefits. Note that USACE showed that seagrasses have been buried at SS1, presumably due to movement of previously disposed dredged material and thus, seagrass burial, and asserted that disposing of additional dredged material here will solve the problem. Obviously, on the face of it, this argument does not make sense. USACE must explain how disposing additional dredged material at SS1, PA4, and HI-E will reduce impacts to seagrasses.</p>	<p>Multiple studies were conducted to support the impact analysis documented in Chapter 4 of the FEIS. These studies are included in Appendices C5, G, H, I, M, and N.</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 and backbeach, both immediately adjacent to habitats for ESA listed species.</p>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
73	22	PC	While the USACE made broad, sweeping, general arguments that the proposed shoreline restoration will protect seagrasses into the future, it offered no evidence in support of its assertions. It would have been very possible to conduct a study examining this hypothesis by scientifically assessing shorelines and seagrass beds in the area over time. USACE did actually reference such a study for SS1, which showed that dredged material previously disposed here, moved and buried adjacent seagrasses. Thus, USACE’s own data do not support their assertion that disposing dredged material at SS1 will protect seagrasses. Rather, it supports my concerns that disposing additional dredged material here will cause seagrasses to be buried and destroyed. If there is evidence that proposed disposal of dredged material will protect seagrasses, USACE should have provided it to the public. While USACE’s conclusion regarding this may not exactly be arbitrary and capricious, it is clearly not consistent with its own evidence offered in support of their conclusion.	Numerous studies were conducted and included in the Appendices. These studies include the Sediment Transport Model in Appendix G, Vessel Wake Analysis in Appendix H, Hydrodynamic and Salinity Modeling Study in Appendix I, and the Propeller Scour Study in Appendix M. These studies compare with and without project and demonstrate the type and location of erosion documented in the FEIS.	<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 backbeach, both immediately available habitats for ESA listed species.</p>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
73	23	PC	<p>The USACE’s proposed mitigation for impacts to seagrasses is completely unacceptable. As proposed, the project will almost certainly impact far more area of seagrasses than the FEIS acknowledges. As I asserted above, I believe indirect impacts to seagrasses due to beneficial use of dredged material placement, which may cause increased light attenuation over seagrass beds. In addition, USACE has shown that previously disposed dredged material at SS1 has actually caused seagrass burial, so it is difficult to accept the conclusion that disposing of additional dredged material here will reduce seagrass impacts.</p>	<p>The applicant has proposed the compensatory mitigation plan, not the Corps. The direct and indirect impacts from turbidity in all alternatives analyzed are discusses in multiple locations through the Chapter 4 Environmental Consequences.</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 and backbeach, both immediately adjacent to habitats for ESA listed species.</p>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
73	24	PC	The USACE’s proposed mitigation site is proposed to be protected only by a deed restriction. It is not clear that this satisfies the requirements of Compensatory Mitigation for Losses of Aquatic Resources; Final Rule. The USACE should have demonstrated clearly in the FEIS, that a deed restriction meets requirements of the Final Rule, or it should have proposed something that does.	The Corps did not propose the real estate instrument. The proposed project is located on submerged owned lands of both the State of Texas and the PCCA, as granted by the State. Additional real estate instruments are unnecessary.	<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 backbeach, both immediately adjacent to habitats for ESA listed species.</p>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
73	25	PC	<p>The USACE’s proposed mitigation site plan for site SS1 will almost certainly result in much of the proposed wetland areas failing due to inappropriate target elevations and slopes, and possibly inappropriate soils.</p> <p><i>See comment letter for more specific concerns regarding mitigation.</i></p>	<p>The CMP includes ecologically based performance metrics, monitoring and reporting requirements, and adaptive management plans if performance metrics are not met.</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 and backbeach habitat in addition to the habitat for FFA listed species.</p>
73	26	PC	<p>The proposed elevations for the upland portion of the Beneficial Use Site at SS1 are inconsistent in the Mitigation Monitoring Plan. 7.2 SS1 and Mitigation Site Construction Methods states that the channel-side levee will be constructed from the existing bay bottom to elevations that vary from +7 feet MLLW to +24 feet MLLW at a 4:1 slope, while the Figure 5. Proposed Permittee Responsible Mitigation Site Section View indicates the levee is to be +5.08’ MLLW. This is a huge discrepancy. USACE must clarify what the intent actually is. I assert that +24’ MLLW is far too high. There is nothing environmentally beneficial about a 24’ high dredged spoil levee across the channel from Port Aransas, Texas. Such a feature has no model in nature. USACE and POCC must not be allowed to construct an enormous confined disposal facility here and call it “Beneficial Use of Dredged Material”. Its not a “Beneficial Use” if the only thing it benefits is the Port’s ability to dispose of dredged material.</p>	<p>The comment seems to be confusing the height of the marsh with the height of the berm.</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. The BUMP provides the detailed dredge placement work plan with details.</p> <p>PCCA, in extensive coordination with the USACE and other regulatory agencies, is dedicating SS1 for wholistic sensitive habitat creation through beneficial use (BU) and compensatory mitigation. The height of the levee has been informed by the vast surveys, studies, and modeling conducted during project evaluation, and not for the sole purpose of dredged material disposal. The elevations illustrated in the cross-sections represent targets for the various habitat re-establishment areas (i.e., uplands, palustrine, estuarine, and seagrass). Please reference Appendix C2 (Beneficial Use Monitoring Plan, page 32 of 121) and C3 (BU Site Plan Drawings, page 89 of 121). The existing and new construction levee at PA4, an existing Federally authorized and used dredge material placement area, is at an elevation of + 24-feet. The SS1 levee will adjoin the PA4 levee at +24 feet and is the reason for the elevation range reference in applicable documents.</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 will result in over 200 acres of additional/new habitat creation.</p>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
73	27	PC	The proposed mitigation for oyster impact is insufficient, given that relocation of all oysters from disposal site HI-E to the proposed mitigation site, will almost certainly result in some mortality. I strongly recommend additional mitigation, possibly in the form of deposition of additional shell substrate in the vicinity of the proposed relocation site, for additional spat settlement in the future.	The CMP includes ecologically based performance metrics, monitoring and reporting requirements, and adaptive management plans if performance metrics are not met.	<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 backbeach, both immediately valuable habitats for FFA listed species.</p>
73	28	PC	As I was nearing completion of these comments, I stumbled on comments on the DEIS submitted on behalf of Ingleside on the Bay Coastal Watch Association (“IOBCWA”) and Port Aransas Conservancy (“PAC”), dated August 9, 2022. I found that their comments focused on many of the same issues I raised here. However, because their comments were drafted by attorneys, and since the most serious issues seem to be important legal questions of compliance with NEPA, the CWA, and related regulations, their comments seem to be more clearly articulated in many cases. I urge you to pay close attention to them (PERALES, ALLMON & ICE, P.C.). In particular, note that little has changed since the DEIS was made available.	Thank you for your comment.	Thank you for your comment.

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
74	1	NGO	Request that the Corps grant an extension request to allow for meaningful and informed public participation from IOBCWA members and other potentially impacted members of the Corpus Christi community. Comment letter cites ongoing evaluation of desalination facilities proposed, Easter holiday, and the fact that there is no need for the authorization justifying the curtailment of public participation.	<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>
75	1	PC	Concerned about impacts to green sea turtles and how impacts to SAV and sediment suspension with dredging and placement will impact the turtles. Does not wan dredging to occur during Dec 1 to March 31 due to cold impacts.	<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 utilized to construct 663 to restore the shoreline and to construct and maintain</p>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
75	2	PC	Disagrees that loggerhead turtles are unlikely to occur, as hundreds have been admitted to the Amos Rehab Keep over the last couple of years.	<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 utilized beneficially at SS2 to restore the shoreline washed-out and erosion caused by hurricanes.</p>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
75	3	PC	<p>There are dozens of Kemp's Ridley sea turtle nests on Mustang Island and several on San Jose and they will be round the channel. Cold stunning is a major concern with these.</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 utilized beneficially at SS2 to restore the shoreline washed-out and erosion caused by hurricanes.</p>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
75	4	PC	The proposed dredging will impact a wide variety of wildlife in the marine waters. It will create eroded shoreline and disturb the dunes for nesting turtles. It will kill much of the tidal flats and algal mats on which the young depend. It will increase the storm surge intensity in a hurricane prone 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 utilized to benefit the PCCA to restore the shoreline eroded and washed-out by hurricanes.</p>
75	5	PC	None of these risks are worth taking, especially since the Port of Corpus Christi's CEO Kent Britton has publicly stated that no market exists for a crude oil shipping terminal on Harbor Island and we should not expect a terminal to be built there unless there is a change in the market. If there is no market, there is no reason to build the terminal and thus no reason to dredge the channel.	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.	<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>
76	1	PC	Fails to consider the long-term impacts of an increased oil economy. We know that burning fossil fuels, most often from crude oil, is a major contributor to global warming. Increasing oil exports further entrenches us in an economy reliant on oil for fuel, which poses major air quality, climate, and resource availability threats.	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 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.

