

# The Facts

about the

**Matagorda Ship Channel Improvement Project**

**--Do it Right to Protect the Bay--**



March 28, 2024 v5.2

Lavaca Bay Foundation

Matagorda Bay Foundation

San Antonio Bay Partnership

Texas Conservation Alliance

**Stand Up for the Bay!**

**Add your name here!**

# Summary

The proposed Matagorda Ship Channel Improvement Project (MSCIP) may bring an economic boost to Calhoun and surrounding counties. However, it must also be recognized that there will be an impact on the health and productivity of our Bays and the economic benefits that they currently provide. We advocate for a responsible implementation plan that takes all reasonable steps to mitigate the environmental risks. The plan proposed in 2019 did not, and it is appropriately stalled. While we are hopeful that the USACE's Supplemental Environmental Impact Statement currently in progress will address our concerns with a more environmentally sensitive design, we must be prepared as citizens of the Bay to actively advocate for responsible implementation of this significant project.

Our concerns include:

1. Placement of dredge materials: open bay disposal has adverse environmental impacts, yet it is central to the proposed plan for the MSCIP despite USACE's own guidelines to reduce its use. Placement of spoil west of the channel risks the nurseries from Chocolate Bay to Port O'Connor.

Deepening and widening of the Houston Ship Channel was accomplished while confining the spoil. Doing so protects oysters and seagrasses from siltation and reduces maintenance costs of the channel. Matagorda Bay deserves the same design. There are multiple opportunities to use the spoil for 'beneficial use', e.g. protecting eroding shorelines and creating bird rookeries.

2. Disbursement of mercury contamination from the Alcoa Superfund Site: The implementation plan must include a thorough review of all available data, identifying and filling gaps, and ensuring that all contaminated materials are appropriately handled. The public deserves a comprehensive and transparent process.
3. The status of the Ship Channel Jetty and implications to Pass Cavallo: The USACE acknowledges deficiencies of the Jetty, but states that the deepening of the MSC can proceed without the needed remedies. Since the MSC was dredged and jettied, Pass Cavallo has sanded, now carrying a fraction of its former flow. Additional impacts should also be anticipated. Its closure will increase currents through the jetties, increase transit risks, and add environmental risks to the extensive marsh complex immediately west of the Pass. The SEIS must address this issue as part of the project.
4. Our bays are a significant driver of the local economy, both commercially and recreationally. Protecting these activities is essential to the long-term economic health of the region.

A recent assessment of the health of the Matagorda and San Antonio Bay systems by the Harte Research Institute determined both bays 'Vulnerable', indicating negative influences from human and natural pressures. If done poorly, this project will be a significant step in the wrong direction.

Public comments to the USACE by responsible agencies state similar concerns. We know what can be done to address each of these issues. **We insist that the project be done right!**

The attached report provides additional details regarding our concerns.

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## I. Environmental Impacts from Dredge Spoils from the proposed Project

(extracted from *Evaluation of the Proposal for Widening and Deepening the Matagorda Ship Channel*, by Dr. Paul Montagna, TAMU CC, Harte Research Institute - Sept 2021)

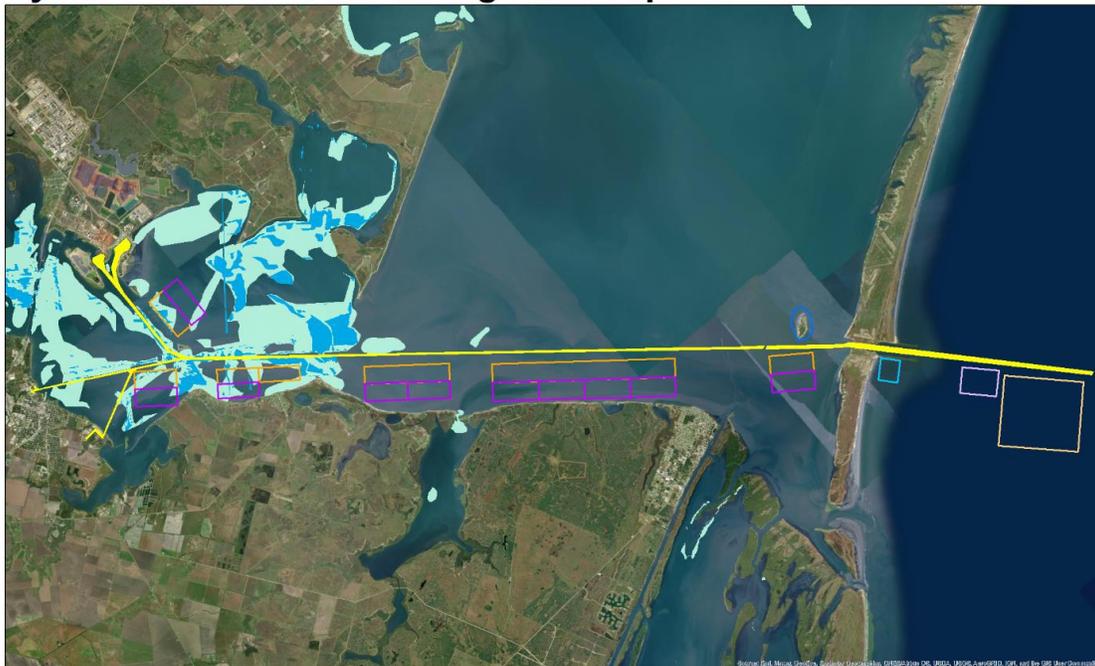
<https://www.hartheresearch.org/project/evaluation-proposal-widening-and-deepening-matagorda-ship-channel>

“There are concerns specific to Matagorda Bay and Lavaca Bay that there could be the following potential environmental changes: Placement of dredge spoil could smother benthic habitats, such as oysters, seagrasses, or muddy bay bottoms. This would affect forage potential for desirable fish species.”

