

**MEMORANDUM TO:** Public File for the Corpus Christi Midscale Trains 8 & 9 Project under Docket No. CP23-129-000

**FROM:** U.S.C.G. – United States Coast Guard  
[Posted by John E. Bugno II, FERC staff]

**SUBJECT:** Letter of Recommendation on Corpus Christi Midscale Trains 8 & 9 Project  
Docket No. CP23-129-000

**DATE:** January 29, 2024  
[Letter dated January 25, 2024]

This document was provided to the Federal Energy Regulatory Commission via email from the Coast Guard on January 25, 2024.

**U.S. Department of  
Homeland Security****United States  
Coast Guard**Commander  
United States Coast Guard  
Sector Corpus ChristiValent Hall  
249 Glasson drive  
Corpus Christi, TX 78406  
Phone: (361) 939-020116611/SCC24-347  
January 25, 2024

Director of Gas Environment and Engineering, PJ 11  
Federal Energy Regulatory Commission  
888 First St NE  
Washington, DC 20426

Dear Sir or Madam:

This Letter of Recommendation (LOR) is issued pursuant to 33 CFR 127.009 in response to the Letter of Intent submitted by Lanier and Associates Consulting Engineers, Inc. on behalf of Corpus Christi Liquefaction, LLC on August 15, 2022, proposing to begin construction for the Corpus Christi Midscale Trains 8 & 9 Project at Corpus Christi Liquefaction, LLC in Ingleside, Texas. It conveys the Coast Guard's recommendation on the suitability of the Corpus Christi Ship Channel from the entrance approach at Port Aransas to the La Quinta Junction, and the entire length of the La Quinta Channel as it relates to safety and security due to the increase from 400 liquefied natural gas carriers (LNGCs) per annum from the initial three stages to a maximum of 480 after the Corpus Christi Midscale Trains 8 & 9 Project is completed. In addition to meeting the requirements of 33 CFR 127.009, this letter also fulfills the Coast Guard's commitment for providing information to your agency under the Interagency Agreement signed in February 2004.

After reviewing the information in the applicant's Letter of Intent and Follow-on Waterway Suitability Assessment (WSA) and completing an evaluation of the waterway in consultation with a variety of state and local port stakeholders, I recommend that the Corpus Christi Ship Channel from the entrance approach at Port Aransas to the La Quinta Junction, and the entire length of the La Quinta Channel be considered suitable for the additional liquefied natural gas (LNG) marine traffic that is anticipated as a result from the additional capacity of LNG. My recommendation is based on my review of the factors listed in 33 CFR 127.007 and 33 CFR 127.009. The reasons supporting my recommendation are outlined below.

On December 13, 2023, I completed a review of the Follow-on WSA for the Corpus Christi Liquefaction, LLC expansion project, submitted to the Coast Guard by Lanier and Associates Consulting Engineers, Inc. on February 9, 2023. This review was conducted following the guidance provided in U.S. Coast Guard Navigation and Vessel Inspection Circular 01-2011, dated January 24, 2011. In conducting this review and analysis, I focused on the navigational safety and maritime security aspects of LNGC transits along the affected waterway. My analysis included an assessment of the risks posed by these transits and validation of the risk management measures proposed by the applicant in the WSA. During the review, I consulted a variety of stakeholders including Port of Corpus Christi, local facility security representatives, the Aransas-Corpus Christi Pilots Association, and maritime stakeholders.

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Based upon a comprehensive review of the applicant's WSA and after consultation with state and local port stakeholders, I recommend that the Corpus Christi and La Quinta Ships Channels be considered suitable for accommodating the type and frequency of LNG marine traffic associated with this project.