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
76	2	PC	This EIS needs to consider the effects the preferred alternative will have on air quality because of increase oil transactions and how an increase of CO2 (from using this oil) will impact the world’s climate stability.	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>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>
77	1	PC	Commenter does not support the project and concerned it could threaten the Port Aransas area’s tourism economy, natural wildlife, fishing and shrimping businesses, and the appeal of the Port Aransas beaches, there is simply no justification for deepening the ship channel.	Thank you for your comment.	Thank you for your comment.
78	1	PC	Concerned the project will be devastating to the fishing public.	<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. Impacts associated with marine resources are addressed in Section 4.2.2.2 and Appendix E (EFH Assessment). EFH consultation with NMFS was initiated with the release of the DEIS. NMFS provided EFH Conservation Recommendations to the USACE in an August 9, 2022 letter.</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>	<p>In accordance with the Magnum-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>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
78	2	PC	Concerned the dredging will disturb the sediments and the ecosystem.	Thank you for your comment.	<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
78	3	PC	Concerned about ship accidents, including LNG transportation, explosive projects.	Thank you for your comment.	<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>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
79	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>	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.
79	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.
79	3	PC	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>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
79	4	PC	<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>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
79	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 utilized to benefit the PCCA to restore the shoreline washed-out and erosion caused by hurricanes.</p>
79	6	PC	Purpose is for one company, Axis Midstream. Unsubstantiated claim that lightering needed at Harbor Island.	<p>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.</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>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
79	7	PC	Sea level rise projections, tidal velocity increase and impacts during storm surge (36% at Pt. 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>
79	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 ridges, both in addition to the habitats for ESA listed species.</p>

FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
80	1	PC	There isn't a need to dredge the channel to 80 ft. Engineering and economics will not allow them to function property or SAFELY.	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.	<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>
80	2	PC	Water currents and boat traffic in the area around Harbor Island are unsafe for dockage of VLCCs.	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 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>
80	3	PC	Existing VLCC terminals and the depth of the channel at 57ft. Works fine for lightering vessels to pass through the channel out to the Gulf.	Thank you for your comment.	<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>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
80	4	PC	Offshore terminals are more efficient ,economical and safer than dredging in highly Populated and critical marine life ecosystems.	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.
80	5	PC	Does not was dredge spoils and clay on their beaches .	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>
80	6	PC	Port Aransas depends on fishing tourism and clean beach access for their economic survival. Dredging the channel constantly to maintain an unnatural 80ft depth will Cloud the waters kill vegetation and larvae marine life. Kill the marine life you kill our tourism !	<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. Impacts associated with marine resources are addressed in Section 4.2.2.2 and Appendix E (EFH Assessment). EFH consultation with NMFS was initiated with the release of the DEIS. NMFS provided EFH Conservation Recommendations to the USACE in an August 9, 2022 letter.</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.

FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
81	1	PC	Commenter is not happy the public received less than 30 days to comment on such a complex report.	<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.
81	2	PC	Unsure why the Corps would grant a permit to dredge to Harbor Island as it is an abandoned, contaminated oil tank farm that has nothing on it. We know that there is no way a VLCC terminal can be constructed here due to the vicinity and location to the Port Aransas ferry, the recreational use of the Lydia Ann channel by hundreds of people in fishing boats, kayaks, air boats, bay boats, cruising boats, sailboats, jet ski personal watercraft, tourist on pirate boats and dolphin viewing boats, and least, we forget, barges that moor in the Lydia Ann channel.	<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>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.</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>
81	3	PC	“Piecemealing” a project, as I understand it, is against the NEPA. This is an attempt by Corps to engage in unlawful segmentation of projects in order to avoid considerations of actions and it’s effects on the environment. How could this even be considered to be a “single and complete project”? If there was to be a Harbor Island terminal, wouldn’t the Corps require another complete separate EIS for such a development on a declared contaminated island?	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 there 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.

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
81	4	PC	The POCC’s application states that “To safely, efficiently, and economically export current and forecasted crude oil inventories via VLCC’s. Crude oil is delivered via pipelines from the Eagle Ford and Permian basins to multiple locations at the POCC.” Where are these multiple locations? Certainly not on contaminated Harbor Island! The proposed project is incomplete and doesn’t meet the project purpose!	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.	<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>
81	5	PC	Does not believe the information in the mitigation plan about creating and protecting habitats, as does not believe the Port will protect anything.	Thank you for your comment	Thank you for your comment.
81	6	PC	And as far as the dredge material goes, will it be “beach quality sand” or “new work material” which means clay and possibly contaminated dredge material? It appears to me that USACE is not evaluating the suitability of the proposed disposal of dredge material at specific sites based on potential contamination concerns. Did the USACE analyze said material to make an educated determination of this or just accept that the dredge is clean and worthy of dune, beach, wetland restoration? Did USACE determine the grain size of the dredge material to determine its compatibility with the placement sites?	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>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
81	7	PC	<p>Concerned about the salinity impacts with increased temperatures which increases evaporation, reduced freshwater inflow that provides less seawater, dilution, or industrial brine discharges. Local scientists have already documented that our region is suffering from high salinity stress. (Montagna, ET Al, 2021).</p> <p>The FEIS does not address salinity levels and/or the effects on larval transport and recruitment. Appendix I does not address dissolved oxygen levels which decrease with higher salinity. What we do know is high salinity affects larva in a negative way.</p>	<p>Impacts associated with the Applicant's Preferred Alternative are addressed in Section 4.2 Ecological and Biological Resources, Section 4.4 Socioeconomics, Appendix D (Biological Assessment), and Appendix E (EFH Assessment). The impacts to larval transport of estuarine dependent species are discussed in Section 4.2.2.2.2 in the FEIS.</p> <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>
81	8	PC	<p>Section 404 of the FEIS USACE’s criteria states that the least environmentally impacted alternative should be chosen. As an alternative a single point mono buoy offshore is definitely the least impactful alternative by far! Phillips 66 has such a project in the works but thus far the POCC has not embraced the concept.</p> <p><i>Commenter attached the following reports: Montagna et al. (2021) and Tominack et al. (2020) reports.</i></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 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.</p>
82	1	NGO	<p>The impacts of the CDP, the Port's terminal project, and the Axis project must be treated as a single and complete project in accordance with the Corpss regulations and binding legal precedent.</p> <p>States the Corpss response to this contradicts its own previous determinations, directly conflicts with legal precedent, and ignores the relationship between the Port, Axis, and other interested parties that clearly show all three Projects should be considered a single and complete project. Moreover, it appears the Corps gave only lip service to considering the three projects in its cumulative impact analysis.</p> <p>Commenter provides information on the prior Corps determination; legal precedent; and relationship of the Port, Axis, and Lone Star Ports.</p> <p>The Applicant is intentionally circumventing the NEPA process and for some reason, Corps is allowing it to do so. This is not consistent with the Corps’ purpose in evaluating projects like this.</p> <p>See comment letter for additional details on the reasoning and background for this comment.</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-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 there 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>

Entity Acronyms:

- FED - Federal Agency
- STATE - State Agency
- NGO - Non-governmental organization
- PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
82	2	NGO	<p>States that the USACE failed to comply with several aspects of the public interest review requirement under 33 CFR §320.4. Including failing to provide an independent review of the need for the Project.</p> <p><i>See comment letter for additional details on the reasoning and background for this comment.</i></p>	Thank you for your comment.	<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>
82	3	NGO	<p>States that the USACE failed to comply with several aspects of the public interest review requirement under 33 CFR §320.4. Including failing to fully consider greenhouse gas emissions.</p> <p><i>See comment letter for additional details on the reasoning and background for this comment.</i></p>	The proposed activities within the Corps’ Federal control and responsibility likely will result in a negligible release of greenhouse gasses into the atmosphere when compared to global greenhouse gas emissions. Greenhouse gas emissions have been shown to contribute to climate change. Aquatic resources can be sources and/or sinks of greenhouse gases. For instance, some aquatic resources sequester carbon dioxide, whereas others release methane; therefore, authorized impacts to aquatic resources can result in either an increase or decrease in atmospheric greenhouse gas. These impacts are considered de minimis. Greenhouse gas emissions associated with the Corps’ Federal action may also occur from the combustion of fossil fuels associated with the operation of construction equipment, increases in traffic, etc. The Corps has no authority to regulate emissions that result from the combustion of fossil fuels. These are subject to Federal regulations under the Clean Air Act. Greenhouse gas emissions from the Corps’ action have been weighed against national goals of energy independence, national security, and economic development and have been determined not contrary to the public interest.	<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>
82	4	NGO	<p>States that the USACE failed to comply with several aspects of the public interest review requirement under 33 CFR §320.4. Including failing to evaluate impacts to safety and maritime traffic.</p> <p><i>See comment letter for additional details on the reasoning and background for this comment.</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 safety was found to be negligible, see Section 4.4.2 in the FEIS.</p> <p>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>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
82	5	NGO	<p>States that the USACE failed to comply with several aspects of the public interest review requirement under 33 CFR §320.4. Including failing to evaluate salinity impacts to fisheries.</p> <p>Concerned about the desalination facilities cumulative impacts on salinity. States the FEIS reports 50 mgd, not the 100 mgd allowed by the permit.</p> <p><i>See comment letter for additional details on the reasoning and background for this comment.</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 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>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 since they are not in the scope of this permit application.</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>
82	6	NGO	<p>Concerned about the increase of salinity on EFH with desalination facilities. Multiple aquatic life experts have testified it is likely that significant discharges of brine into the Aransas Pass tidal inlet will result in a significant increase in the mortality of larvae on the journey to the nursery grounds in Corpus Christi Bay and surrounding estuaries. Concerned about the impacts to increased salinity on migration and spawning.</p> <p>Feels that USACE has waved its hands at a potential salinity increase of 1 ppt without further investigating the potential impacts of such increased salinity within Corpus Christi Chip Channel and the immediate vicinity of Aransas Pass—specifically, the impacts to vulnerable larval stages of aquatic life, and the potential ecologic and economic damage.</p> <p><i>See comment letter for additional details on the reasoning and background for this comment.</i></p>	<p>The potential changes from the proposed desalination projects were not explicitly modeled in the hydrodynamic and salinity model since they are not in the scope of this permit application.</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>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
82	7	NGO	<p>Any permitted discharge into waters of the U.S. (“WOTUS”) must be the least environmentally damaging practicable alternative available to achieve the project purpose. The mandate here is clear. Yet, by the Applicant’s own admission, there is a practical alternative that would “require virtually no dredging” and therefore, would have less adverse impact on the aquatic ecosystem.</p> <p>Cites concerns raised by the EPA in 2019 and 2022 letters and does not feel the USACE has addressed these concerns.</p> <p><i>See comment letter for additional details on the reasoning and background for this comment.</i></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 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.</p>
82	8	NGO	<p>As described in Appendix J of the Final EIS, the dredged material is predominantly made up of clay, clayey sands, and silt. The proposed disposal of such materials on a naturally sandy beach will be catastrophic to the ecology of the Barrier Island ecosystems and the diversity of life that depend on their natural habitat. The Mustang Island location has some of the densest populations of tourist using the beach on the Texas Coast. The placement of silt and clay over a natural sand environment will have a significant adverse economic effect on the Port Aransas tourism economy. The toxic chemicals in the dredge material being placed on, and just offshore of, public beaches will present a tremendous potential health risk to thousands of visitors and residents.</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>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>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
82	9	NGO	The Final EIS fails to account for the loss of wetlands and potential impacts from dredged material placement. This does not fulfill the intent and purposes behind the requirements for an EIS.	The Compensatory Mitigation Plan included in Appendix K of the FEIS included the performance metrics, monitoring requirements, and adaptive management plans. These plans include elevation monitoring, vegetation monitoring, reporting requirements, and identified probable risks and appropriate adaptive management procedures. The concerns raised by the EPA are fully addressed in these plans with specific goals and timeframes necessary to ensure success.	<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 backbeach, both immediately adjacent to habitats for ESA listed species.</p>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
82	10	NGO	<p>While the Corps has indicated the scope of its analysis of certain areas within the Corpus Christi Ship Channel that will be dredged, but the identified locations for dredged material sampling excludes the turning basin where there are currently known toxins in the soil and water. This is a glaring omission. Letter cites issues at Harbor Island and provides specific details.</p> <p>States that despite this omission, the FEIS claims that measureable impacts from chemical contaminants are not expected. This analysis does not fulfill the Corps’ obligation to take a “hard look” at the environmental impact of the proposed dredging activities.</p> <p><i>See comment letter for additional details on the reasoning and background for this comment.</i></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>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>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
83	1	PC	<p>Please consider adding the entirety of Nueces County Gulf facing beaches to the BUDM placement and feeder berm location list. There is documented need and no other viable sand sources for beaches under Nueces County jurisdiction.</p> <p>Please consider adding the beach and dune complex from 1) the southern limit of Mustang Island State Park at Newport Pass Rd. to Packery Channel and 2) the NPI beaches from Packery Channel to PAIS.</p>	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>
84	1	PC	Concerned about the ecosystem health and businesses that depend on tourism.	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.
84	2	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>	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.
85	1	PC	Concerned about the ecosystem health and businesses that depend on tourism.	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.

FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
85	2	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>	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.
86	1	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.	<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>
86	2	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.	<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>
86	3	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.

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
86	4	PC	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>Dredged material proposed for ocean disposal is evaluated and tested to ensure that the material will not adversely affect human health and the marine environment. Evaluation of dredged material for ocean disposal under the MPRSA relies on standardized testing using biological organisms (bioassays). Under section 103 of the MPRSA, any proposed dumping of dredged material into ocean waters must be evaluated through use of EPA's ocean dumping criteria (40 CFR 220-229). The Ocean Testing Manual (OTM), a national testing manual for the evaluation of dredged material proposed for ocean dumping, provides guidance for sampling, testing, and analysis of water, sediment, and tissue to evaluate the environmental acceptability of dredged material proposed for ocean disposal. In addition to the OTM, the USACE and EPA have cooperatively prepared the Reginal Implementation Agreement, or RIA, to adapt the national procedures of the OTM to regional situations to ensure compliance with MPRSA.</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 sampling activities conducted was provided to USACE for review and concurrence on</p>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
86	4	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 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 or 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 sampling activities conducted was provided to USACE for review and concurrence on</p>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
86	4	PC	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.	Appendix C provides information on placement of dredged materials, locations, modeling, and monitoring plans. Appendix J provides information on sediment testing.	<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 sampling activities conducted was provided to USACE for review and concurrence on</p>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
86	5	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, 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
86	6	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 there 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.

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
87	1	PC	<p><i>Commenter cites numerous guidance from C FR Chapter II (7-1-12) Edition, Subchapter 320.4. It is difficult to decipher specific concerns of the commenter, see comment letter for more specifics.</i></p> <p>Does not feel the cooperating agency comments on the DEIS have been adequately answered or addressed in the FEIS.</p>	The Corps responded to each comment from federal and state agencies as well as the public in an itemized matrix provided in Appendix B7 of the FEIS.	<p>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.</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> <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> <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. 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 mitigation of</p>
87	2	PC	No permit should be issued, but if one is issued for Alternative 2: Offshore Single Point Mooring, it should be limited to a period of 5 years.	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.
87	3	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>	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.

NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
87	4	PC	Commenter does not believe the project has taken into account the needs and welfare of the people and does not comply with the Public Interest Review. Believes the decision should reflect the national concern for both protection and utilization of resources and that all factors relevant to the proposal must be considered including cumulative.	<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>	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.
87	5	PC	<p>It can't be completely claimed that the deep dredging helps meet the "energy needs" of the people of the United States, as there are no restrictions on the export of this oil and natural gas.</p> <p>Commenter states there is no public need.</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>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.</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>
87	6	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.
87	7	PC	Commenter is concerned about all environmental and social impacts of the project.	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.

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
87	8	PC	Concerned about the use of localized and temporary in the document.	Thank you for your comment.	<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
87	9	PC	States that the agency consensus for 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.

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
87	10	PC	Designating the "Redfish Bay State Scientific Area" makes this area an important wetland resource, which needs to be respected and 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>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
87	11	PC	Concerned about the inadequate nature of the Applicant's mitigation plan and states most BU proposed actually are inappropriate dumping areas for dredge spoils, under the guise of "protection" from sea level rise.	Thank you for your comment.	<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 backbeach, both immediately adjacent to habitats for FSA listed species.</p>
88	1	PC	<p><i>Commenter provides a lot of information and cites specifics from the FEIS, refer to comment letter for specific details.</i></p> <p>This EIS for a CDP is part of a three-prong project that must be evaluated as one action. Those three are this project (the deepening of the channel to -75’), the POCC dock/Harbor Island Terminal and the Axis Midstream Midway/Midway to Harbor Island.</p> <p>Commenter does not agree that the No-Action Alternative considers those projects that have been completed (existing), are under construction, or have been authorized for construction.</p> <p>The three actions are all one project and should be permitted together.</p> <p>Commenter cites inconsistencies throughout the document and states it is unreasonable and probably illegal to base the entire environmental assessment of the CDP on the assumption that two of the critical components of the oil export project (i.e. a source of oil and a facility to load that oil onto ships) are in place and will have no environmental impacts.</p> <p><i>See comment letter for additional information provided by commenter regarding the connected actions issue.</i></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-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 there 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.