Spoil placement and construction areas overlap with known habitats such that “839 acres of oyster reef” and “1,107 acres of seagrass” may potentially be affected by operations. “

From the Harte report:

### Oyster Reefs Near the Matagorda Ship Channel

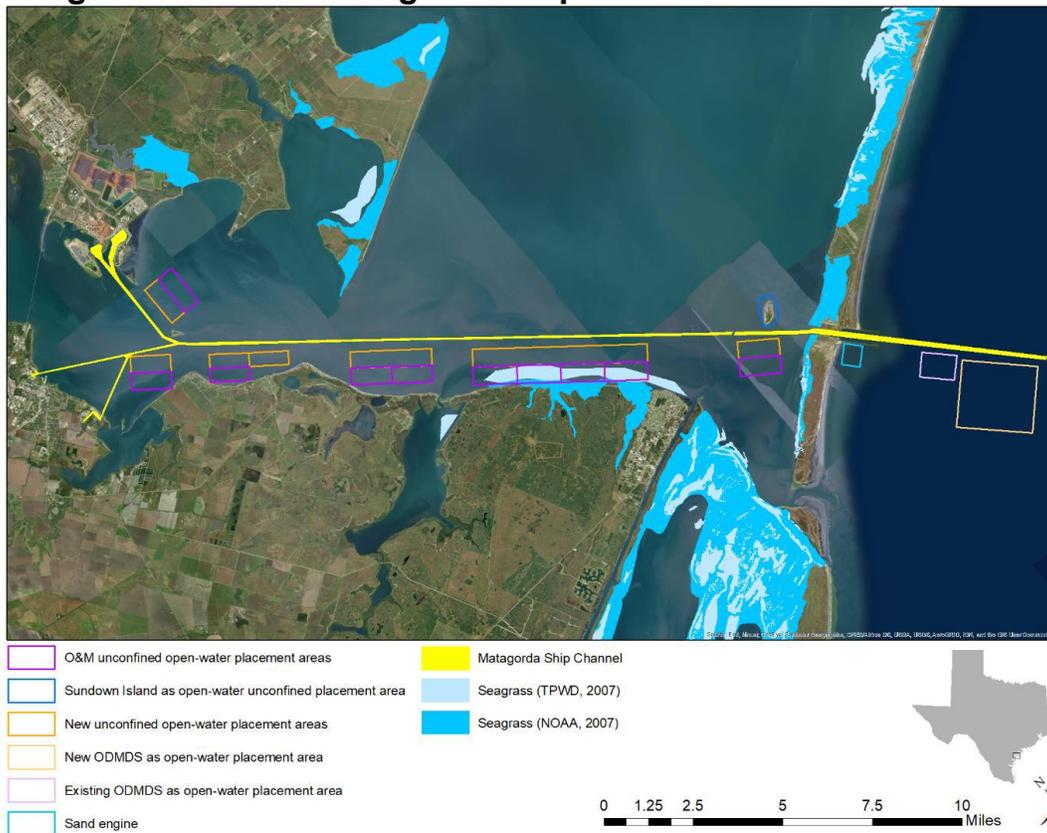


- O&M unconfined open-water placement areas
- Sundown Island as open-water unconfined placement area
- New unconfined open-water placement areas
- New ODMDS as open-water placement area
- Existing ODMDS as open-water placement area
- Sand engine
- Matagorda Ship Channel
- Oyster reefs (TGLO, 2004)
- Oyster reefs (TPWD, 2004)

0 1.25 2.5 5 7.5 10 Miles



## Seagrass Near the Matagorda Ship Channel



“Ways to mitigate the effects of dredge operations include careful pre-and post- construction environmental studies, a means to control turbidity, dredging during periods of low benthic populations, and thoughtful disposal of spoil. “

### According to USACE Guidelines:

[https://www.swg.usace.army.mil/Portals/26/docs/regulatory/Construction\\_Guidelines/disposal.pdf](https://www.swg.usace.army.mil/Portals/26/docs/regulatory/Construction_Guidelines/disposal.pdf)

“Disposal of dredged material can adversely affect wetlands and water quality if disposal sites are not properly sited and managed.

Implementing the following guidelines should minimize adverse impacts associated with most dredged material disposal activities.