The attached LOR Analysis contains a detailed summary of the WSA review process that has guided this recommendation. It documents the assumptions made during the analysis of the WSA submitted to the Coast Guard by Corpus Christi Liquefaction, LLC. It discusses details of potential vulnerabilities and operational safety and security measures that were analyzed during the review. The LOR Analysis sets forth the navigational safety and maritime security resource gaps that currently exist in, on, and adjacent to the waterway, including the marine transfer area of the proposed facility, and which, to the extent allowable under the Federal Energy Regulatory Commission's (FERC) existing legal authority, may be addressed in its Commission Order if one is issued. To the extent implementation of specific mitigation measures fall outside the scope of FERC's legal authority, the applicant is expected to examine the feasibility of implementing such mitigation measures, in consultation with the Coast Guard and state and local agencies as applicable.

This recommendation is provided to assist in the Commission's determination of whether the proposed facility should be authorized. This letter is not an enforceable order, permit, or authorization that allows any party, including the applicant, to operate a facility or a vessel on the affected waterway. Similarly, it does not impose any legally enforceable obligations on any party to undertake any future action be it on the waterway or at the proposed facility. It does not authorize, nor in any way restrict, the possible future transit of properly certificated vessels on the Corpus Christi or La Quinta Ship Channels. As with all issues related to waterway safety and security, I will assess each vessel transit on a case by case basis to identify what, if any, safety and security measures are necessary to safeguard the public health and welfare, critical marine infrastructure and key resources, the port, the marine environment, and vessels. In the event the facility begins operation and LNG vessel transits commence, if matters arise concerning the safety or security of any aspect of the proposed operation, a Captain of the Port Order could be issued pursuant to my authority under the Ports and Waterways Safety Act of 1972, as amended by the Port and Tanker Safety Act of 1978, 33 U.S.C. § 1221 – 1232, among other authorities, to address those matters.

If you have questions, my point of contact is LCDR Anthony Garofalo. He may be reached at 249 Glasson Drive Corpus Christi, TX 78406, (361) 939-5130 or at [anthony.m.garofalo@uscg.mil](mailto:anthony.m.garofalo@uscg.mil).

Sincerely,



M. A. CINTRON  
Captain, U.S. Coast Guard  
Captain of the Port Sector Corpus Christi, Acting

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Enclosure: (1) LOR Analysis, Public Release

Copy: Commander, Eighth Coast Guard District 8 (dpw), (dl)  
Commander, Coast Guard Atlantic Area (LANT-544)  
Commandant, U.S. Coast Guard (CG-5P), (CG-OES), (CG-MSR), (CG-FAC), (CG-741)  
Corpus Christi Liquefaction, LLC

UNITED STATES COAST GUARD

# Corpus Christi Liquefaction, LLC

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ANALYSIS SUPPORTING THE LETTER OF RECOMMENDATION ISSUED BY  
COTP SECTOR CORPUS CHRISTI ON JANUARY 25, 2024

1. This analysis is a supplement to my Letter of Recommendation (LOR) dated January 25, 2024 that conveys my recommendation on the suitability of the Corpus Christi and La Quinta Ship Channels for liquefied natural gas (LNG) marine traffic associated with the expansion of the Corpus Christi Liquefaction, LLC (CCL) export terminal project Ingleside, Texas. It documents the processes followed in analyzing CCL's Waterway Suitability Assessment (WSA) and the suitability of the waterway.

2. For the purposes of this analysis, the following assumptions were made:

- a. The applicant is fully capable of, and would fully implement, any and all risk management measures they identified in their WSA.
- b. The conditions of the port identified in the WSA fully and accurately describe the actual conditions of the port at the time of the WSA submission.
- c. The conditions of the port have not changed substantially during the analysis process.
- d. The applicant will fully meet all regulatory requirements including the development and submission of a Facility Security Plan, Emergency Manual, and Operations Manual.

