

APPENDIX E
PUBLIC COMMENTS

DRAFT

MOBILE HARBOR, MOBILE, ALABAMA

**Integrated Draft General Reevaluation Report
With Supplemental Environmental Impact Statement
(Draft GRR/SEIS)**

This Appendix E contains a matrix itemizing all of the comments received as a result of the Public Scoping process. The matrix lists the comment submitter, general nature of each comment, and where the general comment was addressed in the Mobile Harbor Draft GRR/SEIS. Following the comment matrix is a copy of all comments that were received.

Comment No.	Commenter Name	Date	Comment Agency	Discipline/Category	Comment Summary	Response
1	Holly R. Wood	1/12/2016		•Erosion •Wildlife	•Concerned about the impact on wildlife and an increase in erosion on Dauphin Island. •Hopes the COE renourishes and maintains the island using the dredged material.	•For impacts to aquatic resources see section 5.8. •For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
2	Avery Bates	1/12/2016	Vice President of the Organized Seafood Association	•Wildlife •Seafood Industry •Fishing	•Concerned about the loss of fish and shellfish habitat and what the loss would do to the commercial and recreational fishermen. •Concerned about the repercussions of an increasing amount of activity in the shipping lanes (ie water turbidity). •Concerned about the creation of another disposal island, like Gaillard Island, and the increase of birds and bird excrement that would further pollute the bay. •Concerned about silt covering the bay bottom.	•For impacts to aquatic resources see section 5.8 •For shipwreck see section 5.3.1 •No additional dredge material placement islands are proposed in the study. •For shipwreck see section 5.3.1 •For sediment transport concerns see section 5.3.3
3	Wayne Hartung	1/12/2016	Vice President on the board of Sandcastle Condominiums	•Erosion •Dredged material placement	•Supports the dredging for industry reasons. •Would like to see an environmental study performed on the erosion that is occurring on the east end of Dauphin Island. •Would like the dredged material to be placed at the east end of Dauphin and Sand Island to replace what has been lost to erosion.	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For renourishment see section 4.2.2.3.
4	Don McKee	1/12/2016		•Public involvement	•Felt that the residents of Dauphin Island could have gotten better notice about the public meeting. •Glad that the COE will be performing a study that will take years to complete.	•See section 4.3.2 for project schedule
5	Christopher Gruenewald	1/12/2016		•Erosion •Dredged Disposal	•Would like to see the SEIS address how the shipping channel effects the erosion on Dauphin Island. •The method of disposing the dredged material needs to change to benefit the island.	•For shipwreck analysis see section 5.3.1 •For SIBUA analysis see section 4.2.2.3
6	Ralph Atkins	1/12/2016	Owner of Southern Fish and Oyster Company	•Wildlife •Seafood Industry	•Concerned about the oyster reefs in Dog River, which supply the bay with fertilized oyster eggs, being covered with muck from dredged material placement and the subsequent loss of oysters in the bay. •Concerned about the dredged material placement in the bay; would prefer placement in the Gulf. •Concerned that the bacteria from the bird excrement on Gaillard Island is being stirred up by the dredging and causing fish kills.	•For impacts to aquatic resources see section 5.8 •For placement within the relic shell mined area see sections 4.2.1, 4.2.3, 5.4.2, 5.4.4, 5.7, 5.8.7, 5.8.9, 5.12, 5.17, and 6.1.
7	David Underhill	1/12/2016		•Climate Change	•Effects of the increased ship traffic on greenhouse gas production and climate change need to be addressed.	•For impacts associated with air quality, traffic, and safety, see sections 2.5.12, 2.5.13, 2.5.14, 2.5.19, 2.5.20, 5.14, 5.15, 5.16, 5.20, and 5.21.
8	Troy Wayman	1/12/2016	Mobile Area Chamber of Commerce	•Economics	•Full support of project for economic growth of our port.	•Noted
9	Wayne Hartung	1/12/2016		•Environmental •Dredging/Disposal	•Erosion of Dauphin Island is problem •Would like a study as to how to prevent further damage. •Sand should be kept on the island and dredging is causing erosion.	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
10	Ellen Fill	1/12/2016		•Environmental •Threatened and Endangered Species •Other	•Study should continue over next 4 years. •Integrity of island critical to ecosystems including residents. •Bird sanctuary should be protected.	•Noted
11	Clifford Fill	1/12/2016	Audobon Place Homeowners Association	•Environmental •Dredging/Disposal •Other	The potential continual destruction of the barrier islands (Dauphin Island) is as important or more so than all other factors. The island protects and sustains the other aspects	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1.
12	Illegible	1/12/2016		•Economics	•The port is vital for economic growth. we must continue and this project should be done	•Noted
13	Ken Stafford	1/12/2016		•Dredging/Disposal •Other	•Sand should be used to restore Dauphin Island beaches instead of dumped offshore	•For material placement see sections 2.4 and 4.2
14	Meg Goecker	1/12/2016		•Environmental •Dredging/Disposal	•The beneficial use of dredge material needs to be highlighted and alternatives thoroughly discussed for keeping sediment in our estuarine system. Whether building marsh island or thin-layer dredge in the remaining marsh or something else innovatve, take the time to consider many alternatives rather than taking it offshore	•For beneficial use see section 4.2.3.2
15	Illegible	1/12/2016		•Environmental •Fish&Wildlife •Water Quality	•Environmental restoration funding should not be used for channel deepening and widening.	•Noted
16	Christopher I. Gruenewald	1/12/2016		•Environmental •Dredging/Disposal	•Eroding Beach •migration of sand being interrupted by ship channel •EIS must address facts, concerns, and disposing of sand	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
17	H.R. Wood	1/12/2016		•Environmental •Threatened and endangered Species •Fish&Wildlife •Dredging/Disposal •Economics	•Erosion of coastlines due to dredging •Re-nourishment of Dauphin Island beaches using dredged material. •Negative economic impact on Dauphin Island.	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
18	Stan Graves	1/12/2016	Dauphin Island Property owners Association	•Environmental •Dredging/Disposal •Engineering	•GRR study doesn't address historic land loss caused by USACE. •Mark Brynes 2008 (lawsuit) is conflict of interest. •Need Citizen Addressing Committee in EIS process. •EIS must address effect of dredging to shoreline. •EIS must address if dredged sand is dependable to restore shoreline. •Public Scoping Notice does not address the effect of dredging •Proof that sand deposited in SIBUA will make it to shore line.	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
19	Myrt Jones	1/7/2016		•Cultural Resource	•Civil War ship in the northern part of the bay that will be destroyed by dredging.	•For Cultural Resources see sections 2.5.16 and 5.17
20	Mike and Anne Drury	2/19/2016		•Environmental	•Based on numerous studies, increased dredging will likely make erosion at Dauphin Island worse. •Would like a study to be performed objectively to assure all concerned interests are given equal consideration. •COE should prepare a Dredged Material Disposal Master Plan for Mobile Bay and make it part of the EIS. •Would like to the COE to extensively involve the public in the early planning stages.	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.

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21	Carol Lawson	2/24/2016		•Environmental	•Believes the dredging is responsible for the erosion occurring on Dauphin Island. •Would like to see the dredged material used for renourishment at the island.	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
22	John Machiasak	1/12/2016	Vice President and General Manager Systems Southeast Shipyards Alabama LLC	•Support	•Supports the widening and deepening of the Mobile Harbor channel. •Urges that the deepening be extended into the Pinto Reach so that Pinto Island may receive calls from vessels that require the 55 foot depth.	•For TSP see section 4.1
23	Dale Roberts	2/10/2016		•Environmental •Public Involvement	•Would like the public to be involved in the Regional Sediment Management Strategy for Mobile Bay. •Concerned that the COE is not adhering to the River and Harbor Act of 1935. •Would like the COE to address the erosion on Dauphin Island that has occurred since 1958, and correlates to the deepening of the Outer Bar Channel. •Would like to know why the COE can not agree with the 1978 report that concluded the maintenance of the Outer Bar Channel was contributing to Dauphin Islands erosion. •Feels that the plan to place sand at Sand Island to counter the erosion at Dauphin Island did not work. •Would like the COE to use the same shallow water deposition methods for Dauphin Island that have been used to build back Petit Bois Island.	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
24	David Meyer	2/29/2016	Dauphin Island Beach Rentals	•Environmental	•Concerned that the COE is not in compliance with section 5 of the River and Harbor Act of 1935. •Believes that the sand that has been placed at Sand Island to counter the erosion at Dauphin Island is not moving as planned, and would like the practice to be reevaluated via an EIS and a Dredged Materials Disposal Plan created with the input of the public. •Believes the COE has purposefully excluded the citizens of Dauphin Island's input from the Regional Sediment Management Strategy for Mobile Bay.	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
25	Domenic Carlucci	2/8/2016	President of the Dauphin Island Property Owners Association	•Environmental	•Believes that the proposed widening and deepening of the Mobile Harbor Navigation Channel merits a new EIS. •Believes that since the ship channel requires re-dredging on a regular basis proves that the sand around it moves into the channel instead of down to Dauphin Island.	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1.
26	Edward Fields	2/28/2016		•Environmental	•Believes the silt from dredging would destroy the grasses in Mobile Bay.	•For sediment transport concerns see section 5.3.3
27	Gary Garstecki	2/26/2016		•Environmental	•If the COE plans to dispose of dredged material in Mobile Bay, then a Dredged material Disposal Master Plan for Mobile Bay should be prepared and made part of the EIS •Would like the public to be involved in the Regional Sediment Management Strategy for Mobile Bay. •Concerned that the COE is not adhering to the River and Harbor Act of 1935. •Would like the COE to address the erosion on Dauphin Island that has occurred since 1958, and correlates to the deepening of the Outer Bar Channel. •Would like to know why the COE can not agree with the 1978 report that concluded the maintenance of the Outer Bar Channel was contributing to Dauphin Islands erosion. •Feels that the plan to place sand at Sand Island to counter the erosion at Dauphin Island did not work. •Would like the COE to use the same shallow water deposition methods for Dauphin Island that have been used to build back Petit Bois Island.	•For sediment transport concerns see section 5.3.3 •For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
28	Gayle Reinhart	2/27/2016		•Environmental	•Would like the COE to complete an extended study (EIS) before deepening and widening the channel.	•Noted
29	Holly R. and Mark Wood	1/11/2016		•Environmental	•Would like to see the dredged material used to restore the beaches of Dauphin Island	•For SIBUA analysis see section 4.2.2.3.
30	Daniel and Sholeh Malensek	2/20/2016		•Environmental	•Believes the Mobile shipping channel has disrupted the natural flow of sand and should reconsider deepening and widening it.	•For sediment transport concerns see section 5.3.3
31	Casi Callaway and Jason Kudulis	2/11/2016	Mobile Baykeeper	•Environmental	•Include in the DSEIS: •shoreline erosion impacts from larger ships and increased traffic •impacts of larger ships and increased traffic to living shoreline projects •consideration of how harbor improvements might impact current and future funded restoration projects •impacts of larger ships and increased traffic to marsh, SAV, and wetlands •Incorporate and update dredged material disposal options currently included in the Mobile Bay Regional Sediment Management Strategy and include potentially impacted sites not currently in the management strategy •All methods of disposal should be studied to understand which benefits the environment the greatest/least. •Examine the potential for increased sediment loss on Dauphin Island. •Evaluate the long term disposal needs and the ability to dispose in an environmentally responsible manner. •Evaluate the impacts of increased disposal on benthic communities and the potential loss of fishing grounds on Mobile Bay •Be sure to utilize the most current techniques to gather data •Examine impacts of saltwater intrusion to freshwater supplies, oyster reefs, fisheries, and other estuarine habitats. •Ensure all existing community plans are incorporated in the review to eliminate one plan contradicting another.	•For impacts to aquatic resources see section 5.8 •For shipwreck see section 5.3.1 •For material placement see sections 2.4 and 4.2 •For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.

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32	Joseph Murray	2/29/2016		•Environmental	<ul style="list-style-type: none"> •Resolve conflict between 1980 EIS and 1976 report •Ensure that the littoral transport is restored and maintained •Verify the application of all GCRSM principles •Ensure that all project decisions are in the context of the sediment system and all regional implications are addressed. •Enhance natural resources within the project area •Provide beneficial placement of dredged material •Contribute to the preservation of historically significant resources within the project area •Assure compliance with section 5 of the river and Harbor Act of 1935 and rectify noncompliance •State a basis of acceptance of the USGS Open-File Report 2007-1161 •Analyze continuing erosional impact to the economic activities, the Audobon Bird Sanctuary, oyster beds, salt marshes, and Fort Gaines (all located on or around Dauphin Island). •Explain dredging material drift zone deposition impact versus sediment transport along natural lines. 	<ul style="list-style-type: none"> •For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3. •For beneficial use see section 4.2.3.2 •For Cultural Resources see sections 2.5.16 and 5.17
33	Keith Deerman	2/9/2016		•Environmental	<ul style="list-style-type: none"> •Make all plans for disposal public •Include Dauphin Island in your Regional Sediment Management Strategy for Mobile Bay •Comply with section 5 of the river and Harbor Act of 1935 •Address erosion on Dauphin Island caused by COE practices 	<ul style="list-style-type: none"> •For erosion concerns on Dauphin Island see section 5.3.3 and 6.1.
34	Laurin Martin	2/29/2016	Dauphin Island Restoration Task Force	•Public Involvement •Environmental	<ul style="list-style-type: none"> •Believes the public meeting resembled more of a trade show than a meeting, and thinks that this format kept many people from voicing their concerns. •Would like an explanation how the 1978 study was not based on science. •Believes there is a conflict of interest and that the new study will not be impartial, but tilted to a result in favor of the Mobile Harbor expansion. 	<ul style="list-style-type: none"> •Noted
35	Lynda McGinley	2/22/2016		•Public Involvement •Environmental	<ul style="list-style-type: none"> •Based on numerous studies, increased dredging will likely make erosion at Dauphin Island worse. •Would like a study to be performed objectively to assure all concerned interests are given equal consideration. •COE should prepare a Dredged Material Disposal Master Plan for Mobile Bay and make it part of the EIS. •Would like the COE to extensively involve the public in the early planning stages. •Would like the COE to address the erosion on Dauphin Island that has occurred since 1958, and correlates to the deepening of the Outer Bar Channel. •Assure compliance with section 5 of the river and Harbor Act of 1935 and rectify noncompliance •Would like to know why the COE can not agree with the 1978 report that concluded the maintenance of the Outer Bar Channel was contributing to Dauphin Islands erosion •Feels that the plan to place sand at Sand Island to counter the erosion at Dauphin Island did not work. •Would like the COE to use the same shallow water deposition methods for Dauphin Island that have been used to build back Petit Bois Island. •Establish a Citizen Advisory Committee 	<ul style="list-style-type: none"> •For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
36	Lynn A. Hinrichs	2/22/2016		•Environmental	<ul style="list-style-type: none"> •Feels that the COE should make specific scientific studies focused on an improved understanding of the fate of the sands placed in the Sand Island Beneficial Use Area, due to current scientific evidence stating that the sand is being placed in water too deep to allow migration of the sand. •Is calling for improved disposal of dredge materials, especially those consisting of beach quality sand. •Requests that the COE assist in ensuring that all beach quality sand removed for the shipping channel be placed in a location that stabilizes and protects Dauphin Island. 	<ul style="list-style-type: none"> •For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
37	Marc Whitehead	2/22/2016		•Environmental •Public Involvement	<ul style="list-style-type: none"> •Believes the best solution to solve disputes between COE and the public is to place the dredged material in areas that would continue natural flow and coastline distribution, or conduct a coastline restoration project each time the channel is dredged. 	<ul style="list-style-type: none"> •Noted
38	Patricia Linder	2/22/2016		•Environmental	<ul style="list-style-type: none"> •Would like the COE to accept that the dredging has contributed to the erosion of Dauphin Island beaches. •Would like dredged materials to be placed where they can replenish Dauphin Island. 	<ul style="list-style-type: none"> •For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
39	Ramsey Sprague	2/11/2016	President of the Mobile Environmental Justice Action Coalition	•Minority and low-income populations	<ul style="list-style-type: none"> •Identify the types of commodities projected to benefit from the project, and identify the commodities as hazardous, flammable, toxic, or otherwise deleterious to human health and safety. •Conduct current air quality analysis, that includes reliable baselines, for the communities of Orange Grove and Africatown to predict any future changes in contaminants. •Analyze the effects of the project on jobs, income, and other socioeconomic variables. •Identify any other indirect, secondary and/or cumulative adverse socioeconomic and environmental effects potentially associated with the project that could impact the environmental justice communities. •Will the volume of petroleum products transported via water, rail, and truck be expected to increase and will their be a need for additional storage space? •Will there be any increases to coal shipments and storage? •What future changes will the Alabama State Port Authority have to make to its land holdings along the Mobile River waterfront to accommodate the anticipated commodity movements? •Will any lands need to be converted from existing uses to port and industrial uses? •Will there be any changes to truck and rail traffic? •Will there be an increase in accident risks involving highways and railways? •Over the 50-year economic life of the project, are there any traffic congestion problems anticipated? •Recommends the COE hold an Environmental Justice Workshop 	<ul style="list-style-type: none"> •For impacts associated with air quality, traffic, and safety, see sections 2.5.12, 2.5.13, 2.5.14, 2.5.19, 2.5.20, 5.14, 5.15, 5.16, 5.20, and 5.21. •For economic conditions see section 2.3 •See section 5.23 Environmental Justice

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40	Ritchie Macpherson	2/12/2016	Principal at SeaCliff Agency LLC	*Economics	<ul style="list-style-type: none"> •Support for the project •Greatly enhance the Port of Mobile's ability to compete regionally, nationally and internationally. •Will enable the port to move forward in a very positive direction for years to come. 	*Noted
41	Robert Meaher	2/29/2016		*Economics *Aesthetics *Environmental	<ul style="list-style-type: none"> •Will the COE do a benefit/cost study? •Navigation, aesthetics, archaeological, flight path impacts associated with the creation of a tidal marsh? •Will there be containment structures required to hold the silky clay/fine grain material in place at the proposed tidal marsh? •Will the erosion of this proposed tidal marsh cause a problem for the remaining sea grasses on the Eastern Shore? 	<ul style="list-style-type: none"> •For benefit/cost see section 4.3 •For sediment transport see section 5.3.3
42	Russ Voisin	2/18/2016		*Environmental *Public Involvement	<ul style="list-style-type: none"> •SEIS must address the changed environmental conditions within the study area due to the significant erosion of Dauphin Island. •1980 EIS did not consider the erosion effects an enlarged ship channel would have on Dauphin Island. •Must address the cumulative sand losses dating back to 1958 that correspond with increasing the depth and width of the channel. •1976 report that concluded the Outer Bar Channel contributes to the erosion of Dauphin Island shouldn't be ignored. •Identify new dredged sand disposal areas near Dauphin Island and apply the same shallow water deposition concepts recommended by the COE to build back Petit Bois Island. •Would like a public involvement program be established. 	<ul style="list-style-type: none"> •For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
43	Ruth Anne Foote	2/19/2016		*Environmental	<ul style="list-style-type: none"> •Ensure that all beach quality sand removed from the channel be placed in the most beneficial location possible to stabilize and protect Dauphin Island. 	•For material placement see sections 2.4 and 4.2
44	Samuel Mason	2/21/2016		*Environmental	<ul style="list-style-type: none"> •Recognizes the importance of widening and deepening the Mobile Ship Channel. •Improve the manner in which the COE disposes of the dredged material. 	•For material placement see sections 2.4 and 4.3
45	Stan Graves	2/24/2016		*Environmental	<ul style="list-style-type: none"> •Concerned that the COE's SIBUA is ineffective in moving sand toward Dauphin Island, and would like the idea of placing sand within closer proximity to the island added to the EIS. •Is it possible to extend the SIBUA north and/or west versus south? •Has the COE researched the implementation of a by-pass dredge? 	•For SIBUA analysis see section 4.2.2.3.
46	Steve Hambalek	1/26/2016		*Environmental	<ul style="list-style-type: none"> •Placement of the dredge materials nearer to the island would likely help the beaches. •The DSEIS should analyze the effects of all alternatives of Dauphin Island, including the beaches. 	•For SIBUA analysis see section 4.2.2.3.
47	Wendy Allen	1/17/2016		*Economics *Environmental	<ul style="list-style-type: none"> •Concerned that the larger ship channel will intensify the ongoing erosion of Dauphin Island and create other significant adverse impacts on the ecosystem. •Requests that extensive consideration, appropriations and accommodations be made to ensure there is no negative impact to Dauphin Island. •Urges sand to be used to rebuild Dauphin Island beaches and stabilize the area around the Sand Island Lighthouse. 	<ul style="list-style-type: none"> •For shipwake see section 5.3.1 •For SIBUA analysis see section 4.2.2.3.
48	William D. Richardson	1/18/2016		*Environmental *Dredging/Disposal	<ul style="list-style-type: none"> •Concerned that money is being used to fund studies instead of implementing ways to conserve the Dauphin Island coastline. •Would like a citizen advisory board to address the problems and solutions associated with the project. 	*Noted
49	Dee Revnyak	2/5/2016		*Public Involvement *Environmental	<ul style="list-style-type: none"> •Would like a study to be performed objectively to assure all concerned interests are given equal consideration. •COE should prepare a Dredged Material Disposal Master Plan for Mobile Bay and make it part of the EIS. •Would like to the COE to extensively involve the public in the early planning stages. •Would like the COE to address the erosion on Dauphin Island that has occurred since 1958, and correlates to the deepening of the Outer Bar Channel. •Assure compliance with section 5 of the river and Harbor Act of 1935 and rectify noncompliance •Would like to know why the COE can not agree with the 1978 report that concluded the maintenance of the Outer Bar Channel was contributing to Dauphin Islands erosion •Feels that the plan to place sand at Sand Island to counter the erosion at Dauphin Island did not work. •Would like the COE to use the same shallow water deposition methods for Dauphin Island that have been used to build back Petit Bois Island. •Establish a Citizen Advisory Committee 	<ul style="list-style-type: none"> •For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For material placement see sections 2.4 and 4.2
50	Kathleen Geske	2/4/2016		*Public Involvement *Environmental	<ul style="list-style-type: none"> •Would like a study to be performed objectively to assure all concerned interests are given equal consideration. •COE should prepare a Dredged Material Disposal Master Plan for Mobile Bay and make it part of the EIS. •Would like to the COE to extensively involve the public in the early planning stages. •Would like the COE to address the erosion on Dauphin Island that has occurred since 1958, and correlates to the deepening of the Outer Bar Channel. •Assure compliance with section 5 of the river and Harbor Act of 1935 and rectify noncompliance •Would like to know why the COE can not agree with the 1978 report that concluded the maintenance of the Outer Bar Channel was contributing to Dauphin Islands erosion •Feels that the plan to place sand at Sand Island to counter the erosion at Dauphin Island did not work. •Would like the COE to use the same shallow water deposition methods for Dauphin Island that have been used to build back Petit Bois Island. 	<ul style="list-style-type: none"> •For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For material placement see sections 2.4 and 4.2

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51	James W. Frazell	2/5/2016		•Public Involvement •Environmental	<ul style="list-style-type: none"> •Would like a study to be performed objectively to assure all concerned interests are given equal consideration. •COE should prepare a Dredged Material Disposal Master Plan for Mobile Bay and make it part of the EIS. •Would like to the COE to extensively involve the public in the early planning stages. •Would like the COE to address the erosion on Dauphin Island that has occurred since 1958, and correlates to the deepening of the Outer Bar Channel. •Assure compliance with section 5 of the river and Harbor Act of 1935 and rectify noncompliance •Would like to know why the COE can not agree with the 1978 report that concluded the maintenance of the Outer Bar Channel was contributing to Dauphin Islands erosion •Feels that the plan to place sand at Sand Island to counter the erosion at Dauphin Island did not work. •Would like the COE to use the same shallow water deposition methods for Dauphin Island that have been used to build back Petit Bois Island. 	<ul style="list-style-type: none"> •For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For material placement see sections 2.4 and 4.2
52	Mike and Anne A. Drury	2/4/2016		•Public Involvement •Environmental	<ul style="list-style-type: none"> •Would like a study to be performed objectively to assure all concerned interests are given equal consideration. •COE should prepare a Dredged Material Disposal Master Plan for Mobile Bay and make it part of the EIS. •Would like to the COE to extensively involve the public in the early planning stages. •Would like the COE to address the erosion on Dauphin Island that has occurred since 1958, and correlates to the deepening of the Outer Bar Channel. •Assure compliance with section 5 of the river and Harbor Act of 1935 and rectify noncompliance •Would like to know why the COE can not agree with the 1978 report that concluded the maintenance of the Outer Bar Channel was contributing to Dauphin Islands erosion •Feels that the plan to place sand at Sand Island to counter the erosion at Dauphin Island did not work. •Would like the COE to use the same shallow water deposition methods for Dauphin Island that have been used to build back Petit Bois Island. 	<ul style="list-style-type: none"> •For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For material placement see sections 2.4 and 4.2
53	Joseph Lovorn	2/4/2016		•Public Involvement •Environmental	<ul style="list-style-type: none"> •Would like a study to be performed objectively to assure all concerned interests are given equal consideration. •COE should prepare a Dredged Material Disposal Master Plan for Mobile Bay and make it part of the EIS. •Would like to the COE to extensively involve the public in the early planning stages. •Would like the COE to address the erosion on Dauphin Island that has occurred since 1958, and correlates to the deepening of the Outer Bar Channel. •Assure compliance with section 5 of the river and Harbor Act of 1935 and rectify noncompliance •Would like to know why the COE can not agree with the 1978 report that concluded the maintenance of the Outer Bar Channel was contributing to Dauphin Islands erosion •Feels that the plan to place sand at Sand Island to counter the erosion at Dauphin Island did not work. •Would like the COE to use the same shallow water deposition methods for Dauphin Island that have been used to build back Petit Bois Island. 	<ul style="list-style-type: none"> •For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For material placement see sections 2.4 and 4.2
54	Vince and Anna Mish	2/6/2016		•Public Involvement •Environmental	<ul style="list-style-type: none"> •Would like a study to be performed objectively to assure all concerned interests are given equal consideration. •COE should prepare a Dredged Material Disposal Master Plan for Mobile Bay and make it part of the EIS. •Would like to the COE to extensively involve the public in the early planning stages. •Would like the COE to address the erosion on Dauphin Island that has occurred since 1958, and correlates to the deepening of the Outer Bar Channel. •Assure compliance with section 5 of the river and Harbor Act of 1935 and rectify noncompliance •Would like to know why the COE can not agree with the 1978 report that concluded the maintenance of the Outer Bar Channel was contributing to Dauphin Islands erosion •Feels that the plan to place sand at Sand Island to counter the erosion at Dauphin Island did not work. •Would like the COE to use the same shallow water deposition methods for Dauphin Island that have been used to build back Petit Bois Island. 	<ul style="list-style-type: none"> •For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For material placement see sections 2.4 and 4.2
55	Danny and Kerri Camp			•Public Involvement •Environmental	<ul style="list-style-type: none"> •Would like a study to be performed objectively to assure all concerned interests are given equal consideration. •COE should prepare a Dredged Material Disposal Master Plan for Mobile Bay and make it part of the EIS. •Would like to the COE to extensively involve the public in the early planning stages. •Would like the COE to address the erosion on Dauphin Island that has occurred since 1958, and correlates to the deepening of the Outer Bar Channel. •Assure compliance with section 5 of the river and Harbor Act of 1935 and rectify noncompliance •Would like to know why the COE can not agree with the 1978 report that concluded the maintenance of the Outer Bar Channel was contributing to Dauphin Islands erosion •Feels that the plan to place sand at Sand Island to counter the erosion at Dauphin Island did not work. •Would like the COE to use the same shallow water deposition methods for Dauphin Island that have been used to build back Petit Bois Island. 	<ul style="list-style-type: none"> •For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For material placement see sections 2.4 and 4.2

Comment No.	Commenter Name	Date	Comment Agency	Discipline/ Category	Comment Summary	Response
56	Glen Powers	2/24/2016	Owner of Holiday Isle Condominiums	•Public Involvement •Environmental	<ul style="list-style-type: none"> •Would like a study to be performed objectively to assure all concerned interests are given equal consideration. •COE should prepare a Dredged Material Disposal Master Plan for Mobile Bay and make it part of the EIS. •Would like to the COE to extensively involve the public in the early planning stages. •Would like the COE to address the erosion on Dauphin Island that has occurred since 1958, and correlates to the deepening of the Outer Bar Channel. •Assure compliance with section 5 of the river and Harbor Act of 1935 and rectify noncompliance •Would like to know why the COE can not agree with the 1978 report that concluded the maintenance of the Outer Bar Channel was contributing to Dauphin Islands erosion •Feels that the plan to place sand at Sand Island to counter the erosion at Dauphin Island did not work. •Would like the COE to use the same shallow water deposition methods for Dauphin Island that have been used to build back Petit Bois Island. •Establish a Citizen Advisory Committee 	<ul style="list-style-type: none"> •For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For material placement see sections 2.4 and 4.2
57	Annette Johnson	2/10/2016	Mayor of City of Bayou La Batre	•Dredging/Disposal	<ul style="list-style-type: none"> •Disposal master plan •include DI in RMS •Section 5 River & Harbor Act •Explanation why Corps no longer agrees with agency position in 1978 draft •Why SIBUA fails to meet its purpose •Sand migration •interruption of littoral drift 	<ul style="list-style-type: none"> •For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
58	Dee Revnyak	2/2/2016		•Environmental •Public •Dredging/Disposal	<ul style="list-style-type: none"> •Sand migration •All interest considered •Section 5 River & Harbor Act •Historical sand losses •SIBUA fails to meet its purpose •Rebuild Petit Bois •Include DI in RMS •Citizen Advisory Committee 	<ul style="list-style-type: none"> •For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
59	John P. Rice			•Environmental •Erosion •Dredging/Disposal	<ul style="list-style-type: none"> •All interest should be considered •Disposal master plan •include DI in RMS •Section 5 River & Harbor Act •address historical sand losses •Why Corps no longer agrees with agency position of 1978 draft on DI •interruption of sand drift •Use sand to rebuild Petit Bois 	<ul style="list-style-type: none"> •For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
60	Jeffrey F. & Kelly Fortuna			•Dredging/Disposal •Environmental	<ul style="list-style-type: none"> •Disposal master plan •include DI in RMS •Section 5 River & Harbor Act •Explanation why Corps no longer agrees with agency position in 1978 draft •Why SIBUA fails to meet its purpose 	<ul style="list-style-type: none"> •For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
61	James W. Frazwell	2/2/2016		•Erosion •Dredging/Disposal	<ul style="list-style-type: none"> •Erosion history of DI •Section 5 of River & Harbor Act •Placement of sand on DI •Implement RSM concept on DI 	<ul style="list-style-type: none"> •For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
62	David C. DeLaney	2/4/2016		•Erosion	<ul style="list-style-type: none"> •Erosion of DI and mouth of bay 	<ul style="list-style-type: none"> •For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
63	Myrt Jones	2/9/2016		•Public •Environment •Dredging/Disposal	<ul style="list-style-type: none"> •Corps promoting its own agenda w/o regard to public interest •Improper NEPA documentation •Improper handling of dredged material •Impact to wildlife/fisheries 	<ul style="list-style-type: none"> •For impacts to aquatic resources see section 5.8.
64	Kenneth D. Underwood	2/8/2016	Mayor of town of Magnolia Springs	•Environmental •Dredging/ Disposal	<ul style="list-style-type: none"> •Open bay disposal •Include DI in study •Past disposal practices •saltwater intrusion •Citizen Advisory Committee 	<ul style="list-style-type: none"> •For impacts to aquatic resources see section 5.8. •For material placement see sections 2.4 and 4.2
65	Myrt Jones	1/22/2016		•Public	<ul style="list-style-type: none"> •Public denied right for public comment •Disrespect for public and natural resources •Section 5 River & Harbor Act 	<ul style="list-style-type: none"> •Noted
66	Larry Merihew	1/12/2016	Warrior-Tombigbee Waterway Association	•Economics	<ul style="list-style-type: none"> •Supports the widening of the shipping channel •to maintain its competitive position in a world economy •to continue to provide timely and valuable shipments of products 	<ul style="list-style-type: none"> •Noted
67	Carol Merkel	2/5/2016	Island Watch	•Erosion •Dredging/Disposal	<ul style="list-style-type: none"> •Erosion of DI from maintenance dredging of Bar channel •Include DI in RSM strategies •Placement of sand on Sand Island 	<ul style="list-style-type: none"> •For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
68	Jeff Collier	1/20/2016	Mayor of town of Dauphin Island	•Dredging/Disposal	<ul style="list-style-type: none"> •Placement of sand at SIBUA •Placement of sand to protect DI 	<ul style="list-style-type: none"> •For SIBUA analysis see section 4.2.2.3.
69	Myrt Jones			•Environment	<ul style="list-style-type: none"> •Cultural resources and general effect on Mobile Bay 	<ul style="list-style-type: none"> •See section 5 Environmental Effects •For Cultural Resources see sections 2.5.16 and 5.17
70	Myrt Jones	1/8/2016		•Dredging /Disposal •Environment	<ul style="list-style-type: none"> •Effects on wildlife habitat •Global climate changes •Discuss recent catch in bay in new EIS and health of catch •too costly •Citizen Advisory Committee 	<ul style="list-style-type: none"> •For impacts to aquatic resources see section 5.8. •For sea level rise see section 5.3.4
71	William B. Pennington	2/17/2016		•Dredging/ Disposal •Erosion	<ul style="list-style-type: none"> •Dredging will destroy Dixie Bar habitat •effects of widening/deepening •Erosion of DI 	<ul style="list-style-type: none"> •See Cumulative Impacts section 6.1
72	Joseph Mahoney	2/9/2016	Mobile Bay Group Sierra Club	•Dredging/ Disposal •Erosion •Public	<ul style="list-style-type: none"> •Dredged material Disposal Management Strategy •Erosion of DI •GRR No Action Alternative define significant ongoing erosion •Implement NED plan •Comply with all Applicable Statutes, Policies, and Regulations •Section 5 of River & Harbor Act •Mitigation of Significant Impacts •Designate more suitable site for disposal of beach quality sands dredged from outer bar channel •Salinity intrusion •Determination of scientific merit of GRR studies •Citizen Advisory Meeting 	<ul style="list-style-type: none"> •For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.