- Uncontaminated dredged material should be viewed as a potentially reusable resource and beneficial uses of these materials are encouraged. Materials that are suitable for beach nourishment, marsh construction or other beneficial purposes should be utilized for these purposes.
- If disposal sites must be located near wetlands, they should be confined with levees and stabilized to eliminate possible wind or water erosion or encroachment onto those wetlands.
- If no beneficial uses are identified, dredged material should be placed in contained upland sites. The capacity of these disposal areas should be used to the fullest extent possible. “

“The US Army Corps of Engineers routinely creates value from dredged sediments through beneficial uses such as beach nourishment, enhancing wetland habitat, and brownfield reconstruction. Using dredged sediment beneficially is an important component of USACE’s dredged material management strategy, significantly reducing disposal requirements. With interest in beneficial use of dredged sediments at an all-time high, the timing is ripe to increase beneficial use.” <https://www.usace.army.mil/Missions/Civil-Works/Beneficial-Use-Program/>



In August 2018 USACE hired Battelle to conduct an external independent peer review of its 2018 Feasibility Report and Environmental Impact Statement. The review identified several areas of concern:

- **Engineering Design:** the review panel believed that the channel side walls are too steep for the submerged soils and that it will not be possible to maintain the slope as engineered.
- **Environmental:** The majority of the Panel’s concerns were identified during the environmental review of the 2018 FR/EIS. Of greatest concern is that the base plan for the 2018 FR/EIS appears to disregard the findings of analyses conducted for the 2014 FR/EIS without clearly explaining why the 2009 and 2014 analyses were not carried forward. Issues identified include the possibility that dredged material proposed for open-water disposal may have been deemed acceptable for such disposal based solely on a reliance on 2011 data. The conclusions that there are no concerns about environmental impacts and that dredged sediment is acceptable for open-water disposal are **not** supported.

The 2019 plan did appear to address these issues. It is our hope the Supplemental EIS will address them in a transparent manner.

The full independent Battelle is available at:

<https://usace.contentdm.oclc.org/digital/collection/p16021coll7/id/7737>



## II. Beneficial Use of Dredged Materials

An important goal of managing dredged material is to ensure that the material is used or disposed of in an environmentally sound manner. Most of this dredged material could be used in a beneficial manner instead, such as for nourishment of beaches and shorelines with clean sand or development of wetland habitats or bird rookeries.

Ecosystem restoration is recognized as one of the primary missions of USACE under its planning guidance (USACE 2000), and the placement or disposal option that is selected for a project should maximize the sum of net economic development and national environmental restoration benefits.

The General Land Office's *2023 Texas Coastal Resiliency Master Plan* identifies a number of projects that would benefit from dredged materials (<https://glo.texas.gov/coast/coastal-management/coastal-resiliency/resources/files/2023-tcrmp-book.pdf>):

- Port Lavaca's Harbor of Refuge Protection and Restoration (#9250) would address erosion of the former landfill that is exposing trash and contaminants to Lavaca Bay. This project should be considered an emergency to halt active contamination from the landfill.
- Boggy Nature Park Shoreline Stabilization (#9237) would protect about 3500' of eroding shoreline at Boggy Nature Park in Port O'Connor. Engineering design for the project is in progress by the GLO.
- Sand Point Peninsula Shoreline (#9245) is at a tipping point. Its breach will significantly impact Keller Bay.

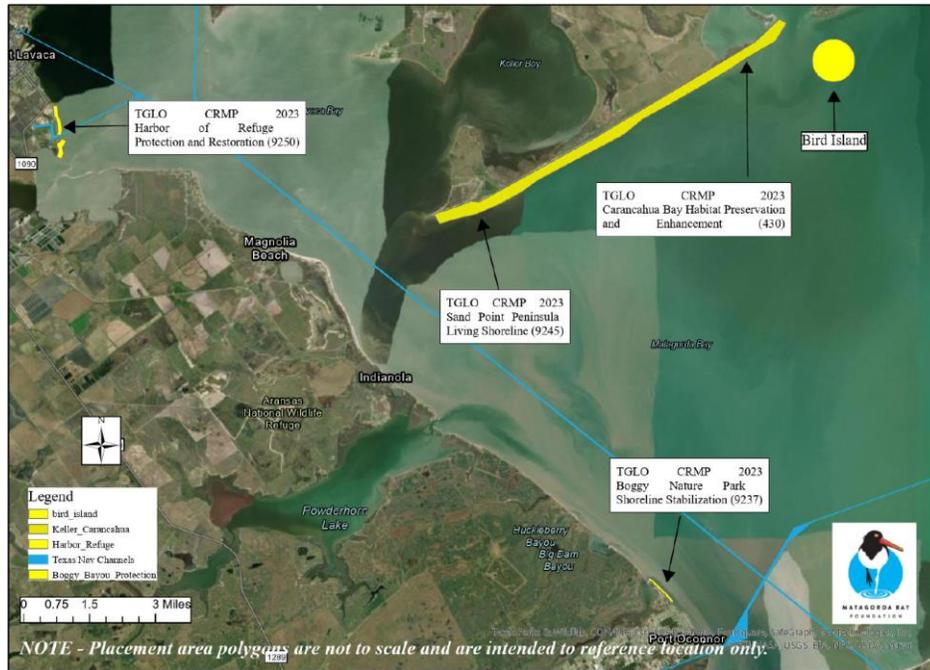
Additionally, the GLO is currently studying how to address eroding shoreline at Powderhorn Lake and along the shoreline of the Powderhorn State Park and WMA. Beneficial use can play an important role.

Also, Audubon has proposed containing and enlarging the essential Chester Island Rookery and the creation of additional rookeries along the Channel.

The 2007 EIS identify several inland disposal sites, including the current Joslin disposal site near the turning basin that is currently causing environmental harm due to lack of containment. Confine it and use it to contain spoil!