3. The Port of Corpus Christi is the third-largest port in the United States in total tonnage. It provides quick access to the Gulf of Mexico and the entire United States inland waterway system. The Port of Corpus Christi offers access to overland transportation with on-site and direct connections to three Class I railroads and direct, vessel-to-rail discharge capabilities. The Corpus Christi and La Quinta Ship Channels are managed under the jurisdiction of the Port of Corpus Christi and has ranging depths between 45 and 54 feet. The current Corpus Christi Ship Channel improvement project is expected to be completed by mid-2025 and will increase the Corpus Christi Ship Channel depth to 54 feet. Work is completed from the Gulf of Mexico to the La Quinta Ship Channel intersection with depth to 54 feet. There are five turning basins within the Inner Harbor of the Corpus Christi Ship Channel and two turning basins within the La Quinta Ship Channel. The Corpus Christi Ship Channel stretches for 29 miles and the La Quinta Ship Channel stretches 6 miles north from the Corpus Christi Ship Channel. The primary import/export commodities handled by the ports include crude oil, liquified natural gas, fuel oil, gas oil, and feedstock. The Port of Corpus Christi is also a designated, strategic military deployment port.

The U.S. Coast Guard regulates the port under the Maritime Transportation Security Act (MTSA), Security and Accountability for Every Port Act (SAFE Port Act), Ports and Waterways Safety Act (PWSA) and other laws applicable to maritime safety and security. These facilities include oil refineries, chemical plants, oil terminals, grain terminals, and various facilities handling bulk cargos. The various industries that comprise this petroleum and chemical complex have pro-actively cooperated over the years to establish and maintain a robust mutual aid emergency response program as well as an integrated security and surveillance network, which includes five separate law enforcement agencies that are recognized throughout the country for their effectiveness.

Certain vessels entering or departing Texas ports require a pilot in accordance with Title 46 of the Code of Federal Regulations, part 15, Section 812 and Texas Transportation Code Chapter 61. The Aransas-Corpus Christi Pilots are state licensed Texas pilots responsible

for ensuring the safe transit of vessels transiting through the Port of Corpus Christi. They handle approximately 4,700 vessel transits through the Port of Corpus Christi each year. The Aransas-Corpus Christi Pilots are among the 150 members of the Texas State Pilots Association (TSPA), which includes the Matagorda Pilots, Aransas-Corpus Christi Pilots, Brazos Pilots, Galveston-Texas City Pilots, Houston Pilots, and Sabine Pilots.

Inbound and outbound traffic density in the Port of Corpus Christi include a variety of vessels sizes and classes which are projected to increase on average by approximately 1.5 LNG Carriers per week once the terminal and facility are operational with 2 additional liquefaction trains. The maximum anticipated port calls per year is expected to be around 480, an increase of 80 vessels from the first three phases. Other traffic transiting through the La Quinta Channel include offshore rigs, chemical carriers, ore carriers and a small number of tug/barges. The U.S. Coast Guard is responsible for screening LNG carriers transiting from flag states prior to arrival to the port.

The terminal is sited along the La Quinta Channel located in San Patricio County, Texas. All terminal facilities will be located within an approximately 1,500-acre parcel of land owned or controlled by Cheniere and situated along the northeast side of the Corpus Christi Bay. The property is roughly centered on the northern end of the La Quinta Channel. The center point of the terminal property has the approximate coordinates: Latitude 27°53' N and Longitude 97°16' W.