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
88	2	PC	Commenter points out that in the Cumultaive Impacts section, the description of the Harbor Island project is accurate, but then want to know how it can be misstated so consistently throughout the EIS. How can you correctly state here that the project is “proposed” but then willfully, throughout the entire EIS work under the “assumption” that this facility actually exist? What possible justification can there be for such willful deceit.	The purpose of the assessments, specifically the modeling, are to analyze a future with project (Applicant's preferred alternative) to a future without project (No Action alternative). If the assessment does not include the reasonably foreseeable appurtenances that would accompany the project then the analysis would be skewed and inaccurate. The assumptions in these efforts are clearly disclosed and the results are used to inform the impacts of four alternatives.	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.
88	3	PC	Commenter states again that permit for Harbor Island is berths of –54 feet, and that as proposed can only take advantage of the current ship channel depth and not the proposed 75 foot depth unless they modify the permit application. States not only are they dishonest in implying the dock facilities are already operational or being built but they completely neglect to mention that the docks, as requested in the still not approved permit, will not accommodate fully loaded VLCCs.	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 there 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.
88	4	PC	In Section 5.4.7 and 5.3.3.2 - commenter wants to know what happened to the HDD solution the Port says can avoid potential impacts and why did Section 5.4.7 not assess the cumulative trench and fill impacts.	The Corps is not conducting an alternative analysis for past, present or reasonably foreseeable projects considered in the Cumulative effects analysis.	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.
88	5	PC	Cites inconsistency resulting from the invalid assumptions and separation of convoluted future projects can be seen in Section 4.2.4.3, regarding placing a dredge pipeline across Redfish Bay. Commenter states the implication here is that this negative effect is unique to Alternative 2 when in fact Alternative 1 will require the exact same pipeline construction with the very same impacts. There is no pipeline in place now.	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.	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.
88	6	PC	Description of impacts on page 5-42 is just word salad, no description of how this benefit would occur or how such potential benefit was determined. Applicant should not be allowed to use hedge words such as "could potentially" or "may benefit". They should be required to declare the effect "will" benefit or be required to acknowledge that they really do not know the potential effect of their action.	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.

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
88	7	PC	<p>Section 2.1.2 of Appendix C1, describes SS2, the commenter states the conditions behind the objective and statement of condition, as stated above, no longer exist. The proposed project would be more harmful than helpful. The major breach through the bulkhead has been closed and reconstruction of the entire bulkhead, including that repaired breach, will be completed by midsummer 2024 in a project largely funded through FEMA. This site is simply not appropriate as an industrial size spoil disposal site and should be eliminated from the plan.</p> <p><i>Commenter provides additional information about this, see comment letter.</i></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 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>
88	8	PC	<p>Commenter provides numerous comparisons of alternatives 1 and 2, including maintenance dredging, circulation patterns, tidal range, tidal prism, salinity changes, turbidity, HTRW leaks or spills showing that Alternative 1 has measureable and real impacts on on physical and biological properties within the project area but Alternative 2 has relatively few impacts. The only areas where the EIS suggests positive effects of the CDP are in benefits of reduced vessel traffic and reduced lightering. The only reasonable way the CDP makes sense is if the Harbor Island facility is exporting “new” oil as opposed to taking business away from Ingleside. In that case, the SPM in Alternative 2 serves the same purpose and with, as pointed out over and over again it this EIS, few environmental effects.</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 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.</p>
88	9	PC	<p>Another supposed benefit of Alternative 1, or at least a detriment of the other Alternatives, is that it generates massive amounts of dredge spoil that can supposedly be used for beneficial uses (BU). If BU is that important it seems the USACE would be looking for all opportunities to get material. States that none of the material from the recent dredging to 54 foot was used for BU. Instead they built a new island in the middle of the bay and put tons of it on old disposal sites.</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 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.</p>
88	10	PC	<p>Wants to know where the actual evaluation of alternatives is as they do not see anything except Table 4-21.</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 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.</p>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
88	11	PC	Given all the examples provided in the letter, commenter believes Alternative 2 is clearly the best option and accomplishes the goals of the USACE as stated on page 2-1 of the FEIS.	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.
89	1	PC	There really is no reason for further hearings/evaluation of this proposal, as the current Executive Director of the Port of Corpus Christi Kent Britton has himself stated on October 18, 2023 "no market currently exists for a crude oil shipping terminal on Harbor Island... I don't think that's a location that will ever be called on for an export terminal. If there's another terminal needed in Corpus Christi, it's going to be an offshore buoy."	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.	<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>
89	2	PC	Does not support the project as concerned about the risk to the ship channel, ecosysstems, recreational areas, with no beneficial purpose.	Thank you for your comment.	Thank you for your comment.
89	3	PC	Dredging to the depth requested will create significant changes in tide and storm swell levels, which will adversely impact the shoreline along the dredged area, including populated areas in Port Aransas.	<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>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
89	4	PC	The plan to dispose of dredged material along nearby beaches as "nourishment" is simply hogwash - soils from that deep are not going to be fine sand suitable for beaches, but rather mucky dark silt that will destroy the beaches if disposed of near-offshore and allowed to permeate the beaches.	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 sampling activities conducted was provided to USACE for review and concurrence on</p>
90	1	PC	Concerned about the ecosystem health and businesses that depend on tourism.	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.
90	2	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>	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.

FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
91	1	PC	Concerned about the impact to tourism.	<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. Impacts associated with marine resources are addressed in Section 4.2.2.2 and Appendix E (EFH Assessment). EFH consultation with NMFS was initiated with the release of the DEIS. NMFS provided EFH Conservation Recommendations to the USACE in an August 9, 2022 letter.</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>	<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>
91	2	PC	Concerned about placing dredged material on the beach that could impact their health. Concerned about the contamination of material at Harbor Island.	<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 Reginal 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>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
91	2	PC	<p>Concerned about placing dredged material on the beach that could impact their health. Concerned about the contamination of material at Harbor Island.</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 or 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 sampling activities conducted was provided to USACE for review and concurrence on</p>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
91	2	PC	Concerned about placing dredged material on the beach that could impact their health. Concerned about the contamination of material at Harbor Island.	<p>Appendix C provides information on placement of dredged materials, locations, modeling, and monitoring plans. Appendix J provides information on sediment testing.</p> <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>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 sampling activities conducted was provided to USACE for review and concurrence on</p>
91	3	PC	Concerned about the impact to ecosystems with increased salniity and larger vessels with more petroleum products.	<p>Impacts associated with the Applicant's Preferred Alternative are addressed in Section 4.2 Ecological and Biological Resources, Section 4.4 Socioeconomics, Appendix D (Biological Assessment), and Appendix E (EFH Assessment). The impacts to larval transport of estuarine dependent species are discussed in Section 4.2.2.2.2 in the FEIS.</p> <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). 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 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>
91	4	PC	Does not want more industrial development infringing upon Port Aransas and does not want the VLCC coming to Corpus.	Thank you for your comment.	Thank you for your comment.

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
91	5	PC	Project is unfunded and one of the goals of the proposed project is to allow for more and larger vessels resulting in more trips, more operational risk and higher air emissions (and much higher soil and water contamination which can easily become airborne contaminates further degrading the AQI air quality index of the region and contributing to countless respiratory and other ailments),	<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 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>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>
92	1	PC	Does not support the project.	Thank you for your comment.	Thank you for your comment.
93	1	PC	Commenter states the Port has no jurisdiction in Aransas County. Rockport does not want the industrial facilities or contaminated dredge spoil anywhere in their county.	Thank you for your comment.	Thank you for your comment.