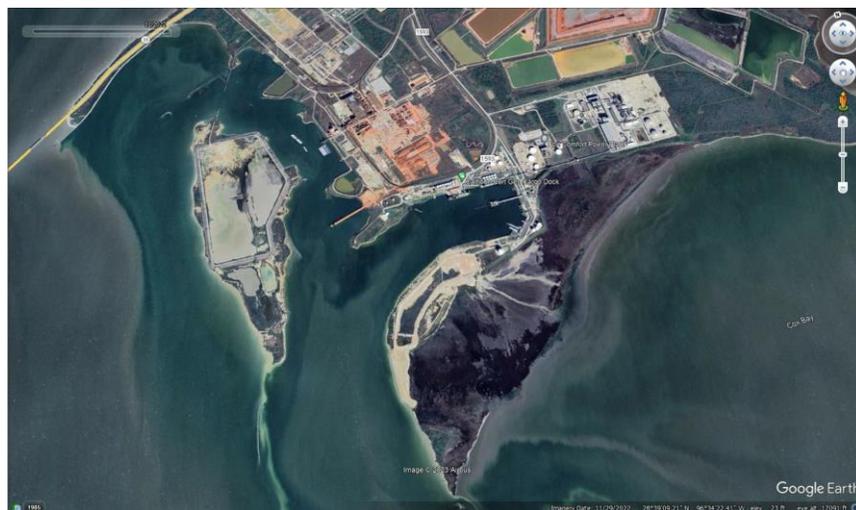
The USACE should include in its implementation plan a thorough evaluation of all these options to eliminate open bay disposal. The 2007 EIS for a proposed LNG plant did just that. The 2019 implementation plan does not.

# Port of Calhoun and Beneficial use sites



## E.S. Joslin Area 2022

Needs Confinement



### III. Disbursement Mercury Contamination

(extracted from *Evaluation of the Proposal for Widening and Deepening the Matagorda Ship Channel*, by Dr. Paul Montagna, TAMU CC, Harte Research Institute - Sept 2021)

“The Aluminum Company of America (ALCOA) released wastewater, containing mercury, into Lavaca Bay from 1966 to 1979. Human exposure to different forms of mercury can affect areas of the brain, kidneys, gut lining, and can be distributed to other organs throughout the entire body. In the estuarine and marine environment, mercury can be biomagnified in food webs making fish dangerous to eat, and human exposure is often due to consumption of contaminated fish. This mercury contaminated area is within the proposed dredging project area.

Mercury concentration assessments in bay sediments have not been conducted recently, and the last sampling collection was conducted in 2002. A new assessment should be conducted to accurately assess the current location and concentration of the mercury in Lavaca Bay. A review, summary, and model of the distribution of mercury in sediments demonstrates the highest concentrations around the dredge spoil island, within the area that is now closed (Figure 11a). Bissett also predicted mercury concentrations in oyster tissues, and they are high, i.e., > 1 µg/g, throughout Lavaca Bay (Figure 11b). The concentration of mercury in sediments is highest at a sediment depth between 10 – 30 cm (4-12”).

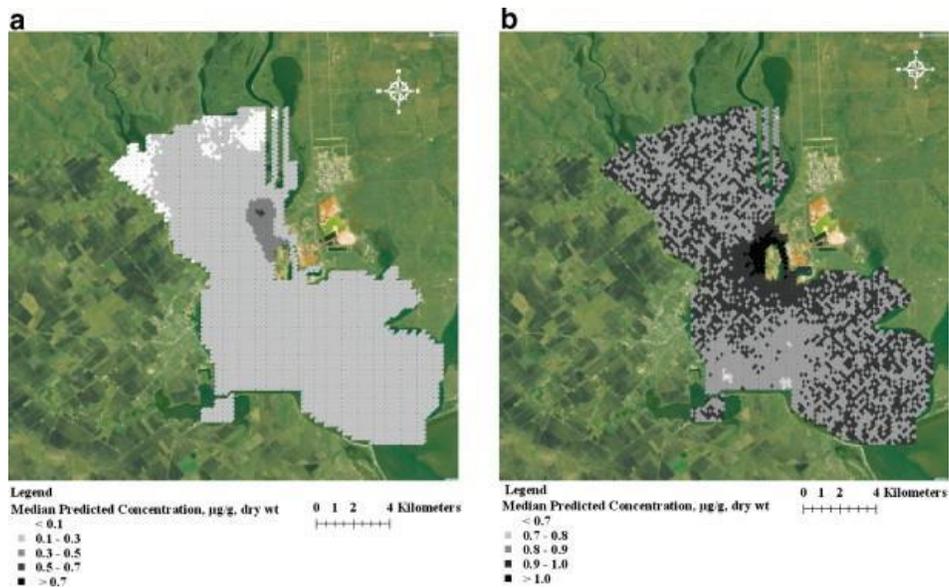


Figure 11. Predicted mercury concentrations in Lavaca Bay (a) sediments and (b) oysters (Bissett et al. 2008).

“Lavaca Bay is a **Superfund** site with an area closed to fishing (Figure 14). The elevated mercury concentrations in the water column and sediments can cause mercury and other heavy metals to be ingested or absorbed via bioaccumulation by smaller organisms and biomagnified up the trophic levels when they are fed upon by larger fish.”