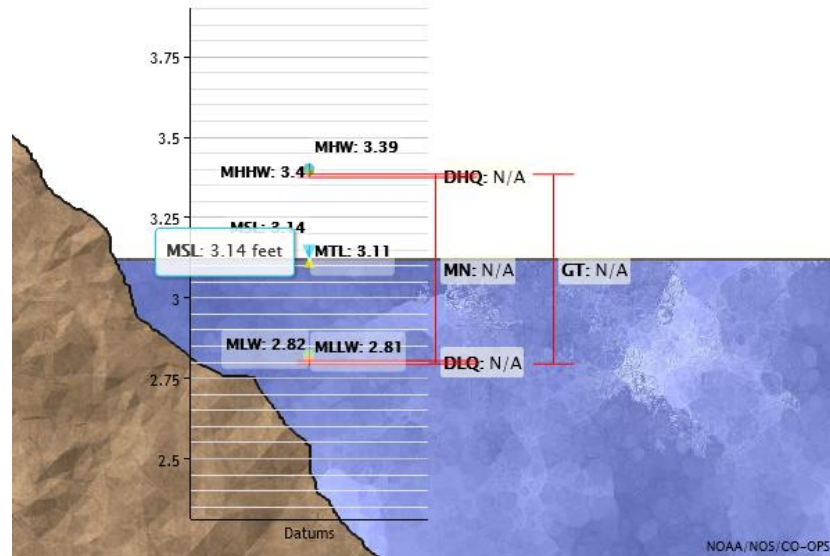


**Figure 1. Cheniere Conceptual Rendering of Facility**

**Factors Adjacent to the Facility:**

- a. **Depth of Water** – The La Quinta is currently maintained at a 45’ depth and up to 400’ wide, starting at the Corpus Christi Ship Channel junction and extending 5.9 miles north.
- b. **Tidal Range** - The normal tidal range along the ship channel is approximately outlined in Table 1 below.

**Table 1 Tidal Datums, Port Ingleside, TX NOAA Tide Station 8775283, 1983-2001 Tidal Epoch**



- c. **Protection from High Seas** – Protection from High Seas – The facility is located within the La Quinta Channel and therefore only exposed to high water as a result of a severe storm surge from a hurricane or tropical storm.
- d. **Natural Hazards** – There are no natural hazards in the La Quinta Channel.
- e. **Underwater Pipelines and Cables** - Based on current pipeline charts that are available, there are several active pipelines running across/underneath the channel in the vicinity of the LNG Carrier transit route or Terminal mooring operations. Due to the depths of the pipeline, this will have no effect on ship channel traffic.
- f. **Maximum Vessel Size by Dock** – The dock can accommodate a vessel with lengths of approximately 1,133 feet and with nominal cargo capacities up to 267,000 m<sup>3</sup>. The mooring assessment has also been performed to establish safety and environmental procedures to ensure safe mooring operations for LNG Carriers at each berth. The maximum size ship to call on the facility will be a Q-Max size ship.

Included in the assessment, was a plan to divide the LNG Carrier transit routes into five (5) inbound, one (1) loading at berth, and five (5) outbound segments. The total inbound transit from the sea buoy (pilot boarding area) to the terminal berth is approximately 18.4 miles and will take approximately 2 hours to berth. The route is reversed for outbound



LNG Carrier transits with the exception of the turning/maneuvering basin, which is bypassed. The route is shown below in Figure 2.