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
93	2	PC	Concerned about contaminated dredged material being dumped in their county.	<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 Reginal 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>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
93	2	PC	<p>Concerned about contaminated dredged material being dumped in their county.</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 or 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>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
93	2	PC	Concerned about contaminated dredged material being dumped in their county.	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>
93	3	PC	Upset that the USACE did not hold public meetings in Aransas County, Rockport, or Fulton.	The public meeting held in Corpus Christi in June 2022 provided an opportunity for individuals to meet and discuss the Draft EIS with USACE employees, and their contractors, as well as members of the applicant’s team. The public meeting also included the ability to submit comments both orally and in writing. Corpus Christi was selected for the public meeting because it is the population center of the 4-county study area evaluated in the Draft EIS. Prior to the public meeting, USACE released a special public notice and several press releases to notify the public of the time and place of the public meeting. In addition, USACE continued to accept written comments throughout the 60-day comment period.	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.
93	4	PC	USACE did not contact the Aransas County Commissioners Court, or County Judge, Ray Garza, or the City of of Rockport's City Council or the Town of Fulton's Town Council about your dredging and dumping EVEN THOUGH THE USACE proposes to approve the dumping of toxic dredge spoil into the Waters of Aransas County. Upset that the USACE is proposing a project to dump dredged material in Aransas County without involving the county residents or taxpayers.	Commissioners and County Judges in Aransas, Nueces, and San Patricio Counties as well as Mayors and Council Members in the Cities of Port Aransas, Ingleside, Portland, and Corpus Christi were directly notified by electronic mail about the proposed Scoping in 2020, the Draft EIS and Public Meeting in 2022, and the Final EIS in 2024. In total, a special public notice in both Spanish and English was sent by electronic mail to over 1600 recipients.	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.

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
94	1	PC	There really is no reason for further hearings/evaluation of this proposal, as the current Executive Director of the Port of Corpus Christi Kent Britton has himself stated on October 18, 2023 "no market currently exists for a crude oil shipping terminal on Harbor Island... I don't think that's a location that will ever be called on for an export terminal. If there's another terminal needed in Corpus Christi, it's going to be an offshore buoy."	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.	<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>
94	2	PC	Does not support the project as concerned about the risk to the ship channel, ecosysstems, recreational areas, with no beneficial purpose.	Thank you for your comment.	Thank you for your comment.
94	3	PC	Dredging to the depth requested will create significant changes in tide and storm swell levels, which will adversely impact the shoreline along the dredged area, including populated areas in Port Aransas.	<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>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
94	4	PC	The plan to dispose of dredged material along nearby beaches as "nourishment" is simply hogwash - soils from that deep are not going to be fine sand suitable for beaches, but rather mucky dark silt that will destroy the beaches if disposed of near-offshore and allowed to permeate the beaches.	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 sampling activities conducted was provided to USACE for review and concurrence on</p>
95	1	PC	Concerned about the ecosystem health and businesses that depend on tourism.	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.
95	2	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>	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.

FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
96	1	PC	Concerned about the ecosystem health and businesses that depend on tourism.	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.
96	2	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>	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.
97	1	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.	<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>
97	2	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.	<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>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
97	3	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.
97	4	PC	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>Dredged material proposed for ocean disposal is evaluated and tested to ensure that the material will not adversely affect human health and the marine environment. Evaluation of dredged material for ocean disposal under the MPRSA relies on standardized testing using biological organisms (bioassays). Under section 103 of the MPRSA, any proposed dumping of dredged material into ocean waters must be evaluated through use of EPA’s ocean dumping criteria (40 CFR 220-229). The Ocean Testing Manual (OTM), a national testing manual for the evaluation of dredged material proposed for ocean dumping, provides guidance for sampling, testing, and analysis of water, sediment, and tissue to evaluate the environmental acceptability of dredged material proposed for ocean disposal. In addition to the OTM, the USACE and EPA have cooperatively prepared the Reginal Implementation Agreement, or RIA, to adapt the national procedures of the OTM to regional situations to ensure compliance with MPRSA.</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>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
97	4	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 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 or 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 sampling activities conducted was provided to USACE for review and concurrence on</p>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
97	4	PC	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.	Appendix C provides information on placement of dredged materials, locations, modeling, and monitoring plans. Appendix J provides information on sediment testing.	<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 sampling activities conducted was provided to USACE for review and concurrence on</p>
97	5	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

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
97	6	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 there 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.
98	1	NGO	Concerned that 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>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
98	2	NGO	These large ships already have trouble maneuvering - even with power. If a fully-loaded VLCC loses power, coastal communities will be in harm's way.	<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>
98	3	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 in Corpus Christi Bay.	<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>
98	4	NGO	Feel it is not right to tear up Corpus Christi Bay and disrupt aquatic and bird life so that private petroleum companies can further enrich themselves.	Thank you for your comment.	<ul style="list-style-type: none">• 2.0 Proposed Action and Alternatives

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
98	5	NGO	Keeping the channel deepened to the proposed depth of 75' will require constant dredging, which is not pleasant to be around.	Thank you for your comment.	<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
98	6	NGO	The placement of potentially polluted dredged materials on and in front of the beaches in Port Aransas will harm 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>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>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
98	7	NGO	This channel deepening is another step closer to bringing in ammonia and hydrogen companies that further harm our communities.	Thank you for your comment.	<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>
98	8	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.
99	1	PC	<p><i>Commenter provides lots of information on the research behind the concerns being expressed. See comment letter for more details.</i></p> <p>Concerned about the impacts on early-life stages of marine sports fish to silt from the 5 years of initial dredging and the maintenance dredging.</p>	<p>Impacts associated with the Applicant's Preferred Alternative are addressed in Section 4.2 Ecological and Biological Resources, Section 4.4 Socioeconomics, Appendix D (Biological Assessment), and Appendix E (EFH Assessment). The impacts to larval transport of estuarine dependent species are discussed in Section 4.2.2.2.2 in the FEIS.</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>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
99	2	PC	Concerned about the impacts on early-life stages of marine sports fish to silt from contaminants in the sediments released into the water and in the spoil to be placed in the bay.	<p>Impacts associated with the Applicant's Preferred Alternative are addressed in Section 4.2 Ecological and Biological Resources, Section 4.4 Socioeconomics, Appendix D (Biological Assessment), and Appendix E (EFH Assessment). The impacts to larval transport of estuarine dependent species are discussed in Section 4.2.2.2.2 in the FEIS.</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 Magnum-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>
99	3	PC	Concerned about the impacts on early-life stages of marine sports fish to silt fromchronic oil spills that occur in waters around oil transfer.	<p>Impacts associated with the Applicant's Preferred Alternative are addressed in Section 4.2 Ecological and Biological Resources, Section 4.4 Socioeconomics, Appendix D (Biological Assessment), and Appendix E (EFH Assessment). The impacts to larval transport of estuarine dependent species are discussed in Section 4.2.2.2.2 in the FEIS.</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 Magnum-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>
99	4	PC	To minimize environmental impacts the offshore alternatives 2 and 3 would eliminate these losses and would protect the economy of Port Aransas and the safety and well-being of its citizens.	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.

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
99	5	PC	Concerned that little attention was given to Port Aransas history or current economy. Expresses concerns about the local nature-based tourism economy and the impacts the project would have on those.	<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. Impacts associated with marine resources are addressed in Section 4.2.2.2 and Appendix E (EFH Assessment). EFH consultation with NMFS was initiated with the release of the DEIS. NMFS provided EFH Conservation Recommendations to the USACE in an August 9, 2022 letter.</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.
99	6	PC	The USAC has failed to consider the impacts of the proposed project on the human safety. Large ships (VLCC) in the Aransas Pass Ship Channel are of concern. Strong waves have swamped fishing boats and that area is a home base for a large number of fishing guides and their boats, head boats, sight seeing and nature tourism boats, Jetty Boat, and ferry. All need access to the channel, increasing the potential for serious accidents as more and more very large tankers are berthed in the channel. The seemingly benign process of turning and docking these super large ships might create hour’s long congestion or even closing of the channel.	<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>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
99	7	PC	Increased storm surge with the deepening of the channel is also a serious safety concern. Modeling shows that the 80 ft. depth would increase the tidal surge in the channel and flooding in Port Aransas in the face of a storm path like Hurricane Harvey in 2017. The Port of CC should include these safety hazards as negatives in their evaluation of alternatives.	<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>
99	8	PC	There are no docking facilities at Harbor Island and the EIS incorrectly includes docking facilities for filling VLCCs without including them in the current EIS. At the very least his needs to be included in the Cumulative Impacts section where it is mentioned but not analyzed or discussed.	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 there inclusion in the cumulative effects analysis but not in the permit’s scope of analysis.	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.
100	1	NGO	<p><i>Commenter provides detailed information to explain their concerns. See comment letter for additional details.</i></p> <p>The Corps has improperly segmented evaluation of the Port’s Channel Deepening Project from consideration of the Port’s Terminal Project, and the Axis Project. These project should not be considered separate for purposes of development of an EIS.</p> <p>The Applicant’s ultimate goal is to provide the infrastructure for fully loading VLCCs with crude oil at Harbor Island which can only be accomplished if all three Projects are approved. There is a close relationship between the entities involved in the Channel Deepening Project, the Harbor Island Terminal, and the Axis Project.</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-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 there 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.