Figure 14. Alcoa, Point Comfort, Lavaca Bay Superfund Site (EPA 2021). Blue lines are ship channels. Red lines is boundary of former Alcoa plant and area of water closed to fishing.

Biomagnification of mercury is concentrated up the trophic levels with the mass consumed by each level (Capuzzo 1987). One particular fish of human interest is red drum, a popular sport fish, that have been found to contain around twice the level of Hg that is safe for human consumption. Mercury concentrations in red drum tissues have been slowly declining since 1997 (Figure 15). The most recent sampling in 2020 has measured the lowest concentrations of Hg in fish tissue to date.

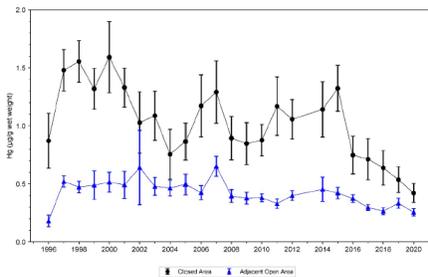


Figure 15. Average mercury concentration in red drum tissue found in Lavaca Bay (EPA 2021). Red drum collected from the open area of Lavaca Bay (blue) and closed area (green).

The conclusions by Bloom et al. (2004) are still valid: “In Lavaca Bay, because of high sedimentation rates and low remixing, the highest levels of Hg are buried 10–30 cm below the surface. Combined with previous observations of strong mercury methylation after dredging activities, this argues for leaving Hg-contaminated sediment in place, to be buried by the deposition of cleaner sediments.”

**The takeaways regarding mercury contamination:**

1. Mercury contamination is extensive and can be exacerbated by this project if done poorly.
2. Mercury is a human health concern. Trends in mercury contamination of red drum are trending in the right direction. This trend must be maintained.
3. The implementation plan must include a thorough review of all available survey data, identifying and filling in gaps in the data.
4. The implementation must ensure that all contaminated materials are appropriately disposed.
5. The public deserves a comprehensive and transparent process of this key human health concern.

#### IV. Pass Cavallo

(excerpts from *Morphologic Examination of the Stability of Pass Cavallo, Texas*; Nicholas C. Kraus Coastal and Hydraulics Laboratory U.S. Army Engineer Research and Development Center, 2008

[https://www.researchgate.net/publication/235095441\\_Morphologic\\_Examination\\_of\\_the\\_Stability\\_of\\_Pass\\_Cavallo\\_Texas](https://www.researchgate.net/publication/235095441_Morphologic_Examination_of_the_Stability_of_Pass_Cavallo_Texas))

“Pass Cavallo has experienced a reduction in cross-sectional area and width since the Matagorda Ship Channel deep-draft entrance was cut through Matagorda Peninsula to a more central and hydrodynamically efficient position in the bay. Both environmental and engineering concerns are associated with the possible closure of Pass Cavallo.

The purpose of the 2008 study was to investigate if Pass Cavallo would remain open or gradually close. Subject to the uncertainties that enter all coastal sediment processes studies, it is concluded that Pass Cavallo will remain open at its present cross-sectional channel area or undergo a moderate increase in channel area based on the following evidence:

1. It benefits from the wind tide produced by weather fronts from the north.
2. An extensive photographic record indicates that the width of Pass Cavallo has been nearly constant since about 1990. The inlet reached a minimum width of 600 m in 1995 and has been slowly increasing in width since then, up to the last available photograph, taken in September 2007.
3. The channel gorge’s maximum depth at Pass Cavallo is presently 9 m, a substantial depth consistent with depths found historically (1856–1965). Such a depth would allow the inlet to sustain episodic sediment inputs as might be associated with a hurricane.
4. Widening and deepening of the MSC entrance will not notably change the stability of Pass Cavallo, because the additional capture of the tidal prism by the ship channel will be small relative to the present value of tidal prism for Pass Cavallo and in comparison to past reductions in prism there.”

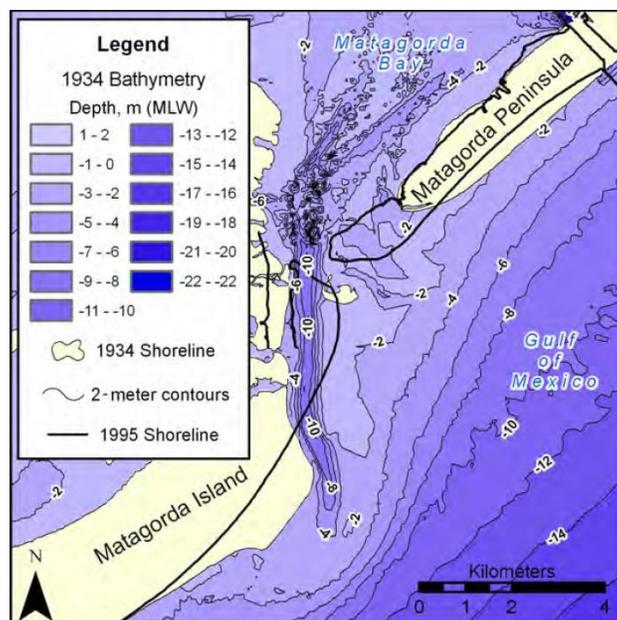


Figure 6. Pass Cavallo channel and ebb shoal in 1934.