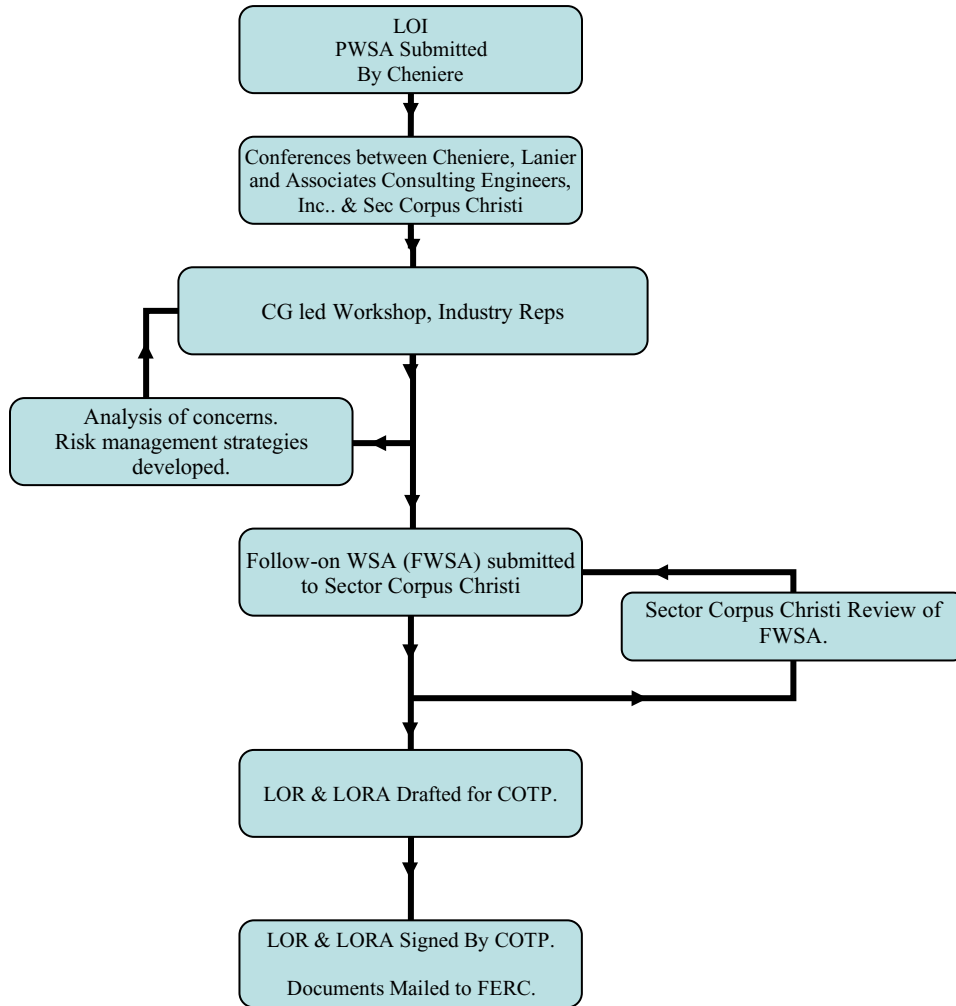


Figure 2. Overview of LNG Carrier Transit Route

The LNG vessels exporting cargo from the two proposed marine loading berths are expected to accommodate both membrane and spherical designed LNG vessels with cargo capacities up to 267,000 m<sup>3</sup>. The terminals will be built in accordance with applicable international and domestic design requirements giving due consideration to collision and grounding protection. Double bottom and double side protection are sized appropriately based on the hazard associated with the cargo being carried.

All factors regarding the condition of the waterway, vessel traffic, and facilities upon the waterway, were taken into consideration during the LOR process. The processes used are detailed in Section 4 of this analysis.

4. To ensure all regulatory processes were met, Sector Corpus Christi took a systematic approach in the decision-making process as outlined in Figure 3. To streamline and ensure transparency in the LOR process, Sector Corpus Christi worked with Cheniere, the Lanier and Associates Consulting Engineers, Inc., and port partners through a series of ad-hoc meetings.



**Figure 3 - LNG LOR Process**  
(Sector Corpus Christi)

Enclosure (3) of NVIC 01-2011 provides guidance on the review of a WSA. To meet the expectations of NVIC 01-2011, my staff held several in-house reviews of the WSA, and facilitated discussions during a workshop held in Corpus Christi, TX on October 27, 2022 and November 16, 2023. The workshop included a wide range of participants as a subcommittee of the South Texas Waterways Advisory Committee, including representatives from Cheniere Energy, Inc., Lanier and Associates Consulting Engineers, Inc., the USCG, Aransas-Corpus Christi Pilots Association, terminal operators, refinery operators, Port Authority, shipping agents, and law enforcement agencies.