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73	Stan Graves	2/8/2016		•Environmental	•Disapproval of removing sand from Alabama for Barrier Island restoration	•Noted
74	Stan Graves	2/21/2016		•Environmental •Erosion	•EIS must consider effects of boat wake on shoreline erosion, effect of maintenance dredging, and historical sand deficit caused by dredging •GRR and SEIS does not consider historic sand loss due to dredging •EIS does not consider all potential environmental impacts •Sep 1978 Feasibility Report considered for basis of EIS •Dredging caused erosion •Corps should follow all federal laws that apply •Public scoping does not address effects of dredging •EIS must document and prove SIBUA sand makes it to DI •Citizen Advisory Committee	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3. •For shipwake see section 5.3.1
75	Brad & Beth Cox	2/20/2016		•Dredging/Disposal •Erosion •Environmental •Public	•Prepare dredged material disposal master plan in EIS for public •incorporate DI in RMS study •section 5 River & Harbor Act •Address historical erosion of DI •Explain why Corps does not agree with agency position in 1978 draft of DI •Interruption of littoral drift •SIBUA failing to meet intended purpose •Build back Petit Bois instead of SIBUA •Establish Citizen Advisory Committee	•For material placement see sections 2.4 and 4.2 •For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
76	Wayne & Bonnie Sherman	2/20/2016		•Dredging/Disposal •Erosion •Environmental •Public	•Prepare dredged material disposal master plan in EIS for public •incorporate DI in RMS study •section 5 River & Harbor Act •Address historical erosion of DI •Explain why Corps does not agree with agency position in 1978 draft of DI •Interruption of littoral drift •SIBUA failing to meet intended purpose •Build back Petit Bois instead of SIBUA •Establish Citizen Advisory Committee	•For material placement see sections 2.4 and 4.2 •For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
77	Peter Sadlo	2/20/2016		•Dredging/Disposal •Erosion •Environmental •Public	•Prepare dredged material disposal master plan in EIS for public •incorporate DI in RMS study •section 5 River & Harbor Act •Address historical erosion of DI •Explain why Corps does not agree with agency position in 1978 draft of DI •Interruption of littoral drift •SIBUA failing to meet intended purpose •Build back Petit Bois instead of SIBUA •Establish Citizen Advisory Committee	•For material placement see sections 2.4 and 4.2 •For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
78	Catherine Eason	2/20/2016		•Dredging/Disposal •Erosion •Environmental •Public	•Prepare dredged material disposal master plan in EIS for public •incorporate DI in RMS study •section 5 River & Harbor Act •Address historical erosion of DI •Explain why Corps does not agree with agency position in 1978 draft of DI •Interruption of littoral drift •SIBUA failing to meet intended purpose •Build back Petit Bois instead of SIBUA •Establish Citizen Advisory Committee	•For material placement see sections 2.4 and 4.2 •For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
79	Jack Vinitkul	2/20/2016		•Dredging/Disposal •Erosion •Environmental •Public	•Prepare dredged material disposal master plan in EIS for public •incorporate DI in RMS study •section 5 River & Harbor Act •Address historical erosion of DI •Explain why Corps does not agree with agency position in 1978 draft of DI •Interruption of littoral drift •SIBUA failing to meet intended purpose •Build back Petit Bois instead of SIBUA •Establish Citizen Advisory Committee	•For material placement see sections 2.4 and 4.2 •For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
80	Peter Leeds	2/20/2016		•Dredging/Disposal •Erosion •Environmental •Public	•Prepare dredged material disposal master plan in EIS for public •incorporate DI in RMS study •section 5 River & Harbor Act •Address historical erosion of DI •Explain why Corps does not agree with agency position in 1978 draft of DI •Interruption of littoral drift •SIBUA failing to meet intended purpose •Build back Petit Bois instead of SIBUA •Establish Citizen Advisory Committee	•For material placement see sections 2.4 and 4.2 •For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
81	Aaron King	2/20/2016		•Dredging/Disposal •Erosion •Environmental •Public	•Prepare dredged material disposal master plan in EIS for public •incorporate DI in RMS study •section 5 River & Harbor Act •Address historical erosion of DI •Explain why Corps does not agree with agency position in 1978 draft of DI •Interruption of littoral drift •SIBUA failing to meet intended purpose •Build back Petit Bois instead of SIBUA •Establish Citizen Advisory Committee	•For material placement see sections 2.4 and 4.2 •For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
82	Marshall Butler	2/20/2016		•Dredging/Disposal •Erosion •Environmental •Public	•Prepare dredged material disposal master plan in EIS for public •incorporate DI in RMS study •section 5 River & Harbor Act •Address historical erosion of DI •Explain why Corps does not agree with agency position in 1978 draft of DI •Interruption of littoral drift •SIBUA failing to meet intended purpose •Build back Petit Bois instead of SIBUA •Establish Citizen Advisory Committee	•For material placement see sections 2.4 and 4.2 •For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.

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83	Karen Hill	2/20/2016		•Dredging/Disposal •Erosion •Environmental •Public	•Prepare dredged material disposal master plan in EIS for public •incorporate DI in RMS study •section 5 River & Harbor Act •Address historical erosion of DI •Explain why Corps does not agree with agency position in 1978 draft of DI •Interruption of littoral drift •SIBUA failing to meet intended purpose •Build back Petit Bois instead of SIBUA •Establish Citizen Advisory Committee	•For material placement see sections 2.4 and 4.2 •For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
84	Jim & Dee Frazell	2/20/2016		•Dredging/Disposal •Erosion •Environmental •Public	•Prepare dredged material disposal master plan in EIS for public •incorporate DI in RMS study •section 5 River & Harbor Act •Address historical erosion of DI •Explain why Corps does not agree with agency position in 1978 draft of DI •Interruption of littoral drift •SIBUA failing to meet intended purpose •Build back Petit Bois instead of SIBUA •Establish Citizen Advisory Committee	•For material placement see sections 2.4 and 4.2 •For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
85	Lewis James	2/20/2016		•Dredging/Disposal •Erosion •Environmental •Public	•Prepare dredged material disposal master plan in EIS for public •incorporate DI in RMS study •section 5 River & Harbor Act •Address historical erosion of DI •Explain why Corps does not agree with agency position in 1978 draft of DI •Interruption of littoral drift •SIBUA failing to meet intended purpose •Build back Petit Bois instead of SIBUA •Establish Citizen Advisory Committee	•For material placement see sections 2.4 and 4.2 •For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
86	Richard & Barbara Pool	2/20/2016		•Dredging/Disposal •Erosion •Environmental •Public	•Prepare dredged material disposal master plan in EIS for public •incorporate DI in RMS study •section 5 River & Harbor Act •Address historical erosion of DI •Explain why Corps does not agree with agency position in 1978 draft of DI •Interruption of littoral drift •SIBUA failing to meet intended purpose •Build back Petit Bois instead of SIBUA •Establish Citizen Advisory Committee	•For material placement see sections 2.4 and 4.2 •For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
87	Dr. Les & Laura Greer	2/20/2016		•Dredging/Disposal •Erosion •Environmental •Public	•Prepare dredged material disposal master plan in EIS for public •incorporate DI in RMS study •section 5 River & Harbor Act •Address historical erosion of DI •Explain why Corps does not agree with agency position in 1978 draft of DI •Interruption of littoral drift •SIBUA failing to meet intended purpose •Build back Petit Bois instead of SIBUA •Establish Citizen Advisory Committee	•For material placement see sections 2.4 and 4.2 •For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
88	Linda Percival	2/20/2016		•Dredging/Disposal •Erosion •Environmental •Public	•Prepare dredged material disposal master plan in EIS for public •incorporate DI in RMS study •section 5 River & Harbor Act •Address historical erosion of DI •Explain why Corps does not agree with agency position in 1978 draft of DI •Interruption of littoral drift •SIBUA failing to meet intended purpose •Build back Petit Bois instead of SIBUA •Establish Citizen Advisory Committee	•For material placement see sections 2.4 and 4.2 •For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
89	C. Thomas & Tracy McFadden	2/20/2016		•Dredging/Disposal •Erosion •Environmental •Public	•Prepare dredged material disposal master plan in EIS for public •incorporate DI in RMS study •section 5 River & Harbor Act •Address historical erosion of DI •Explain why Corps does not agree with agency position in 1978 draft of DI •Interruption of littoral drift •SIBUA failing to meet intended purpose •Build back Petit Bois instead of SIBUA •Establish Citizen Advisory Committee	•For material placement see sections 2.4 and 4.2 •For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
90	W.J. Filmore	2/20/2016		•Dredging/Disposal •Erosion •Environmental •Public	•Prepare dredged material disposal master plan in EIS for public •incorporate DI in RMS study •section 5 River & Harbor Act •Address historical erosion of DI •Explain why Corps does not agree with agency position in 1978 draft of DI •Interruption of littoral drift •SIBUA failing to meet intended purpose •Build back Petit Bois instead of SIBUA •Establish Citizen Advisory Committee	•For material placement see sections 2.4 and 4.2 •For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
91	John Landrum	2/20/2016		•Dredging/Disposal •Erosion •Environmental •Public	•Prepare dredged material disposal master plan in EIS for public •incorporate DI in RMS study •section 5 River & Harbor Act •Address historical erosion of DI •Explain why Corps does not agree with agency position in 1978 draft of DI •Interruption of littoral drift •SIBUA failing to meet intended purpose •Build back Petit Bois instead of SIBUA •Establish Citizen Advisory Committee	•For material placement see sections 2.4 and 4.2 •For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.

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92	Scott & Mary Kiker	2/20/2016		•Dredging/Disposal •Erosion •Environmental •Public	•Prepare dredged material disposal master plan in EIS for public •incorporate DI in RMS study •section 5 River & Harbor Act •Address historical erosion of DI •Explain why Corps does not agree with agency position in 1978 draft of DI •Interruption of littoral drift •SIBUA failing to meet intended purpose •Build back Petit Bois instead of SIBUA •Establish Citizen Advisory Committee	•For material placement see sections 2.4 and 4.2 •For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
93	Melvin Emmons	2/20/2016		•Dredging/Disposal •Erosion •Environmental •Public	•Prepare dredged material disposal master plan in EIS for public •incorporate DI in RMS study •section 5 River & Harbor Act •Address historical erosion of DI •Explain why Corps does not agree with agency position in 1978 draft of DI •Interruption of littoral drift •SIBUA failing to meet intended purpose •Build back Petit Bois instead of SIBUA •Establish Citizen Advisory Committee	•For material placement see sections 2.4 and 4.2 •For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
94	Frank & Debra Cassel	2/20/2016		•Dredging/Disposal •Erosion •Environmental •Public	•Prepare dredged material disposal master plan in EIS for public •incorporate DI in RMS study •section 5 River & Harbor Act •Address historical erosion of DI •Explain why Corps does not agree with agency position in 1978 draft of DI •Interruption of littoral drift •SIBUA failing to meet intended purpose •Build back Petit Bois instead of SIBUA •Establish Citizen Advisory Committee	•For material placement see sections 2.4 and 4.2 •For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
95	Paul & Connie Johnson	2/20/2016		•Dredging/Disposal •Erosion •Environmental •Public	•Prepare dredged material disposal master plan in EIS for public •incorporate DI in RMS study •section 5 River & Harbor Act •Address historical erosion of DI •Explain why Corps does not agree with agency position in 1978 draft of DI •Interruption of littoral drift •SIBUA failing to meet intended purpose •Build back Petit Bois instead of SIBUA •Establish Citizen Advisory Committee	•For material placement see sections 2.4 and 4.2 •For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
96	Michael Bailey	2/20/2016		•Dredging/Disposal •Erosion •Environmental •Public	•Prepare dredged material disposal master plan in EIS for public •incorporate DI in RMS study •section 5 River & Harbor Act •Address historical erosion of DI •Explain why Corps does not agree with agency position in 1978 draft of DI •Interruption of littoral drift •SIBUA failing to meet intended purpose •Build back Petit Bois instead of SIBUA •Establish Citizen Advisory Committee	•For material placement see sections 2.4 and 4.2 •For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
97	Jan Waguespack	2/20/2016		•Dredging/Disposal •Erosion •Environmental •Public	•Prepare dredged material disposal master plan in EIS for public •incorporate DI in RMS study •section 5 River & Harbor Act •Address historical erosion of DI •Explain why Corps does not agree with agency position in 1978 draft of DI •Interruption of littoral drift •SIBUA failing to meet intended purpose •Build back Petit Bois instead of SIBUA •Establish Citizen Advisory Committee	•For material placement see sections 2.4 and 4.2 •For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
98	Dr. Wilmer & Caroline Cody	2/20/2016		•Dredging/Disposal •Erosion •Environmental •Public	•Prepare dredged material disposal master plan in EIS for public •incorporate DI in RMS study •section 5 River & Harbor Act •Address historical erosion of DI •Explain why Corps does not agree with agency position in 1978 draft of DI •Interruption of littoral drift •SIBUA failing to meet intended purpose •Build back Petit Bois instead of SIBUA •Establish Citizen Advisory Committee	•For material placement see sections 2.4 and 4.2 •For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
99	Craig & Faith Hartle	2/20/2016		•Dredging/Disposal •Erosion •Environmental •Public	•Prepare dredged material disposal master plan in EIS for public •incorporate DI in RMS study •section 5 River & Harbor Act •Address historical erosion of DI •Explain why Corps does not agree with agency position in 1978 draft of DI •Interruption of littoral drift •SIBUA failing to meet intended purpose •Build back Petit Bois instead of SIBUA •Establish Citizen Advisory Committee	•For material placement see sections 2.4 and 4.2 •For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
100	Patrick & Linda Ward	2/20/2016		•Dredging/Disposal •Erosion •Environmental •Public	•Prepare dredged material disposal master plan in EIS for public •incorporate DI in RMS study •section 5 River & Harbor Act •Address historical erosion of DI •Explain why Corps does not agree with agency position in 1978 draft of DI •Interruption of littoral drift •SIBUA failing to meet intended purpose •Build back Petit Bois instead of SIBUA •Establish Citizen Advisory Committee	•For material placement see sections 2.4 and 4.2 •For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.

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101	Manoj Singh	2/20/2016		•Dredging/Disposal •Erosion •Environmental •Public	•Prepare dredged material disposal master plan in EIS for public •incorporate DI in RMS study •section 5 River & Harbor Act •Address historical erosion of DI •Explain why Corps does not agree with agency position in 1978 draft of DI •Interruption of littoral drift •SIBUA failing to meet intended purpose •Build back Petit Bois instead of SIBUA •Establish Citizen Advisory Committee	•For material placement see sections 2.4 and 4.2 •For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
102	Roger Lusins	2/20/2016		•Dredging/Disposal •Erosion •Environmental •Public	•Prepare dredged material disposal master plan in EIS for public •incorporate DI in RMS study •section 5 River & Harbor Act •Address historical erosion of DI •Explain why Corps does not agree with agency position in 1978 draft of DI •Interruption of littoral drift •SIBUA failing to meet intended purpose •Build back Petit Bois instead of SIBUA •Establish Citizen Advisory Committee	•For material placement see sections 2.4 and 4.2 •For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
103	Tom & Patricia Gaughan	2/20/2016		•Dredging/Disposal •Erosion •Environmental •Public	•Prepare dredged material disposal master plan in EIS for public •incorporate DI in RMS study •section 5 River & Harbor Act •Address historical erosion of DI •Explain why Corps does not agree with agency position in 1978 draft of DI •Interruption of littoral drift •SIBUA failing to meet intended purpose •Build back Petit Bois instead of SIBUA •Establish Citizen Advisory Committee	•For material placement see sections 2.4 and 4.2 •For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
104	Howard Hinds	2/20/2016		•Dredging/Disposal •Erosion •Environmental •Public	•Prepare dredged material disposal master plan in EIS for public •incorporate DI in RMS study •section 5 River & Harbor Act •Address historical erosion of DI •Explain why Corps does not agree with agency position in 1978 draft of DI •Interruption of littoral drift •SIBUA failing to meet intended purpose •Build back Petit Bois instead of SIBUA •Establish Citizen Advisory Committee	•For material placement see sections 2.4 and 4.2 •For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
105	Joanna Rodriguez	2/20/2016		•Dredging/Disposal •Erosion •Environmental •Public	•Prepare dredged material disposal master plan in EIS for public •incorporate DI in RMS study •section 5 River & Harbor Act •Address historical erosion of DI •Explain why Corps does not agree with agency position in 1978 draft of DI •Interruption of littoral drift •SIBUA failing to meet intended purpose •Build back Petit Bois instead of SIBUA •Establish Citizen Advisory Committee	•For material placement see sections 2.4 and 4.2 •For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
106	Harvey Pesnell	2/20/2016		•Dredging/Disposal •Erosion •Environmental •Public	•Prepare dredged material disposal master plan in EIS for public •incorporate DI in RMS study •section 5 River & Harbor Act •Address historical erosion of DI •Explain why Corps does not agree with agency position in 1978 draft of DI •Interruption of littoral drift •SIBUA failing to meet intended purpose •Build back Petit Bois instead of SIBUA •Establish Citizen Advisory Committee	•For material placement see sections 2.4 and 4.2 •For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
107	Gerald Lamay	2/20/2016		•Dredging/Disposal •Erosion •Environmental •Public	•Prepare dredged material disposal master plan in EIS for public •incorporate DI in RMS study •section 5 River & Harbor Act •Address historical erosion of DI •Explain why Corps does not agree with agency position in 1978 draft of DI •Interruption of littoral drift •SIBUA failing to meet intended purpose •Build back Petit Bois instead of SIBUA •Establish Citizen Advisory Committee	•For material placement see sections 2.4 and 4.2 •For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
108	James Sinclair	2/20/2016		•Dredging/Disposal •Erosion •Environmental •Public	•Prepare dredged material disposal master plan in EIS for public •incorporate DI in RMS study •section 5 River & Harbor Act •Address historical erosion of DI •Explain why Corps does not agree with agency position in 1978 draft of DI •Interruption of littoral drift •SIBUA failing to meet intended purpose •Build back Petit Bois instead of SIBUA •Establish Citizen Advisory Committee	•For material placement see sections 2.4 and 4.2 •For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
109	Virginia Johnson	2/20/2016		•Dredging/Disposal •Erosion •Environmental •Public	•Prepare dredged material disposal master plan in EIS for public •incorporate DI in RMS study •section 5 River & Harbor Act •Address historical erosion of DI •Explain why Corps does not agree with agency position in 1978 draft of DI •Interruption of littoral drift •SIBUA failing to meet intended purpose •Build back Petit Bois instead of SIBUA •Establish Citizen Advisory Committee	•For material placement see sections 2.4 and 4.2 •For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.

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110	Carol Lawson	2/20/2016		•Dredging/Disposal •Erosion •Environmental •Public	•Prepare dredged material disposal master plan in EIS for public •incorporate DI in RMS study •section 5 River & Harbor Act •Address historical erosion of DI •Explain why Corps does not agree with agency position in 1978 draft of DI •Interruption of littoral drift •SIBUA failing to meet intended purpose •Build back Petit Bois instead of SIBUA •Establish Citizen Advisory Committee	•For material placement see sections 2.4 and 4.2 •For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
111	Martha Waller	2/20/2016		•Dredging/Disposal •Erosion •Environmental •Public	•Prepare dredged material disposal master plan in EIS for public •incorporate DI in RMS study •section 5 River & Harbor Act •Address historical erosion of DI •Explain why Corps does not agree with agency position in 1978 draft of DI •Interruption of littoral drift •SIBUA failing to meet intended purpose •Build back Petit Bois instead of SIBUA •Establish Citizen Advisory Committee	•For material placement see sections 2.4 and 4.2 •For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
112	Cathy Lewis	2/20/2016		•Dredging/Disposal •Erosion •Environmental •Public	•Prepare dredged material disposal master plan in EIS for public •incorporate DI in RMS study •section 5 River & Harbor Act •Address historical erosion of DI •Explain why Corps does not agree with agency position in 1978 draft of DI •Interruption of littoral drift •SIBUA failing to meet intended purpose •Build back Petit Bois instead of SIBUA •Establish Citizen Advisory Committee	•For material placement see sections 2.4 and 4.2 •For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
113	Bettie Champion	2/20/2016		•Dredging/Disposal •Erosion •Environmental •Public	•Prepare dredged material disposal master plan in EIS for public •incorporate DI in RMS study •section 5 River & Harbor Act •Address historical erosion of DI •Explain why Corps does not agree with agency position in 1978 draft of DI •Interruption of littoral drift •SIBUA failing to meet intended purpose •Build back Petit Bois instead of SIBUA •Establish Citizen Advisory Committee	•For material placement see sections 2.4 and 4.2 •For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
114	John & Margaret Plasman	2/20/2016		•Dredging/Disposal •Erosion •Environmental •Public	•Prepare dredged material disposal master plan in EIS for public •incorporate DI in RMS study •section 5 River & Harbor Act •Address historical erosion of DI •Explain why Corps does not agree with agency position in 1978 draft of DI •Interruption of littoral drift •SIBUA failing to meet intended purpose •Build back Petit Bois instead of SIBUA •Establish Citizen Advisory Committee	•For material placement see sections 2.4 and 4.2 •For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
115	Jacqueline Berger	2/20/2016		•Dredging/Disposal •Erosion •Environmental •Public	•Prepare dredged material disposal master plan in EIS for public •incorporate DI in RMS study •section 5 River & Harbor Act •Address historical erosion of DI •Explain why Corps does not agree with agency position in 1978 draft of DI •Interruption of littoral drift •SIBUA failing to meet intended purpose •Build back Petit Bois instead of SIBUA •Establish Citizen Advisory Committee	•For material placement see sections 2.4 and 4.2 •For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
116	Billy Gibbon	2/20/2016		•Dredging/Disposal •Erosion •Environmental •Public	•Prepare dredged material disposal master plan in EIS for public •incorporate DI in RMS study •section 5 River & Harbor Act •Address historical erosion of DI •Explain why Corps does not agree with agency position in 1978 draft of DI •Interruption of littoral drift •SIBUA failing to meet intended purpose •Build back Petit Bois instead of SIBUA •Establish Citizen Advisory Committee	•For material placement see sections 2.4 and 4.2 •For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
117	Clarence Manning	2/20/2016		•Dredging/Disposal •Erosion •Environmental •Public	•Prepare dredged material disposal master plan in EIS for public •incorporate DI in RMS study •section 5 River & Harbor Act •Address historical erosion of DI •Explain why Corps does not agree with agency position in 1978 draft of DI •Interruption of littoral drift •SIBUA failing to meet intended purpose •Build back Petit Bois instead of SIBUA •Establish Citizen Advisory Committee	•For material placement see sections 2.4 and 4.2 •For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
118	Earl Flowers	2/20/2016		•Dredging/Disposal •Erosion •Environmental •Public	•Prepare dredged material disposal master plan in EIS for public •incorporate DI in RMS study •section 5 River & Harbor Act •Address historical erosion of DI •Explain why Corps does not agree with agency position in 1978 draft of DI •Interruption of littoral drift •SIBUA failing to meet intended purpose •Build back Petit Bois instead of SIBUA •Establish Citizen Advisory Committee	•For material placement see sections 2.4 and 4.2 •For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.

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119	Dr. Frank Wilson	2/20/2016		•Dredging/Disposal •Erosion •Environmental •Public	•Prepare dredged material disposal master plan in EIS for public •incorporate DI in RMS study •section 5 River & Harbor Act •Address historical erosion of DI •Explain why Corps does not agree with agency position in 1978 draft of DI •Interruption of littoral drift •SIBUA failing to meet intended purpose •Build back Petit Bois instead of SIBUA •Establish Citizen Advisory Committee	•For material placement see sections 2.4 and 4.2 •For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
120	Brendan & Michele McAloon	2/20/2016		•Dredging/Disposal •Erosion •Environmental •Public	•Prepare dredged material disposal master plan in EIS for public •incorporate DI in RMS study •section 5 River & Harbor Act •Address historical erosion of DI •Explain why Corps does not agree with agency position in 1978 draft of DI •Interruption of littoral drift •SIBUA failing to meet intended purpose •Build back Petit Bois instead of SIBUA •Establish Citizen Advisory Committee	•For material placement see sections 2.4 and 4.2 •For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
121	Christopher I. Gruenewald	2/8/2016		•Erosion •Environmental •Dredging/Disposal	•Erosion of DI •Sand migration on Mobile Bar •Effects of dredging to island •disposal of material	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
122	Chuck Taylor			•Economics •Erosion	•Erosion of DI •Economic impact to property investments	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1.
123	Barabra S. Price			•Environmental •Erosion	•Erosion of beach front property on DI •Section 5 River & Harbor Act. •Impact to wildlife & natural resources	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
124	Richard G Schmohl	1/26/2016		•Dredging /Disposal	•Placement of sand on DI	•For SIBUA analysis see section 4.2.2.3.
125	Paul Watson	1/27/2016		•Environmental	•Impacts to DI •Against Corps' sediment management practices.	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
126	Russel L. Voisin	2/1/2016		•Environmental	•Placement of sand on DI •Section 5 of the River & Harbor Act. •Public involvement	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
127	Patricia Wilson	1/27/2016		•Erosion •Environmental	•Erosion to DI •Preference ASPA •Impacts to resources	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •See section 5 for environmental effects
128	Lella B. Lowe	1/26/2016		•Environmental	•Citizens advisory committee. •section 5 River & Harbor Act •Placement of sand on DI	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
129	Michael D. Greer	1/11/2016		•Dredging /Disposal	•Conduct project to place material to benefit DI	•For SIBUA analysis see section 4.2.2.3.
130	Jeffrey P. Bogdan	1/7/2016		•Erosion	•Erosion of DI from dredging of bar channel. •Placement of material	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
131	William C. Roedder	1/8/2016		•Erosion	•Erosion of DI beaches	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
132	Ward C. Wilson	1/8/2016		•Dredging/Disposal	•Sand transport to DI. •Placement of sand in SIBUA •Ignoring public &	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
133	Robert W. Riddell	1/11/2016		•Erosion	•Erosion of DI •Disruption of sand migration. •Placement of sand on east end of DI	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
134	Holly R and Marc Wood			•Erosion •Environmental	•Erosion of DI •Why hasn't erosion problem been addressed •Declining property value •Plan to rebuild shoreline	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
135	Jeni Smith Bogden	1/7/2016		•Erosion	•Erosion of DI	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1.
136	Kenneth M. Stafford	2/11/2016		•Erosion	•Erosion of DI •Proper sand Placement/	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
137	Stephen McConnell	2/1/2016		•Erosion	•Erosion of DI •Proper sand Placement/	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
138	Kenneth M. Stafford	1/25/2016		•Erosion	•Erosion of DI •Proper sand Placement/	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
139	Glendon L. Coffee	2/27/2016		•Erosion	•Considering Dauphin Island erosion history in SEIS.	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1.
140	Glendon L. Coffee	2/10/2016		•Environmental •Erosion •Dredging/Disposal	•Erosion of DI. •Mitigation of shoreline erosion. •Disposal of Dredged material in Mobile Bay. •Federal Standard should include mitigation for shoreline erosion as a component of the navigation process. •Involve public in GRR study	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3. •For material placement see sections 2.4 and 4.2
141	Carol R. Parks	2/20/2016		•Dredging/Disposal	•Placing dredged sand on DI.	•For SIBUA analysis see section 4.2.2.3.
142	Mark A. Williams	2/16/2016		•Erosion •Dredging/Disposal	•Address DI erosion history •Placement of Dredged material on DI	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
143	Catlin Cade	2/25/2016		•Environmental •Erosion •Dredging/Disposal	•Section 5 of River & Harbor Act of 1935 •Erosion of DI. •Placement of Dredged sand on DI.	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
144	Patricia L. Garstecki	2/26/2016		•Erosion •Dredging/Disposal	•DI shoreline erosion. •Placement of sand on DI.	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
145	David Crigler	2/15/2016		•Environmental •Erosion	•Section 5 of River & Harbor Act. •Erosion history of DI.	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1.
146	Darlene Perry	2/18/2016		•Erosion	•Dauphin Island Erosion	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1.
147	Lewis James	2/11/2016		•Environmental •Erosion	•DI erosion. •Section 5 River & Harbor Act.	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1.
148	Deborah Coffee			•Erosion •Dredging/Disposal	•Section 5 of River & Harbor Act. •Erosion of DI. •Placement of sand on DI	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.