The Pass is a shadow of its historic self. LaSalle would be unable to enter Matagorda Bay. The USACE should update this study. Anyone familiar with the Pass of 1960's and that visits it now would conclude based on those observations that it is closing. Note the significant increase in sand in the bay north of the pass in the most recent photo. Similar trends are associated with other natural passes competing with man-made jettied channels.



Of concern is the impact of the significant marsh complex (Fish Pond & Mules Slough) to the west of the Pass. Gulf larvae will have much further to travel to this nursery.

Also, closure of the Pass will further increase current at the Ship Channel and exacerbate current and Jetty issues.

## V. Jetty Deficiency

The USACE has issued a draft report entitled *Matagorda Ship Channel Project Deficiency Study*, 2006

The report recommends removing the existing rock dike on both sides of the channel and reusing the stone to construct a new 2,800-foot dike on the west bank and 3,800-foot dike on the east bank of the Matagorda Ship Channel. The bottleneck between the jetties would be removed, and dredging would be performed using a hydraulic cutterhead dredge to a depth of 40 feet MLLW.

The report states that the proposed action would provide for more efficient movement of vessels transporting commodities through the MSC .

The unsigned draft can be seen on this link:

<https://www.swg.usace.army.mil/Portals/26/Public%20Review/NewFolder/MSC%20Deficiency%20FONSI.pdf?ver=2018-08-29-124152-507>

“This study was performed to understand the hydrodynamics of the existing condition and evaluate alternatives for stabilizing the jetties to reduce the current velocity, thereby reducing the scour and improving navigation reliability. The interaction between the entrance and Pass Cavallo, the natural inlet to Matagorda Bay located southwest of the Matagorda Ship Channel entrance, was also examined in a regional approach. The study proceeded by review of the engineering and scientific literature, analysis of regional and local trends in the shoreline change at the entrance and at Pass Cavallo, field measurements of the water level and current, bathymetry surveys, and hydrodynamic numerical modeling of tidal circulation, including wind forcing and river discharges to the bay. Alternative configurations of the jetties were investigated with the hydrodynamic model. A frequency-of-occurrence methodology based on the current velocity magnitude was introduced to evaluate the alternatives. Possible changes in salinity were also investigated.”

The USACE should finalize its report, make the report viewable to the public, and establish a plan to remedy the jetty issues as part of the MSCIP.

## VI. Current Health of the Bay

In 2023, the Harte Research Institute conducted an assessment of the ecosystem health of Texas bays. <https://www.harterresearch.org/news/2023-texas-ecosystem-health-report-cards>

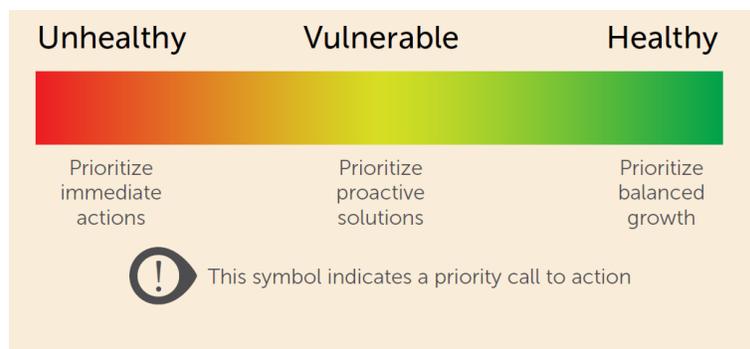
The 2023 Texas Coast Ecosystem Health Report Cards utilize data on a broad suite of indicators such as water quantity and quality, bacteria, habitats, fisheries and oysters, birds, and coastal economies to determine how healthy our coastal waters are. This science-based effort provides a snapshot of the current condition of a given area and highlights missing information that is critical to decision making, providing local leaders with an opportunity to advocate for additional resources to fill data gaps.

Findings show that Texas' coastal fisheries and the economies they support are remarkably healthy despite pronounced human population growth and natural stressors. However, some parts of the Texas coast are displaying vulnerabilities that include symptoms of deteriorating water quality (such as in Baffin Bay), loss of critical habitat (such as seagrass beds, wetlands and rookery/spoil islands), and population declines of iconic wildlife species such as flounder, oysters and colonial waterbirds. These vulnerabilities are related to factors including human population growth in coastal watersheds without adequate pollution or erosion controls, impacts from unsustainable harvesting, changing water temperatures, and erosion from natural weather events and sea level rise, among other factors.