Members	Position/Role
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LCDR Anthony Garofalo	Waterways Management Division Chief, Sector Corpus Christi
MSTC William Rogers	Waterways Management Division, Sector Corpus Christi
Joeseph Harrington	Valero Energy
Timothy Lewis	Texas Department of Transportation
Romeo Rice	Genesis Marine
Eric Giannamore	Port of Corpus Christi Police Department
Hunter Myres	Kiewit Offshore Services
Quentin Henderson	Kiewit Offshore Services
Tracy Myrick	ArcelorMittal
Adrian Wilson	MAX Shipping
John Williams	Aransas-Corpus Christi Pilots
Marvin Tamez	Port of Corpus Christi Police Department
Richard Ludwig	BIEHLCO
Samuel Holland	BIEHLCO
Brandi Rogers	STWAC Chairperson/Enbridge
William Griffin	Oxy Chemical Corp
Rebecca Muckleroy	Cheniere Energy, Inc.
Mike Winans	Cheniere Energy, Inc.
David Krams	Lanier and Associates Consulting Engineers, Inc
Mike Kershaw	Port of Corpus Christi and Aransas-Corpus Christi Pilots Liaison
Wesley Langston	ArcelorMittal
Dan Koesema	Port of Corpus Christi
Manmeet Chhabra	Teekay Tankers
Matthew Peterson	Moram Shipping
Xavier Valverde	G&H Towing
Russel Cordo	Port of Corpus Christi
Tony MacDonald	Port of Corpus Christi

**Figure 4 – South Texas Waterway Advisory Committee WSA Team**  
(Port of Corpus Christi)

The participants of this “ad-hoc” workshop, authorized by NVIC 01-2011 enclosure (3), utilized their expertise on the physical characteristics and traffic patterns of the waterway, as well as their respective specialty knowledge of the marine, LNG, safety, security, and facility fields, to analyze the feasibility of the project.

Participants considered the changes in the area’s safety and security dynamics due to the introduction of additional LNG ship traffic associated with the Cheniere Project. Lanier and Associates Consulting Engineers, Inc used methodology similar to that previously used by the U.S. Coast Guard for Ports and Waterway Safety Assessments in various ports to evaluate the navigation and operational safety risks associated with the project. That methodology or model was developed from the work done by the National Dialogue Group (NDG) in 1998. Risk factors identified by the NDG were put into a model form and during the course of more than ten years of workshops throughout the United States and in international venues; the model has been substantially revised to more accurately reflect the nature of waterway risks being experiences. For security purposes, participants considered potential threats and consequences of intentional act of aggression to the facility and developed security measures to mitigate the risks. At a minimum, each of the recommended risk management measures from enclosure (7) of NVIC 01-2011 were

considered, yet in the WSA workshop, additional risks and recommendations were discussed.

The WSA workshop members considered whether the expansion project would cause maritime traffic concerns with the additional traffic expected.

Sector Corpus Christi followed the checklist found in enclosure (4) of NVIC 01-2011 during the review. Through this review, Sector Corpus Christi clarified certain points in the WSA to ensure that the document contained accurate information, and that all references were proper. With the final draft of the WSA, Cheniere and Lanier and Associates Consulting Engineers, Inc. have satisfied the requirements of the LOR process.

The reader must reference Waterway Suitability Assessment Corpus Christi Liquefaction Midscale Trains 8 & 9 Project dated February 2023 in order to interpret the following check sheet:

## Checklist for Reviewing a Waterway Suitability Assessment (WSA) for LNG Marine Traffic

This checklist can be used by the Captain of the Port (COTP)/Federal Maritime Security Coordinator (FMSC) or members of a standing committee or work group to review a Waterway Suitability Assessment (WSA). The reviewer should fill in the appropriate box(es) for each section under review. For any entries deemed not applicable, check "N/A." Provide a brief explanation for "No" and "N/A" responses.

<b>SCOPE OF ASSESSMENT AND GENERAL CONTENT REVIEW</b>				
1.	Yes	No	N/A	Does the WSA identify the professional competencies of those selected to conduct an assessment?
2.	Yes	No	N/A	Does the WSA cover the liquefied natural gas (LNG) tanker's transit for the distance outlined in 33 CFR 127.007?
3.	Yes	No	N/A	Does the WSA address the physical vessel-facility interface and cargo operations?
4.	Yes	No	N/A	Does the WSA address broad port level concerns?
5.	Yes	No	N/A	Does the WSA focus on the transit waterway and facility site in adequate detail?
6.	Yes	No	N/A	Does the WSA address both safety and security issues?
7.	Yes	No	N/A	Is the WSA written for an audience comprised of various port stakeholders?
<p>Comments:</p> <p>1) All members involved with the development of the WSA were identified; the COTP's representatives has ensured competencies within the field are legitimate.</p> <p>2) WSA includes additional considerations for stakeholders not previously addressed in past WSAs and adequately captures various stakeholders.</p> <p>3) The WSA scope and general content is adequate for the COTP to evaluate increased vessel traffic from 400 to 480 vessel per year.</p>				