Comment No.	Commenter Name	Date	Comment Agency	Discipline/ Category	Comment Summary	Response
149	Dr. Michael Krumpelt	2/5/2016		•Public •Erosion	•No Opportunity for public comment •Sand flow on Mobile Bar. •Historic erosion on DI in SEIS •Section 5 River&Harbor Act. •Placement of sand.	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
150	Jeffrey P. Bogden	2/4/2016		•Dredging/Disposal •Environmental	•Dredging master plan •Inclusion of Dauphin Island in SEIS •Sand migration on Mobile Bar •Section 5 River&Harbor Act.	•For material placement see sections 2.4 and 4.2 •For erosion concerns on Dauphin Island see section 5.3.3 and 6.1.
151	John Bowden			•Erosion •Dredging/Disposal	•Erosion of Dauphin Island. •Sand migration on Mobile Bar interrupted by channel. •Placing Sand on Dauphin Island.	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
152	Rich Colberg			•Environmental •Dredging/ Disposal	•Impacts to Dauphin Island •Dredged material master plan. •Section 5 River&Harbor act. •Shallow water disposal of bar channel sand.	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3. •For material placement see sections 2.4 and 4.2
153	Caroline Graves	2/9/2016		•Environmental	• USACE needs to revisit 1980 EIS before SEIS to disclose all environmental impacts to DI from dredging ship channel, share dredged environmental impacts to present day, and identify future impacts to DI from future dredging • Cannot supplement an EIS (1980) with an SEIS when information from original document is inaccurate • Environmental impacts to DI from dredging of Mobile Harbor needs to be addressed • Erosion concerns on DI from Mobile Harbor dredging should be assessed now since not addressed in 1980 EIS • Deeping channel is not a priority since only the turning basin of the ships was a concern for larger vessels	•See section 5 Environmental Effects •For erosion concerns on Dauphin Island see section 5.3.3 and 6.1.
154	Chester McConnell	2/8/2016	The Mobile Bay Audubon Society	•Erosion •Dredging/Disposal	•Disposal of material •Include Dauphin Island in RSM strategy. •River and Harbor Act. •Historical erosion.	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1.
155	Paul and Sarah Vincent			•Environmental	•Effects on Dauphin Island •Interruption of sand migration.	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1.
156	Frank Wilson	2/8/2016		•Erosion •Dredging/Disposal	•Beach erosion •Sand placed back on coastline	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
157	Henry Paul Watson			•Environmental	•Sand flow to Dauphin Island •Lack of sand to cover debris. •Impacts to sandbar.	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
158	William B. Pennington	2/9/2016		•Erosion •Dredging/Disposal	•Erosion of Dauphin Island. •Placement of Dredged material on Dauphin Island •Priority given to interests of the port.	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
159	Jeni Bogdan	2/5/2016		•Erosion •Dredging/Disposal	•Preparation of Master plan •Capture historic erosion and Shorelines •Consider River and Harbor Act •Outer Bar Channel •Placement of Sand on Sand Island.	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
160	Laura Martin	3/31/2014	Board of Directors of DIPOA	•Environmental	•Erosion of Dauphin Island. •Erosion of Sand Island •1978 EIS should be supplemented to adequately analyze the effects of dredging. •Corps using inadequate NEPA documents.	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
161	J. W. Greer	4/3/2018		•Erosion	•Hurricanes, storms, and dredging causing erosion •How can the Corps help	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1.
162	Jeff Collier	3/28/2018	Dauphin Island Mayor	•Dredge material placement	•Incorporate an improved dredge placement practice that will keep the sand in the littoral system that will stabilize the island.	•For SIBUA analysis see section 4.2.2.3.
163	Michael D. Greer	3/20/2018	Greer, Russell, Dent & Leathers, PLLC	•Dredge material placement •Erosion	•Alternative to the SIBUA placement site •Mitigation plan •Dauphin Island erosion	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
164	Lynn A. Hinrichs	3/20/2018		•Dredge material placement •Erosion	•Alternative to the SIBUA placement site •Mitigation plan •Dauphin Island erosion	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
165	William C. Roedder	2/27/2018		•Dredge material placement •Erosion	•Alternative to the SIBUA placement site •Mitigation plan •Modeling to solve Dauphin Island erosion problem •Study and address effects on fishermen and oystermen	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
166	Lewis James	11/10/2016		•Dredge material placement •Erosion •Public Affairs	•Public identified concerns/issues with channel expansion/material placement •Public comments not addressed	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
167	Dennis J. Knizley	3/21/2018	Dauphin Island Property owners Association	•Dredge material placement •Erosion	•Change the SIBUA placement site to shallower areas •Dauphin Island erosion	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
168	Myrt Jones	3/1/2018		•Environmental •Public Involvement	•Placement of material in Mobile Bay •Have a Public Hearing	•For placement within the relic shell mined area see sections 4.2.1, 4.2.3, 5.4.2, 5.4.4, 5.7, 5.8.7, 5.8.9, 5.12, 5.17, and 6.1.
169	Kelly B. Fox	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Dauphin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.

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170	Nikon Eder	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
171	Michael L. Fox	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
172	Joe Fox	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
173	Reagan Fox	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
174	Glenda Fox	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
175	Lillian Bunkley	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
176	Laura Rice	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
177	Jason Rice	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
178	Ginny Clausen	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
179	Paul Clausen	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
180	Nancy T. Rice	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.

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181	Abby Fox	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
182	Ava L. Barbour	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
183	Rickie M. Healy	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
184	Myra Harper Healy	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
185	Jimmie J. Gammage	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
186	Kayla Denmark	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
187	Cathy Dorman	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
188	Todd Jordan	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
189	Connie Deven	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
190	Shannon Tyler	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
191	Sheryl Lewis	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.

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192	Elizabeth J. Warner	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
193	Jennifer Carpio-Zella	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
194	Breanne Bedgood	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
195	Meredith Comer	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
196	Leanne M. Bedgood	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
197	James Willis	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
198	Savanah Edwards	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
199	Christy Cook	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
200	Cody Thibodeaux	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
201	Kayla Whatley	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
202	Keith B.	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.

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203	Jill Bloomer	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
204	Colin Barrett	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
205	Jay Lewis	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
206	Shannon Haney	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
207	Royce M. Hall	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
208	D.B. Peters	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
209	J.L. Peters	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
210	Jason Black	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
211	Justin Brooks	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
212	Skylar	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
213	Reese Millay	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.

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214	Jacey Brooks	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
215	Kim Adkins	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
216	Susan Adkins	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
217	Cathy Fontenot	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
218	Jim Bedgood	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
219	James Sullivan	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
220	Mike Drury	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
221	Dennis Deven	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
222	Illegible	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
223	William Thompson	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
224	Sara Rivas	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.

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226	Michael Brosnan	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
227	Debbie Graves	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
228	Cody D.	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
229	Devin Crawford	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
230	Ben Parker	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
231	Donnie Boykin	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
232	William B. Gray	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
233	Betty Sultan	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
234	Reid Kilborn	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
235	Laurie Kilborn	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.

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236	John D. Lively Jr.	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
237	Mary Elizabeth Gray Lively	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
238	Brad Kilborn	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
239	Doris T. Gray	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
240	John F. Rice	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
241	Laney Hughes	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
242	Margie Brunner	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
243	Margaret Campbell	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
244	Daniel Bishop	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
245	Scarlet Dixon	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
246	Teddy Dismukes	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.

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247	Rod Till	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
248	Scott Paoust	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
249	Luke Bronining	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
250	Jessie Squellah	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
251	Sara Paoust	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
252	Frederick L. Brunner	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
253	Darlene Castjohn	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
254	Joyce Harger	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
255	Shane Castjohn	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
256	Douglas Harger	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
257	Brian Goff	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.

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258	Treva Goff	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
259	Sonja Castjohn	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
260	Courtney Fira	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
261	Shane Castjohn	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
262	Jeffrey D. Winsor	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
263	Martin Castjohn Jr.	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
264	Denise Winsor	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
265	Emily Chard	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
266	Gretchen Chauvin	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
267	BJ Chauvin, III	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
268	Ricky D. Harrison	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.

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269	Linda Eyer mann	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
270	Gene Gabel	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
271	Anna Fay Harbison	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
272	Diane Mikulan	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
273	Joe Mikulan	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
274	Chris Eyer mann	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
275	Ann Harrison	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
276	Richard Colbery	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
277	Steven E. Myers	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
278	H. Higgins	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
279	Richard Schmohl	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.

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280	Laurie Myers	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
281	Linda N. Smith	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
282	Terri Kirkman	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
283	Karen L. Wilson	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
284	J. Larry Smith	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
285	Kim Childers	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
286	Michaela Thompson	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
287	Kyle M. Reese	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
288	Valerie Musial	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
289	Thomas P. Oldweiler	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
290	Melanie Harlow	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.

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291	Barbara Illanne	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
292	Donna Kirkman	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
293	Betsy C. Crook	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
294	Holly Hennig	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
295	Renee Fiemry	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
296	Sharron Yommer	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
297	Shelly Ferrell	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
298	Frank Watson	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
299	Janis Watson	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
300	Gene Myrick	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
301	Marna Rushing	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.

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302	Eddie Guesnard	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
303	Joyce Cawshe	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
304	Abigail W.	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
305	David W. Cauben	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
306	Kenneth R. Hall	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
307	Stuart S.	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
308	Bill Smith	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
309	Jeff Harrison	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
310	Illegible	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
311	Christopher Orrell	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
312	Charles Lea	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.

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313	Faye Lea	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
314	Dawnell Hindelang	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
315	Judy H. Higgins	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
316	Sally Bloom	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
317	Roger Cusins	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
318	Eva Golson	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
319	David A. Adams	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
320	Mike roger	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
321	Rebecca Evenson	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
322	Hugh T. Porter	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
323	Jennifer Thompson	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.

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324	Neva Porter	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
325	Bill Naylor	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
326	Denise Privette	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
327	Debbie Naylor	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
328	David Holtz	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
329	C. Macpherson	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
330	Joseph Wentworth	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
331	Charles Tucker	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
332	K.M.	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
333	J. M.	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
334	Tamara Macpherson	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.

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335	Billy Lindsey	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
336	Jimmy Sprinkle	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
337	Eileen Connolly	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
338	Billy Richardson	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
339	Vickie Connolly	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
340	Charles Lynn	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
341	Michael Hardin	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
342	Robert Register	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
343	Jacquette Johnson	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
344	Susan Richardson	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
345	David J. Connolly	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.

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346	Nicki McClane	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
347	Tony G. Waldrop	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
348	Julee B. Waldrop	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
349	Jessie Briggs	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
350	John Dismukes	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
351	Joan D. Smith	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
352	Nancy B. Adams	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
353	James W. Adams, JR.	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
354	Artis Wells	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
355	Deborah J. Booker	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
356	Deborah Ann Lawber	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.

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357	Robert A. Booker	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
358	Penny Hall	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
359	Beth Mathison	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
360	V.	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
361	Cory Pless	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
362	Dara Ginny Pless	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
363	Teresa S. Walkley	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
364	Earle V. Walkley, III	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
365	Amy Smith	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
366	Shawn Smith	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
367	Illegible	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.

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368	Susan B. Dubey	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
369	Gail M. L.	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
370	Susan Haeefe	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
371	Jay Haeefe	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
372	Nathaniel W.	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
373	Amanda Winstead	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
374	Joe Dennis	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
375	Glen Bryant	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
376	Sandra Bryant	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
377	Mark A. Andrews Sr.	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
378	Haleigh King	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.

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379	L. Gordon King	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
380	James Julian	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
381	Tristan Naylor	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
382	Scott Gelbert	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
383	Patrick Cook	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
384	T. B.	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
385	Linda Harcrow	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
386	Ruby Dunlap	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
387	Theodore Dunlap	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
388	Christopher Brumfield	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
389	Sally A. Ellison	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.

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390	Charles Ellison	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
391	Mary C. Holland	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
392	Buddy Holland	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
393	Joanne Sprinkle	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
394	Deborah Coffee	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
395	Frank Dagley	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
396	Albert B. R.	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
397	Brad Cox	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
398	Beth Cox	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
399	Daniel Lincoln	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
400	Stan Junkin	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.

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401	R. E.	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
402	Celia Smith	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
403	Walton Shannon	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
404	Gene Burchfield	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
405	Cliff Burchfield	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
406	James Fisher	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
407	Kathryn S. Smith	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
408	Ivy C. Featherstone	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
409	Steve Y.	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
410	Bruce Lemley	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
411	Jerrilynn C. Lemley	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.

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412	F. N. Stewart	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
413	Donna Richmond	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
414	Regina Doi-Kollegger	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
415	Billy Sanders	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
416	Gary Kane	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
417	Judy Sanders	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
418	Thomas F. Sirmon	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
419	Bill D.	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
420	Peyton Watson	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
421	Paul Watson	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
422	Daniela Fischer	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.

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423	Art Powell	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
424	Jay Fitzpatrick	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
425	Deanna Sullivan	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
426	Zeke Thomas	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
427	Leonard U.	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
428	Scot Tindol	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
429	Martha R. Davis	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
430	Billy Andrews	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
431	Rick Marshall	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
432	Kyle Stanley	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
433	Yvonne Landry	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.

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434	David W. Nelson	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
435	E. Watts Davis	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
436	Roger Ferguson	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
437	Marsha K. St. John	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
438	Robert W. St. John	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
439	Susan R. Carley	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
440	Kevin W. Carley	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
441	Joe Fesenmeier	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
442	David Simms	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
443	Kandice Williams	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
444	Russell Floyd	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.

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445	Jeremy A. Collier	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
446	Abby C.	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
447	Joseph Sims	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
448	Stan Graves	3/27/2018		•Erosion •Dredging/Disposal •Environmental	•Fully evaluate effects of widening and deepening, including historic sand loss, in the EIS •Alternative to SIBUA •Mitigate for historic loss of sand on Dauphin Island •Protection of sea turtles	•For impacts to aquatic resources see section 5.8. •For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
449	Skye E. Kent	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
450	Shay Lawson	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
451	Joan Voss	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
452	Myrt Jones			•Dredging/Disposal •Public involvement	•Put together a Citizens Advisory Committee	•Noted
453	Kathryn S. Liretee	3/31/2018	A Professional Law Corporation	•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
454	Barton E. & Gina C. Briggs	3/21/2018		•Erosion •Dredging/Disposal	•Dredged material should be placed back in an area to return to littoral drift to return to the beaches of Dauphin Island to mitigate erosion problem •SIBUA nearing capacity so alternative location(s) will need to be implemented soon •Material should be placed in waters of 20 feet or less for it to return to littoral drift	•For SIBUA analysis see section 4.2.2.3.
455	David S. Marks III	1/24/2018		•Erosion	• Connection between Mobile Bay dredging and policy/procedures to Dauphin Island erodin (based on Dr. Scott Douglas' Beach Erosion	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1.
456	Glen Coffee	2/23/2018		•Evironmental •Erosion	•GRR study should evaluate alternatives to comply with discretionary Section 302 authority granted to the Corps (also 1997 directive from Corps higher authority provided permission) • Placing dredged material into SIBUA is not most beneficial placement; should be placed to return to littoral drift •Significant loss to naturally provided nearshore sands (loss to Sand/Pelican Island complex and Dauphin Island shoreline recession) •SIBUA should be extended into more shallow waters to allow for sand to return to littoral drift system to rebuild Sand/Pelican Island complex and DI shoreline	•See section 4.2.3.2 for beneficial use of dredged material •For SIBUA analysis see section 4.2.2.3.
457	Linda Segrest	4/1/2018		•Erosion	•Agrees with Dauphin Island Property Owners Association to place dredged material in shallower waters to allow for sand to return to littoral drift system to aid in restoration of DI shoreline	•For SIBUA analysis see section 4.2.2.3.
458	Vickie Connolly	2/26/2018		•Erosion •Dredged Material	•Human intervention (dredging) caused erosion to the Mississippi and Alabama barrier islands based on Dr. Robert Morton's service report •SIBUA should be expanded to replace sand to DI shoreline or other sand should be placed back to shoreline	•See section 4.2.3.2 for beneficial use of dredged material •For SIBUA analysis see section 4.2.2.3.

Comment No.	Commenter Name	Date	Comment Agency	Discipline/Category	Comment Summary	Response
459	Glen Coffee	3/1/2018		<ul style="list-style-type: none"> Public Affairs Erosion Dredged Material 	<ul style="list-style-type: none"> Proposed SIBUA expansion to address dredged sand accumulation problem adversely affecting the continued utilization of the disposal area (not included in slideshow, should have been) 	<ul style="list-style-type: none"> For SIBUA analysis see section 4.2.2.3.
460	Stan Graves	2/2/2018		<ul style="list-style-type: none"> Erosion 	<ul style="list-style-type: none"> 1980 EIS is flawed as it ignored Dauphin Island in analysis (not compliant with Section 5 of the 1935 River and Harbor Act) Should address error of 1980 EIS in GRR or omit 1980 EIS and DI included in GRR analysis addressing maintenance dredging and deficit sand deposited in Open Gulf and ineffectiveness of SIBUA GRR should address erosion of DI dating back to 1980 EIS, not from current conditions, since maintenance dredging caused change/loss of shoreline sand on DI 	<ul style="list-style-type: none"> See section 4.2.3.2 for beneficial use of dredged material For SIBUA analysis see section 4.2.2.3.
461	Joseph Lovorn	2/26/2018		<ul style="list-style-type: none"> Dredge material placement Erosion Water quality 	<ul style="list-style-type: none"> Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. TSP must include a mitigation plan to halt future erosion and restore Dauphin Island's shoreline. Outer Bar Channel material should be disposed in shallow waters Demonstrate model represents Dauphin Island's historic topography, preferably back to 1980. 1200-acre disposal island in the upper bay is a major concern for fishermen. Decrease in oyster production due to water quality issues caused by disposal practices. 	<ul style="list-style-type: none"> For impacts to aquatic resources see section 5.8. For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. For SIBUA analysis see section 4.2.2.3.
462	Chris Husting	4/10/2018		<ul style="list-style-type: none"> Erosion Dredged Material 	<ul style="list-style-type: none"> Agrees with Dauphin Island Property Owners Association to place dredged material in shallower waters to allow for sand to return to littoral drift system to aid in restoration of DI shoreline Deposit beach quality sand onto shores of DI from Mobile Ship Channel dredging 	<ul style="list-style-type: none"> For SIBUA analysis see section 4.2.2.3.
463	Stan Graves	3/21/2018		<ul style="list-style-type: none"> Erosion Dredged Material 	<ul style="list-style-type: none"> GRR study should evaluate/address changed conditions since the 1980 EIS was released, not as it exists today, based on NEPA guidelines and the testimony of Dr. Susan Rees 	<ul style="list-style-type: none"> For erosion concerns on Dauphin Island see section 5.3.3 and 6.1.
464	Kathleen Geske	2/20/2018		<ul style="list-style-type: none"> Erosion Dredged Material 	<ul style="list-style-type: none"> Material dredged from channel should be placed closer to natural flow paths to return sand to littoral drift 	<ul style="list-style-type: none"> For SIBUA analysis see section 4.2.2.3.
465	Jonathon Meeks	3/22/2018	Sierra Club	<ul style="list-style-type: none"> Erosion Dredged Material 	<ul style="list-style-type: none"> Corps should replace amount of sand that has been eroded over the last 20 years due to dredging of channel Sand that has accumulation in the SIBUA would have naturally transported to the shoreline of DI by littoral drift, so Corps should replace that amount to shoreline Corps has to develop and implement an acceptable mitigation plan to restore eroded shorelines as well as eliminating maintenance of the Mobile Harbor Outer Bar Channel as a contributing factor in any future erosion Mitigation measures to restore Sand/Pelican Island complex and DI shorelines SIBUA should not be expanded solely for the purpose from an operational standpoint, but also from a beneficial use for replacement of sand to DI shoreline Separation of the GRR Study to enlarge Mobile Harbor and the ongoing Mobile Bay Regional Sediment Management Program should not occur since the two efforts are similar and connected Should use dredged material on shorelines of DI with justification of environmental restoration concurrent with Section 302 of WRDA 1996 DMMP needs to be shared to be concurrent with the Preliminary Assessment from ER-1105-2-100 	<ul style="list-style-type: none"> For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. See section 4.2 for dredged material placement.
466	Lella B. Lowe	3/16/2017		<ul style="list-style-type: none"> Environmental Public Affairs/Involvement 	<ul style="list-style-type: none"> Air quality should be addressed in DSEIS (baseland and potential changes) USACE should not alter Mobile Harbor if changes will disrupt natural replenishment of Dauphin Island Believes not enough effort is being applied to incorporating all concerns from the public regarding channel improvements Project should not be implemented if there is concerns with possible negative impacts to fisheries/environment 	<ul style="list-style-type: none"> For impacts to aquatic resources see section 5.8. For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. For impacts associated with air quality, traffic, and safety, see sections 2.5.12, 2.5.13, 2.5.14, 2.5.19, 2.5.20, 5.14, 5.15, 5.16, 5.20, and 5.21.
467	Barry L. Zipperman	7/24/2017	Law Offices of Davis, Ziperman, Kirschenbaum & Lotito, LLP	<ul style="list-style-type: none"> Environmental Erosion 	<ul style="list-style-type: none"> Corps should include erosion and environmental impacts to Dauphin Island in GRR/EIS (not included in 1980 EIS for Mobile Harbor Federal Navigation project) Include information from 1978 Dauphin Island study saying maintenance dredging caused erosion on Dauphin Island shoreline Address sand from SIBUA does not reach Dauphin Island Include information from other subject matter experts analyses Address 2016 statement that the Corps would narrow the scope of the Supplement to the original identified in the 1980 EIS Address Corps nonconcurrence with Federal Laws and Corps manuals regarding placement of Mobile Harbor Federal Navigation Channel dredged material closer to the beaches of Dauphin Island Address the LEAST COSTLY rule of the Corps regarding the utilization of a pipeline dredge versus a hopper dredge for placing sand closer to Dauphin Island and the insignificant cost difference between the two methods 	<ul style="list-style-type: none"> See section 4.2.3.2 for beneficial use of dredged material For SIBUA analysis see section 4.2.2.3. For erosion concerns on Dauphin Island see section 5.3.3 and 6.1.
468	Chuck Taylor	11/21/2017	Ocean Serenade, Ocean Melody and Ocean Harmony LLC's	<ul style="list-style-type: none"> Erosion 	<ul style="list-style-type: none"> Concerned about the erosion from the west end of the island (as 1st tier lots are now under water from a realty property sales person) Channel policies, dredging policies, and lack of beach restoration should be addressed 	<ul style="list-style-type: none"> For SIBUA analysis see section 4.2.2.3. For erosion concerns on Dauphin Island see section 5.3.3 and 6.1.

Comment No.	Commenter Name	Date	Comment Agency	Discipline/Category	Comment Summary	Response
469	Robert Burns and Linda O. Nichols	12/1/2017		• Erosion	<ul style="list-style-type: none"> • Lost 100 feet of beach over past 16 years due to dredging maintenance of Mobile Harbor Outer Bar Channel • Should restore shoreline to ensure no further degradation is caused 	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1.
470	Joseph Murray	2/29/2016		• Environmental	<ul style="list-style-type: none"> •Resolve conflict between 1980 EIS and 1976 report •Ensure that the littoral transport is restored and maintained •Verify the application of all GCRSM principles •Ensure that all project decisions are in the context of the sediment system and all regional implications are addressed. •Enhance natural resources within the project area •Provide beneficial placement of dredged material •Contribute to the preservation of historically significant resources within the project area •Assure compliance with section 5 of the river and Harbor Act of 1935 and rectify noncompliance •State a basis of acceptance of the USGS Open-File Report 2007-1161 •Analyze continuing erosional impact to the economic activities, the Audobon Bird Sanctuary, oyster beds, salt marshes, and Fort Gaines (all located on or around Dauphin Island). •Explain dredging material drift zone deposition impact versus sediment transport along natural lines. 	<ul style="list-style-type: none"> •For SIBUA analysis see section 4.2.2.3. •For erosion concerns on Dauphin Island see section 5.3.3 and 6.1.
471	William Wiik	3/30/2018		•Dredge material placement •Erosion	<ul style="list-style-type: none"> •Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •Place dredged material in water shallower than 20 feet. •Mitigation for loss of sand on Dauphin Island. 	•For SIBUA analysis see section 4.2.2.3.
472	Wendy Allen	3/20/2018		•Dredge material placement •Erosion	<ul style="list-style-type: none"> •Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •Place dredged material in water shallower than 20 feet. •Mitigation for loss of sand on Dauphin Island. 	•For SIBUA analysis see section 4.2.2.3.
473	Susan Jones	3/10/2018		•Erosion •Dredged Material	<ul style="list-style-type: none"> •Alternative site has to be identified to benefit DI shoreline •Corps is required to address significant adverse project impacts, such as SIBUA not meeting the intended purpose of protecting/restoring DI shoreline with sand in littoral drift •Corps should consider historic erosion, not just current state in GRR analysis of DI •Corps should provide location/plan for dredged material from the channel alterations •More analysis should be conducted regarding the oyster population impacts from channel alterations (siltation, dissolved oxygen level, salinity, etc) 	<ul style="list-style-type: none"> •See section 4.2 for dredged material placement. •For erosion concerns on Dauphin Island see section 5.3.3 and 6.1.
474	Scott Kiker	3/22/2018		•Dredge material placement •Erosion	<ul style="list-style-type: none"> •Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •Place dredged material in water shallower than 20 feet. •Mitigation for loss of sand on Dauphin Island. 	•For SIBUA analysis see section 4.2.2.3.
475	Russell Voisin	2/20/2018		•Erosion	<ul style="list-style-type: none"> •GRR should address SIBUA not restoring DI shoreline •GRR should identify a new disposal site in shallow water to restore DI shoreline via littoral drift 	•For SIBUA analysis see section 4.2.2.3.
476	Roy and Barbara Price	2/20/2018		•Erosion	•Dauphin Island cannot handle more erosion via channel alteration	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1.
477	Roy and Barbara Price	3/28/2018		•Erosion	<ul style="list-style-type: none"> •Removal of sand from the ship channel interrupts normal westerly migration is causing beach erosion on DI •Close placement of dredged material to DI could restore shores 	<ul style="list-style-type: none"> •For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
478	Richard Brewer	3/20/2018		•Erosion •Dredged Material •Species	<ul style="list-style-type: none"> •Loss of longshore sediment transportation due to adherence to the channel dredging plan has led to DI beach erosion •Material should be placed in waters less than 20 feet to allow for dredged material to return to DI shoreline •Loss of habitat for nesting turtles from channel alteration will increase •SIBUA contributing to DI shoreline erosion since beach quality sand has been removed from littoral drift system via maintenance of Outer Bar Channel •Channel alterations should not take place unless mitigation plans for DI are in place to protect/prevent further erosion of DI shoreline 	<ul style="list-style-type: none"> •For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
479	Ray C. Mayo Jr.	2/28/2018		•Erosion •Dredged Material	<ul style="list-style-type: none"> •SIBUA has prevented beach quality sand from reaching DI shoreline from Outer Bar Channel maintenance •Alternate site for dredged material should be identified in shallow water to aid in shoreline restoration of DI •SIBUA not meeting intended purpose and Corps required to address this in GRR with an appropriate mitigation plan for DI erosion due to dredging maintenance •Historic erosion of DI should be evaluated, not only for current state •Method and location for increased quantity of dredged material from channel alteration needs to be addressed in GRR •Effects on oysters population should be revisited and reevaluated (siltation, salinity, dissolved oxygen, etc) 	<ul style="list-style-type: none"> •For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3. •For impacts to aquatic resources see section 5.8.
480	Peter Kraemer	3/22/2018		•Dredge material placement •Erosion	<ul style="list-style-type: none"> •Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •Place dredged material in water shallower than 20 feet. •Mitigation for loss of sand on Dauphin Island. 	•For SIBUA analysis see section 4.2.2.3.
481	Paul Watson	3/1/2017		• Environmental • Erosion	• Believes Mobile shipping channel is connected to erosion problems of Dauphin Island	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1.