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
100	2	NGO	<p>Public Interest Review is inadequate:</p> <p>The Corps’ public interest review is inadequate, and does not comply with the standards set forth in 33 CFR §320.4. The Corps has not met these requirements considering(to name only a few amongst many issues) the Corps failure to perform an independent review of the need for the project, the Corps’ failure to fully consider greenhouse gas emissions, the Corps’ failure to evaluate impacts of the Project upon safety and maritime traffic, and the Corps’ failure to adequately consider impacts of the project upon salinity.</p> <p>The Corps’ regulations require denial of applications for permits under Sections 10 and 404 if it determines that issuance “would be contrary to the public interest.”</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 safety was found to be negligible, see Section 4.4.2 in the FEIS.</p> <p>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>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>
100	3	NGO	<p>Public Interest Review is inadequate:</p> <p>These factors encompass the impacts of greenhouse gasses. The Corps attempts to dodge a consideration of greenhouse gas emissions with the claim that the global extraction, transportation, and consumption of crude oil is outside of the USACE's Scope of Analysis. But, a consideration of the impact of an increased production of such gasses is not beyond the Corps’ jurisdiction in this matter. In fact, exclusion of a consideration of such impacts is inconsistent with the applicable regulations, which require the Corps to consider the reasonably foreseeable impacts of the proposed activity and its intended use.4 The dredging is intended to allow the greater production and shipping of oil. Emissions from the consequent increased production of oil are reasonably foreseeable impacts of the Project. The Corps is violating its own regulations in refusing to consider such impacts.</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 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>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
100	4	NGO	<p>Public Interest Review is inadequate:</p> <p>The Draft EIS also fails to adequately address impacts of the Project upon navigation. In order to be economically feasible, the Port will need to constantly be loading VLCCs. Contrary to the Corps assumptions, the project will increase the volume of vessel traffic in the area. The safety solution proposed by the Corps of limiting the channel to one-way traffic when VLCCs are filling effectively limits the Corpus Christi Ship Channel to one way traffic permanently. Recent events should apprise the Corps of the dangers of simply dismissing navigational hazards. There have been prior occurrences in this area where large vessels lost power, and it was only by sheer luck that multiple vehicles did not collide. The Corps should exercise a heightened concern for navigational safety, rather than simply dismissing such concerns as to be addressed by someone else.</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 safety was found to be negligible, see Section 4.4.2 in the FEIS.</p> <p>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>
100	5	NGO	<p>Public Interest Review is inadequate:</p> <p>The increased traffic will cause increased siltation of the shoreline, as a result of the significant sediment re-suspended and deposited upon the shoreline as the result of this increased traffic.</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.</p> <p>The beach nourishment and nearshore berm component is proposed for Mustang Island and the privately owned and undeveloped San José Island. 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>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>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
100	6	NGO	<p>Public Interest Review is inadequate:</p> <p>The Corps’ has also failed to adequately address the impact of desalination facilities associated with the Project.</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>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>
100	7	NGO	<p>Public Interest Review is inadequate:</p> <p>The frequency and duration of maintenance dredging have not been adequately addressed. Such maintenance dredging will be needed, and will result in ongoing impacts upon the quality of life of the community that are not addressed in the FEIS.</p>	<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

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
100	8	NGO	<p>Dredged material placement and failure to require LEDPA. The Federal guidelines for disposal of dredged material are clear. Yet, by the Applicant’s own admission, there is a practical alternative that would “require virtually no dredging” and therefore, would have less adverse impact on the aquatic ecosystem. EPA has raised similar concerns and concerns regarding the BU analysis.</p> <p>Alternative 1: Channel Deepening, is not the LEDPA. The USACE should have identified this in the FEIS, and refused to issue a permit for the option that is not the LEDPA.</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 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.</p>
101	1	NGO	<p>Requests an extension of the comment period.</p>	<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>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
101	2	NGO	<p>There are MAJOR FLAWS with the Fugro (2019) geotechnical data used in the FEIS that misrepresented the grain size soil borings analysis testing results. Failure to properly evaluate the soil borings data will result in higher clay and silt content, resulting in greater suspended solids and turbidity than documented in the FEIS. Placement of dredge spoils would have greater impacts on seagrasses, wetlands, and the fish and wildlife these habitats support. As demonstrated below, the evidence becomes clear that Fugro had not followed the USACE Unified Soil Classification System (USACE Classifications) Appendix A guidelines but had in fact, distorted the grain size analysis as being larger than the USACE Classification allows.</p> <p>What is important here is that Furgo’s data conclusively shows that silts and clay will be highest percentage of material throughout the dredging spoil deposits. The Fugro report fails the basic sediment classification and brings into questions other studies and models.</p> <p><i>Commenter provides very detailed information and figures explaining the flaws, see comment letter for additional information.</i></p>	<p>The sampling team conducted their work using the standard level of care and diligence normally practiced by recognized engineering firms who perform similar services under similar circumstances. The testing standards are clearly disclosed in the report as are the sampling methods.</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 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>
101	3	NGO	<p>The particulate matter (PM) air borne from the dredge spoil islands across from Ingleside on the Bay covers homes, cars and boats. Have these been tested and where are the results? Now that it has been established that dredge spoil grain size would be smaller, then the threat of Particulate Matter 2.5 must be included in the FEIS as it pertains to health impacts.</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>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
101	4	NGO	This FEIS “Purpose” as proposed by the applicant is based on short-term goals, misaligned with climate change and the health and welfare of people living in the region. Corps’s response to this question is simply “to assume that an applicant has made the appropriate economic evaluations and the proposal is economically viable.” Assumptions based upon short-term projections are dangerous for the populations that are nearby.	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.	<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>
101	5	NGO	Please consider the increase in ship traffic at Cheniere’s LNG facility, the second largest exporter in North America. Consider that Enbridge Oil Terminal and Buckeye, the two largest oil exporters in North America, the Port of Corpus Christi is the 3rd largest oil exporter in the WORLD, all traverse a pinch point located Port Aransas. What is the probability of collisions and the risks to residents in Port Aransas, Ingleside, Aransas Pass, Ingleside on the Bay, Portland and Gregory? What is the blast zone radius of an LNG tanker exploding? What is the evironmental impact of oil spills? (Flint Hills has had 2 spills at Ingleside within one year. How can the channel deepening purpose be justified as threats to residents, recreational boaters, commercial shrimp and fishing and the ecosystem if a catastrophe occurs?	<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>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
101	6	NGO	4.5 Navigation – Port Aransas is the gateway to the Gulf of Mexico as well as inland lagoonal waters behind the barrier Padre Island. The convergence of CCSC, Lydia Ann Channel, Conn Brown Channel plus the Intracoastal Canal, La Quinta and numerous small and large vessel harbors throughout the Coastal Bend. The FEIS should include the increase in hazards from the increase in vessel traffic in all forms not just commercial vessel traffic. The hazards should include dredging operations, barge and Port Aransas ferry traffic in determining the threat to boaters as well as oil spills from collisions.	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>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>
101	7	NGO	Commenter provides multiple examples of navigation issues that have occurred in the area. What is the probability of vessel collisions and oil spills with this project? How is the damage assessment modeled in terms of environmental and property losses to residents? What spill control measures are in place now and if the deepening occurs? What is the risk of collision now that the ship channel is deepened to 54’ from 47’? What assurances can the USACE give to small boaters that navigate around Harbor Island if the permit is allowed? What about ferry traffic delays and loss of tourist revenues? How will the Cheniere LNG tankers reported increase to 480 vessels per year affect navigational risks including this deepening project?	<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>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
101	8	NGO	Global temperatures in 2023 were unprecedented surpassing prior records by large margins. Graphs above clearly show the dramatic temperature increase with predictions of higher temperatures resulting from greenhouse gas emissions. The FEIS should include a climate predictive model for the next 10, 20, and 50 years to determine what impact another oil terminal would have on the Gulf Coast.	The Corps does not have federal control and responsibility over greenhouse gas emmissions resulting from operations at the Port of Corpus Christi.	<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>
101	9	NGO	<p>Section 4.1.3.2 Relative Sea Level Change - The FEIS has not upgraded the new worldwide data of sea level rise given the high global temperatures. This is a MAJOR FLAW for the CDP in the FEIS as it neglects to consider erosion, increased tidal velocities, tidal fluctuations and amplitudes. Here are a few articles that USACE should review and incorporate into the FEIS. This incredible 2022 sea level analysis was quickly overshadowed by NASA’s 2023 sea level jump. USACE's sea level data from the DEIS (Below) already underestimated sea level rise!</p> <p>What plans does the USACE have for the Coastal Bend communities long term protection from RSLC since the USACE ignores climate change damaging effects with the FEIS? Where are the models that include the 54’ deepening of the ship channel for tides, storm surge and erosion? How will storm surge impact communities if the channel is deepened to 78’?</p>	<p>The DEIS and the FEIS included several studies using the best available information at the time they were published in 2022. These studies are specific to the location of the project and include a comparison of the future with project ('78) and the future without the project ('54). The four alternatives' impacts on Relative Sea Level Changes are discussed in Section 4.1.3.2 of the DEIS and FEIS.</p> <p>The Corps does not have federal control and responsibility over RSLC.</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>
101	10	NGO	Would opt for Alternative #2 offshore single point mooring.	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.	Thank you for your comment.