<b>A. PORT CHARACTERIZATION:</b>				
1.	Yes	No	N/A	Does the WSA adequately summarize the port environment?
2.	Yes	No	N/A	Does the WSA describe the general issues and port level impacts of introducing LNG operations into the port?
3.	Yes	No	N/A	Does the WSA graphically show where the LNG operations are proposed ( <i>i.e.</i> , a "footprint") so that the relative physical impact to the port may be gauged?
4.	Yes	No	N/A	Is the port characterization in general alignment with the Area Maritime Security Plan (AMSP) and any other important local references?
<p>Comments:</p> <p>1) The WSA accurately summarizes the port environment and captures changes from previously submitted WSAs.</p>				

2) LNG operations have existed in the port since 2018. During the workshop, the Aransas-Corpus Christi Pilot Association acknowledged LNG vessel movements are more predictable than other vessel types and impact the port less than other industries. Recommendations were made during the workshop to assess future channel shoaling locations and amounts. The recommendation is not specific to movement of LNG vessels.

#### B. CHARACTERIZATION OF THE LNG FACILITY AND LNG TANKER ROUTE:

1.	Yes	No	N/A	Does the WSA sub-divide the transit route into logical segments for detailed review?
2.	Yes	No	N/A	Does the WSA describe the transit route in adequate detail to identify important navigation safety issues?
3.	Yes	No	N/A	Does the WSA describe all locks, bridges, or other man-made obstructions in the waterway?
4.	Yes	No	N/A	Does the WSA describe the natural features and hazards of the waterway?
5.	Yes	No	N/A	Does the WSA describe the transit route in adequate detail to discern points or areas that pose security concerns or problems?
6.	Yes	No	N/A	Does the WSA adequately describe the density, character, and type of marine traffic in the waterway?
7.	Yes	No	N/A	Does the WSA include information on regular and non-routine marine events and seasonal considerations that affect the waterway?
8.	Yes	No	N/A	Does the WSA describe the physical location of the facility, with a description of the proposed facility?
9.	Yes	No	N/A	Does the WSA describe the proposed LNG tankers' characteristics and the frequency of LNG shipments to or from the facility?
10.	Yes	No	N/A	Does the WSA include information on the flag state and the nationality of officers and crew members of LNG tankers that are regularly expected to call on the facility?
11.	Yes	No	N/A	Does the WSA describe the following factors adjacent to or near the facility? <ul style="list-style-type: none"> <li>• Depths of the water.</li> <li>• Tidal range.</li> <li>• Protection from high seas.</li> <li>• Natural hazards, including reefs, rocks, and sandbars.</li> <li>• Underwater pipelines and cables.</li> <li>• Distance of berthed vessel from channel and width of channel.</li> </ul>
12.	Yes	No	N/A	Does the WSA graphically depict the "zones of concern" overlaid on the transit route?
13.	Yes	No	N/A	Does the WSA identify critical infrastructure (CI) and key assets along transit route? (See the AMSP for a listing of the CI along the transit route).
14.	Yes	No	N/A	Does the WSA identify populated areas, shoreside use and important community structures along the transit route?