Comment No.	Commenter Name	Date	Comment Agency	Discipline/Category	Comment Summary	Response
482	Patricia Linder	10/5/2017		<ul style="list-style-type: none"> • Environmental • Water Quality • Erosion 	<ul style="list-style-type: none"> • Concerned with potential impacts to southern shoreline of DI • Concerned about dredged sand and sediments impacts to water quality and surrounding species • Impacts from continued erosion to the nests of Loggerhead sea turtles • Would like analysis of historic sand loss from nearshore littoral system due to Outer Bar Channel 	<ul style="list-style-type: none"> •For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3. •For impacts to aquatic resources see section 5.8.
483	Patricia Linder	5/16/2018		<ul style="list-style-type: none"> •Erosion 	<ul style="list-style-type: none"> •Previously mentioned berm in front of island to mitigate for maintenance of Mobile Harbor should be revisited 	<ul style="list-style-type: none"> •Noted
484	Mike Greer	3/20/2018		<ul style="list-style-type: none"> •Dredge material placement •Erosion 	<ul style="list-style-type: none"> •Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •Place dredged material in water shallower than 20 feet. •Mitigation for loss of sand on Dauphin Island. 	<ul style="list-style-type: none"> •For SIBUA analysis see section 4.2.2.3.
485	Mark A. Williams	3/27/2018		<ul style="list-style-type: none"> •Erosion •Dredged Material 	<ul style="list-style-type: none"> •SIBUA has prevents beach quality sand from reaching DI shoreline from Outer Bar Channel maintenance •Alternate site for dredged material should be identified in shallow water to aid in shoreline restoration of DI •SIBUA not meeting intended purposed and Corps required to address this in GRR with an appropriate mitigation plan for DI erosion due to dredging maintenance •Historic erosion of DI should be evaluated, not only for current state •Method and location for increased quantity of dredged material from channel alteration needs to be address in GRR •Effects on oysters population should be revisited and reevaluated (siltation, salinity, dissolved oxygen, etc) 	<ul style="list-style-type: none"> •For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For impacts to aquatic resources see section 5.8. •For SIBUA analysis see section 4.2.2.3.
486	Mark Wyatt	4/11/2018		<ul style="list-style-type: none"> •Erosion 	<ul style="list-style-type: none"> •Allowing for large ships into channel due to widening will increase waves and lead to more erosion (mitigation should be addressed for this issue) •Recommend a study be conducted for potential of vessel-generated erosion and erosion monitoring program in the Mobile Bay Ship Channel to shield shoreline and suppress the waves generated impacts to shoreline •Implementing a breakwater partition on shoreline for larger waves from larger vessels may be best method for remediation 	<ul style="list-style-type: none"> •For shipwake see section 5.3.1
487	Lynn A. Hinrichs	3/1/2018		<ul style="list-style-type: none"> •Erosion •Dredged Material 	<ul style="list-style-type: none"> •SIBUA has prevents beach quality sand from reaching DI shoreline from Outer Bar Channel maintenance •Alternate site for dredged material should be identified in shallow water to aid in shoreline restoration of DI •SIBUA not meeting intended purposed and Corps required to address this in GRR with an appropriate mitigation plan for DI erosion due to dredging maintenance •Historic erosion of DI should be evaluated, not only for current state •Method and location for increased quantity of dredged material from channel alteration needs to be address in GRR •Effects on oysters population should be revisited and reevaluated (siltation, salinity, dissolved oxygen, etc) 	<ul style="list-style-type: none"> •For SIBUA analysis see section 4.2.2.3. •For impacts to aquatic resources see section 5.8.
488	Lyle Fields	1/24/2018		<ul style="list-style-type: none"> •Erosion •Dredged Material 	<ul style="list-style-type: none"> •All information regarding Dauphin Island and the erosion of the shoreline caused by Mobile Harbor maintenance and future erosion possibilities from the expansion that could occur needs to be released for the public in regards to the GRR/SEIS/Mobile Harbor study •Plans and laws for the aforementioned items' mitigation efforts 	<ul style="list-style-type: none"> •For erosion concerns on Dauphin Island see section 5.3.3 and 6.1.
489	Lella Lowe	4/15/2018		<ul style="list-style-type: none"> •Erosion •Air Quality 	<ul style="list-style-type: none"> •SIBUA has prevented beach quality sand from reaching Dauphin Island since its implementation; GRR should include plan for mitigation to the SIBUA /shoreline of DI •GRR should take measures for current air quality information to establish a baseline for comparison to future air quality changes with increased ship traffic 	<ul style="list-style-type: none"> •For SIBUA analysis see section 4.2.2.3. •For impacts associated with air quality, traffic, and safety, see sections 2.5.12, 2.5.13, 2.5.14, 2.5.19, 2.5.20, 5.14, 5.15, 5.16, 5.20, and 5.21.
490	Laura Martin	2/29/2016	Dauphin Island Restoration Task Force	<ul style="list-style-type: none"> • Public Affairs • Environmental 	<ul style="list-style-type: none"> • Unable to hear questions being asked/answered due to meeting setup/format • Consistency between 1978 study with littoral drift effects on Dauphin Island 	<ul style="list-style-type: none"> •For erosion concerns on Dauphin Island see section 5.3.3 and 6.1.
491	Larry Pinkerton	3/22/2018		<ul style="list-style-type: none"> •Dredge material placement •Erosion 	<ul style="list-style-type: none"> •Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •Place dredged material in water shallower than 20 feet. •Mitigation for loss of sand on Dauphin Island. 	<ul style="list-style-type: none"> •For SIBUA analysis see section 4.2.2.3.
492	Larry Pinkerton	3/9/2018		<ul style="list-style-type: none"> •Erosion •Species •Dredged Material 	<ul style="list-style-type: none"> •SIBUA has prevents beach quality sand from reaching DI shoreline from Outer Bar Channel maintenance •Alternate site for dredged material should be identified in shallow water to aid in shoreline restoration of DI •SIBUA not meeting intended purposed and Corps required to address this in GRR with an appropriate mitigation plan for DI erosion due to dredging maintenance •Historic erosion of DI should be evaluated, not only for current state •Method and location for increased quantity of dredged material from channel alteration needs to be address in GRR •Effects on oysters population should be revisited and reevaluated (siltation, salinity, dissolved oxygen, etc) 	<ul style="list-style-type: none"> •For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For impacts to aquatic resources see section 5.8. •For SIBUA analysis see section 4.2.2.3.
493	Justin Roberts	3/30/2018		<ul style="list-style-type: none"> •Dredged Material 	<ul style="list-style-type: none"> •Material dredged from channel should be taken to an alternative site other than the SIBUA to be incorporated back into the littoral drift system to aid in shoreline restoration on Dauphin Island •GRR should address the erosion of Dauphin Island shoreline 	<ul style="list-style-type: none"> •For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
494	Julie Day	4/11/2018		<ul style="list-style-type: none"> •Dredged Material •Species 	<ul style="list-style-type: none"> •Dredged Material should not be placed in a thin layer over the bay; could adversely affect aquatic species via siltation and sedimentation as the bottom of the bay 	<ul style="list-style-type: none"> •See section 4.2 for dredged material placement.

Comment No.	Commenter Name	Date	Comment Agency	Discipline/Category	Comment Summary	Response
495	Joseph G. Murray	4/4/2018		•Erosion •Dredged Material •Species	•Recovery plan should be implemented with GRR for Dauphin Island shoreline restoration from Outer Bar Channel maintenance •Modeling for GRR should be extended to historic erosion data as well •GRR should address benefit for the return to in-bay disposal, including environmental resotration purposes •Address the assessment of the oyster population and no impacts to the current population •Address conflict between 1980 EIS and the Corps 1976 Report in GRR •Analyze erosion impacts to Dauphin Island, Audubon Bird Sanctuary, aquatic species, Fort Gaines Historic site	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For impacts to aquatic resources see section 5.8. •For SIBUA analysis see section 4.2.2.3.
496	John Bowden	3/20/2018		•Dredge material placement •Erosion	•Replace the 7 mcys of beach quality sand lost due to dredging Mobile Harbor Navigation Channel. •Deepening/widening the channel should produce quality sand for the repair of Dauphin Island.	•For SIBUA analysis see section 4.2.2.3. •For erosion concerns on Dauphin Island see section 5.3.3 and 6.1.
497	John Barker	4/2/2018		•Dredged Material	•Alter dredging and deposit practices in GRR to ensure the preservation of Dauphin Island Beaches	•For SIBUA analysis see section 4.2.2.3. •For erosion concerns on Dauphin Island see section 5.3.3 and 6.1.
498	Joan Smith	3/5/2018		•Dredged Material •Erosion •Species	•SIBUA has prevents beach quality sand from reaching DI shoreline from Outer Bar Channel maintenance •Alternate site for dredged material should be identified in shallow water to aid in shoreline restoration of DI •SIBUA not meeting intended purposed and Corps required to address this in GRR with an appropriate mitigation plan for DI erosion due to dredging maintenance •Historic erosion of DI should be evaluated, not only for current state •Method and location for increased quantity of dredged material from channel alteration needs to be address in GRR •Effects on oysters population should be revisited and reevaluated (siltation, salinity, dissolved oxygen, etc)	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For impacts to aquatic resources see section 5.8. •For SIBUA analysis see section 4.2.2.3.
499	Jim and Nancy Harlow	4/1/2018		•Dredged Material	•Material dredged from channel should be placed in shallow waters to enter back into littoral drift system for shoreline replenishment •SIBUA being moved will only be beneficial if dredged material from channel is placed in more shallow waters	•For SIBUA analysis see section 4.2.2.3.
500	Jim and Nancy Harlow	3/5/2018		•Dredged Material	•Material dredged from channel should be placed in shallow waters to enter back into littoral drift system for shoreline replenishment •SIBUA being moved will only be beneficial if dredged material from channel is placed in more shallow waters	•For SIBUA analysis see section 4.2.2.3.
501	Jared Davis	2/21/2018		Dredged Material	•Requests dredged material from channel be placed on or near shoreline of Dauphin Island to help restore the beaches	•For SIBUA analysis see section 4.2.2.3.
502	James H. Roberts	3/22/2018		•Dredge material placement •Erosion	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •Place dredged material in water shallower than 20 feet. •Mitigation for loss of sand on Dauphin Island.	•For SIBUA analysis see section 4.2.2.3. •For erosion concerns on Dauphin Island see section 5.3.3 and 6.1.
503	James Fisher	3/23/2018		•Dredge material placement •Erosion	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •Place dredged material in water shallower than 20 feet. •Mitigation for loss of sand on Dauphin Island.	•For SIBUA analysis see section 4.2.2.3. •For erosion concerns on Dauphin Island see section 5.3.3 and 6.1.
504	Holly Roberts	3/30/2018		•Dredge material placement •Erosion	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •Place dredged material in water shallower than 20 feet. •Mitigation for loss of sand on Dauphin Island.	•For SIBUA analysis see section 4.2.2.3. •For erosion concerns on Dauphin Island see section 5.3.3 and 6.1.
505	Heather Fisher	3/21/2018		•Dredge material placement •Erosion	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •Place dredged material in water shallower than 20 feet. •Mitigation for loss of sand on Dauphin Island.	•For SIBUA analysis see section 4.2.2.3. •For erosion concerns on Dauphin Island see section 5.3.3 and 6.1.
506	Gary Garstecki	3/21/2018		•Dredge material placement •Erosion	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •Place dredged material in water shallower than 20 feet. •Mitigation for loss of sand on Dauphin Island.	•For SIBUA analysis see section 4.2.2.3. •For erosion concerns on Dauphin Island see section 5.3.3 and 6.1.
507	Gary Garstecki	3/20/2018		•Dredge material placement •Erosion	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •Place dredged material in water shallower than 20 feet. •Mitigation for loss of sand on Dauphin Island.	•For SIBUA analysis see section 4.2.2.3. •For erosion concerns on Dauphin Island see section 5.3.3 and 6.1.
508	Gary Warner	4/10/2018		Dredged Material	•GRR should address SIBUA and its benefits to DI •new location for beneficial use area should be chose to aid with restoration of DI shoreline •Thin layer of dredged material over bay will adversely affect the oyster and other species populations in the bay	•See section 4.2 for dredged material placement. •For SIBUA analysis see section 4.2.2.3. •For impacts to aquatic resources see section 5.8.
509	Garrett Mangum	3/21/2018		•Erosion	•Need a mitigation plan to combat erosion	•See section 4.2 for dredged material placement. •For erosion concerns on Dauphin Island see section 5.3.3 and 6.1.
510	Erk Ashbee	4/11/2018		•Erosion	•Need a mitigation plan to combat erosion	•See section 4.2 for dredged material placement. •For erosion concerns on Dauphin Island see section 5.3.3 and 6.1.
511	Eric Wylar	1/25/2018		•Erosion •Dredged Material	•All information regarding Dauphin Island and the erosion of the shoreline caused by Mobile Harbor maintenance and future erosion possibilities from the expansion that could occur needs to be released for the public in regards to the GRR/SEIS/Mobile Harbor study •Plans and laws for the aforementioned items' mitigation efforts	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1.

Comment No.	Commenter Name	Date	Comment Agency	Discipline/Category	Comment Summary	Response
512	Eric Mills	1/25/2018		•Erosion •Dredged Material	•All information regarding Dauphin Island and the erosion of the shoreline caused by Mobile Harbor maintenance and future erosion possibilities from the expansion that could occur needs to be released for the public in regards to the GRR/SEIS/Mobile Harbor study •Plans and laws for the aforementioned items' mitigation efforts	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1.
513	Deborah Hall	3/26/2018		•Dredge material placement •Erosion	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •Place dredged material in water shallower than 20 feet. •Mitigation for loss of sand on Dauphin Island.	•For SIBUA analysis see section 4.2.2.3. •For erosion concerns on Dauphin Island see section 5.3.3 and 6.1.
514	Dave Nelson	3/3/2017		• Environmental • Economic • Dredging	• Revenue from channel should be used to place sand on Dauphin Island • Corps not conducting Mobile Entrance Channel properly • Inform officials of Corps maintenance dredging	•Noted
515	Dan Elcan	3/23/2018		•Dredge material placement •Erosion	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •Place dredged material in water shallower than 20 feet. •Mitigation for loss of sand on Dauphin Island.	•For SIBUA analysis see section 4.2.2.3. •For erosion concerns on Dauphin Island see section 5.3.3 and 6.1.
516	Clyle Serns	2/26/2018		•Erosion	•Need a mitigation plan to compensate for sand loss on Dauphin Island since 1999.	•See section 4.2 for dredged material placement. •For erosion concerns on Dauphin Island see section 5.3.3 and 6.1.
517	Clyle Serns	2/26/2018		•Dredge material placement •Erosion	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •Place dredged material in water shallower than 20 feet. •Mitigation for loss of sand on Dauphin Island.	•For SIBUA analysis see section 4.2.2.3. •For erosion concerns on Dauphin Island see section 5.3.3 and 6.1.
518	Chuck Taylor	3/20/2018		•Dredge material placement •Erosion	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •Place dredged material in water shallower than 20 feet. •Mitigation for loss of sand on Dauphin Island.	•For SIBUA analysis see section 4.2.2.3. •For erosion concerns on Dauphin Island see section 5.3.3 and 6.1.
519	Chuck Taylor	2/26/2018		•Dredged Material •Erosion •Species	•SIBUA has prevents beach quality sand from reaching DI shoreline from Outer Bar Channel maintenance •Alternate site for dredged material should be identified in shallow water to aid in shoreline restoration of DI •SIBUA not meeting intended purposed and Corps required to address this in GRR with an appropriate mitigation plan for DI erosion due to dredging maintenance •Historic erosion of DI should be evaluated, not only for current state •Method and location for increased quantity of dredged material from channel alteration needs to be address in GRR •Effects on oysters population should be revisited and reevaluated (siltation, salinity, dissolved oxygen, etc)	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For impacts to aquatic resources see section 5.8. •For SIBUA analysis see section 4.2.2.3.
520	Charles Lea	3/20/2018		•Dredge material placement •Erosion	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •Place dredged material in water shallower than 20 feet. •Mitigation for loss of sand on Dauphin Island.	•For SIBUA analysis see section 4.2.2.3. •For erosion concerns on Dauphin Island see section 5.3.3 and 6.1.
521	Charles Cohen	3/20/2018		•Dredge material placement •Erosion	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •Place dredged material in water shallower than 20 feet. •Mitigation for loss of sand on Dauphin Island.	•For SIBUA analysis see section 4.2.2.3. •For erosion concerns on Dauphin Island see section 5.3.3 and 6.1.
522	Caroline Graves	3/9/2018		•Public Affairs •Erosion •Dredged Material Placement	•Corps employees misleading the public and press about the Mobile Harbor channel and its effects on Dauphin Island, and also the inability to place sand on Dauphin Island. •O&M funds should be used to investigate opportunities to modify the authorized maintenance plan. •Dredged sand from the Outer Bar must be placed in shallow water. •Construct a nearshore berm in front of the island.	•For SIBUA analysis see section 4.2.2.3. •For erosion concerns on Dauphin Island see section 5.3.3 and 6.1.
523	Caroline Graves	3/3/2017		• Economic • Environmental • Erosion	• Use Dauphin Island's economic value as justification for beach restoration. • Believes dredging at entrance channel is causing erosion to Dauphin Island • Corps should mitigate and protect shoreline based on Federal Law	•For SIBUA analysis see section 4.2.2.3. •For erosion concerns on Dauphin Island see section 5.3.3 and 6.1.
524	Caroline Graves	3/1/2018		•Erosion	•Mitigation for erosion caused by the Corps •Permanent pump-out station to off-set erosion to Dauphin Island?	•For SIBUA analysis see section 4.2.2.3. •For erosion concerns on Dauphin Island see section 5.3.3 and 6.1.
525	Caroline Graves	2/8/2018		•Erosion •Dredged Material	•All information regarding Dauphin Island and the erosion of the shoreline caused by Mobile Harbor maintenance and future erosion possibilities from the expansion that could occur needs to be released for the public in regards to the GRR/SEIS/Mobile Harbor study	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1.
526	Charles and Brenda Fraim	3/29/2018		•Dredge material placement •Erosion	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •Place dredged material in water shallower than 20 feet. •Mitigation for loss of sand on Dauphin Island.	•For SIBUA analysis see section 4.2.2.3. •For erosion concerns on Dauphin Island see section 5.3.3 and 6.1.
527	Bob Neal	3/15/2018		•Erosion •Dredged material placement	•Increase of erosion in recent years •Place material closer/on Dauphin Island, and in shallower waters.	•For SIBUA analysis see section 4.2.2.3. •For erosion concerns on Dauphin Island see section 5.3.3 and 6.1.
528	Billy Richardson	1/23/2018		•Erosion •Dredged Material	•All information regarding Dauphin Island and the erosion of the shoreline caused by Mobile Harbor maintenance and future erosion possibilities from the expansion that could occur needs to be released for the public in regards to the GRR/SEIS/Mobile Harbor study	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1.
529	William L. Green	3/28/2018		•Dredge material placement •Erosion	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •Place dredged material in water shallower than 20 feet. •Mitigation for loss of sand on Dauphin Island.	•For SIBUA analysis see section 4.2.2.3. •For erosion concerns on Dauphin Island see section 5.3.3 and 6.1.

Comment No.	Commenter Name	Date	Comment Agency	Discipline/Category	Comment Summary	Response
530	William L. Green	3/1/2018		<ul style="list-style-type: none"> Dredged Material Erosion Species 	<ul style="list-style-type: none"> SIBUA has prevented beach quality sand from reaching DI shoreline from Outer Bar Channel maintenance Alternate site for dredged material should be identified in shallow water to aid in shoreline restoration of DI SIBUA not meeting intended purpose and Corps required to address this in GRR with an appropriate mitigation plan for DI erosion due to dredging maintenance Historic erosion of DI should be evaluated, not only for current state Method and location for increased quantity of dredged material from channel alteration needs to be addressed in GRR Effects on oysters population should be revisited and reevaluated (siltation, salinity, dissolved oxygen, etc) 	<ul style="list-style-type: none"> For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. For impacts to aquatic resources see section 5.8. For SIBUA analysis see section 4.2.2.3.
531	William L. Green	2/1/2018		<ul style="list-style-type: none"> Erosion Dredged Material 	<ul style="list-style-type: none"> All information regarding Dauphin Island and the erosion of the shoreline caused by Mobile Harbor maintenance and future erosion possibilities from the expansion that could occur needs to be released for the public in regards to the GRR/SEIS/Mobile Harbor study Plans and laws for the aforementioned items' mitigation efforts 	<ul style="list-style-type: none"> For erosion concerns on Dauphin Island see section 5.3.3 and 6.1.
532	Beth K. Stewart	3/20/2018		<ul style="list-style-type: none"> Dredge material placement Erosion 	<ul style="list-style-type: none"> Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. Place dredged material in water shallower than 20 feet. Mitigation for loss of sand on Dauphin Island. 	<ul style="list-style-type: none"> For SIBUA analysis see section 4.2.2.3. For erosion concerns on Dauphin Island see section 5.3.3 and 6.1.
533	Audubon Place Property Owners Association	3/22/2018	Audubon Place Property Owners Association	<ul style="list-style-type: none"> Dredge material placement Erosion 	<ul style="list-style-type: none"> Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. Place dredged material in water shallower than 20 feet. Mitigation for loss of sand on Dauphin Island. 	<ul style="list-style-type: none"> For SIBUA analysis see section 4.2.2.3. For erosion concerns on Dauphin Island see section 5.3.3 and 6.1.
534	Annette McDermott Carwie	2/26/2018		<ul style="list-style-type: none"> Dredged Material Erosion Species 	<ul style="list-style-type: none"> SIBUA has prevented beach quality sand from reaching DI shoreline from Outer Bar Channel maintenance Alternate site for dredged material should be identified in shallow water to aid in shoreline restoration of DI SIBUA not meeting intended purpose and Corps required to address this in GRR with an appropriate mitigation plan for DI erosion due to dredging maintenance Historic erosion of DI should be evaluated, not only for current state Method and location for increased quantity of dredged material from channel alteration needs to be addressed in GRR Effects on oysters population should be revisited and reevaluated (siltation, salinity, dissolved oxygen, etc) 	<ul style="list-style-type: none"> For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. For impacts to aquatic resources see section 5.8. For SIBUA analysis see section 4.2.2.3.
535	Alida Wyler	1/25/2018		<ul style="list-style-type: none"> Erosion Dredged Material 	<ul style="list-style-type: none"> All information regarding Dauphin Island and the erosion of the shoreline caused by Mobile Harbor maintenance and future erosion possibilities from the expansion that could occur needs to be released for the public in regards to the GRR/SEIS/Mobile Harbor study Plans and laws for the aforementioned items' mitigation efforts 	<ul style="list-style-type: none"> For erosion concerns on Dauphin Island see section 5.3.3 and 6.1.
536	Alan Castelin	4/7/2018		<ul style="list-style-type: none"> Erosion Dredged material placement 	<ul style="list-style-type: none"> Dauphin Island being destroyed by erosion Dredged material should be placed closer to Dauphin Island 	<ul style="list-style-type: none"> For SIBUA analysis see section 4.2.2.3. For erosion concerns on Dauphin Island see section 5.3.3 and 6.1.
537	Glen Coffee	7/24/2017		<ul style="list-style-type: none"> Public Involvement Public Affairs Planning Environmental 	<ul style="list-style-type: none"> Address how public comments will be considered during the next in-progress public meeting Regarding public displays, wording should be revisited on the "Key Scoping Comments" to correctly portray the settlement between Dauphin Island and the Federal Government of the 2009 lawsuit Address 2010 Byrnes et al report reference on display board to reflect this was a Corps only opinion not reviewed by independent subject matter experts on sediment movement and erosion, as well as non responses to comments from the 2010 report Corps should address problems associated with Dauphin Island erosion problems as a product of dredging Were there planning objectives and opportunities for DI identified during initial investigation of the problems and needs of the Study Area (an alternative to beneficially use dredged material from Outer Bar channel to restore DI's eroding shoreline) 	<ul style="list-style-type: none"> For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. See section 1.3 and 1.4 for planning objectives and opportunities.
538	Ramsey Sprague	5/11/2018	Mobile Environmental Justice Action Coalition	<ul style="list-style-type: none"> Public Involvement 	<ul style="list-style-type: none"> Environmental justice community outreach to the Down the Bay and Orange Grove communities to capture concerns from their residents. 	<ul style="list-style-type: none"> Noted
539	Donna Young Callahan	3/31/2018		<ul style="list-style-type: none"> Erosion Dredging/Disposal 	<ul style="list-style-type: none"> Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. TSP must include a mitigation plan to halt future erosion and restore Dauphin Island's shoreline. Outer Bar Channel material should be disposed in shallow waters Shoreline restored to at least 1999 conditions Section 302 of WRDA of 1996 	<ul style="list-style-type: none"> For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. For SIBUA analysis see section 4.2.2.3.
540	Carol Lawson	3/31/2018		<ul style="list-style-type: none"> Erosion Dredging/Disposal 	<ul style="list-style-type: none"> Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. TSP must include a mitigation plan to halt future erosion and restore Dauphin Island's shoreline. Outer Bar Channel material should be disposed in shallow waters Shoreline restored to at least 1999 conditions Section 302 of WRDA of 1996 	<ul style="list-style-type: none"> For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. For SIBUA analysis see section 4.2.2.3.
541	Thomas R. Lawson Jr.	3/31/2018		<ul style="list-style-type: none"> Erosion Dredging/Disposal 	<ul style="list-style-type: none"> Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. TSP must include a mitigation plan to halt future erosion and restore Dauphin Island's shoreline. Outer Bar Channel material should be disposed in shallow waters Shoreline restored to at least 1999 conditions Section 302 of WRDA of 1996 	<ul style="list-style-type: none"> For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. For SIBUA analysis see section 4.2.2.3.

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554	Sid Roberts	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
555	Ann R. Hattrich	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
556	Tabitha Ogden	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
557	Jane Nolen Gilmore	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
558	John Barrett, PhD.	3/31/2018		•Erosion •Dredging/Disposal	•Dredged sand accumulating at the SIBUA instead of rejoining the littoral drift. •TSP must include a mitigation plan to halt future erosion and restore Daupin Island's shoreline. •Outer Bar Channel material should be disposed in shallow waters •Shoreline restored to at least 1999 conditions •Section 302 of WRDA of 1996	•For erosion concerns on Dauphin Island see section 5.3.3 and 6.1. •For SIBUA analysis see section 4.2.2.3.
559	Beverly Crandall	4/24/2018	Down the Bay Block Club	•Environmental Justice	•Concerned that the increase in truck traffic will negatively impact air quality.	•For impacts associated with air quality, traffic, and safety, see sections 2.5.12, 2.5.13, 2.5.14, 2.5.19, 2.5.20, 5.14, 5.15, 5.16, 5.20, and 5.21.

U.S. ARMY CORPS OF ENGINEERS
PUBLIC SCOPING MEETING
MOBILE HARBOR GENERAL REEVALUATION REPORT

HELD AT THE MOBILE CRUISE TERMINAL
ON WATER STREET
MOBILE, ALABAMA

JANUARY 12, 2016; 5:00-8:00 P.M.

I N D E X

COMMENTS:

BY [REDACTED] - page 3

BY [REDACTED] - page 4

BY [REDACTED] - page 10

BY [REDACTED] - page 12

BY [REDACTED] - page 12

BY [REDACTED] - page 14

BY [REDACTED] - page 24

[REDACTED]

1 [REDACTED], NAVARRE, FLORIDA:

2 I'm very concerned about the impact this is
3 going to have on Dauphin Island. I know it's
4 debatable and it's been argued whether it had an
5 effect in the past or not. But I'm uncomfortable
6 thinking that if it had an effect in the past, that
7 this is going to really increase the scope of the
8 problem as far as the erosion on Dauphin Island. I
9 would hope that within the plans that the Corps of
10 Engineers considers renourishing the island before it
11 begins and then maintaining the island, depositing the
12 sand on any coastlines that are like Dauphin Island
13 that have the potential for erosion.

14 As a homeowner, I had planned on retiring on
15 Dauphin Island. And I'm afraid to at this point.
16 I've been putting it off now for about three years,
17 and I don't know whether to build on Dauphin Island.
18 I cannot really even sell a house because nobody knows
19 what's going to happen, and people don't want to
20 invest in an area not knowing if erosion is going to
21 become a bigger issue. I'm concerned about the
22 wildlife as well, the effects it will have.

23 And that's pretty much it.

[REDACTED]

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[REDACTED], BAYOU LA BATRE/IRVINGTON AREA:

I was born and raised in Bayou La Batre. A lot of generations of commercial fishermen, a lot of concern about maintaining habitat, our seafood and people that work in our seafood.

The siltation that we've seen over the years from different projects where there's open water disbursement or islands, protective islands that's always been habitat for net fishing, different species of fish, flounder, sheepshead, mullet. You have areas that you've always worked and always crabbed along the channel and around -- we call it Goat Island. Just the bottoms that we've seen, also on the west side, silted up and destroyed from digging channels and pipelines and everything.

But this project here has raised concern with some of our upper bay fishermen. And after talking with a number of fishermen, [REDACTED] and [REDACTED] -- his real name is [REDACTED], but we call him [REDACTED]. And after seeing the problems that existed in some of the silting up on the west side -- and this is going to be a hundred times more

[REDACTED]

1 dirt being moved and placed in areas they work. And
2 me being vice president of the Organized Seafood
3 Association -- some of them should be here tonight to
4 show the voice of concern of losing fishing bottoms
5 and worrying about what the State might allow to be
6 done, seeing in the past the State has allowed several
7 things to go on that literally destroyed some of our
8 prime oyster bottoms. And the Corps has done the
9 same thing. And working over the years with Susan
10 Reese way back with this same problem, moving of dirt
11 in the wrong areas without mitigating habitat for our
12 way of life and producing -- a lot of times they'll
13 say we're going to make grass beds. Grass beds, it's
14 all right. But the biomass of oyster reefs and stuff
15 and clam reefs that we've seen is catastrophic to our
16 way of life and the fish and marine life, both
17 recreationally and commercially. It's so important to
18 the people of the State and to the State because the
19 only way that they can get this property, the seafood,
20 is through us.

21 And if you take the fields, we call them
22 water bottoms -- and the bottoms do belong to the
23 people of the State -- and you change these bottoms to

1 be nonproductive bottoms for us, it's not just for us,
2 it's for everybody that loves to eat these fish,
3 crabs, shrimp and oysters.

4 So if this amount of property, the oyster
5 bottoms -- fishing bottoms and also the silt that
6 comes from this, if it's lost, it will never come back
7 because of the type of bottoms it is and the
8 methodology they're using. Because silt has to run
9 downhill. That's the reason we say are you working up
10 the bay or down the bay. Up the bay means at the
11 mouth of the river south. And all the bays and the
12 rivers up here is productive bottoms for down the bay
13 also where there's oysters or crabs coming out of
14 Grand Bay up here. Just so many others. The Tensaw
15 River Delta that feeds the Alabama River.

16 The tonnage that we produce is for him, you
17 and every restaurant that buys our seafood. We can't
18 afford to lose that critical habitat, not only for us
19 but for the natural things, the fish, the crabs that
20 everybody enjoys. So if you make it dry land or pump
21 it above sea level and see ships coming in and causing
22 high amounts of turbidity, wave action and stuff that
23 we've seen, it's going to cause some repercussions.