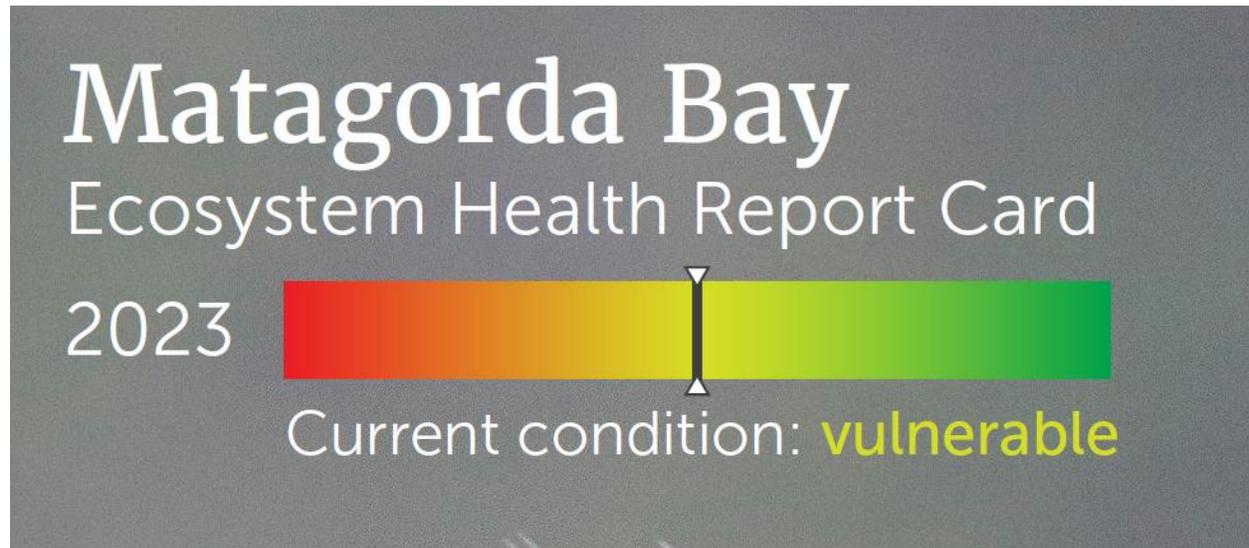
“Findings from the Report Cards can help resource managers and communities prioritize conservation and restoration actions and achieve balanced growth with healthy ecosystems that support our vibrant coastal communities,” said Dr. Amie West, Assistant Research Scientist at HRI.

This Report Card uses local, state, and national datasets alongside stakeholder input to evaluate how current conditions compare to long-term trends. This is meant to give a high-level summary of the health of bay ecosystems to inform management decisions for the Texas coast.

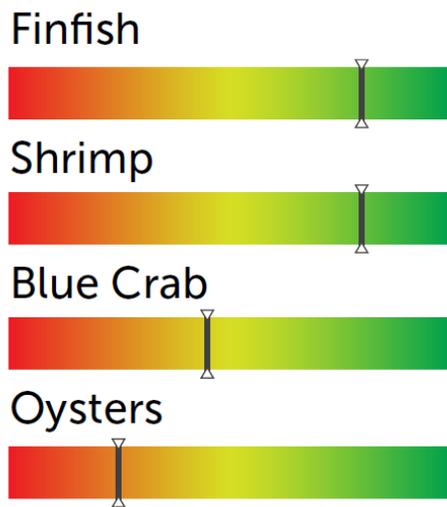
A *healthy* score represents a well-balanced system that supports current uses. A *vulnerable* score indicates that negative influences from human and natural pressures are being observed. An *unhealthy* score means that measured values are outside the range of what is expected in a balanced, healthy system.



The following is a summary of the assessment of Matagorda Bay:



“Redfish, Atlantic Croaker, and Spotted Seatrout populations are sufficient to support Matagorda Bay’s vibrant fishing industry. Shrimp are still within acceptable ranges, but populations should be closely monitored to ensure continued sustainability. Southern Flounder, oyster, and Blue Crab populations are in decline.



This assessment offers a clear warning. The health of Matagorda Bay is at risk. Many familiar with the Bay will argue that the assessment understates the deterioration. The MSCIP must be implemented in an environmentally sensitive manner to avoid continued degradation.

Additionally, we must ensure that post implementation, monitoring programs are in-place so that unanticipated consequences can be mitigated.

## VII. Current Economic Benefits of a Healthy Bay in Matagorda & Calhoun Counties

The economic evaluation included in the 2018 EIS does not mention the potential negative impacts on current commercial fisheries or to recreational tourism, especially if implemented poorly.

Further, the independent review by Battelle commented that the studies quantifying the potential benefits of the project were not adequate: “Plan Formulation / Economics: First, the Panel believes that a multiport analysis to analyze additional ports as a network of competing ports on the Texas Gulf Coast is warranted. Second, an analysis of the risk and uncertainty associated with the benefits accruing from new crude oil and condensate activity was not performed. Without such an analysis, the magnitude of the National Economic Development (NED) benefits could be either over- or understated.”

A healthy bay has a positive impact on the local economy.

According to TPWD

([https://tpwd.texas.gov/landwater/land/programs/tourism/economic\\_benefits/index.phtml](https://tpwd.texas.gov/landwater/land/programs/tourism/economic_benefits/index.phtml)) “The total economic effect from 2001 fish and wildlife-related recreation in Texas was estimated by Southwick Associates to be \$10.9 billion. In other words, if hunters, anglers, and wildlife watchers stopped spending money in Texas and did not spend these dollars on other items in state, the Texas economy would shrink by \$10.9 billion. Of this total, sport fishing accounted for \$4.6 billion, with \$3.6 billion and \$2.7 billion from hunting and wildlife watching, respectively.”

Part of the economic impact is the number of jobs supported by the activity, including those that serve recreationists directly such as retailers and restaurants, and those who support them including wholesalers, utilities, manufacturers, and grocers. Statewide, total jobs in 2001 from these activities were estimated at 96,700, with 41,300, 31,700, and 23,700 from hunting, fishing and wildlife watching, respectively.