15.	Yes	No	N/A	Does the WSA show high density population areas (>9,000 persons per square mile) and medium density population areas (1,000 to 9,000 persons per square mile)?
<p>Comments:</p> <p>1) All concerns regarding the waterway were addressed through the workshop. The workshop focused on increased traffic from 400 to 480 vessels/year and validated port conditions. The USCG found the route to remain satisfactory based on input from the Aransas-Corpus Christi Pilots Association, federal, state and local agencies.</p> <p>2) The workshop validated the conditions along the route's five segments have not significantly changed since the last WSA. Dredging has been completed for the Corpus Christi Ship Channel segment of this route and the workshop found the waterway is improved by the Corpus Christi Ship Channel Improvement Project.</p> <p>3) The route currently contains no nationally-designated CI/KR, pending changes to MSRAM model.</p>				

<b>C. RISK ASSESSMENTS (SAFETY AND SECURITY):</b>				
1.	Yes	No	N/A	Does the WSA use a specific industry or government accepted risk assessment methodology? If not, is the methodology used adequate?
2.	Yes	No	N/A	Does the WSA address both safety and security issues and correctly identify the differences and similarities between them?
3.	Yes	No	N/A	Does the WSA clearly identify the key assumptions that were made in performing the analysis?
4.	Yes	No	N/A	Does the WSA include a sensitivity analysis of the key assumptions and characterize their effect on risk?
5.	Yes	No	N/A	Does the WSA identify all of the potential scenarios for accidental release of LNG?
6.	Yes	No	N/A	Does the WSA adequately address the consequences of an accidental release of LNG?
7.	Yes	No	N/A	Does the WSA address all the specific attack scenarios identified in the Sandia report (reference (e), which include sabotage, projectile threats, aerial, surface, and underwater threats?
8.	Yes	No	N/A	Does the WSA consider attack scenarios or accident types that are in addition to those listed in the Sandia report and the Risk Management Quick-Reference Tool (enclosure (7))?
9.	Yes	No	N/A	Does the WSA adequately identify areas in the port from which an attack could be launched?
10.	Yes	No	N/A	Does the WSA adequately address vulnerabilities, both in terms of the physical target and likelihood of a successful attack?
11.	Yes	No	N/A	Does the vulnerability assessment consider the vessel, the facility and the port community?
12.	Yes	No	N/A	Does the WSA identify the points or areas along the transit route where attacks would have the most significant consequences?
13.	Yes	No	N/A	Does the WSA use the "zones of concern" (Encl.9)?
14.	Yes	No	N/A	Does WSA lead to a distinct set of issues which can be addressed with risk management strategies?

Comments:

- 1) The risk-based approach were evaluated using a methodology similar to that used by the U.S. Coast Guard in Ports and Waterway Safety Assessments. The methodology is adequate.
- 2) Key assumptions concerning weather, spills, intentional attacks and a consequence scale were all made when developing the WSA. It includes effects on the environment, human lives, and the economy, taken into account economic impacts for Corpus Christi and the disruption to the terminal.
- 3) The WSA discussed all concerns required by enclosure (7) of this NVIC and the Sandia report. Due to the location of the operation and waterway, a disruption to this operation would only reach the “Low” risk category.
- 4) Additional firefighting needs and emergency response capabilities within the port have been increased since the last WSA and remains adequate with increased traffic levels.

**D. RISK MANAGEMENT STRATEGIES:**

1.	Yes	No	N/A	Does the WSA adequately use the Risk Management Quick-Reference Tool (enclosure (7)) and/or other sources to identify possible risk management strategies to consider for identified areas of risk and determine which risk management strategies are appropriate for each?
2.	Yes	No	N/A	Does the WSA identify or propose additional risk management strategies that are locally available or that might be made available?
3.	Yes	No	N/A	Does the WSA identify and apply risk management strategies that are appropriate for the given issues?

Comments:

- 1) Zones of concern were addressed in the WSA and provides adequate research into potential risk and mitigation strategies.
- 2) The risk management strategies found in the WSA and currently practiced remain acceptable to the COTP.



5. Based on my review of the WSA completed on December 13, 2023 and input from state and local port stakeholders, and taking into account the previously reviewed original project, I am recommending to the Federal Energy Regulatory Commission that the waterway in its current state be considered suitable for LNG marine traffic associated with the proposed project.

Document Content(s)

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