[REDACTED]

1 We see it down the bay from ship and wave action, the
2 Cedar Point area down off of Alabama Port beach.
3 Ships want to be bigger, more of them. What progress
4 does is a living, healthy bay.

5 What might happen if you wind up putting
6 islands like Gaillard Island -- that's got about
7 11,000 nesting pelicans on there that adds a lot of
8 amounts of what you call waste, increases the
9 pollution to the bay -- with another island up the bay
10 with probably another 22 or 40,000 pelicans? It's
11 going to decrease the quality of the bay, too.

12 What are we going to hand the next
13 generation? If we lose our jobs and our bottoms, your
14 bottoms, you lose your seafood and you lose the people
15 that produce it in these areas.

16 So we have grave concern over projects that
17 might cause what we've seen in the past, cost jobs and
18 production. And I hope -- I hope we have enough
19 insight as being the stewards and as the State being
20 the managers. It belongs to the people of the State.
21 That was ruled in court a long time ago. With the
22 property rights, it actually is the people. Seafood
23 is the property of the State to be held in trust for

the people of the State. And that's law 9-12-20,
title 9, State of Alabama. If the people don't
protect it and the State don't protect it, our state,
our country, our next generation will not be able to
work and feed from the bottoms that we have fed from.

It's kind of scary if you pollute it out,
dig it up, cover it up, silt it up. I have my
concerns. I like to see our people out there working.
And I like to eat good seafood. As you know, that's
good flounder bottom. We have some good fishing that
produces that.

We hope the Corps will take into
consideration the value of our way of life versus
foreign countries' way of life. There's nothing wrong
with the channel, but I've seen the results of other
digging. And they say, well, it's profitable to the
State what they've done. Maybe so. But who's going
to feed us in the future? I don't think some of these
countries like America. At least it don't look that
way. And I want to depend on our own people to feed
us, not a third world country.

We hope the people consider what they do in
any project, whether it's an outfall line, a berm, an

island, how you place it, where you place the berm. what are you going to do if all this wipes out some of the areas that we just re-layed oysters from just a few years back? we could lose thousands and thousands of barrels of oysters that we could use for seed oysters and creating productive reefs and habitat if this is not done properly. Not a good idea as far as our fishermen are concerned.

So we want them to hear from the fishermen and the people that have done it for generations and want to keep on doing it. we believe it's part of our Constitutional rights because we harvest this property. And property is one of the things that we're entitled to by the Fifth Amendment and the 14th Amendment. Plus seafood is our property and our bottoms is our property. So what if you take our bottoms away from us for a third world country, for a few ships and claim you're doing improvements? I'll tell you I sure hate losing our oyster reefs and our flounder bottoms and our crabbing bottoms for the next 500 years maybe if they put in as much dirt as they plan on putting there in the next five to 25 years. It's going to be there a long time, a real long time.

[REDACTED]

1 My grandchildren won't be able to enjoy it. Neither
2 will yours. So maybe the birds will enjoy it. But
3 I'm going to tell you eating pelicans is not good.

Comment #3

* * * * *

5 [REDACTED], MOBILE, ALABAMA:

6 I have properties on Dauphin Island. And
7 I'm also the vice president on the board of Sandcastle
8 Condominiums, which is located on the east end beach,
9 50 Forney Johnston Road.

10 My first concern is that the dredging,
11 although I support it for industry reasons, but I
12 would like to see an environmental study regarding the
13 erosion problem that the east end is experiencing and,
14 before any more dredging is done, that there are some
15 outlines as to where that sand is going to be put. If
16 you look -- I'm a lifelong resident of Mobile and my
17 family have property on Dauphin Island. The east end
18 of Sand Island is going away. As you dredge,
19 obviously you dig a hole in the sand, the sand falls
20 down to the hole. The closest sand to the hole goes
21 first.

22 Same thing with the east end of the island.
23 Years ago they had a problem where the fort was being

[REDACTED]

1 eroded away. So they blocked it up and they installed
2 jetties. That solved that problem. The sand couldn't
3 come from there anymore, but it came from Audubon,
4 which is just next to that. And it came from
5 Audubon's subdivision and it came from Sandcastle's
6 beach and surf club's beach. They protected the very
7 east -- the very corner of the east end but did
8 nothing with the adjacent properties. And we have
9 lost about 220 feet of beach, and that was the last
10 estimate three years ago. I don't know where we're at
11 now. Sand Island in front of us is totally gone.
12 Sand Island is now to the far west of us, which it
13 used to be across from us and closer to the
14 lighthouse.

15 So I'm asking, one, that there be some
16 research into what they can do to prevent any more
17 erosion with this dredging. And, number two, what can
18 be done to take the sand that they're digging up and
19 putting it back to the area that's been eroded from?
20 And again, the areas that are closest to the dredging,
21 the east end of the island, Dauphin Island, and the
22 east end of Sand Island.

23 * * * * *



1 [REDACTED], DAUPHIN ISLAND, ALABAMA:

2 I live at Dauphin Island. I was not
3 impressed, I guess, with how little anyone knew about
4 the meeting. Probably better word could have gotten
5 out somehow to especially island residents. I don't
6 know about the other people. But I thought the people
7 here were very prepared. And I was greatly
8 enlightened with the whole Corps of Engineers
9 procedures. I had no idea.

10 I'm glad to find out that they're going to
11 be studying this for years before they actually do it.
12 That tells me at least we're going to be better
13 prepared than if we were jumping into something
14 quickly.

Comment #5

* * * * *

16 [REDACTED], DAUPHIN ISLAND, ALABAMA:

17 I have a house on Dauphin Island. My son
18 lives there most of the time. I spend as much time as
19 I can, my wife and I do. And we enjoy the island.

20 I'm going to read this to you. You go ahead
21 and take this down. I'm also going to put this in the
22 box.

23 My concern is simple. I own a house on

[REDACTED]

1 [REDACTED] at
2 Dauphin Island and have owned it since 1988. During
3 my time on the island I've watched our beach erode to
4 a fraction of what it once was. I understand the
5 signs of migration of sand east to west with migrating
6 sand from the east replacing sand which migrates to
7 the west, unless the migration of the sand is
8 interrupted -- and that's stressed, that phrase.

9 Common sense tells us that the ship channel
10 interrupts the flow of sand -- interrupts the flow of
11 sand. When the channel is dredged, the sand which
12 would otherwise have replenished the beaches of
13 Dauphin Island is and has historically been taken out
14 to locations in which it will not migrate to Dauphin
15 Island with the result that the beaches continue to
16 steadily erode.

17 The Supplemental EIS must address these
18 facts and concerns. The method of disposing of the
19 sand dredged from the channel must be changed.
20 Otherwise the erosion will continue unabated. If the
21 erosion resulted in beaches replenished, the benefits
22 are clear. Not only will the island and the
23 environment benefit, but the island would once again

[REDACTED]

1 be a protection against storm damage to the mainland.

2 Thank you for your consideration.

Comment #6

3 * * * * *

4 [REDACTED] MOBILE, ALABAMA:

5 I own [REDACTED] next
6 door. If you want real snapper, you've got to come to
7 me. Everybody else does frozen import. I sell green
8 snapper. And this May 30th will be my 50th year
9 walking in the door.

10 Now, I do know a little bit about the
11 seafood business. My concern about all this dredging
12 stuff, it's already affected what they've done just in
13 the last few years. We now have no more -- I'm going
14 to call it the Mother Reef from Dog River north. It's
15 always been closed because of the pollution factor.
16 And I have no problem with it. But that reef up
17 there, that oyster spat, when they lay their eggs,
18 adult female oysters will throw 100 million eggs. Her
19 husband next door will fertilize them. For three days
20 they float down and drop at the mouth of the bay down
21 south of where they're legally catching oysters.

22 So all that up there has already been --
23 Dog River north, for the most part, it has been

[REDACTED]

1 covered up. We've covered all those oysters. In the
2 last couple of years they filled up that -- there was
3 a fishery reef off Brookley Field, it was a 40-foot
4 deep hole with riprap in it for fish habitat. And
5 it's now filled up, totally covered up. And all those
6 oyster reefs up there, they're a foot under muck right
7 now. And we want to dredge and do some more stuff,
8 put more stuff in there.

9 For years the Corps of Engineers had that
10 ship that ran up and down, and it would dredge and
11 take it offshore and dump it out into the Gulf, which
12 -- no problem. But now the last couple of years that
13 dredge has set out there, 25-inch hole pipe, and they
14 dredge that thing and they're spewing it out all over
15 the flats.

16 Now, another project that I watched happen,
17 [REDACTED] told me -- I didn't realize it had been
18 that long. Gaillard Island has been built for 25 or
19 30 years. I hadn't realized it's been that long. I
20 guess I'm getting old. It started off it was no
21 problem. But ten years ago they just about filled the
22 whole thing up. There used to be a big lake inside of
23 it, but they filled it all the way up. And pelicans

1 started breeding. Now, a few pelicans are cute, not a
2 problem. The brown pelican was actually endangered at
3 one time. But all of a sudden that Gaillard Island
4 got filled up and there's 20, 30,000 pair of pelicans
5 breeding out there every year. Now, guess what
6 happens when we'll just say 40,000 birds each eat a
7 pound of fish a day and land on that island? Hmmm.

8 I don't know how you -- you put that in
9 there however you want to.

10 But pretty soon Gaillard Island, it's
11 covered in pelican poop. And every time we get --
12 three or fewer times a year we get these three-,
13 four-inch rains, it washes all that stuff off, and
14 it's going into the main ship channel and going into
15 the Theodore channel. It's washing off that v right
16 there and it's filling all that area up. And the last
17 two years, this being the third year, the Corps has
18 dredged that and they've spewed it out, and there have
19 been massive fish kills with that stuff.

20 Now, onto itself, if it had just ran off the
21 island, settled in the ship channel, the silt would
22 cover it up. And it was okay till they disturbed it
23 and we dredged it. Now all that ammonia, nitrogen,

1 everything else out there, they spread it out and
2 there have been major fish kills.

3 We got blamed for it: Oh, it was you
4 gillnet fishermen. And I looked around and I talked
5 to all the people. We didn't do it.

6 And then I heard this little bit of stuff,
7 and I said: You know, now I know what happened to it.
8 It's been called to people's attention, but they don't
9 want to listen about it.

10 Now, it's an offshoot. And I've got no
11 problem dredging this stuff. Hopefully economic wise
12 this country is going to need big ships coming in
13 here. I have my doubts about that with the economics
14 of what's going on in this world.

15 So that's my problem with it. And
16 everything north of Gaillard, particularly, they've
17 killed that Mother Reef of oysters. We have no
18 oysters left in the state of Alabama, nothing out
19 there anymore. It's gone. Because that spat comes
20 from the upper bay, and it's named the Mother Reef,
21 what I call it. It drifts down the bay, and three
22 days after it's fertilized, it will stop down there.
23 And it's done that way for thousands of years.

[REDACTED]

1 I have a picture on my wall over there in my
2 office that was made in 1895, and Eslava Street was
3 the unloading grounds for seafood. So for over 100
4 years it's been that way. And my business was
5 built -- well, it was built in '32. I wasn't here
6 yet. But we bought it in '52. It was my grandfather
7 involved and then his two sons, which was my daddy,
8 Ralph, and my uncle. And then my uncle wanted out,
9 and I bought his share. And in '80 I bought my father
10 out. So it's been mine ever since. I have a son
11 that's 34 and he's in the business with me.

12 But it's such a problem getting product.
13 It's all environmental stuff. That oil spill -- write
14 this down, underline it -- the oil spill was done on
15 purpose. And in the last -- since all this stuff has
16 happened and we had a red tide in December -- November
17 and December. We don't have red tides in the northern
18 gulf. That's coming off that oil that was out there.
19 It's not a red tide. It's something else. Because
20 all that oil was sank out there, bacteria eat that oil
21 up. And now there's so much oil there, now there's so
22 much bacteria. And like those pelicans that go out
23 there and eat every day and get on that reef and

[REDACTED]

1 excrement comes out, that's what's there. And that
2 stuff is horrendous that's coming in now. I have
3 fishermen that get finned, get stuck by a fish, the
4 fin on a fish, and in 30 minutes they had a red streak
5 and had to go to the emergency room. Red tide don't
6 do that. This is coming off of that bacteria that's
7 on that bottom that's devouring that oil out there
8 that sunk in the Gulf. And that's coming ashore now.

9 We've got maybe five percent of the flounder
10 that we used to have. If it's on the bottom, it's
11 been decimated since that oil spill. The flounder was
12 the worst; like I said, 5 percent of what we used to
13 have. Plenty other fish. Primarily bottom stuff --
14 shrimp are way off, crabs are way off, brown mullet,
15 white trout, another bottom fish, they're way off.
16 Flounder was hurt the worst because they are a total
17 bottom fish. And whatever that stuff has done, either
18 it killed the little zooplankton that the little
19 flounder feed on or it rendered the adult females, you
20 know -- you know, they're not reproducing anymore.
21 "Sterile" is the word I'm looking for.

22 Now, whatever the case is, it's not there
23 anymore. And I can't get people to listen to me about

[REDACTED]

1 this stuff. BP will not pay us. Now, I've been here
2 forever, for all practical purposes. But BP is not
3 paying us. I have lost eight dealers in the last
4 three years that I used to buy a world of stuff from.
5 They're gone. Either they're totally outright gone or
6 they're hanging on, workaday, little oyster shop, a
7 little crab shop that picks one afternoon a week. You
8 know, Daddy catches the crabs and Mama picks them,
9 just like that used to be done. And that's the only
10 way they can still make some money. And it's just
11 that. It's so rare out there doing it.

12 A major company shut the door in November.
13 International Oceanics walked away, lack of
14 production. Economy had a lot to do with it. That's
15 just what we're facing in this industry now.

16 So, you know, but part of it -- part of this
17 is this dredging stuff they're doing out here. If
18 they scoop that stuff up and it was going to cost some
19 money to go take it -- take it up there and put it on
20 the spoil islands north of here, there's plenty of
21 ground to put it. And/or take it offshore out there
22 and drop it.

23 But, you know, you've got to consider -- the

[REDACTED]

1 whole industry has been decimated since the oil spill.
2 And with all the regulations, I tell folks I'd rather
3 get caught with a kilo of cocaine -- write it down, I
4 never have touched the stuff and never will, hate it.
5 But I can get in more trouble over a snapper than I
6 can running cocaine. And you go to jail with no
7 trial, all the regulations we have to put up with now.

8 So, now, there's just a lot of stuff going
9 on out here in this world. I'm interested tonight
10 here about the dredging and what it's going to do.
11 And I've been told -- one said no, another one said
12 yes. But they want to make more islands up in the
13 head of the bay to the east side of the channel.

14 Now, first thing you're going to do -- now
15 it's nice and safe. Gaillard turned out to be a safe
16 haven because of everything else. There was no place
17 for pelicans to go breed anymore. And all of a sudden
18 here is this nice island here, and there's no wild
19 coons, there's no cats, dogs -- which is the worst.
20 And we've got a perfect habitat. But now even that's
21 been decimated because of the overpopulation. It's
22 changed the whole ecology of this whole bay.

23 Now you're going to build another one? Hey,

1 they've got a place to eat and sleep and there's still
2 some fish in the bay. They'll be covered up with more
3 pelicans making more babies and then more poop.

4 My fishermen tell me in the height of the
5 summer you can't get anywhere near Gaillard, it stinks
6 so bad because it's a foot deep.

7 Now, that's part of your problem. You go
8 create this. But for every action, there's an
9 opposite and equal reaction. There you go. They sit
10 there and that stuff washes off or something like
11 that, then it affects other things. Eventually it
12 will take all the fish out and the pelicans will
13 starve to death, and then we start over again.

14 I saw a program years ago where they went off
15 the barrier islands out in the Pacific and there were
16 rock islands out there, and they literally scooped it
17 up and they put it in fertilizer. And it was feet
18 deep on this island because they had been there
19 forever. But, you know, who are you going to get to
20 shovel it? It could be done. And you could have a
21 vacuum, big vacuum operation or something. I'm just
22 coming up with an idea off the top of my head. Yes,
23 it's a product. But it's still going to be there.

1 But it's an offshoot of what happened.

2 Now, if it was a perfect world and there was
3 enough money, you would take that muck and put it up
4 north of here. They're already there. They diked off
5 everything. Put it there. And then you would have
6 your cake and eat it, too, because we'd still have our
7 territory to fish in, the Mother Reef would be there
8 to let that oyster -- that spat drift down and cover
9 that.

10 You know, we're talking about billions of
11 dollars a year the seafood industry creates. You
12 know, we're being decimated by these shortcuts.

13 Now, throw in economics. I wake up every
14 morning at 5:30, 6 o'clock and I watch CNBC. I look
15 at the stock market and see what's happening and look
16 at all this other stuff and how much money we're in
17 debt. Something is going to give. And it ain't going
18 to be pretty when it does. People are going to have
19 to call me: Ralph, we're hungry, can you get us
20 something to eat? Some fish, anything?

21 Yeah, I can. What do you want? But you're
22 going to have to have a lot of money.

23 So we're sitting here, we're killing one

[REDACTED]

1 aspect to do another, you know. That's my problem
2 with what's happening.

Comment #7

3 * * * * *

4 [REDACTED], MOBILE, ALABAMA:

5 The final declaration of the Global Climate
6 Conference last month in Paris called for the prompt
7 and drastic reduction in the world's production of
8 greenhouse gases. The United States is a signatory to
9 that declaration, making this the policy of the U.S.
10 government. Therefore any decision about enlarging
11 the ship channel here should explicitly take into
12 account the effects of that decision on greenhouse gas
13 production and climate change, in particular the fuels
14 burned by the increased ship traffic that the enlarged
15 channel would allow and the increased fossil fuel
16 cargoes that this enlarged channel would allow because
17 those cargoes will eventually be carried someplace and
18 burned, whether coal or petroleum products,
19 contributing to greenhouse gases and climate change.

20 That's all.

21 * * * * *

22

23

CORPS OF ENGINEERS PUBLIC SCOPING MEETING 1/12/2016

C E R T I F I C A T E

STATE OF ALABAMA)

COUNTY OF BALDWIN)

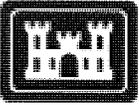
I do hereby certify that the foregoing proceedings were taken down by me and transcribed using computer-aided transcription and that the foregoing is a true and correct transcript of said proceedings.

I further certify that I am neither of counsel nor of kin to any of the parties, nor am I in anywise interested in the result of said cause.

I further certify that I am duly licensed by the Alabama Board of Court Reporting as a Certified Court Reporter.

DEBRA AMOS ISBELL, CCR, RDR, CRR
ALABAMA - ACCR #21
MISSISSIPPI - CSR 1809
COURT REPORTER, NOTARY PUBLIC
STATE OF ALABAMA AT LARGE

My Commission Expires: 6/25/2016



**US Army Corps
of Engineers**
Mobile District

Comment #8

Thank You for Your Comments

**Mobile Harbor General Reevaluation Report, Mobile, Alabama
Public Scoping Meeting at the Mobile Alabama Cruise Terminal
201 S. Water Street, Mobile, Alabama 36602
Tuesday, January 12, 2016
5:00 - 8:00 PM**

In an effort to ensure that all public comments are captured for the Mobile Harbor General Reevaluation Report, Mobile, Alabama, we welcome your written comments. You may place them in the "Written Comments" box at this public meeting session, or send them to: U.S. Army Corps of Engineers, Mobile District, Planning & Environmental Division, Coastal Environment Team, P.O. Box 2288, Mobile, Alabama 36628-0001; (Phone: 251.690.3139); or by email to MobileHarborGRR@usace.army.mil.

Comment Category:

- Environmental Cultural Resources Threatened and Endangered Species
- Fish and Wildlife Water Quality Dredging/Disposal Economics Engineering
- Other

Comments (additional space on back):

AS AN ECONOMIC DEVELOPMENT PROFESSIONAL AND AN OUTDOOR ENTHUSIAST,
I AM IN FULL SUPPORT OF ADDITIONAL DREDGING TO WIDEN AND
DEEPEN THE SHIP CHANNEL. EVERY ECONOMIC DEVELOPMENT PROJECT
OF SIGNIFICANT SIZE IN THE MANUFACTURING CLUSTER IS
DEPENDANT ON A FUNCTIONING AND GROWING PORT!

FROM TIK, NOW DUBKUNDO AN AM/NS CONVERT, TO AIRBUS,
WITHOUT OUR PORT, THEY WOULD NOT BE HERE. OUR
FUTURE ECONOMIC GROWTH AND VITALITY IS RELIANT ON THE
CONTINUED GROWTH OF OUR PORT.

Name/Organization/Contact Information (Optional):

[REDACTED] Chamber of Commerce : [REDACTED]

Comment #9



US Army Corps
of Engineers
Mobile District

Thank You for Your Comments

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Comment Category:

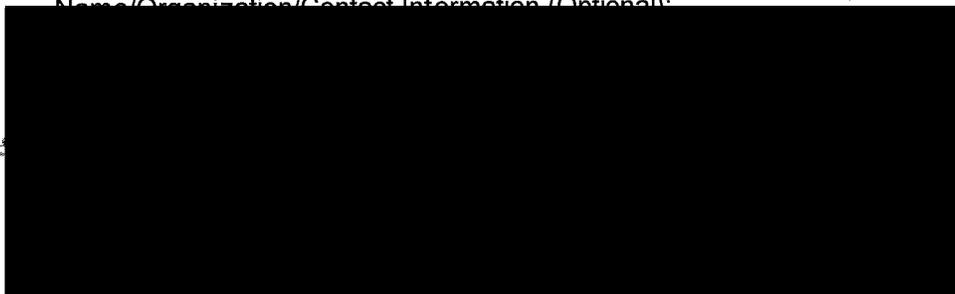
- Environmental
- Cultural Resources
- Threatened and Endangered Species
- Fish and Wildlife
- Water Quality
- Dredging/Disposal
- Economics
- Engineering
- Other

Comments (additional space on back):

#1 The East End of the Dauphin Island an Sand Island Has a Severe Erosion problem, as the sand is Dredged out of the Channel and put far out to Sea, our beach ends up falling into the Dredged area : I would like a study as to How you can prevent further Damage

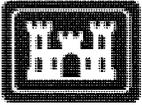
#2 The Sand you are removing should be kept on the East End of the Island and Rebuilt Sand Island as that is where the sand eroded from: The dredging is causing our East End Beach erosion

Name/Organization/Contact Information (Optional):



Sandy Kastle Condos
Dauphin Island
I also own other
property on East End

my
Address



US Army Corps
of Engineers
Mobile District

Comment #10

Thank You for Your Comments

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Comment Category:

- Environmental
- Cultural Resources
- Threatened and Endangered Species
- Fish and Wildlife
- Water Quality
- Dredging/Disposal
- Economics
- Engineering
- Other

Comments (additional space on back):

I think it is critically important that interim reports be issued as this study continues over the next 4 years. This could have a major impact on the residents of Dauphin Island and the integrity of the barrier island that are so critical to the ecosystems of fish turtle & even onland residents. The bird sanctuary, Ft. Gaines are entitled to serious protection & consideration

Name/Organization/Contact Information (Optional):



Dauphin Island Resident



**US Army Corps
of Engineers**
Mobile District

Comment #12

Thank You for Your Comments

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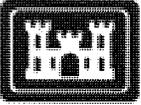
Comment Category:

- Environmental
 Cultural Resources
 Threatened and Endangered Species
 Fish and Wildlife
 Water Quality
 Dredging/Disposal
 Economics
 Engineering
 Other

Comments (additional space on back):

The Port is a vital engine for economic growth.
 The "Port City" has grown over the decades and centuries
 because of our port. Opening the door to
 our competition (other ports) will only hinder
 our local economy and quality of life. We
 must continue to grow and deepen our
 footprint to continue to grow as a community
 and society. We need to do this.

Name/Organization/Contact Information (Optional):



**US Army Corps
of Engineers**
Mobile District

Comment #13

Thank You for Your Comments

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Comment Category:

- Environmental
- Cultural Resources
- Threatened and Endangered Species
- Fish and Wildlife
- Water Quality
- Dredging/Disposal
- Economics
- Engineering
- Other

Comments (additional space on back);

I am okay with the channel project as long as all of the sand is used to restore the beaches along Dauphin Island. The existing channel is the problem now. Also, any sand from the dredging of the channel should be used to restore all of Alabama's beaches, instead of dumping in the gulf. There are too many historical landmarks on Dauphin Island, as well as the huge tourism impact for the state, not to protect it.

Name/Organization/Contact Information (Optional):





**US Army Corps
of Engineers**
Mobile District

Comment #14

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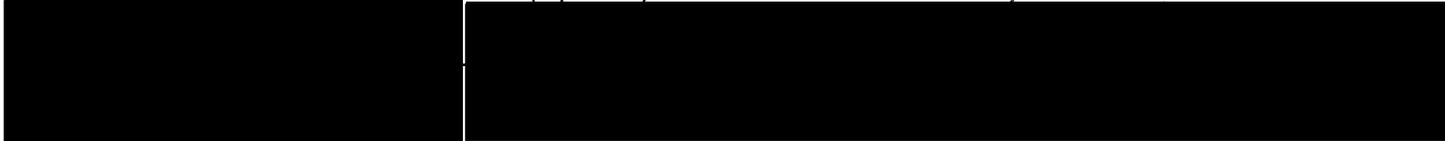
Comment Category:

- Environmental Cultural Resources Threatened and Endangered Species
- Fish and Wildlife Water Quality Dredging/Disposal Economics Engineering
- Other

Comments (additional space on back):

The beneficial use of dredge material needs to be highlighted and alternatives thoroughly discussed for keeping sediment in our estuarine system. Whether building marsh island or thin-layer dredge ^{into remaining marsh} or something else innovative, take the time to consider many alternatives rather than taking it offshore.

Name/Organization/Contact Information (Optional):





**US Army Corps
of Engineers**
Mobile District

Comment #15

Thank You for Your Comments

**Mobile Harbor General Reevaluation Report, Mobile, Alabama
Public Scoping Meeting at the Mobile Alabama Cruise Terminal
201 S. Water Street, Mobile, Alabama 36602
Tuesday, January 12, 2016
5:00 - 8:00 PM**

In an effort to ensure that all public comments are captured for the Mobile Harbor General Reevaluation Report, Mobile, Alabama, we welcome your written comments. You may place them in the "Written Comments" box at this public meeting session, or send them to: U.S. Army Corps of Engineers, Mobile District, Planning & Environmental Division, Coastal Environment Team, P.O. Box 2288, Mobile, Alabama 36628-0001; (Phone: 251.690.3139); or by email to MobileHarborGRR@usace.army.mil.

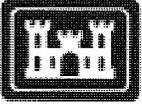
Comment Category:

- Environmental
 Cultural Resources
 Threatened and Endangered Species
 Fish and Wildlife
 Water Quality
 Dredging/Disposal
 Economics
 Engineering
 Other

Comments (additional space on back):

I believe that the use of environmental restoration funding to widen and deepen a commercial shipping channel is an extreme misappropriation. The Army Corps of Engineers has an unfortunate record of failed / misguided attempts to overcome nature and common sense, and I believe this project will most likely continue that legacy. The shipping channel being modified to accommodate super Panamax vessels probably needs to happen in order for the Port of Mobile to stay economically viable, but I very strongly feel the funding should be found elsewhere from the very scarce resources devoted to ecological restoration in this country.

Name/Organization/Contact Information (Optional):



**US Army Corps
of Engineers**
Mobile District

Comment #16

Thank You for Your Comments

**Mobile Harbor General Reevaluation Report, Mobile, Alabama
Public Scoping Meeting at the Mobile Alabama Cruise Terminal
201 S. Water Street, Mobile, Alabama 36602
Tuesday, January 12, 2016
5:00 - 8:00 PM**

In an effort to ensure that all public comments are captured for the Mobile Harbor General Reevaluation Report, Mobile, Alabama, we welcome your written comments. You may place them in the "Written Comments" box at this public meeting session, or send them to: U.S. Army Corps of Engineers, Mobile District, Planning & Environmental Division, Coastal Environment Team, P.O. Box 2288, Mobile, Alabama 36628-0001; (Phone: 251.690.3139); or by email to MobileHarborGRR@usace.army.mil.

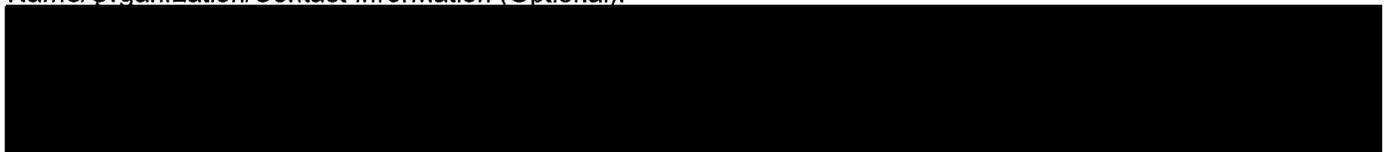
Comment Category:

- Environmental Cultural Resources Threatened and Endangered Species
 Fish and Wildlife Water Quality Dredging/Disposal Economics Engineering
 Other

Comments (additional space on back):

My concern is simple. I own a house on Ponchartraine Court at Dauphin Island, and have owned it since 1988. During my time on the Island, I've watched our beach ~~erode~~ erode to a fraction of what it once was. I understand the science of migration of sand east to west with migrating sand from the east replacing sand which migrates to the west unless the migration of the sand is interrupted. Common sense tells us that the ship channel interrupts the flow of sand, when the channel is dredged, the sand which would otherwise have replenished

Name/Organization/Contact Information (Optional):



Comments (continued)

The beaches of Dunphri Island is and has ~~been~~ historically been taken out to locations ~~and~~ deposited from which it will not migrate to Dunphri Island, with the ~~result~~ result that the ~~beach~~ beaches continue to ~~set~~ steadily erode.

The supplemental EIS ~~must~~ address these facts and concerns and the method of disposing of the sand dredged from the ~~channel~~ channel ~~must~~ be changed. Otherwise, the erosion will continue unabated.

If the erosion is halted and the ~~beach~~ beaches replenished, the benefits are clear. Not only will the Island and the environment benefit, but the Island will once again be a protection against storm damage to the mainland.

Thank you for your consideration.