These activities generate tax revenue which impacts the local and state economy. According to the Southwick report, state sales tax generated from 2001 fish and wildlife-related recreation in Texas was estimated at \$298 million. Wildlife watchers accounted for \$80.3 million of the total, while anglers and hunters generated \$124.8 million and \$93.0 million, respectively.

According to the TPWD publication, tourism is the third largest industry in Texas, and nature-based tourism is one of the fastest growing segments of this industry. Studies of economic benefits need to include all local activities that will be potentially affected by the ship channel project. Calhoun and Matagorda Counties are known for their commercial shrimping and oystering, recreational fishing, and bird-watching activities.

### **Economic Impacts of Recreational Fishing – 2016**

A study by Texas Sea Grant credit 432 jobs directly to recreational fishing in Matagorda Bay.

[https://repository.library.noaa.gov/view/noaa/43595/noaa\\_43595\\_DS1.pdf](https://repository.library.noaa.gov/view/noaa/43595/noaa_43595_DS1.pdf)

A study by Texas Seagrant credited 206 jobs directly related to recreational fishing in San Antonio Bay.

[https://repository.library.noaa.gov/view/noaa/43596/noaa\\_43596\\_DS1.pdf](https://repository.library.noaa.gov/view/noaa/43596/noaa_43596_DS1.pdf)

As any fisherman will tell you, the bays are much busier today!

## VIII. Project Funding

From Victoria Advocate - Jul 14, 2021 Updated Sep 12, 2022

“The Calhoun Port Authority entered into a binding agreement with Max Midstream Texas on Wednesday for funding of the Matagorda Ship Channel expansion project.

The memorandum of understanding locks the oil and gas company in as the guarantor on bonds that will be issued for construction.

“Basically this has us covered in the event on the bonds being issued to where the Port is not on the hook,” said Port Director Charles Hausmann. “The Port is basically having Max guarantee those payments, but we will be working on other documents in the future to finalize the exact terms of the summary sheet.

The company said that investment would include [\\$225 million](#) for the ship channel expansion, which will enable the company to build out its oil exportation operation, which is already underway.

In addition to defining Max Midstream’s financial commitment to the project, the definitive agreement will detail the company’s access to lease of new docks at the port and the dock and wharf fees it will pay the port, according to the memorandum of understanding.

Max Midstream’s financial support of the project will be considered in negotiations of fees and lease access, according to the document. As part of the engineering and design of the ship channel, Max Midstream and the port will also negotiate terms for the company’s access to additional docks that are planned as part of the project.”

### **Additional public information about project funding is sketchy.**

- Typically, project funding for these this type would be 75% federal and 25% local (Port of Calhoun).
- It has been stated that Max Midstream will front funding for the full project, both the federal and local share.
- Max Midstream monies for the federal share would subsequently be repaid upon Congressional authorization.
- Details for Max Midstream’s arrangement with the Port are unavailable.
- Incremental costs for environmental protection upgrades beyond what is required by the USACE will be borne by the Port but then can be recovered via increased tariffs on Port users.
- The Bay should not bear in lost productivity the costs of the project – the users should.
- The Port Commissioners are elected by the community.

## IX. Conclusions

The proposed Matagorda Ship Channel Improvement Project may bring an economic boost to Calhoun and surrounding counties. However, it must also be recognized that there will be an impact on the health and productivity of our Bays and the economic benefits that they currently provide. We advocate for a responsible implementation plan that takes all reasonable steps to mitigate the environmental risks. The plan proposed in 2019 did not, and it is appropriately stalled. While we are hopeful that the USACE's Supplemental Environmental Impact Statement currently in progress will address our concerns with a more environmentally sensitive design, we must be prepared as citizens of the Bay to actively advocate for responsible implementation of this significant project.

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Deepening and widening of the Houston Ship Channel was accomplished while confining the spoil. Doing so protects oysters and seagrasses from siltation and reduces maintenance costs of the channel. Matagorda Bay deserves the same design. There are multiple opportunities to use the spoil for 'beneficial use', e.g. protecting eroding shorelines and creating bird rookeries.

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A recent assessment of the health of the Matagorda and San Antonio Bay systems by the Harte Research Institute determined both bays 'Vulnerable', indicating negative influences from human and natural pressures. If done poorly, this project will be a significant step in the wrong direction.

Public comments to the USACE by responsible agencies state similar concerns. We know what can be done to address each of these issues. **We insist that the project be done right!**

Additionally, it is recommended that the USACE utilize an Interagency Coordination Team. The ICT's purpose is to provide a source of review for all phases of a major civil works project impacting maritime infrastructure. It is intended to capture all areas of knowledge key to the project's impact

from design, during construction, and post-completion. It reports to the USACE. Successful application of this concept are the ICT's for the Houston Ship Channel deepening and widening, as well as the Laguna Madre portion of the Gulf Intracoastal Waterway. It should include a means for receiving input from local knowledge and some tool to insure accountability for response to the ICT concerns and comments.

We do not oppose the MSCIP project, but we do expect that it will reflect long-term environmentally sound measures that will not cause further harm to the coastal ecosystems, commercial navigation, or commercial/recreational fishing.

# Stand Up for the Bay!



# Now is the time!