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CONSERVATION & PROTECTION OF MARINE LIFE

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September 5, 2019

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Regulatory Division, CESWG-RD-R
U.S. Army Corps of Engineers
5151 Flynn Parkway, Suite 306
Corpus Christi, TX 78411-4318
361-814-5847 Phone
SWG201800789@usace.army.mil

Re: SWG-2018-00789

Dear Sir or Madam:

The Texas Chapter of the Coastal Conservation Association (CCA Texas) submits the following comments regarding permit application SWG-2018-00789, Axis Midstream Holdings, LLC - GIWW, Redfish Bay and Corpus Christi Ship Channel - Taft to Port Aransas - San Patricio and Nueces Counties, Texas.

CCA Texas is a non-profit organization of 72,000 recreational anglers and outdoor enthusiasts. The mission of CCA Texas is to advise and educate the public on conservation of marine resources. The objective of CCA Texas is to conserve, promote and enhance the present and future availability of those coastal resources for the benefit and enjoyment of the general public.

The applicant (Axis Midstream) proposes to construct a series of facilities and pipelines to store, transport, and load crude oil into vessels at Harbor Island. A portion of the project will transect Redfish Bay State Scientific Area (RBSSA) with the installation of a pipeline bundle consisting of two 42-inch pipelines, one 12-inch pipeline, one 6-inch pipeline and one 2-inch fiberoptic line.

While Axis Midstream proposes to install 4,250 feet of pipeline bundle across the RBSSA by using Horizontal Directional Drilling (HDD) technology, the remaining installation (across RBSSA) will require a 75-foot-wide open trench with temporary stockpiles of material placed on the adjacent bay bottom. An estimated 16.6 acres of seagrass, tidal flats, and other shallow-water aquatic resources would be directly affected by this activity.

Per Texas Parks and Wildlife Department¹, the RBSSA contains the northernmost extensive stands of seagrass on the Texas coast. This includes 14,000 acres of submerged seagrass beds with all five species of seagrass found in Texas. Seagrasses play essential roles in the estuary, providing nursery habitat for fishes, organic biomass for food webs, and processing agents for nutrient cycling. The RBSSA is a component of both the Aransas and Corpus Christi ecosystems and has about 50 square miles of prime fishing habitat. It contains a unique and fragile environment of not only seagrass beds but also oyster reefs, marshes, and mangroves while providing a feeding habitat for shrimp, crabs, gamefish, waterfowl, shorebirds and turtles.

Additionally, the project location is also important to the local economy from revenues generated from recreational fishing trips. 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 systems²³. 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.

As stated on page 12 of the public notice, the U.S. Army Corps of Engineers (ACOE) has initially determined that the proposed action would have an adverse impact on Essential Fish Habitat or federally managed fisheries in the Gulf of Mexico. CCA Texas is also concerned that the proposed activities will have adverse impacts on the region's habitat and therefore requests that, in addition to fulfilling requirements under the Magnuson-Stevens Fishery Conservation and Management Act, the ACOE require the applicant to conduct an Environmental Impact Statement (EIS). We also request public hearings prior to and upon completion of the EIS to obtain information regarding potential fishery and habitat impacts.

¹ https://tpwd.texas.gov/publications/pwdpubs/media/pwd_br_v3400_1101.pdf

²Ropicki, A., D. Hanselka, and R. Dudensing, The Economic Impacts of Recreational Fishing in the Aransas Bay System, Texas A&M Agrilife Extension and Sea Grant Texas at Texas A&M University (Nov. 16, 2016).

³ Ropicki, A., D. Hanselka, and R. Dudensing, The Economic Impacts of Recreational Fishing in the Corpus Christi Bay System, Texas A&M Agrilife Extension and Sea Grant Texas at Texas A&M University (Nov. 16, 2016).

In conclusion, CCA Texas is concerned about fish and aquatic habitat resources in this environmentally and economically sensitive region of the Texas Coast. We would like to see that impacts to these resources are minimized to the greatest extent possible. The information available on the ACOE SWG-2018-00789 public notice is limited. With that in mind, CCA Texas respectfully requests that Axis Midstream reconsider its analysis and find alternate routes that utilize increased incorporation of HDD in conjunction with an existing right of way adjacent to Highway 361. CCA Texas appreciates the opportunity to provide comment on this permit application and we look forward to continued analysis of alternatives that minimize impacts to aquatic resources in the region.

Sincerely,

A handwritten signature in black ink, appearing to read 'Robby Byers', with a long, sweeping horizontal stroke extending to the right.

Robby Byers
Executive Director
CCA Texas

cc: Gaylord Chase, Chairman of CCA Texas Governmental Relations Committee
(gaylord.chase@sunbeltsecurities.com)