**US Army Corps
of Engineers**
Mobile District

Comment #17

Thank You for Your Comments

**Mobile Harbor General Reevaluation Report, Mobile, Alabama
Public Scoping Meeting at the Mobile Alabama Cruise Terminal
201 S. Water Street, Mobile, Alabama 36602
Tuesday, January 12, 2016
5:00 - 8:00 PM**

In an effort to ensure that all public comments are captured for the Mobile Harbor General Reevaluation Report, Mobile, Alabama, we welcome your written comments. You may place them in the "Written Comments" box at this public meeting session, or send them to: U.S. Army Corps of Engineers, Mobile District, Planning & Environmental Division, Coastal Environment Team, P.O. Box 2288, Mobile, Alabama 36628-0001; (Phone: 251.690.3139); or by email to MobileHarborGRR@usace.army.mil.

Comment Category:

- Environmental
 Cultural Resources
 Threatened and Endangered Species
 Fish and Wildlife
 Water Quality
 Dredging/Disposal
 Economics
 Engineering
 Other

Comments (additional space on back):

I am very concerned about the effect widening will have on erosion of coastlines such as Dauphin Island. I would like to see a plan for protecting the shorelines. I would like to see D.I. re-nourished and an on going plan for continual depositing of sand on the shore line. It has been argued in the past that some of the erosion of D.I. was caused by the dredging of the present channel by the USACE. Concerned about neg. economic impact on D.I. as well. With all the

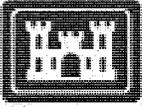
Name/Organization/Contact Information (Optional):

Comments (continued)

uncertainty home and land owners
do not know which way to go in
planning their futures. My family
is afraid to build & locate there and
difficult to sell and get out with
all the uncertainty over erosion
and neg impact widening the channel
could have.

Thank You





US Army Corps
of Engineers
Mobile District

Comment #18

Thank You for Your Comments

Mobile Harbor General Reevaluation Report, Mobile, Alabama
Public Scoping Meeting at the Mobile Alabama Cruise Terminal
201 S. Water Street, Mobile, Alabama 36602
Tuesday, January 12, 2016
5:00 - 8:00 PM

In an effort to ensure that all public comments are captured for the Mobile Harbor General Reevaluation Report, Mobile, Alabama, we welcome your written comments. You may place them in the "Written Comments" box at this public meeting session, or send them to: U.S. Army Corps of Engineers, Mobile District, Planning & Environmental Division, Coastal Environment Team, P.O. Box 2288, Mobile, Alabama 36628-0001; (Phone: 251.690.3139); or by email to MobileHarborGRR@usace.army.mil.

Comment Category:

- Environmental Cultural Resources Threatened and Endangered Species
 Fish and Wildlife Water Quality Dredging/Disposal Economics Engineering
 Other

Comments (additional space on back):

- ① The present GRR Study does not consider or address the historic sand losses/sand deficit caused by the Corps maintenance dredging practices of the Mobile Harbor Shipping Channel. Sand deficit must be addressed.
- ② Any use of the Mark Page Brynes 2008 (Lawrence) study or any other study would be a conflict of interest.
- ③ There needs to be a Citizens Advisory Committee to participate in the EIS (Scoping) process.

Name/Organization/Contact Information (Optional):



Comments (continued)

- ④ The EIS must address the effect of dredging to the shoreline 10 miles, both sides, according to the Federal 1935 Law.
- ⑤ The EIS must address when the dredged sand is to be deposited to maximize shoreline restoration.
- ⑥ The Public Scoping Notice states that the purpose of the study will be to determine improvements for safety and efficiency of harbor users. It does not state that the purpose of the study will address the effect of dredging on Dauphin Island, and the study must also include this objective.
Improve (added)
- ⑦ Document that sand deposited in SIBUA makes it to Dauphin Island ~~with~~ Shoreline.
- ⑧ Why has Corps not ~~used~~ used the Town of Dauphin Islands Study ~~to~~ to restore the shoreline of Dauphin Island. Corps should also use this study to restore shoreline to 1990 baseline.

US Army Corps of Engineers Public Scoping Meeting: Dauphin Island January 12, 2016

HOW WE GOT HERE:

1. Many of the people in this audience have no idea how we got here.
2. Originally the Mobile District Corps of Engineers was proposing an Environmental Assessment. An EA is internal and would not allow for public participation as we have today.
3. The Dauphin Island Property Owners Board of Directors sent a letter to Col Jon Chytka outlining specific issues including comments from Dr. Susan Rees at the Fairness Hearing in Sept 2009 stating that if there were any changes to the Mobile Ship Channel, it would require a Supplement to the Original Environmental Impact Statement. This letter requesting the Supplement EIS was supported by the Town of Dauphin Island and many other organizations and individuals. I think this is very important. So we are here for the public to have input into the process.
4. The Public Notice states the purpose of the Study is to determine improvements for safety and efficiency of harbor uses. The purpose must also include the environmental impacts to the adjacent shorelines, 10 miles on both sides of the Mobile Channel, as the 1935 Federal Law requires and to address the sand deficit that occurred to the Dauphin Island shoreline.
5. To further the public participation, a citizen's advisory Committee needs to be created for continued public participation. I am willing to participate on that committee.

WHY IS THIS PUBLIC SCOPING MEETING IMPORTANT?

Let me show you several pictures on a foam board to illustrate what we need to accomplish with the Environmental Impact Statement.

1. In 1978 the Corps did a study that stated sand should be placed closer to Dauphin Island, but the Study recommendation were never followed. It has been stated that this was not a scientific study.
2. The 1980 EIS did not have any statement concerning the impact of dredging on Dauphin Island
It has been learned that the 2008 Study as well as the 2010 study had flawed data from the Corps own documentation, but I am concerned that the 2008 study is being used as a base line. This would be a conflict because the study and Coastal Engineer was involved in the law-suit; Any participation of this Coastal Engineer would be a conflict.

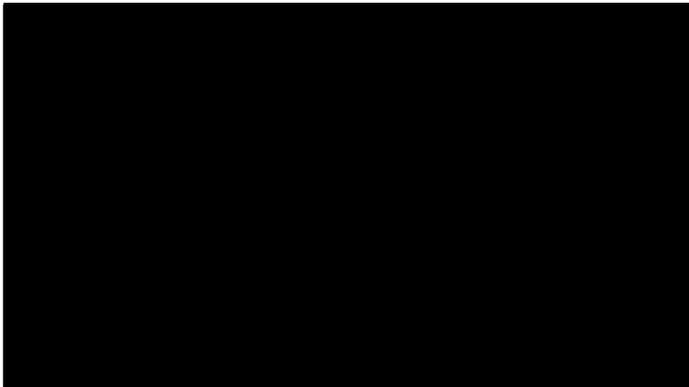
US Army Corps of Engineers Public Scoping Meeting: Dauphin Island January 12, 2016

CONFLICT OF INTEREST:

1. The Mobile Districts Mobile Harbor Schedule – Risk Buy down plan Has a note that approx. \$4 million in data collection, modeling, & analysis will be applied to this project. What is this study and who conducted it?

WHAT HAS TO BE DONE!

1. The sand deficit has that has occurred over the years has to be addressed.
2. We need to be sure that the EIS addresses the Impact to Dauphin Island and follow the 1935 law concerning 10 miles along the adjacent beaches.
3. We need to have a dredging maintenance program that will become an integral part of the ship channel dredging process to replenish the lost sand





REPLY TO
ATTENTION OF:

DEPARTMENT OF THE ARMY
MOBILE DISTRICT, CORPS OF ENGINEERS
P.O. BOX 2288
MOBILE, ALABAMA 36628-0001

CESAM-PD-EC
Public Notice No. FP15-MH01-10

December 11, 2015

PUBLIC NOTICE

**U.S. ARMY CORPS OF ENGINEERS,
MOBILE DISTRICT**

**PUBLIC SCOPING MEETING
PREPARATION OF A SUPPLEMENTAL ENVIRONMENTAL IMPACT STATEMENT
TO
EVALUATE IMPROVEMENTS TO THE MOBILE HARBOR FEDERAL NAVIGATION
CHANNEL, MOBILE, ALABAMA**

TO ALL INTERESTED PARTIES:

The U.S. Army Corps of Engineers (USACE), Mobile District is hosting a public scoping meeting January 12, 2016 at the Mobile Alabama Cruise Terminal, 201 S. Water Street, Mobile, Alabama 36602 from 5:00 pm to 8:00 pm. The purpose of the workshop is to receive public input regarding the preparation of a Draft Supplemental Environmental Impact Statement (DSEIS) to address potential impacts associated with improving the Mobile Harbor Federal Navigation Channel in Mobile County, Alabama. The DSEIS will be used as a basis for ensuring compliance with the National Environmental Policy Act (NEPA) and evaluating alternative plans, including the "No Action" plan. The proposed alternatives being identified in the Alternatives Milestone analysis that will be evaluated include widening and deepening of selected areas of the navigation channel within the federally authorized dimensions.

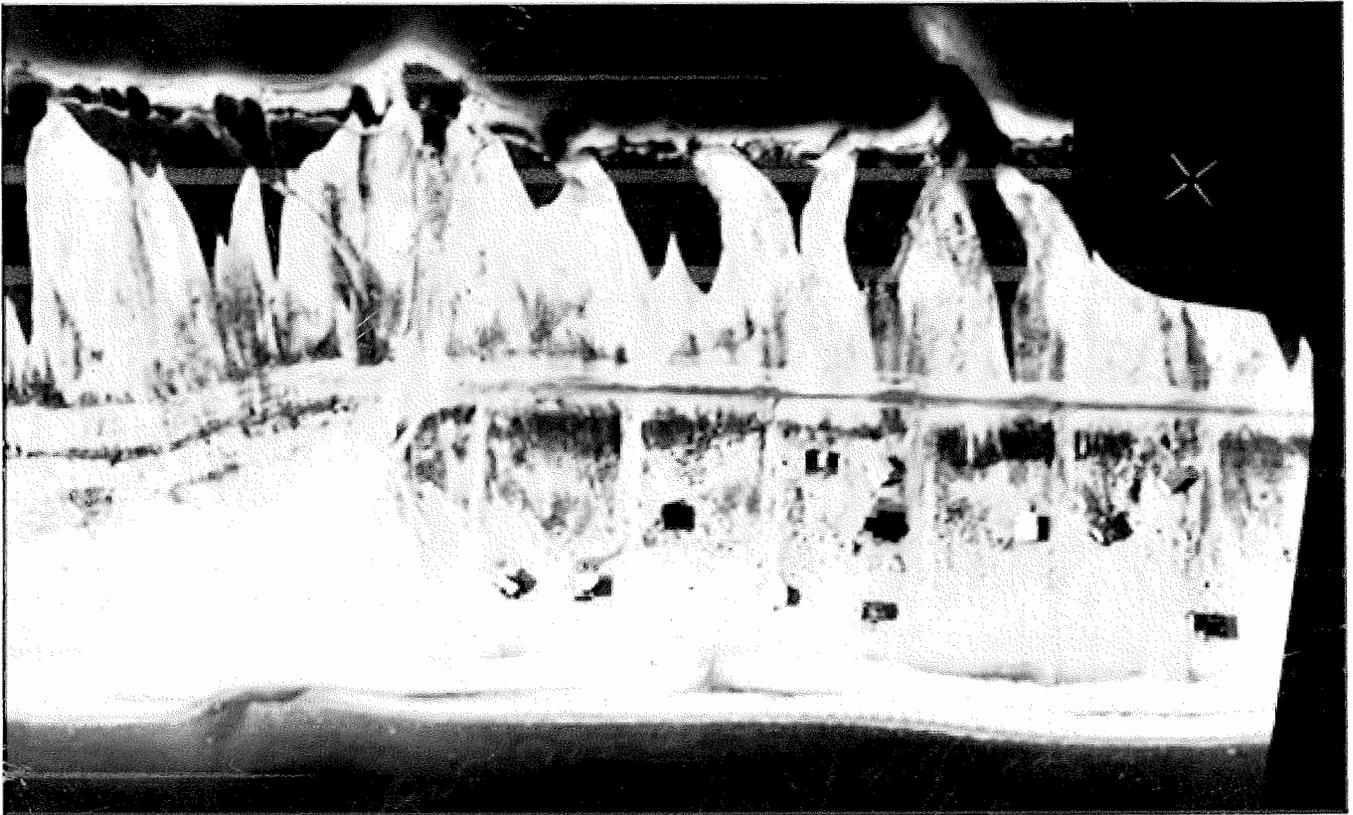
The evaluation will examine the costs and benefits as well as the environmental impacts of modifying the maintained dimensions of the existing Federal project within its federally authorized limits. The purpose of the study will be to determine improvements for safety and efficiency of harbor users. Vessels are experiencing delays leaving and arriving at port facilities and inefficiencies have increased as increased cargo volumes and larger vessels call on the port to handle these increases which have resulted in traffic delays. The Alabama State Port Authority requested the USACE, Mobile District undertake studies to determine the feasibility of deepening and widening the channel to its full federally authorized depths and widths. On October 20, 2014, the Assistant Secretary of the Army approved the direction of General Investigation funds to complete Preconstruction Engineering and Design of channel widening for Mobile Harbor to initiate a General Reevaluation Report, which includes preparation of the DSEIS, to evaluate deepening and widening of the channel to its full federally authorized dimensions.

CORRESPONDENCE: Public comments can be submitted through a variety of methods. Comments may be submitted to the USACE, Mobile District by mail or electronic methods by *January 26, 2016*. In addition, comments (written or oral) may be submitted at the public meeting. Correspondence concerning this notice should refer to Public Notice No. FP15-MH01-10 and should be directed to the District Commander, U.S. Army Engineer District Mobile, P.O. Box 2288, Mobile, Alabama 36628-0001, ATTN: CESAM-PD-EC. For additional information please contact Mr. Larry Parson at (251) 690-3139 or by email at larry.e.parson@usace.army.mil.

A handwritten signature in black ink, appearing to read 'Curtis M. Flakes', with a long horizontal line extending to the right.

CURTIS M. FLAKES
U.S. Army Corps of Engineers
Mobile District

A - Camille



B - Fredrick



Figure 2-12. Surge channels and washover deposits on Dauphin Island follow Hurricanes *Camille* (A) and *Fredrick* (B) (from Morton, 2007).

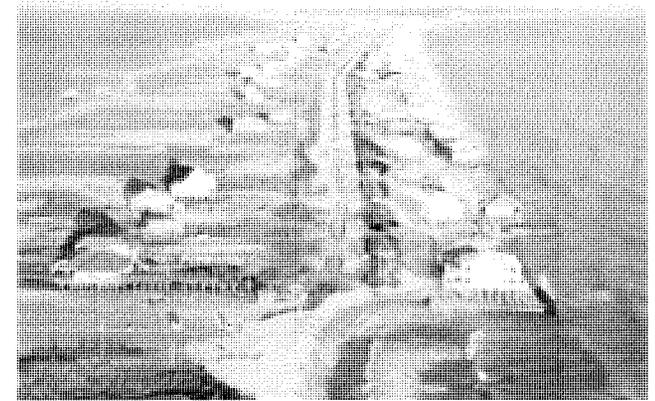
Dauphin Island



Figure B-15. February 2003 Condition of Dauphin Island's West End
(Note three tiers of lots on Gulf shore on right hand side of photo.)



Figure B-16. August 2005 (Post Katrina) View of Island's West End
(Note loss of two most seaward tier of lots that indicate the magnitude of land loss.)



(Photo/Courtesy of Sam St. John | flythecoast.com) The severity of erosion of Dauphin Island's west end is evident in an aerial photo taken Oct. 28, 2015.

Parson, Larry E SAM

From: Wilson, Allen D SAM
Sent: Friday, January 08, 2016 8:51 AM
To: Mobile Harbor GRR
Subject: FW: Mobile Harbor Ship Channel
Attachments: Notice-LOP-SAM-2014-1221-DEM.pdf

Allen Wilson
Maritime Archaeologist
USACE Inland Environmental Team
Planning and Environmental Division
Mobile District
CESAM-PD-EI
109 St. Joseph Street
PO Box 2288
Mobile, Al 36608
Office: 251-694-3867

-----Original Message-----

From: Wilson, Allen D SAM
Sent: Friday, January 08, 2016 8:42 AM
To: 'McBride, Amanda' <Amanda.McBride@preserveala.org>; Fedoroff, Michael P SAM <Michael.P.Fedoroff@usace.army.mil>
Cc: Parson, Larry E SAM <Larry.E.Parson@usace.army.mil>
Subject: RE: Mobile Harbor Ship Channel

Amanda,

I just looked the permit for SAM-2014-1221-DEM over (Letter of Permission attached) and I did the review on this permit. This permit involved dredging in the currently authorized Mobile Harbor Ship Channel, just to a greater depth. It was a one-time deepening event and is unrelated to the much greater Mobile Harbor expansion project that we are currently looking at. We are having a public meeting at the Mobile Cruise Terminal on 12 January from 5-8 during which time the public may express any concerns. We also have an email set up specifically for this project to which citizens can send concerns (MobileHarborGRR@usace.army.mil). I suspect her concerns are centered on the Confederate Obstructions site (1MB28). As you are probably aware, this site has been extensively surveyed as recently as 2013 as part of a study to investigate a potential beneficial use area and is of great concern to USACE and is currently unaffected by any undertaking that we are engaged in. If she is referring to a different wreck, I would love to hear any information she may have. In any event, we are absolutely following the NEPA and NHPA process for this project. I have not yet personally heard anything about this from her or any other citizens.

Thank you,

Allen Wilson
Maritime Archaeologist
USACE Inland Environmental Team
Planning and Environmental Division
Mobile District
CESAM-PD-EI
109 St. Joseph Street
PO Box 2288
Mobile, Al 36608
Office: 251-694-3867

-----Original Message-----

From: McBride, Amanda [mailto:Amanda.McBride@preserveala.org]
Sent: Thursday, January 07, 2016 3:33 PM
To: Fedoroff, Michael P SAM <Michael.P.Fedoroff@usace.army.mil>; Wilson, Allen D SAM <Allen.D.Wilson@usace.army.mil>
Subject: [EXTERNAL] Mobile Harbor Ship Channel

Comment # 19

Gentlemen:

We got a call from [REDACTED] today. She attended a meeting yesterday at the Port Authority and is concerned about the project to widen and deepen the Mobile Bay Ship Channel. She said there is a Civil War ship in the northern part of the bay that will be destroyed and she believes that proper procedure for gaining approval for this project is not being followed.

I believe we have been corresponding on this project for some time. I THINK that our tracking numbers (two were inadvertently assigned) are 2015-0091 and 2012-0739. 2012-0739 is the number under which we have written all of our letters to the COE. I assume the COE number is 2014-1221-DEM, which means that Don is the project manager. I wanted to double check before I sent this e mail to him.

So, bottom line is, can you confirm that the project for which [REDACTED] attended the meeting is something we've seen before and responded to? Also, how should we tell her to go about officially getting her concern across to the COE so that her claim can be investigated? She'll need to provide us/y'all with more details, of course, such as a map and why she believes this ship is there. I have some vague memory of her calling about this resource before but it was regarding a terrestrial project. Have you ever communicated with her?

Any info would be great. Thanks!

Amanda

Amanda McBride

Environmental Review Coordinator

Historic Preservation Division

Alabama Historical Commission

468 South Perry Street

Montgomery, AL

36130-0900 (US Post)

36104 (Courier)

334.230.2692

Amanda.McBride@preserveala.org



REPLY TO
ATTENTION OF

DEPARTMENT OF THE ARMY
MOBILE DISTRICT, CORPS OF ENGINEERS
P.O. BOX 2288
MOBILE, AL 36628-0001

November 3, 2014

South Alabama Branch
Regulatory Division

LETTER OF PERMISSION NOTICE

To: See attached Distribution List

From: Donald E. Mroczko

Subject: Department of the Army Permit Application Number SAM-2014-1221-DEM,
Alabama State Port Authority, Mobile Harbor Ship Channel

Enclosed are copies of the subject application and drawings.

Location/Waterway: The project is located in waters of Mobile Bay and within the Mobile Harbor Ship Channel as well as the Gaillard Island disposal site, Mobile, Mobile County, Alabama; See attached location maps/drawings.

Purpose: Maintain navigable depth within the Mobile Harbor Ship Channel and ensure the integrity of the Gaillard Island disposal facility.

Proposed Work: The applicant proposes to hydraulically excavate (via cutterhead dredge) from below the Mobile Ship Channel adjacent to Gaillard Island an area 300' wide by 3000' in length to a depth of -55' mean lower low water (MLLW). Current authorized depth(s) for Mobile Harbor Ship Channel is -55' MLLW, but is currently maintained to -45' (plus 2' for advanced maintenance, and 2' for allowable overdepth). Total cubic yards (cys) to be removed is approximately 200,000 cys. This is a one-time dredging event and the channel will be allowed to shoal back in over a short period of time and the next operations & maintenance (O & M) dredging will be to the currently maintained depths.

The material removed from this dredging event will be placed on Gaillard Island for dike rehabilitation. After dewatering, the the dredged material will be used as fill to improve and reinforce the upland containment dike structure on Gaillard Island (an area 100-foot-wide by 6000-foot-long). No material will be placed below Ordinary High Tide. No permanent sinks or sumps will be created. The return water will be handled as per approved typical standards and released via the wier box.

Environmental clearances were received for impacts to this area during the recertification of Mobile Habor Federal Navigation Channel in 2012. No new areas are to be impacted outside the scope of the 2012 certification. These environmental

clearances include the Alabama Department of Environmental Management Water Quality Certification and Coastal Zone Consistency (2012-167-COEP), U.S. Fish and Wildlife Services concurrence of no adverse impacts to manatees as long as the Standard Manatee Construction Conditions are followed, and clearances from the National Marine Fisheries Service Protected Resource Division and Habitat Conservation Division.

If no adverse comments are received within 15 days from receipt of this notice (Tuesday, November 18, 2014), we plan to authorize this request by Letter of Permission.

Department of the Army regulatory authority prescribes this type of permit to abbreviate processing procedures for minor work having no significant environmental impacts and no appreciable opposition or controversy. See 33 CFR Part 325.5(b)(2) Federal Register, Vol. 51, No. 219 - Thursday, November 13, 1986.

If you have any questions, please call me at (251) 690-3185.

DISTRIBUTION LIST - ALABAMA

Letter of Permission Notification sent via e-mail to the following:

ADCNR, Fisheries – Kyle Bolton, Matthew Marshall

ADCNR - SLD - Jeff Jordan

ADEM - Mobile - Scott Brown, Dylan Hendrix, Allen Phelps

ADEM – Montgomery, Field Operations

AL Marine Police - Qiana Jackson

AL State Docks - Capt Terry Gilbreath

ALSHPO – Amanda McBride

BWT/AL - Coosa Project - Janalie Graham

CESAM-PD – Matt Grunewald, Michael Fedoroff

CESAM-RD – Joy Earp, Mike Moxey

CESAM-OP-GW - Stephen Reid

CESAM-OP-N - George Rush, Nathan Lovelace, Carl Dyess

CESAM-PM-C – Dean Trawick

EPA - Rosemary Hall, Mike Wylie

NMES - Eric Hawk, Species Protection

 USCG – Richard Nelson, MST2 Dacosta, Lt. David Simonson, Lt. Stanley Tarrant

USFWS - Daphne

Warrior and Gulf Navigation Co. - Paul Hartman

Warrior Tombigbee Waterway Assoc - Larry Merrihew

5. Project Description (continued)

6. Dredging Project Specifications (Show locations and dimensions of proposed dredge areas on attached plans. Include existing and proposed depths.).

New Work Maintenance Work _____
Cubic yards of material to be removed 200000 cys Type of material muck
Surface area (square feet) impacted _____ (sand, muck, hard bottom, ect.)
Method of excavation cutterhead dredge
Nature of area to be dredged (check all that apply) Upland _____ Wetland _____ Waterbottom
Other (explain) _____

7. Specifications for Discharge of Dredged or Fill Material (Show locations and dimensions of all disposal or fill areas on attached plans.).

Cubic yards of fill 200000 cys Type of fill muck
Surface area (square feet) impacted _____
Source of fill material (check all that apply) Commercially obtained _____ Dredged material Borrowed on-site _____
Other (explain) _____
How will discharged material be contained? (Include erosion control measures, levees, etc.) Galliard Island dike
Nature of disposal/fill areas (check all that apply) Upland Wetland _____ Waterbottom _____
Other (explain) _____

8. Additional information relating to the proposed activity.

Are oyster reefs located within or near the project area? Yes _____ No If yes, explain: _____

Will this project result in the siting, construction, and/or operation of an energy-related facility? Yes _____ No

Is the project area greater than 25 acres in size? Yes _____ No _____

Is any portion of the activity for which authorization is sought now complete? Yes _____ No If yes, explain: _____

Month and year activity took place _____

If project is for maintenance work of existing structures or existing channels, describe legal authorization for the existing work. Provide permit number, dates or other form of authorization _____

9. Describe the purpose and public benefit, if any, of the project. Describe the relationship between the project and any secondary or future development the project is designed to support. _____

Intended use: Public Private _____ Commercial _____ Other (explain) _____

10. Project Schedule:

Proposed start date Sept 2014 Proposed completion date December 2014

11. Names and address of adjoining property owners, lessees, etc. whose property also adjoins the waterway. Also identify the owners on the plan views in attachment. NA

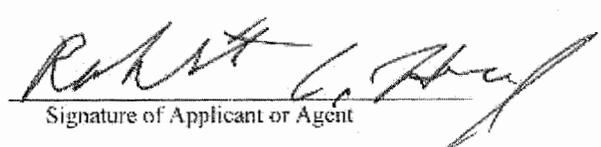
12. List all authorizations or certifications received or applied for from federal, state or local agencies for any Structures, construction, discharges, deposits or other activities described in or directly related to this application. Note that the signature in Item 13 certifies that application has been made to or that permits are not required from the following agencies. If permits are not required place NA in space for Type Approval.

Agency Type Approval Identification No. Date of Application Date of Approval Date of Denial

AL Dept. of Environmental Management
U. S. Army Corps of Engineers
AL State Lands Division
Alabama State Docks
City/County _____
Other _____

13. Application is hereby made for authorization to conduct the activities described herein. I agree to provide any additional information/data that may be necessary to provide reasonable assurance or evidence to show that the proposed project will comply with the applicable state water quality standards or other environmental protection standards both during construction and after the project is completed. For projects within the coastal area of Mobile and Baldwin Counties, I certify that the proposed project for which authorization is sought complies with the approved Alabama Coastal Area Management Program and will be conducted in a manner consistent with the program. I agree to provide entry to the project site for inspectors from the environmental protection agencies for the purpose of making preliminary analyses of the site and monitoring permitted works. I certify that I am familiar with responsible for the information contained in this application, and that to the best of my knowledge and belief such information is true, complete and accurate. I further certify that I possess the authority to undertake the proposed activities or I am acting as the duly authorized agent of the applicant.

(SIGNATURE OF APPLICANT OR AGENT REQUIRED BELOW)


 Signature of Applicant or Agent

9/29/2014
 Date

18 U.S.C. Section 1001 provides that Whoever, in any manner within the jurisdiction of any department or agency of the United States knowingly and willingly falsifies, conceals, or covers up by any trick, scheme or device a material fact or make any false, fictitious or fraudulent statements or representations or makes or uses any false writing or document knowing same to contain any false, fictitious or fraudulent statement or entry, shall be fined not more than \$1 0,000 or imprisoned not more than five years or both.

14. In addition to the completed application, the following attachments are required:

Provide a vicinity map showing the location of the proposed site along with a written description of how to reach the site from major highways or landmarks. Provide accurate drawings of the project site with existing structures and proposed activities shown in detail. For projects located adjacent to, or on water, the site plan must clearly indicate the location of the ordinary mean high tide line and the width of the water body at the site location. All drawings must be to scale or with dimensions noted on drawings and must show a plan view and across section or elevation. **All plans and attachments must be of reproducible quality on 8 1/2 inch x 11 inch paper.**

NOTE: FEES ARE REQUIRED IN CONJUNCTION WITH ADEM CERTIFICATION: ADEM WILL CONTACT APPLICANT WITH FEE REQUIREMENTS.

NOTE: FEES MAY BE REQUIRED BY THE ALABAMA STATE LANDS DIVISION FOR DREDGE ACTIVITIES AND PROJECTS IMPACTING STATE OWNED SUBMERGED LANDS. THE STATE LANDS DIVISION WILL CONTACT APPLICANT WITH FEE REQUIREMENTS.

15. APPLICATION SUBMISSION INFORMATION

Contact the Corps of Engineers prior to submittal with any questions or to request acceptable alternate content/format. An instruction package, example PAP and SPCC plans, and other information are available upon request. Complete this form, attach additional information as necessary, and submit original to:

(Statewide, except Tennessee River Watershed)
 District Engineer, Attn: Regulatory Division
 U.S. Army Corps of Engineers - Mobile District
 Post Office Box 2288
 Mobile, Alabama 36628-0001
 Phone: (251) 690-2658 Fax: (251) 690-2660

OR (Tennessee River Watershed Only)
 District Engineer, Attn: Regulatory Branch
 U.S. Army Corps of Engineers - Nashville District
 3701 Bell Road
 Nashville, Tennessee 37214
 Phone: (615) 369-7500 Fax: (615) 369-7501
 www.orn.usace.army.mil/

WebPage: www.sum.usace.army.mil/ WebPage:

Submit signed copy of application and attachments to:

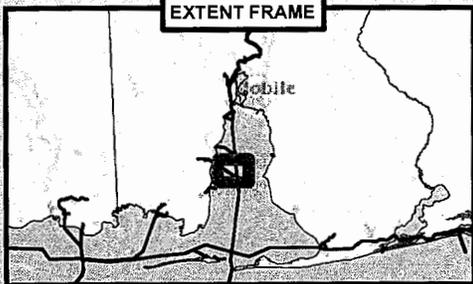
For Activities Statewide:

Mining & Nonpoint Source Section Alabama State Port Authority
 Field Operations Division, ADEM Environmental, Health, Safety
 PO Box 301463 P. O. Box 1588
 Montgomery, AL 36110-2059 Mobile, AL 36633
 Phone: (334) 394-4311 Phone: (251) 441-7085
 Fax: (334) 394-4326 Fax: (251) 441-7255
 Email: mnpss@adem.state.al.us
 WebPage: www.adem.state.al.us WebPage: www.asidd.com

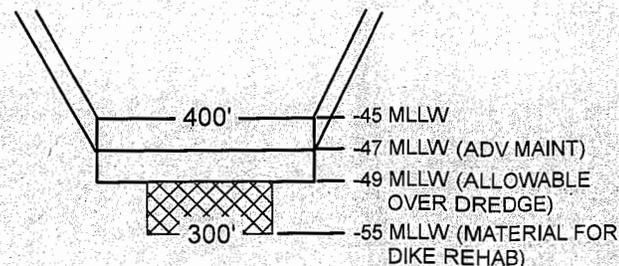
(In Mobile, Baldwin and Washington Counties Only)

Coastal Section-Mobile Branch Alabama State Lands Division
 Field Operations Division, ADEM Coastal Section
 3664 Dauphin Street, Suite B 2310 US Hwy. 98 Suite B-1
 Mobile, AL 36608 Fairhope, AL 36532
 Phone (251) 304-1176 Phone: (251) 929-0900
 Fax: (251) 304-1189 Fax: (251) 990-9293
 Email: coastal@adem.state.al.us
 WebPage: www.adem.state.al.us

EXTENT FRAME



MOBILE SHIP CHANNEL TEMPLATE



750+00

DIKE REHABILITATION

811+00

Gaillard Island

THEODORE SHIP CHANNEL

GBN 57

840+00

RBN 58

*MATERIAL FOR DIKE REHABILITATION WILL BE HYDRAULICALLY EXCAVATED (CUTTER HEAD DREDGE) FROM BELOW THE MOBILE SHIP CHANNEL ADJACENT GAILLARD ISLAND. THE BORROW SOURCE DIMENSIONS ARE 300' WIDE TO A DEPT OF -55 MLLW FOR A STRETCH OF THE CHANNEL APPROX 3000LF. TOTAL YARDAGE TO BE REMOVED - APPROX 200 KCY.