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
102	1	PC	Please consider adding the entirety of Nueces County Gulf facing beaches to the BUDM placement and feeder berm location list in the draft ESI for permit SWG201900067. There is documented need and no other viable sand sources for beaches under Nueces County jurisdiction. <i>Commenter provides information to support this recommendation, see comment letter.</i>	Thank you for your comment.	Thank you for your comment.
103	1	NGO	Does not support the project due to the negative impacts it may have on numerous resources.	Thank you for your comment.	Thank you for your comment.
103	2	NGO	RE: Dredged material placement for beach nourishment. Standards and procedures will only be as good as the actual practices followed by the workers when removing and depositing the spoils. The Final EIS acknowledges the possibility that clay may be placed incorrectly in Appendix C2 where it states, "However, if large deposits of unsuitable material are placed during dredging, such as clay deposits, they will be mechanically removed and placed in a traditional DMPA." To avoid such a scenario, testing must be done in real-time ahead of the dredge to identify any clay lenses what should be diverted to "a traditional DMPA" and quality checks must be done periodically while dredging and transferring all materials to be used in beach nourishment or placed in nearshore berms.	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.	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. 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. 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

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
103	3	NGO	<p>In regard to the proposed 2,000,000 cubic yards of sand to be placed on Mustang Island for beach nourishment and the 3,850,000 cubic yards to be placed at beneficial use sites B7, B8 and B9 offshore, this sand and any sand generated during maintenance of a deeper channel would provide more benefit if placed south of the southern limit proposed in the EIS, extending along the full extent of the Nueces County Gulf facing beaches. Also, care must be taken during the placement of sand at beneficial use sites B7, B8 and B9 to ensure that the tallest sections of the berms will not exceed -18 feet elevation, so as to avoid drag on swells that generate surfing waves and impacts to the nearshore sandbar system that shapes those waves.</p>	<p>Thank you for your comment.</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>
104	1	PC	<p>Concerned about the significant increase in salinity of 3.5 to 5.5 ppt in areas through the jetty area (even through the average salinity increase is 1 ppt) and how that increase in salinity would impact marine species transport (eggs, larval, juveniles) in those areas.</p> <p>Commenter states the FEIS does not address larval transport and recruitment or address what we know about high salinity and abrupt changes in salinity on larvae, especially Redfish and blue crab. Larvae from the Gulf of Mexico will be in lower salinity and face an abrupt change that will either cause acute mortality or latent mortality. Damage to Essential Fish Habitat (EFH) will also add to decreased successful recruitment.</p> <p><i>Commenter attached studies and testimony regarding impacts of salinity increases to larvae.</i></p>	<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). 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>The impacts to larval transport of estuarine dependent species are discussed in Section 4.2.2.2.2 in the FEIS. 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 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>

NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
104	2	PC	Appendix I and other appendices also fail to address dissolved oxygen (DO) levels in the above-named locations. It may or may not be a problem, but it’s not discussed. Higher salinity can cause decreased levels of DO. Decreased dissolved oxygen will impact both larvae and other marine life. There is no question this issue must be investigated.	<p>Hypoxic conditions are addressed in Section 4.1.4.2.2 of the FEIS. Dredging may cause some mixing of bottom water and porewater with low oxygen and oxygenated water higher in the water column, resulting in lowered oxygen concentrations. Possible episodes of lowered DO concentrations would be localized, temporary, and expected to return to pre-dredging conditions within a day after dredging and dredged placement activities have ceased (Van de Velde et al., 2018).</p> <p>Oso Bay was the only TCEQ segment in the project area that is impaired for dissolved oxygen in water.</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>
104	3	PC	Beneficial use placement areas will not be mitigating anything, especially since existing habitats (seagrass beds, mudflats, etc) will be destroyed in order to create new habitat. In fact, not enough mitigation is being required for the areas to be destroyed.	Thank you for your comment.	<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 ridge, both of which are critical habitats for FSA listed species.</p>

FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
104	4	PC	BU placement locations M1 and SS2 are within Port Aransas city limit (as is most of the project). There is no agreement or permission from the City of Port Aransas for BU placement on the beach or at Charlie’s Pasture Preserve. The citizens are not going to allow that clay and silt crap to be placed at these locations. It’s just not compatible material.	The beach nourishment component is proposed for Mustang Island and the privately owned and undeveloped San José Island. Beach nourishment can result in a wider and higher beach that can provide storm protection, create new habitat, and enhance beach recreation. Section 3.2.2.2 of the FEIS documents that although the rate of retreat along these beaches has slowed or reversed in some areas, there is a net loss since 1930. There is no history of previous beach nourishment activities on this section of Mustang Island or San José Island. 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 sampling activities conducted was provided to USACE for review and concurrence on</p>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
104	5	PC	Restrictions must be required for dredging during certain times of the year to avoid direct impacts to larval transport and recruitment as well as impacts to turtle nesting periods.	<p>Consultation for federally listed treat need 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 utilized to benefit the restoration of the shoreline eroded and washed-out by hurricanes.</p>
104	6	PC	There is no doubt the Port of Corpus Christi terminal application, swg-2019-00245, and Axis Midstream’s application, swg-2018-00789 are interconnected and this CDP only serves one private entity customer. Corps is not following its own guidelines of what constitutes a “single and complete project”. Without the one or the other application, this is a dredge to nowhere. In several appendices, these applications are mentioned and with the proposed terminals shown. You can’t have it both ways, and those proposed applications must be considered in the EIS in order for the CPD to be considered a “complete” project.	As currently proposed, the CDP will provide access to multiple locations on Harbor Island. While these facilities are not currently constructed, two DA permit applications have been submitted for the construction of two terminals on Harbor Island with –54 feet MLLW basins; matching the current federally authorized channel depth. If the CDP is authorized, it is reasonable to foresee that any authorized facilities at Harbor Island, whether constructed or not, would request modification of their permit to dredge to the CDP depths. However, if the CDP is not authorized and/or constructed, the proposed Harbor Island facilities would continue to meet their stated purpose and need at the currently authorized depths of –54-feet MLLW. Therefore, the 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 there 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.
104	7	PC	Multiple lead agencies have repeatedly stated the Alternative for the offshore single-point mooring system is the LEDPA. That is the alternative picked by NOAA NMFS, US Department of Interior, USFWS and TPWD. USACE is required to use LEDPA over the applicant’s preferred alternative.	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.

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

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>	<p>The CDP permit application is not included in the WRDA 214 agreement.</p>	<p>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.</p>
104	9	PC	<p>Demand the USACE deny the permit or pick the LEDPA.</p>	<p>Thank you for your comment.</p>	<p>Thank you for your comment.</p>
105	1	NGO	<p>Requests an extension of the comment period.</p>	<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>
105	2	NGO	<p>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.</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 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.</p>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
105	3	NGO	The newly-supplied mitigation plan is wholly inadequate.	Thank you for your comment.	<p>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.</p> <p>PCCA’s Permittee Responsible CMP was coordinated, reviewed, and approved by the USACE.</p>
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.	<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	5	NGO	<p>States that the scope of the FEIS should extend to existing oil (and planned ammonia) terminals at La Quinta Junction.</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>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
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. he 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>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
105	9	NGO	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>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	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>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>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
105	11	NGO	<p>Public Interest Review: Wetlands - detrimental</p> <p>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 and backbeach, both immediately adjacent to habitats for ESA listed species.</p>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
105	12	NGO	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>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	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>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>

FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
105	14	NGO	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>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	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-maneuver 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>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>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
105	16	NGO	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.	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.	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.
105	17	NGO	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!	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.	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.
105	18	NGO	Public Interest Review: Coastal Zones - detrimental I have serious doubts that a proper assessment of coastal zone factors was done.	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.	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.

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
105	19	NGO	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.	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>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 sampling activities conducted was provided to USACE for review and concurrence on</p>
105	20	NGO	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.”	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>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>

FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
105	21	NGO	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.	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>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	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. <i>Comment continues on next row.</i>	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>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>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
105	22	NGO	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 terinal.” 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.	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.	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. Compared to the No-Action Alternative, the proposed project would eliminate the need for reverse lightering traffic and thereby: <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 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.
105	23	NGO	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.	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. 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.

