

To whom it may concern:

The Permit for dredging the 80-foot channel at Aransas Pass in the Corpus Christ Ship Channel should be denied. It's not even close. There are a broad set of circumstances that support that finding including the following:

1. This Permit is linked to the Port of Corpus Permit to build an Oil Export facility on Harbor Island with Lone Star Ports. It's also linked to Axis Midstream Oil Export Facility on Harbor and their Pipeline permit across Redfish Bay. There are other proposed Industrial Permits including TCEQ brine discharge Permit that adds to the complex of actions that have to be all linked into one large EIS as it has cumulative impacts for the entire Coastal Bend Region. Ecological function of Redfish Bay State Scientific Area will be impacted by these cumulative and related Permits thus the need to combine into one EIS. Any EIS will have alternative and this Permit certainly underperform other alternatives. A EIS will have to include the entire Aransas Bay system where the 54 foot did not.
2. The hydrology of the Corpus Christ, Red Fish and Aransas Bays will all be altered to the detriment of the life cycles, habitats, and function of the plants and animals the depend on their natural function. This pass is the only major pass for 100 miles and the communication of waters and the quality of these water between the Bays and Gulf will harm fish, endangered species, shrimp, crab, and the entire recreation based economy of Port Aransas and surrounding communities.
3. Harm to Whooping Crane expanding critical habitat will be extensive. You affect their food source in surrounding bays and estuaries like Blue Crab then you take the species. Impacts here will cause harm to Aransas National Wildlife Refuge, Matagorda Island and St Joe Island as well as other estuaries critical for the survival of this species. There are other Endangered species that will also be impacted.
4. The term "Beneficial Use of Spoil" is not appropriate. It will damage seagrasses, oysters, fishery, and beaches. Beneficial Use is a term robbed from Conservation Interest and applied into an industrialization of natural areas. The USACE and the Port cannot possibly improve natural ecological systems, they only know how to degrade them.
5. Offshore is a much better solution. Once you dig 80 feet it will be a never ending maintenance expense while offshore your done once pipeline is installed and you have very little damage with inshore environment.
6. Existing inshore development at Ingleside plus the proposed Offshore projects like P66 will take up all of the forecasted oil export capacity over the next 30 years. There is no need to dig this and build Harbor Island Oil Export.
7. Bigger ships create bigger displacement impacts in the channel and cause additional damage to shoreline. It also creates a larger volume of water during storm surge that would add to extensive flooding in the region. Why create your own problem especially within the City Limits of Port Aransas and its parks are preserves.
8. Deepening creates vulnerability to Hurricane impacts. This location is ground zero for Cat 4 and larger storms.
9. Bringing bigger ships inshore is an accident waiting to happen. Oil Spill threat to estuaries. Existing Oil Export facilities at Ingleside are fine with using smaller ships or even half filled VLCC's and Lightering Offshore. Only need is the one being created by POCC which is developing a direct competition to its own existing customers. There is no public benefit, it's a private benefit to a public entity at the expense of an entire coast ecosystem and economy. Not only no but it's crazy and self-serving.

10. Port Aransas is a recreation-based economy. It's not industrial. Fishing, tourism, nature, beach, small town amenities is what drives the economy in Port A. This Permit industrializes and change forever the economic drivers for the benefit of a few companies and the Port.
11. Approval of this Permit will lead to Litigation that will last for years that waste time and energy for all involved. There is no rational reason to deepen the channel and build its related projects especially based on a Oil and Gas industry that is evolving right in front of our eyes. This is not a forward thinking plan, but a doomed folly.
12. A Video Public Meeting is no substitute for a in-person public meeting. This in no way accomplished public input. There is no urgency. The POCC does not have and will not receive the funds to finish its existing 54-foot dredge. There is no rush here other than the Port ceasing on its bully tactics and pushing its agenda on local communities. If a core value was Integrity Beyond Approach the Port would gladly delay until we can meet in person. Delay this until we can meet in person and have Proper Public input.

Thanks

James King