900+00

MOBILE SHIP CHANNEL

AL WEST NAD83

EASTINGS/NORTHINGS

1804697.54 /183868.66 - STA 811+00 C/L

1804430.65 /186766.19 - STA 840+00 C/L

GAILLARD ISLAND DIKE RESTORATION

BORROW AREA

0 1,500 3,000 6,000 9,000

Feet

COOO_08JULY14_GAILLARD_ISALND_DIKE_REST_8X11



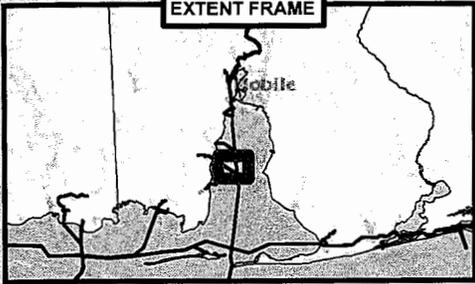
Galliard Island Proposed Action:

The applicant proposes to hydraulically excavate (via cutterhead dredge) from below the Mobile Ship Channel adjacent to Galliard Island an area 300' wide by 3000' in length to a depth of -55' mean lower low water (MLLW). Total cubic yards (cys) to be removed is approximately 200,000 cys. Current authorized depth(s) for Mobile Harbor Ship Channel is -55' MLLW, but is currently maintained to -45' (plus 2' for advanced maintenance, and 2' for allowable overdepth). This is a one-time dredging event and the channel will be allowed to shoal back in over a short period of time and the next operations & maintenance (O & M) dredging will be to the currently maintained depths. The material removed from this dredging event will be placed on Galliard Island for dike rehabilitation.

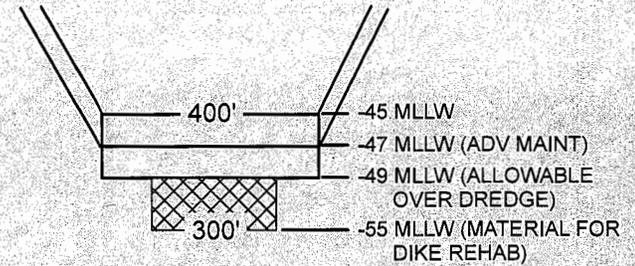
The purpose of this project is for navigation and the maintenance of a federally-authorized previously utilized upland disposal area within Mobile Harbor, Alabama. After dewatering, the dredged material will be used as fill to improve and reinforce the upland containment dike structure on Galliard Island (an area 100 ft long by 6000 ft wide). No fill material will be placed below Ordinary High Tide. No permanent sinks or sumps will be created. The return water will be handled as per approved typical standards and released via the weir box.

All environmental clearances have been received for impacts to this area during the recertification of Mobile Harbor Federal Navigation Channel in 2012. No new areas are to be impacted outside the scope of the 2012 certification. See Public Notice No. FP11-MH01-06. Environmental clearances include Alabama Department of Environmental Management Water Quality Certification and Coastal Zone Consistency (2012-167-COEP), U.S. Fish and Wildlife concurrence of no adverse impacts to manatees as long as Standard Manatee Construction Conditions are followed, and clearances from National Marine Fisheries Service Protected Resource Division and Habitat Conservation Division.

EXTENT FRAME



MOBILE SHIP CHANNEL TEMPLATE



OHT

Fill Area
100' Wide x
6000' Long

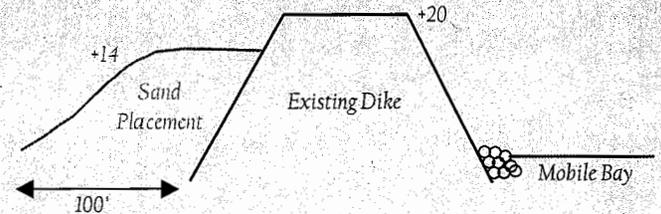
Gaillard Island
(CDF)

DIKE REHABILITATION

THEODORE SHIP CHANNEL

GBN 57

840+00
RBN 58



900+00

MOBILE SHIP CHANNEL

*MATERIAL FOR DIKE REHABILITATION WILL BE HYDRAULICALLY EXCAVATED (CUTTER HEAD DREDGE) FROM BELOW THE MOBILE SHIP CHANNEL ADJACENT GAILLARD ISLAND. THE BORROW SOURCE DIMENSIONS ARE 300' WIDE TO A DEPT OF -55 MLLW FOR A STRETCH OF THE CHANNEL APPROX 3000LF. TOTAL YARDAGE TO BE REMOVED - APPROX 200 KCY.

AL WEST NAD83

EASTINGS/NORTHINGS

1804697.54 /183868.66 - STA 811+00 C/L

1804430.65 /186766.19 - STA 840+00 C/L

GAILLARD ISLAND DIKE RESTORATION

BORROW AREA/DIKE REHABILITATION

0 1,500 3,000 6,000 9,000

Feet

C000_08JULY14_GAILLARD_ISALND_DIKE_REST_8X11





STATE OF ALABAMA
ALABAMA HISTORICAL COMMISSION
468 SOUTH PERRY STREET
MONTGOMERY, ALABAMA 36130-0900

FRANK W. WHITE
EXECUTIVE DIRECTOR

TEL: 334-242-3184
FAX: 334-240-3477

April 9, 2012

Joseph Giliberti
USACE Mobile District
P.O. Box 2288
Mobile, Alabama 36628-0001

Re: AHC 12-0739
COE FPII-MH01-06
Combination of Maintenance Dredge Permits to One Action
Mobile County, Alabama

Dear Mr. Giliberti:

Upon review of the information forwarded by your office, we have determined that we concur with all of the maintenance dredging actions except the Sand Island Beneficial Use Area (SIBUA). We also concur with the spoil disposal sites provided the archaeological exclusion zone (AEZ) areas are avoided. Regarding the SIBUA disposal area, we reluctantly conclude that the designation of the SIBUA is not effective in the protection of cultural resources. This area should remain separate and require separate review if it is to be used.

We appreciate your efforts on this project. Should you have any questions, please contact Greg Rhinehart at 334-230-2662 and include the AHC tracking number referenced above.

Truly yours,

Elizabeth Ann Brown
Deputy State Historic Preservation Officer

EAB/SGH/GCR/gcr



United States Department of the Interior

FISH AND WILDLIFE SERVICE
1208-B Main Street
Daphne, Alabama 36526

IN REPLY REFER TO:

MAR 15 2012

2012-I-0311

Jennifer Jacobson
Chief, Coastal Environmental Team
U.S. Army Engineer District Mobile
Attention: Larry Parson
P.O. Box 2288
Mobile, AL 36628-0001

Dear Ms. Jacobson:

This is the report of the U.S. Fish and Wildlife Service (Service), concerning your letter of February 17, 2012 and public notice FP11-MH01-06, in which the U.S. Army Corps of Engineers (Corps), Mobile District is proposing continued maintenance dredging and disposal effort for the Mobile Harbor Federal Navigation Project, Mobile County, Alabama. The Mobile Harbor Project is divided into three general areas: the river channel section, the bay channel section, and the bar channel section. The river channel section involves the continued maintenance dredging (1.2 mcy annually) and placement of material from the mouth of the Mobile River to the Cochrane Bridge, approximately four miles. The River channel would be dredged to a total depth of 40 feet plus two feet of advanced maintenance and two feet of allowable overdepth dredging. The bay channel section extends 29 miles from near the mouth of Mobile Bay to the mouth of the Mobile River. Approximately 4.3 mcy of material would be removed annually to a depth of 45 feet plus two feet of advanced maintenance and two feet of allowable overdepth dredging. The bar channel section extends eight miles from the Gulf of Mexico to Mobile Bay. Approximately 300,000 cubic yards of material would be removed annually to a total depth of 47 feet plus two feet of advanced maintenance and two feet of allowable overdepth dredging.

Dredged material is proposed to be removed from the channels by dragline/clamshell, hydraulic pipeline and/or hopper dredge, and all material would be placed in previously approved upland disposal sites. We understand that in the event where emergency dredging activities are required, the Corps is proposing to use open bay disposal areas. The emergency option would be necessary when there is insufficient hopper dredge capability to meet these increased needs. Under these circumstances, pipeline dredging equipment will be used for the bay channel utilizing thin-layer open-water disposal on adjacent bay-bottoms. Placement of materials would not exceed 12 inches in thickness. The use of open-water sites would be coordinated with the applicable agencies as needed prior to usage. Following are the Service comments concerning this federal project as it relates to the Marine Mammal Protection Act of 1972 ((16 U.S.C. 1361-1407), and the Endangered Species Act of 1973 (87 Stat. 884, as amended; 16 Cr.S.C. 1531 et seq.).

www.fws.gov

PHONE: 251-441-5181



FAX: 251-441-6222

Your letter states that where hopper dredging equipment will be used for the project the Corps will adhere to the Regional Biological Opinion (RBO) for Dredging of Gulf of Mexico Navigation Channels and Sand Mining Areas Using Hopper Dredges by COE Galveston, New Orleans, Mobile, and Jacksonville Districts (Consultation Number F/SER/2000/01287). Therefore, by strictly adhering to the conditions of the RBO, we believe that adverse impacts to sea turtles during the dredging and disposal operation will be minimal.

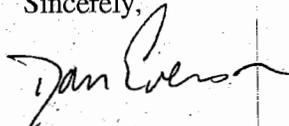
Gulf sturgeon (*Acipenser oxyrinchus desotoi*), particularly juveniles, may be affected by dredging impacts on water quality or food availability, or by direct physical contact. If the following condition is implemented we believe that there will be no adverse impact and formal consultation will not be required. If a Gulf sturgeon is observed, halt operations until the species has left the area. If this step cannot be exercised or there is an occurrence of collision with and/or injury to a sturgeon as a result of the proposed project, then work should cease and further consultation with this office should be undertaken. We request that the Corps report to this office any observation of a sturgeon within the area during project operations.

The Service is also concerned about the potential indirect or direct physical impact on endangered Florida manatees (*Trichechus manatus latirostris*) which may be migrating through the project area during the proposed construction operation. Direct impacts could occur from boat, barge, dredge operation or other construction activities. Because manatees are known to seasonally occur near the area slated for dredging, and could be affected by this activity, we believe that this project, as described, may affect the manatee.

Therefore, the Service proposes that the Corps implement the "Standard Manatee Construction Conditions" that were referred to in your letter (also attached). The Service believes that if these conditions are implemented then there will be no adverse impact to the manatee and formal consultation will not be required. If these steps cannot be exercised or there is an occurrence of collision with and/or injury to a manatee as a result of the proposed project, then further consultation with this office should be undertaken. We request that any observation of a manatee within the area during project operations be reported to this office.

We appreciate the opportunity to comment on your project. For further discussion, please contact Josh Rowell of my staff at (251) 441-5836.

Sincerely,



Dan Everson
Deputy Field Supervisor
Alabama Ecological Services Field Office

Enclosure

**ALABAMA
STANDARD MANATEE CONSTRUCTION CONDITIONS**

- a. The lessee/grantee shall instruct all personnel associated with the project of the potential presence of manatees and the need to avoid collisions with manatees. All construction personnel are responsible for observing water-related activities for the presence of manatees.
- b. The lessee/grantee shall advise all construction personnel that there are civil and criminal penalties for harming, harassing, or killing manatees which are protected under the Marine Mammal Protection Act of 1972 and the Endangered Species Act of 1973.
- c. Siltation barriers shall be made of material in which manatees cannot become entangled, are properly secured, and are regularly monitored to avoid manatee entrapment. Barriers must not block manatee entry to, or exit from, essential habitat.
- d. All vessels associated with the construction project shall operate at "no wake/idle" speeds at all times while in the construction area and while in water where the draft of the vessel provides less than a four-foot clearance from the bottom. All vessels will follow routes of deep water whenever possible.
- e. If manatees are seen within 100 yards of the active daily construction/dredging operation or vessel movement, all appropriate precautions shall be implemented to ensure their protection. These precautions shall include the operation of all moving equipment no closer than 50 feet of a manatee. Operation of any equipment closer than 50 feet to a manatee shall necessitate immediate shutdown of that equipment. Activities will not resume until the manatee(s) has departed the project area of its own volition.
- f. Any collision with and/or injury to a manatee shall be reported immediately to the U.S. Fish and Wildlife Service in Daphne (251-441-5181).
- g. Temporary signs concerning the manatees shall be posted prior to and during all construction/dredging activities. All signs are to be removed by the lessee/grantee upon completion of the project. A sign measuring at least 3 ft. by 4 ft. which reads *Caution: Manatee Area* will be posted in a location prominently visible to water related construction crews. A second sign should be posted if vessels are associated with the construction, and should be placed visible to the vessel operator. The second sign should be at least 8½" by 11" which reads *Caution: Manatee Habitat. Idle speed is required if operating a vessel in the construction area. All equipment must be shutdown if a manatee comes within 50 feet of operation. Any collision with and/or injury to a manatee shall be reported immediately to the U.S. Fish and Wildlife Service in Daphne (251-441-5181).*

TEMPORARY MANATEE SIGNS

for standard manatee construction conditions

The Caution: Manatee Area signs are available through the companies listed below and may also be available from other local suppliers. Permit/lease holders, should contact sign companies directly to arrange for shipping and billing.

Cape Coral Signs & Designs Inc.

1311 Del Prado Boulevard
Cape Coral, Florida 33990
1-800-813-9992
FAX 813-772-9992

Municipal Supply and Sign Company

P.O. Box 17
Naples, Florida 33939-1765
1-800-329-5366
813-262-4639
FAX 813-262-4645

JADCO Signing Inc.

708 Commerce Way
P.O. Box 911
Jupiter, Florida 33458
1-800-432-3404
407-747-1065
FAX 407-744-2985

The second sign should be at least 8½ inches by 11 inches, and should read:

Caution: Manatee Habitat. Idle speed is required if operating a vessel in the construction area. All equipment must be shutdown if a manatee comes within 50 feet of operation. Any collision with and/or injury to a manatee shall be reported immediately to the U.S. Fish and Wildlife Service in Daphne (251-441-5181).

An example is enclosed, and this example can be copied and used during construction activities.

CAUTION

MANATEE HABITAT

**IDLE SPEED IS REQUIRED IF OPERATING A VESSEL IN
THE CONSTRUCTION AREA.**

**ALL EQUIPMENT MUST BE SHUTDOWN IF A MANATEE
COMES WITHIN 50 FEET OF OPERATION.**

**ANY COLLISION WITH AND/OR INJURY TO A MANATEE SHALL BE
REPORTED IMMEDIATELY TO THE U.S. FISH AND WILDLIFE
SERVICE IN DAPHNE AT**

251-441-5181

NMFS PRD concurrence.txt

From: Parson, Larry E SAM
Sent: Tuesday, April 10, 2012 6:59 AM
To: Jacobson, Jennifer L SAM; Kovacevich, Caree
Subject: FW: Mobile Harbor Navigation Project (UNCLASSIFIED)

Classification: UNCLASSIFIED
Caveats: NONE

See email below from Ryan Hendren regarding the consultation for Mobile Harbor.

-----Original Message-----

From: Ryan Hendren [mailto:ryan.hendren@noaa.gov]
Sent: Monday, April 09, 2012 2:37 PM
To: Parson, Larry E SAM
Subject: Mobile Harbor Navigation Project

Larry:

Upon review of your project it looks like the Mobile Harbor Navigation Project (Consultation Number I/SER/2012/00581) would be covered by NMFS' November 19, 2003, Regional Biological Opinion (GMRBO) to the COE's Gulf of Mexico districts on hopper dredging of navigation channels and borrow areas (Consultation Number F/SER/2000/01287). The GMRBO analyzes and accounts for the effects of maintenance dredging, as well as channel widening and deepening "to previously authorized dimensions," on listed species. Thus, any effects to sea turtles or Gulf sturgeon from the proposed project have been analyzed in the GMRBO, are included in that opinion's incidental take statement, and are subject to the terms and conditions of that opinion. If the identified action is subsequently modified in a manner that causes an effect to the listed species or critical habitat in a manner or to an extent not previously considered, or if a new species is listed or critical habitat designated that may be affected by the identified action, consultation will need to be reestablished.

Please contact me if you have any additional questions. -rH

--
Ryan Hendren
ESA Consultant
I.M. Systems Group Contractor
National Marine Fisheries Service
NOAA Southeast Regional Office
Protected Resources Division
263 13th Avenue South
St. Petersburg, Florida 33701
PH: (727) 551-5610
FX: (727) 824-5309
Email: Ryan.Hendren@noaa.gov
web: <http://sero.nmfs.noaa.gov/pr/pr.htm>

Classification: UNCLASSIFIED
Caveats: NONE

FW NMFS-HCD Mobile Hbr PN and EFH consult ltr (UNCLASSIFIED).txt
From: Parson, Larry E SAM
Sent: Friday, April 13, 2012 8:22 AM
To: Kovacevich, Caree
Subject: FW: NMFS-HCD Mobile Hbr PN and EFH consult ltr. (UNCLASSIFIED)

Classification: UNCLASSIFIED
Caveats: NONE

-----Original Message-----

From: Mark Thompson [mailto:mark.thompson@noaa.gov]
Sent: Thursday, April 12, 2012 5:58 PM
To: Parson, Larry E SAM; Jacobson, Jennifer L SAM
Cc: Veronica Beech
Subject: NMFS-HCD Mobile Hbr PN and EFH consult ltr.

Jenny and Larry,

These are our draft comments. I'll look at them again tomorrow and will put them in a formal letter and fax them over to you. Call early if you want to discuss. 850-814-3576

Mark

NOAA's National Marine Fisheries Service, Southeast Region, Habitat Conservation Division (NMFS-HCD), has reviewed the public notice number FP11-MH01-06 dated November 9, 2011, and your letter dated February, 17, 2012, initiating essential fish habitat (EFH) consultation pursuant to the provisions of the Magnuson-Stevens Fishery Conservation and Management Act (Magnuson-Stevens Act) for the continued maintenance dredging and placement activities for the Mobile Harbor navigation project (MHNP), Mobile Bay, Mobile County, Alabama. The U.S. Army Corps of Engineers, Mobile District (COE), propose to annually dredge approximately 5.8 million cubic yards of sediment from the Mobile River, Mobile Bay, and Gulf of Mexico entrance channel to maintain authorized depths associated with the MHNP. Authorized maintenance dredged material placement includes upland sites, the Mobile-North Ocean Dredged Material Disposal Site, and the Sand Island Beneficial Use Site. The COE's public notice also advertised an Emergency Disposal Action option that will result in the placement of approximately 6.5 million cubic yards of dredged material in uncontained open water sites adjacent to the channel during the next dredging event. This Emergency Disposal Action is to be available on an as need basis for future dredging events as well. The reauthorization is not to exceed five years.

Mobile Bay has been identified by Gulf of Mexico Fishery Management Council (GMFMC) as EFH for the following federally managed species: red drum; Spanish mackerel; white, brown, and pink shrimp; and lane and gray snapper. Furthermore, NMFS has designated Mobile Bay as EFH for the following: bull sharks; Atlantic sharknose sharks; juvenile blacktip sharks; and juvenile as well as adult bonnethead sharks. Categories of EFH that would be impacted by the project include sand and mud substrate and estuarine water column. Preliminary examination of the seasonal patterns of abundance suggests that at least one of the managed species is present in Mobile Bay at all times of the year. Detailed information on federally managed fisheries and their EFH is provided in the 2005 generic amendment of the fishery management plans for the Gulf of Mexico prepared by the GMFMC and in the 2009 amendment 1 to the Consolidated Atlantic Highly Migratory Species Fishery Management Plan prepared by NMFS. In addition to EFH designated for federally managed species, Mobile Bay provides nursery and foraging habitats that support both forage and economically important marine fishery species such as black drum, spotted seatrout, southern flounder, gulf menhaden, bluefish, croaker, mullet, and blue crab. These estuarine-dependent organisms serve as prey for other fisheries managed under the Magnuson-Stevens Act by the GMFMC (e.g., mackerels, snappers, and groupers) and highly migratory species managed by the

FW NMFS-HCD Mobile Hbr PN and EFH consult ltr (UNCLASSIFIED).txt
NMFS (e.g., billfishes and sharks).

The EFH provisions of the Magnuson-Stevens Act support one of the Nation's overall marine resource management goals - maintaining sustainable fisheries. Essential to achieving this goal is the restoration and maintenance of suitable marine fishery habitat quality and quantity. We identified concerns with uncontained open water maintenance material placement in estuarine waters and have recommended in previous letters and meetings that this material should be utilized for environmental beneficial uses and environmental restoration. Unconfined open water dredged material placement has been demonstrated to temporarily: smother benthic infauna, increase turbidity, total suspended solids, and total organic material, increase water column nutrients such as phosphorus, nitrogen and ammonia; release metals; and decrease dissolved oxygen throughout the water column. This can impact ichthyoplankton, post-larval and juvenile fishery species, as well as have long term food web impacts through bioaccumulation and biomagnification of contaminants. The extent of adverse impacts, both long-term and short term, is influenced by many factors such as quantity and quality of the sediments, tidal transport, disposal rate, water depths, the area's biological productivity, water quality conditions, and the time of year of disposal. Accordingly, the placement of approximately 6.5 million cubic yards of maintenance dredged material onto 3,800 acres of bay bottom will likely result in direct and indirect adverse impacts to EFH and NOAA's trust resources in Mobile Bay.

While the NMFS-HCD has no objections to the continued maintenance dredging of the MHNP with upland and ocean placement of dredged sediments, we do not necessarily believe it is the best use of these vital resources. Because of the potential adverse impacts to EFH from uncontained dredged material placement in the bay, the historic loss of wetlands within the Mobile Bay system, and the predicted future loss of wetlands that will result from ongoing relative sea level rise, NMFS-HCD preferred alternatives are to utilize this maintenance dredged material to restore historic shoreline wetlands and to create tidal wetlands within contained placement areas.

We are also concerned as it appears the COE has redefined criteria for what is to be declared Emergency Disposal Actions. Previously, Emergency Disposal Actions were associated with significant storm events that resulted a rapid shoaling of the channel and not regular anticipated maintenance. While we understand the insufficient hopper dredge availability issue and the immediate need to "catch up" with maintenance of the Mobile Harbor channel, we anticipate that this new criteria may well result in more frequent Emergency Disposal Actions based upon the COE's ever shrinking Operations and Maintenance budget and the always increasing costs of dredging.

Also, in light of recent interagency discussions regarding the COE's consideration of modifying the dredged material disposal requirements of the MHNP, detailed information will be necessary to fully address impacts associated with uncontained open water placement. Our main issues include habitat impacts as well as the short and long term fate of the dredged sediments. Therefore, to assist in addressing within bay placement issues, this current requested Emergency Disposal Action should incorporate field data collection and modeling efforts to supplement data already being collected by the COE. To specifically address the sediment fate issue, we recommend the COE develop monitoring and modeling protocols to answer the following questions:

1. What is the precision to which the COE can apply thin layer placement (not to exceed 12 inches) in a shallow bay?
2. How much material leaves the site during placement and where does it go?
3. What are the exposure values for habitat outside the placement sites?

4. How much material leaves the site post-placement due to waves/currents and where does it go?
5. What are the opportunities to take advantage of transport processes post-placement to achieve positive objectives, such as an accretion of sediments along shorelines?
6. How much of the material re-enters the channel and at what rate?

To address the habitat impact issues, we recognize that numerous studies have been performed regarding uncontained open water placement of dredged sediments and, at this time, we believe an interagency workshop would be beneficial to identify these studies, review them, and address their results. Also, the workshop could assist in determining if additional specific biological studies are necessary.

In consideration of the direct and indirect impacts to Mobile Bay and to ensure the conservation of EFH and fishery resources, the reauthorization of the MHNPs should include the following:

EFH Conservation Recommendations

1. The COE shall develop monitoring and modeling protocols to address the fate of the disposed sediments during the proposed emergency disposal action.
2. The COE shall organize a workshop to address impacts associated with uncontained open water disposal.
3. The COE shall continue to work with the federal and state resource agencies to address and develop beneficial use opportunities for the maintenance dredged material associated with the MHNPs.

Please be advised the Magnuson-Stevens Act and the regulation to implement the EFH provisions (50 CFR Section 600.920) require the Corps to provide a written response to this letter. That response must be provided within 30 days and at least 10 days prior to final agency action. A preliminary response is acceptable if final action cannot be completed within 30 days. The Corps' final response must include a description of measures to be required to avoid, minimize, mitigate, or offset the adverse impacts of the activity. If the Corps' response is inconsistent with these EFH conservation recommendations, the Corps must provide an explanation of the reasons for not implementing those recommendations.

We appreciate the opportunity to review and comment on the project and are available to continue consultation on the issues identified herein. If you have questions regarding these comments, please contact Mark Thompson at our Panama City office at (850) 234-5061.

FW NMFS-HCD Mobile Hbr PN and EFH consult ltr (UNCLASSIFIED).txt
Caveats: NONE

LANCE R. LEFLEUR
DIRECTOR

ADEM

ROBERT J. BENTLEY
GOVERNOR

Alabama Department of Environmental Management
adem.alabama.gov

1400 Coliseum Blvd. 36110-2400 ■ Post Office Box 301463
Montgomery, Alabama 36130-1463
(334) 271-7700 ■ FAX (334) 271-7950

April 10, 2012

MR. CURTIS FLAKES
U.S. ARMY CORPS OF ENGINEERS
P.O. BOX 2288
MOBILE, AL 36628-0001

RE: State of Alabama: CWA Section 401(a) Water Quality Certification and Coastal Consistency Concurrence
Mobile Harbor Navigation Project, Mobile County (097)
U.S. Army Corps of Engineers Joint Public Notice and Permit: FP11-MH01-06
ADEM Tracking Code: 2012-167-COEP

Dear Mr. Flakes:

This office has completed its review of the above referenced joint public notice and all submitted materials related to the U.S. Army Corps of Engineers' (USACOE) proposal to conduct dredging and disposal activities in the Mobile Harbor, Mobile Bay and the Gulf of Mexico in Mobile County, Alabama. The approved project involves the dragline/clamshell, hydraulic pipeline or hopper dredge removal of approximately 1.2 million cubic yards of material annually from the mouth of the Mobile River to the Cochrane Bridge with placement in upland disposal areas located in the upper harbor area or the Mobile-North Ocean Dredged Material Disposal Site (ODMDS); the dragline/clamshell, hydraulic pipeline or hopper dredge removal of approximately 4.3 million cubic yards of material annually from the main channel in Mobile Bay, from near the mouth of the bay to the mouth of the Mobile River, with placement in the Mobile-North ODMDS; and, the hopper or hydraulic cutterhead dredge of approximately 300,000 cubic yards of material annually from the Mobile Bay Channel from the Gulf of Mexico to Mobile Bay with placement in the SIBUA and the Mobile-North ODMDS. In addition, in the event where storm related emergency dredging activities are considered critical to provide safe navigation for returning the channels to the pre-storm dimension and restoring full shipping capacity, the USACOE will utilize the open bay disposal areas and the Galliard Island disposal area.

Action pertinent to water quality certification is required by Section 401(a)(1) of the Clean Water Act, 33 U.S.C. §1251, *et seq.* If conducted in accordance with the conditions prescribed herein, ADEM hereby **grants** official certification that there is reasonable assurance that the discharge resulting from the proposed activities as submitted will not violate applicable water quality standards established under Section 303 of the Clean Water Act and §22-22-9(g), *Code of Alabama* {1975}. This certification terminates coincidentally with the expiration of FP11-MH01-06 but in no case shall this ADEM certification exceed a maximum of five (5) years from the date the U.S. Army Corps of Engineers issues permit FP11-MH01-06 unless specifically authorized in response to a written request for same.

The ADEM **concurs** with USACOE's consistency determination that the project is consistent with the Alabama Coastal Area Management Program to the maximum extent practicable.

The ADEM certifies that there are no applicable effluent limitations under Sections 301 and 302 nor applicable standards under Sections 306 and 307 of the Clean Water Act in regard to the activities specified. However, regulations promulgated by the EPA requiring discharge permits for storm water runoff from individual and commercial facilities may be applicable. This certification does not address the requirements of those regulations.

To protect water quality and coastal resources, the following conditions must be incorporated as part of FP11-MH01-06.

1. The ADEM must be notified of the starting date and expected completion date, including any project phasing utilized, prior to project implementation.