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
105	24	NGO	<p>Public Interest Review: Economics - detrimental</p> <p>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> <p>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”</p> <p>2) Seek massive local tax abatements through the schools and governmental entities (like Chapter 403, Chapter 312, and Industrial District Agreements)</p> <p>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</p> <p>4) Easily obtain TCEQ permits to pollute the air and water of surrounding communities even more</p> <p>5) Significantly exacerbate global warming, making it</p> <p>6) Hire just a handful of local people.</p> <p>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> <p><i>Comment continues on next row.</i></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.	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.
105	24	NGO	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.	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>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>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
105	25	NGO	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.	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>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	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?	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>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

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
105	27	NGO	<p>Public Interest Review: Flood Hazards - detrimental</p> <p>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 the inundation extent, expected maximum elevation gain is 3.5 inches. The area of most</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</p> <p>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>

FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
105	29	NGO	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 Anaylsis, 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>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	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 power ⁶ and a ship colliding with the Moda (now Enbridge) dock in 2021 after losing propulsion ⁷ ; 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>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>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
105	31	NGO	<p>Public Interest Review: In General, Needs and Welfare of the People - detrimental</p> <p>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-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.</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-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.</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>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
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 4.2.2.2.2 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>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
106	6	NGO	The Draft EIS identiified 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.	<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>
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 prodiving the additional information.

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
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 open disposal of dredge material from the Channel Deepening Project. Open disposal has</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>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
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>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
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.	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.	Thank you for your comment.
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

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
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 March 4, 2024, USEPA issued a 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>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
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 sampling activities conducted was provided to USACE for review and concurrence on</p>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
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>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
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 utilized to benefit the PCCA to restore the shoreline washed-out and erosion caused by hurricanes.</p>
108	13	NGO	Purpose is for one company, Axis Midstream. Unsubstantiated claim that lightering needed at Harbor Island.	<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. 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>	<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>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
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 and beach ridges, both in addition to the habitats for ESA listed species.</p>

FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
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>	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.
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.	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 sampling activities conducted was provided to USACE for review and concurrence on</p>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
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 utilized to fill the SS1 area to the existing ground surface elevation of the area.</p>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
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.	<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>
109	7	PC	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>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
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 backbeach, both immediately valuable habitats for FSA listed species.</p>
110	1	PC	Does not support the project.	Thank you for your comment.	Thank you for your comment.

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
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.

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
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 there 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>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
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 shoe 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>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
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>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
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.

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
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 thrird 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>Dredged material proposed for ocean disposal is evaluated and tested to ensure that the material will not adversely affect human health and the marine environment. Evaluation of dredged material for ocean disposal under the MPRSA relies on standardized testing using biological organisms (bioassays). Under section 103 of the MPRSA, any proposed dumping of dredged material into ocean waters must be evaluated through use of EPA’s ocean dumping criteria (40 CFR 220-229). The Ocean Testing Manual (OTM), a national testing manual for the evaluation of dredged material proposed for ocean dumping, provides guidance for sampling, testing, and analysis of water, sediment, and tissue to evaluate the environmental acceptability of dredged material proposed for ocean disposal. In addition to the OTM, the USACE and EPA have cooperatively prepared the Reginal Implementation Agreement, or RIA, to adapt the national procedures of the OTM to regional situations to ensure compliance with MPRSA.</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>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
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 thrird 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 or 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>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
111	11	PC	Commenter is concerned about the quality of the sediment being dredged and its impacts. States the updated samping did not include Harbor Island and should be done by a thrird 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.	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>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
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>	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 sampling activities conducted was provided to USACE for review and concurrence on</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>	Thank you for your comment.	Thank you for your comment.
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>	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>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>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
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.	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>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
112	6	PC	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>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	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.	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>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>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
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.	<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>
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.	<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>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
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 habitat.</p>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
113	2	PC	Concerned about the acres of open water/bottom habitat that would be directly impacted.	Thank you for your comment.	<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>
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	<p>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.</p> <p>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.</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.

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
114	2	PC	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>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 utilized beneficially at SS2 to restore the shoreline washed out and erosion caused by hurricanes.</p>
114	3	PC	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.	Thank you for your comment.	Thank you for your comment.

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
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 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</p>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
114	5	PC	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.	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.	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.
114	6	PC	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.	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. The Corps will condition the permit to comply with the January 13, 2023 BCO.	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. 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. 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: <ul style="list-style-type: none">• 2.0 Proposed Action and Alternatives• 3.0 Affected Environment• 4.0 Environmental Consequences• 5.0 Cumulative Impacts

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
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 Magnum-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>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
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.	<p>In accordance with the Magnum-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>
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.	<p>In accordance with the Magnum-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>
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.	<p>In accordance with the Magnum-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>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
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 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>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 utilized for beneficial use to restore the shoreline washed-out areas caused by hurricanes.</p>

FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
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>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
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>

FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
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 behaviorial 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 Magnum-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>
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 Salinty 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>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
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 Reginal 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>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
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 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 or 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>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
121	1	PC	Commenter does not want dirty dredged material in Aransas County destroying the land and waterways.	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>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
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 Reginal 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>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
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>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 or 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>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
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.

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
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 concurrence on November 27, 2023. On May 14, 2024, USEPA issued a concurrence letter.</p>
122	Entity Acronyms: PC 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.

STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
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.

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
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 and beach dune habitat.</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: FEDA- 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 Port of Corpus Christi Bend has put strains on all communities.	Thank you for your comment.	Thank you for your comment.

NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
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 Reginal 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>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
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 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 or 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>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
124	1	PC	Commenter is concerned that the project will dump contaminated dredge spoil in Aransas County waters.	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>
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.

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
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 Reginal 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>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
127	2	PC	Concerned the dredged material is toxic.	<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 or 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>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
127	2	PC	Concerned the dredged material is toxic.	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>
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>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
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.	<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>
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.	<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>
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.

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
128	5	PC	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>Dredged material proposed for ocean disposal is evaluated and tested to ensure that the material will not adversely affect human health and the marine environment. Evaluation of dredged material for ocean disposal under the MPRSA relies on standardized testing using biological organisms (bioassays). Under section 103 of the MPRSA, any proposed dumping of dredged material into ocean waters must be evaluated through use of EPA's ocean dumping criteria (40 CFR 220-229). The Ocean Testing Manual (OTM), a national testing manual for the evaluation of dredged material proposed for ocean dumping, provides guidance for sampling, testing, and analysis of water, sediment, and tissue to evaluate the environmental acceptability of dredged material proposed for ocean disposal. In addition to the OTM, the USACE and EPA have cooperatively prepared the Reginal Implementation Agreement, or RIA, to adapt the national procedures of the OTM to regional situations to ensure compliance with MPRSA.</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 sampling activities conducted was provided to USACE for review and concurrence on</p>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
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 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 or 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 sampling activities conducted was provided to USACE for review and concurrence on</p>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
128	5	PC	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.	Appendix C provides information on placement of dredged materials, locations, modeling, and monitoring plans. Appendix J provides information on sediment testing.	<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 sampling activities conducted was provided to USACE for review and concurrence on</p>
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

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
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 there 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 info1mation 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.

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
131	1	PC	Concerned about placing contaminated dredged spoil into waters of Aransas Bays and Aransas County.	<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 Reginal 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>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
131	1	PC	<p>Concerned about placing contaminated dredged spoil into waters of Aransas Bays and Aransas County.</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 or 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>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
131	1	PC	Concerned about placing contaminated dredged spoil into waters of Aransas Bays and Aransas County.	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>
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.
134	1	PC	Does not support the project.	Thank you for your comment.	Thank you for your comment.
135	1	PC	Does not support the project.	Thank you for your comment.	Thank you for your comment.
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	<i>Commenter provides numerous direct quotes from the FEIS, at times it is difficult to draw specific comments. See letter for more information.</i> Does not support the project.	Thank you for your comment.	Thank you for your comment.

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
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.	<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>
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.	<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>
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.

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
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.

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
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>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
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 backbeach, both immediately adjacent to habitats for ESA listed species.</p>
142	1	PC	Does not support the project.	Thank you for your comment.	Thank you for your comment.

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
142	2	PC	Concerned about the dredged material being used for placement and that it may be contaminated and impact the fishery, tourism, wildlife, economy.	<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 Reginal 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>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
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>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 or 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>

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
142	2	PC	Concerned about the dredged material being used for placement and that it may be contaminated and impact the fishery, tourism, wildlife, economy.	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>
142	3	PC	Make it a requirment 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>
	Entity Acronyms:				
	FED - Federal Agency				
	STATE - State Agency				

NGO - Non-governmental organization
PC - Public Commentor

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response

Entity Acronyms:
FED - Federal Agency
STATE - State Agency
NGO - Non-governmental organization
PC - Public Commentor