Birmingham Branch
110 Vulcan Road
Birmingham, AL 35209-4702
(205) 942-6188
(205) 941-1603 (FAX)

Decatur Branch
2715 Sandlin Road, S.W.
Decatur, AL 36033-1333
(256) 353-1713
(256) 340-9359 (FAX)



Mobile Branch
2204 Perimeter Road
Mobile, AL 36619-1131
(251) 450-3400
(251) 479-2593 (FAX)

Mobile-Coastal
4171 Commanders Drive
Mobile, AL 36615-1421
(251) 432-6533
(251) 432-6598 (FAX)

2. The USACOE and/or its assigns **shall** allow any duly authorized employee of the ADEM or its contractors, or Attorney General or District Attorney to enter the premises associated with the project authorized by this permit for the purposes of ascertaining compliance with the terms and conditions of the permit and with the rules and regulations of the ADEM.
3. The USACOE and/or its assigns must implement and maintain appropriate, effective Best Management Practices (BMPs) for prevention and control of nonpoint sources of pollutants, during and after project implementation. The USACOE and/or its assigns, at a minimum, must implement applicable effective BMPs as provided in the Alabama Handbook for Erosion Control, Sediment Control, and Stormwater Management on Construction Sites and Urban Areas, published by the Alabama State Soil and Water Conservation Committee, March 2009.
4. The USACOE and/or its assigns shall conduct **daily** inspections of the sand placement activities during the life of the project to ensure that in-stream turbidity resulting from active dredging or return water from a disposal area will not cause the discharge of sediment into wetlands, substantial visible contrast with the receiving waters greater than 400 feet from the activity or result in an increase of 50 NTUs above background turbidity levels in the receiving waters. The USACOE and/or its assigns must suspend operations should downstream turbidity exceed upstream turbidity by 50 NTUs. The USACOE and/or its assigns shall **immediately** notify the ADEM Coastal Program Satellite Office at (251) 432-6533 of resultant work stoppage.
5. The USACOE and/or its assigns shall be responsible for the condition of the spoil disposal areas for the life of the placement activity and until the disposal areas are reclaimed or adequately stabilized, and for pumping and discharge rates, to ensure settling of suspended solids within the confines of the spoil disposal areas sufficient to ensure that turbidity in the return water will not cause substantial visible contrast within the receiving waters, or result in an increase of 50 NTUs above background turbidity levels in the receiving waters.
6. Upon the loss or failure of any treatment facility, BMP, or other management measure as identified by responsible on-site staff during day-to-day operations or as identified by ADEM technical staff during facility inspections, the USACOE and/or its assigns shall, where necessary to maintain compliance with this certification, suspend, cease, reduce, or otherwise control work/activity and all discharges until effective treatment is restored. The USACOE and/or its assigns shall **immediately** notify the ADEM Coastal Program Satellite Office at (251) 432-6533 of resultant work stoppage.
7. The USACOE and/or its assigns shall provide written notice to the ADEM of any proposed modifications to the fill and construction proposal. Modification and/or time extension requests must be received **60 days prior** to the expiration of this CWA 401 (a) water quality certification. Modification and/or time extension requests should be submitted to the ADEM Coastal Program Satellite Office, Attn: Jennifer Robinson, 4171 Commanders Drive, Mobile, AL 36615.

In recognition that projects are site specific in nature and conditions can change during project implementation, the ADEM reserves the right to require the submission of additional information or require additional management measures to be implemented, as necessary on a case-by-case basis, in order to ensure the protection of water quality and coastal resources.

Liability and responsibility for compliance with this certification are not delegable by contract or otherwise. USACOE shall ensure that any agent, contractor, subcontractor, or other person employed by, under contract, or paid a salary by USACOE complies with this certification. Any violations resulting from the actions of such person shall be considered violations of this certification and may result in an enforcement action.

U.S. Army Corps of Engineers
2012-167-COEP/FP11-MH01-06
April 10, 2012
Page 3 of 3

This certification does not convey any property rights in either real or personal property, or any exclusive privileges, nor does it authorize any injury to persons or property or invasion of other private rights, trespass, or any infringement of Federal, State, or local laws or regulations, and in no way purports to vest in USACOE title to lands now owned by the State of Alabama nor shall it be construed as acquiescence by the State of Alabama of lands owned by the State that may be in USACOE's possession.

Call or write Jennifer Robinson: (251) 432-6533 or jrobinson@adem.state.al.us anytime with questions. Always include the ADEM Tracking ID referenced above when correspondence relative to this project.

Sincerely,



Steven O. Jenkins, Chief
Field Operations Division

SO//jcr File: CZCERT/XXX

Enclosure (6 Pages)

E-copy: Larry Parson, U.S. Army Corps of Engineers
Rosemary Hall, USEPA Region IV, Atlanta
Patric Harper, USFWS, Daphne
Mark Thompson, NMPS, St. Petersburg
Carl Ferraro, ADCNR, Spanish Fort

Comment # 20

Parson, Larry E SAM

From: [REDACTED]
Sent: Friday, February 19, 2016 7:13 PM
To: Mobile Harbor GRR
Subject: [EXTERNAL] PUBLIC NOTICE: FP15-MH01-10

It is our understanding that the Corps of Engineers has begun a new study to deepen and widen the Mobile Harbor ship channel which will increase the amount of dredging performed. Based on numerous studies regarding dredging practices here and in other states, this increased dredging will likely make Dauphin Island's erosion worse.

The Corps has asked the public to identify environmental issues and concerns that should be considered in the study and in the evaluation of the environmental effects of a deeper and wider channel. To this end, we are submitting this email to identify the issues the US Army Corps of Engineers must address in its General Reevaluation Study and Environmental Impact Statement (EIS) to deepen and widen the Mobile Harbor Ship Channel.

- * Conduct the study objectively to assure all concerned interests are given equal consideration.
- * The Corps should prepare a Dredged Material Disposal Master Plan for Mobile Bay and make it part of the Study and EIS, with extensive involvement of the public from the early planning stages rather than at the end of the process when all decisions have essentially been made. The Corps should cease secretly developing and implementing dredged material disposal options under its so called "Mobile Bay Regional Sediment Management Strategy" and begin calling this effort what it actually is: "Mobile Bay Dredged Material Disposal Management Strategy". It is essential that this effort be incorporated into the General Reevaluation Study and EIS, with information being made public in the early planning stages.
- * The Corps should no longer purposefully exclude Dauphin Island from its "Regional Sediment Management Strategy (RMS)" for Mobile Bay. Instead, the Study should incorporate Dauphin Island in the existing RMS approach (by recognizing that the island's erosion is affected by maintenance of the Outer Bar Channel) and devote major attention to the beneficial use of dredged sands to counter erosion. It is unacceptable that Dauphin Island continues to be penalized and excluded as "punishment" for the Corps 2000-2009 lawsuit with the Dauphin Island Property Owners Association.
- * Thoroughly address the cumulative historical sand losses to Dauphin Island dating back to at least 1958 that correspond with increasing deepening of the Outer Bar Channel according to U.S. Geological Survey's 2007 report. This analysis is needed to establish the historical and baseline and projected future conditions to describe the No Action Alternative against which the deepening and widening alternatives will be compared. The Corps cannot ignore the losses in millions and millions of littoral drift sands due to its maintenance practices and the erosion of Dauphin Island that occurred over time.
- * Document why the Corps no longer agrees with its own agency's position (stated in its draft 1978 report on Dauphin Island's beach erosion) that concluded maintenance of the Outer Bar Channel is contributing to at least 40% of Dauphin Island's erosion problem. The Corps not only ignores its own 1978 report, but is of the new position that maintenance dredging of the channel has no impact on the erosion of Dauphin Island. How can the Corps expect the public to believe the results of the impending Study and EIS, when its change in position on the erosion issue appears to have been influenced by its desire to win the 2000-2009 lawsuit with the Dauphin Island Property Owners Association as well as the desire to keep the non-federal share of the costs borne by the Alabama State Port Authority to maintain the Mobile Harbor project as low as possible?
- * The scientific literature is replete with numerous examples where navigation channels dredged through coastal inlets have interrupted the littoral drift of nearshore sands along the beach, causing beaches downdrift of the inlets to erode. This phenomenon is common along the entire US Gulf Coast, the rest of the nation, and around the world. Yet, the Mobile District has maintained this scientific model widely accepted by coastal scientists and engineers does not apply to dredging the Outer Bar Channel through the Mobile Pass Inlet and the erosion of Dauphin Island. Given this inexplicable disregard of known cause and effect by the Corps, The General Evaluation Study and EIS must devote

considerable attention to this issue and provide convincing information to support whatever conclusion the Corps develops.

* The Corps has dumped dredged sands in the Sand Island Beneficial Use Area (SIBUA) south of the lighthouse for years with their position being that these sands are moved by currents to Dauphin Island to counter erosion. However, the observed evidence indicates most of the sands are not moved, but rather accumulate at that location, while Sand Island has almost disappeared and Dauphin Island continues to erode. This leads to the conclusion that the SIBUA is failing to meet its intended purpose. In lieu of continuing to use the SIBUA, the Corps should adopt the same shallow water (<10 to 15 feet) deposition methods that the Mobile District has recently recommended be used to build back Petit Bois Island's eroded Gulf shoreline west of Dauphin Island.

* The General Reevaluation Study and EIS should thoroughly evaluate why the SIBUA fails to meet its purpose. To this purpose, establish a Citizen Advisory Committee that will meet at least two to four times a year with the Corps to assess how public concerns are being addressed in the General Reevaluation Study and EIS. The next time the public hears from the Corps should not be when Draft EIS is released for review at the end of the 4-year study.

Your consideration of these issues is much appreciated.

[Redacted signature block]

Sent from Mail <Blocked<https://go.microsoft.com/fwlink/?LinkId=550986>> for Windows 10

Comment # 21

Parson, Larry E SAM

From: [REDACTED]
Sent: Wednesday, February 24, 2016 9:30 AM
To: Mobile Harbor GRR
Subject: [EXTERNAL] Dredging of Sand in Mobile Bay

To whom it may concern:

Our family has had a house on Dauphin Island since 1968 and over the years have watched the beaches disappear slowly. I think alot of this is caused by the dredging of the bay and where the sand is deposited afterwards. It would be so much better to deposit this sand closer to the island or on the beach. We keep having sand brought in , why not use this sand for renourishment of our beaches. To me it looks like the west end of the island is loosing out the most. I hope your will consider where you place the sand when it is removed from the shipping channels. Thank you for your consideration of this matter. We want to keep our beautiful island.

Sincerely,
[REDACTED]



US Army Corps
of Engineers
Mobile District

Comment # 22

Thank You for Your Comments

**Mobile Harbor General Reevaluation Report, Mobile, Alabama
Public Scoping Meeting at the Mobile Alabama Cruise Terminal
201 S. Water Street, Mobile, Alabama 36602
Tuesday, January 12, 2016
5:00 - 8:00 PM**

In an effort to ensure that all public comments are captured for the Mobile Harbor General Reevaluation Report, Mobile, Alabama, we welcome your written comments. You may place them in the "Written Comments" box at this public meeting session, or send them to: U.S. Army Corps of Engineers, Mobile District, Planning & Environmental Division, Coastal Environment Team, P.O. Box 2288, Mobile, Alabama 36628-0001 ; (Phone: 251.690.3139); or by email to MobileHarborGRR@usace.army.mil.

Comment Category:

Environmental Cultural Resources Threatened and Endangered Species
Fish and Wildlife Water Quality Dredging/Disposal Economics Engineering
Other

Comments (additional space on back):

BAE Systems Southeast Shipyards Alabama LLC supports widening and deepening Mobile Harbor's channel to the fully authorized width and depth. We further urge that deepening to 55 feet extend into the Pinto Reach so that Pinto Island may receive calls from vessels, particularly drill ships and offshore watercraft which work offshore in the Gulf of Mexico, which require such depths. The opening of the enlarged and expanded Panama Canal will produce a new generation of PANAMAX vessel which will require the fullest widening and deepening of the channel.

Name/Organization/Contact Information (Optional):

John Machisak
Vice President & General Manager
Systems Southeast Shipyards Alabama LLC
(251) 690.7061
john.machisak@BAEsystems.com

Comment # 23

Ms. Jennifer Jacobson
US Army Corps of Engineers
Mobile District, Planning & Environmental Division
Coastal Environment Team
PO Box 2288
Mobile, Alabama 36628-0001

RE: Public Notice: FP15-MH01-10

Dear Ms. Jacobson:

I have deep concern with some of the issues the US Army Corps of Engineers should address in i Impact Statement (EIS) to deepen and widen the Mobile Harbor Ship Channel. These are my concerns resulting from the January 12 Public Scoping Meeting.

- We need a study that makes sure all interests are considered, and not just the Alabama State Port Authority.
- The public should be involved in plans to dispose of dredged material removed during initial deepening and widening of the ship channel and future maintenance. The public need to be made aware of the planned dredged material disposal before it happens, not after.
- Dauphin Island should be included in the “Regional Sediment Management Strategy (RMS)” for Mobile Bay. The island’s erosion is affected by maintenance of the Outer Bar Channel and we need to devote major attention to the beneficial use of dredged sands to counter erosion.
- Adhere to the River and Harbor Act of 1935 which requires the Corps to report involving a improvements to the Mobile Harbor Outer Bar Channel evaluate shoreline erosion for a distance of ten miles on either side of the channel.
- Thoroughly address the cumulative historical sand losses to Dauphin Island dating back to at least 1958 that correspond with increasing deepening of the Outer Bar Channel according to U.S. Geological Survey's 2007 report. This analysis is needed to establish the historical and baseline and projected future conditions to describe the No Action Alternative against which the deepening and widening alternatives will be compared. The Corps cannot ignore the losses in millions and millions of littoral drift sands due to its maintenance practices and the erosion of Dauphin Island that occurred over time.
- Why can’t the Corps agree with the 1978 report on Dauphin Island’s beach erosion that concluded maintenance of the Outer Bar Channel is contributing to at least 40% of Dauphin Island’s erosion problem?
- The Corps has dumped dredged sands at Sand Island south of the lighthouse for years thinking that these sands are moved by currents to Dauphin Island to counter erosion. What happens, however is that most of the sands are not moved, but accumulate at that

location, while Sand Island has almost disappeared and Dauphin Island continues to erode. The Plan is not working.

- The Corps should adopt the same shallow water (<10 to 15 feet) deposition methods the Mobile District has recently recommended be used to build back Petit Bois Island's eroded Gulf shoreline west of Dauphin Island.
- We need to be informed and be involved in the processes. The next time the public hears from the Corps should not be when Draft EIS is released for review at the end of the 4-year study.

Thank you for your consideration.

[REDACTED]

[REDACTED]

Comment # 24

Parson, Larry E SAM

From: [REDACTED]
Sent: Monday, February 29, 2016 10:40 PM
To: Mobile Harbor GRR
Subject: [EXTERNAL] omments on Public Notice: FP15-MH01-10 Proposed Widening of the Mobile Shipping Channel

Ms. Jennifer Jacobson
US Army Corps of Engineers
Mobile District, Planning & Environmental Division
Coastal Environment Team
PO Box 2288
Mobile, Alabama 36628-0001

RE: Public Notice: FP15-MH01-10

Dear Ms. Jacobson:

This letter is submitted in response to the Corps' January 12 Public Scoping Meeting. I wish to express my great concerns with the proposed Shipping Channel Widening proposed for the Mobile Harbor Ship Channel as authorized by the Water Resources Development Act of 1986.

I have watched the erosion occurring on Dauphin Island with great alarm. I am particularly concerned that the Corp is not in compliance with Section 5 of the River and Harbor Act of 1935 that requires every Corps report involving an "improvement" to an inlet to evaluate shoreline erosion for a distance of not less than ten miles on either side of the inlet channel.

I have watched the Corps dump dredged sands in the Sand Island Beneficial Use Area (SIBUA) south of the Sand Island lighthouse for years with the assertion that these sands would be moved by currents to Dauphin Island to counter erosion. However, it is clear to even a casual observer that this sand is NOT making its way into the littoral flow. The dumping areas are full, the sand is not moving. The practice needs to be re-evaluated via an EIS, and a Dredged Materials Disposal Plan created with the input of area stakeholders, namely, local residents, the Town Government, and the Dauphin Island Property Owners' Association.

The Corp has operated with impunity in south Alabama for many years, and the results of this mismanagement are clear and stark. The Corps should no longer purposefully exclude Dauphin Island from its "Regional Sediment Management Strategy (RMS)" for Mobile Bay. The public will no longer accept Dauphin Island being penalized and excluded because of the 2000-2009 lawsuit. The time has come for a full EIS; to do anything less under the circumstances would be highly questionable and totally unacceptable to the people of south Mobile County.

Sincerely,

[REDACTED]

--

<Blocked<http://dx577khz83dc.cloudfront.net/1116/0323a353-b6f4-4758-bf25-70b6ae2dbbc6.png>>

[REDACTED]

Comment # 25

Parson, Larry E SAM

From: [REDACTED]
Sent: Monday, February 08, 2016 12:29 PM
To: Mobile Harbor GRR
Cc: bill.hightower@alsenate.gov; d.r.sessions@att.net
Subject: [EXTERNAL] Mobile Ship Channel EIS

Feb. 7, 2016

Dear Colonel Chytka,

My name is Domenic Carlucci and I currently serve as the President of the Dauphin Island Property Owners Association. I am writing to you today as a concerned resident of Dauphin Island.

I recently attended the Corps Public Scoping Hearing on Jan 12, 2016. It was an interesting forum which provided a significant amount of information. The individuals I spoke to were knowledgeable in their fields and provided answers to many of the questions I asked. The one glaring absence in information offered was any reference to the controversy that exists over the influence of the ship channel dredging on the erosion of Dauphin Island. Whether one agrees or disagrees with a "dredging effect" on Dauphin Island the controversy should have been addressed.

The Corps' 2009 Mississippi Coastal Improvements Study acknowledged that maintenance of the ship channels passing between the barrier islands forming Mississippi Sound contribute to the erosion of those islands. That conclusion is similar to the one contained in the Corps' 1978 "Mobile County (including Dauphin Island) Feasibility Report for Beach Erosion Control and Hurricane Protection" which clearly stated that the Mobile Harbor ship channel contributes to the erosion of Dauphin Island.

It is my belief that the proposed Widening and Deepening of the Mobile Harbor Navigation Channel merits a new Environmental Impact Study to evaluate the impact on the surrounding areas. There are different theories on the littoral drift of sand in the northern gulf. The Corps position that the Mobile Harbor Ship Channel does not effect "littoral" drift cannot be proven. The basic fact that the ship channel requires re-dredging on a 2-3 year schedule proves that the sand surrounding it has moved and has reduced the depth and width of the channel. To suggest that a portion of that sand could not have moved toward a replenishment of Dauphin Island defies logic.

It is as simple as that. The requirement to re-dredge the channel proves that littoral drift of sand occurs and thus presents a need to properly research that effect. Only a new EIS could offer the answer to the erosion controversy that concerns many residents of Dauphin Island.

I look forward to a meaningful response on this matter.

Sincerely,

[REDACTED]

Comment # 26

Parson, Larry E SAM

From: [REDACTED]
Sent: Sunday, February 28, 2016 5:42 PM
To: Mobile Harbor GRR
Subject: [EXTERNAL] Comment.

I believe the silt from this would destroy what's left of the grasses in Mobile bay.

Sent from my iPad

Comment # 27

Parson, Larry E SAM

From: [REDACTED]
Sent: Friday, February 26, 2016 8:43 PM
To: Mobile Harbor GRR
Subject: [EXTERNAL] Mobile Ship Channel Dredging

Jennifer- please note that I agree with all items set forth in letter below. The Corps needs to take into consideration the detrimental effects past activities have had on our coast.

Thank you,

[REDACTED]

Ms. Jennifer Jacobson

US Army Corps of Engineers

Mobile District, Planning & Environmental Division

Coastal Environment Team

PO Box 2288

Mobile, Alabama 36628-0001

RE: Public Notice: FP15-MH01-10

Dear Ms. Jacobson:

This letter identifies the issues the US Army Corps of Engineers must address in its General Reevaluation Study and Environmental Impact Statement (EIS) to deepen and widen the Mobile Harbor Ship Channel as authorized by the Water Resources Development Act of 1986. I am submitting these issues in response to the Corps' January 12 Public Scoping Meeting.

- Conduct the study objectively to assure all concerned interests are given equal consideration and not just the views of the Alabama State Port Authority.
- If the Corps plans to dispose of dredged material in Mobile Bay (i.e., thin layer spreading, island creation, etc.) removed during initial deepening and widening of the ship channel and future maintenance, the Corps should prepare a Dredged Material Disposal Master Plan for Mobile Bay and make it part of the Study and EIS, with the extensive involvement of the public. No longer should the Corps hide behind the guise of the Interagency Working Group to secretly develop and implement dredged material disposal options under its so called "Mobile Bay Regional Sediment Management Strategy".

The Corps should cease using this euphemism and begin calling this effort what it actually is: "Mobile Bay Dredged Material Disposal Management Strategy". It is essential that this effort be incorporated into the General Reevaluation Study and EIS, with information finally being made public in the early planning stages and not at the end of the process when all decisions have essentially been made as has been the case to date.

- The Corps should no longer purposefully exclude Dauphin Island from its "Regional Sediment Management Strategy (RMS)" for Mobile Bay. Instead, the Study should incorporate Dauphin Island in the existing RMS approach because the island's erosion is affected by maintenance of the Outer Bar Channel and devote major attention to the beneficial use of dredged sands to counter erosion. The public will no longer accept Dauphin Island being penalized and excluded because of the 2000-2009 lawsuit.
- Comply with Section 5 of the River and Harbor Act of 1935 that requires every Corps report involving an "improvement" to an inlet (i.e., Mobile Harbor Outer Bar Channel through Mobile Pass) to evaluate shoreline erosion for a distance of not less than ten miles on either side of the inlet channel. The Corps' 1980 report and EIS did not comply with that law.
- Thoroughly address the cumulative historical sand losses to Dauphin Island dating back to at least 1958 that correspond with increasing deepening of the Outer Bar Channel according to U.S. Geological Survey's 2007 report. This analysis is needed to establish the historical and baseline and projected future conditions to describe the No Action Alternative against which the deepening and widening alternatives will be compared. The Corps cannot ignore the losses in millions and millions of littoral drift sands due to its maintenance practices and the erosion of Dauphin Island that occurred over time.
- Explain why the Corps no longer agrees with the agency position stated in its draft 1978 report on Dauphin Island's beach erosion that concluded maintenance of the Outer Bar Channel is contributing to at least 40% of Dauphin Island's erosion problem. Document why the findings and conclusions of that report are now considered to be invalid? The Corps not only ignores its own 1978 report now, but is of the new position that maintenance dredging of the channel has no impact on the erosion of Dauphin Island. How can the Corps expect the public to believe the results of the impending Study and EIS, when its change in position on the erosion issue appears to have been influenced by its desire to win the 2000-2009 lawsuit with the Dauphin Island Property Owners Association and by the desire keep the non-federal share of the costs borne by the Alabama State Port Authority to maintain the Mobile Harbor project as low as possible?
- The scientific literature is replete with numerous examples where navigation channels dredged through coastal inlets have interrupted the littoral drift of nearshore sands along the beach, causing beaches downdrift of the inlets to erode. This phenomenon is common along the entire US Gulf Coast, the rest of the nation, and around the world. Yet, the Mobile District has maintained this scientific model widely accepted by coastal scientists and engineers does not apply to dredging the Outer Bar Channel through the Mobile Pass Inlet and the erosion of Dauphin Island. The General Evaluation Study and EIS must devote considerable attention to this issue and provide convincing information to support whatever conclusion the Corps develops.
- The Corps has dumped dredged sands in the Sand Island Beneficial Use Area (SIBUA) south of the lighthouse for years with the position being that these sands are moved by currents to Dauphin Island to counter erosion. However, the observed evidence indicates most of the sands are not moved, but accumulate at that location, while Sand Island has almost disappeared and Dauphin Island continues to erode. This leads to the conclusion that the SIBUA is failing to meet its intended purpose. The General Reevaluation Study and EIS should thoroughly evaluate why the SIBUA fails to meet its purpose.
- In lieu of continuing to use the SIBUA, the Corps should adopt the same shallow water (<10 to 15 feet) deposition methods the Mobile District has recently recommended be used to build back Petit Bois Island's eroded Gulf shoreline west of Dauphin Island.
- Establish a Citizen Advisory Committee that will meet at least two to four times a year with the Corps to assess how public concerns are being addressed in the General Reevaluation Study and EIS. The next time the public hears from the Corps should not be when Draft EIS is released for review at the end of the 4-year study.

Comment # 28

Parson, Larry E SAM

From: [REDACTED]
To: Saturday, February 27, 2016 7:55 AM
Mobile Harbor GRR
Subject: [EXTERNAL] Dauphin Island-dredging and widening

Ms. Jennifer Jacobson,

As property owners on beautiful Dauphin Island, Alabama we are begging the Corp of Engineers to please complete the extended studies before you begin the dredging and widening of the channel. Do you not see what the previous dredging and widening has already caused to the transformation of the island? Look at the before pictures and the now pictures. If you continue to make changes to the waters around the island - the island could shift and who knows-connect to the mainland one day? Look how Sand Island has shifted and look at the erosion the previous dredging has caused. Do you see this erosion at Fort Morgan and Gulf Shores? NO! Let us keep the one beautiful island and sanctity Mobile, Alabama has left-Dauphin Island. Please continue to study the consequences before you cause our island to disappear. I might not live long enough to see what you will cause this island to suffer with your dredging, but, trust me from the past changes that the Corps has made, it will definitely caused devastation to beautiful Dauphin Island. Please, please help us save what we have.

Thank you,

[REDACTED]
[REDACTED] 28

Comment # 29

Parson, Larry E SAM

From: Parson, Larry E SAM
Sent: Monday, January 11, 2016 10:12 AM
To: Mobile Harbor GRR
Subject: FW: [EXTERNAL] Erosion of Dauphin Island and the widening of the canal.

-----Original Message-----

From: [REDACTED]
Sent: Sunday, January 10, 2016 1:44 PM
To: Parson, Larry E SAM <Larry.E.Parson@usace.army.mil>
Subject: [EXTERNAL] Erosion of Dauphin Island and the widening of the canal.

To: The US Army Corps Of Engineers

% Mr Larry Parson

From: [REDACTED]

[REDACTED]

Date: January 10, 2016

Re: Addressing the Erosion of Dauphin Island and Widening of the Mobile Bay Canal

Dauphin Island has been confronted with an erosion problem for a number of years now. The past dredging of the Mobile Bay Canal has been shown to have continually added to this problem, so why now would the core want to greatly increase the dredging effort and cause even more erosion. In the years I have owned on Dauphin Island, I have not seen this problem addressed. It has progressively worsened with Ivan and Katrina. I have owned property in other beachfront communities with lesser erosion problems, and have seen these shore lines rebuilt numerous times. I do not understand why the Dauphin Island erosion problem has not been addressed. Even now with all the BP funds coming into the state, the money is being diverted from this island, that was greatly effected by the oil spill to other enterprises in the state that were not effected by the spill. It makes me wonder what the Government's agenda is for this area. Our property values are much less than any other beachfront areas along the coast. Alabama has so little beachfront and yet this part of it is not being protected. I could not sell my property if I wanted to for anything close to what I paid for it. It is worth 1/5 of what I paid for it and now with the increased dredging about to take place, it will only get worse for all the residents and owners of property on the Island. Seems to me before they begin to dredge Dauphin Island, the erosion needs to be considered, and a plan needs to be developed immediately for the now and future rebuilding of its shoreline. With all the dredging that will be taking place, this sand should be routed to Dauphin Island.

I sincerely hope you are listening to all the folks and environmental groups that are expressing their concern and offering solutions to the erosion problem. Dauphin Island has been experiencing for some time and since the original dredging of the canal.

Sincerely,

[REDACTED]

[REDACTED]

Comment # 30

Parson, Larry E SAM

From: [REDACTED]
Sent: Saturday, February 20, 2016 8:58 AM
To: Mobile Harbor GRR
Subject: [EXTERNAL]

As concerned property owners on Dauphin Island we respectfully request that the USACE reconsider further widening or deepening the mobile shipping channel. For decades the mobile shipping channel has disrupted the natural flow of sand from east to west starving our beaches from this natural sand nourishment. Dauphin Island is a barrier island and first line of defense against the increasingly powerful hurricanes. We all remember the hurricane Katrina and the ecological and economical devastation it caused after ocean saltwater spilled into mobile bay.

As is Dauphin Island is hanging by a thread. It is our hope that USACE has the foresight not to further a practice that harms the Island and Mobile Bay's fragile ecology.

Respectfully,

[REDACTED]

Comment # 31

Parson, Larry E SAM

From: Jason Kudulis <jkudulis@mobilebaykeeper.org>
Sent: Thursday, February 11, 2016 4:17 PM
To: Mobile Harbor GRR
Cc: Casi Callaway
Subject: [EXTERNAL] FP15-MH01-10 Comment Letter Mobile Baykeeper
Attachments: FP15-MH01-10_Baykeeper.pdf

Good afternoon,

Please see the attached document for comments regarding notice FP15-MH01-10 Mobile Harbor Supplemental EIS.

Please confirm you receipt of these comments.

Thank you,

--

Jason Kudulis
Program Director
Mobile Baykeeper <Blockedhttp://www.mobilebaykeeper.org>
450-C Government Street
Mobile, Alabama 36602
Phone 251-433-4229
Cell 251-583-5789

Fax 251-432-8197
jkudulis@mobilebaykeeper.org <mailto:jkudulis@mobilebaykeeper.org>

"Clean Water, Clean Air, Healthy Communities"

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Gregory S. McGee, MD
James "Jimbo" Meador
Edward N. Morris, Jr.
Michael Meshad, MD
Henry R. Seawell, III
L. Page Stalcup, III
Stewart Thames

450-C Government Street
Mobile, Alabama 36602
(251) 433-4229
Fax: (251) 432-8197
Website: www.mobilebaykeeper.org
Email: info@mobilebaykeeper.org

February 11, 2016

USACE Mobile District, Regulatory Division
Attn: CESAM-PD-EC
P.O. Box 2288
Mobile, AL 36628

RE: FP15-MH01-10, Preparation of a Supplemental Environmental Impact Statement to Evaluate Improvements to the Mobile Harbor Federal Navigation Channel, Mobile, Alabama.

Dear District Commander:

We are Mobile Baykeeper, an eighteen-year-old nonprofit organization with the mission of providing citizens a means to protect the beauty, health and heritage of the Mobile Bay Watershed, Alabama's waterways and coastal communities. We are submitting comments on behalf of our board, officers, staff and more than 4,000 members regarding a Draft Supplemental Environmental Impact Statement (EIS) to evaluate improvements to the Mobile Ship Channel.

When addressing potential impacts associated with improving the Mobile Bay navigation channel we request the U.S. Army Corps of Engineers (USACE) evaluate the following issues in the Draft Supplemental Environmental Impact Statement (DSEIS):

- Shoreline erosion impacts that larger ships and increased traffic may pose to both sides of Mobile Bay from the northern end at the Port of Mobile south to the Gulf of Mexico;
- Impacts larger ships and increased traffic may pose to existing and planned living shoreline projects;
- Impacts wave action from increased traffic and larger ships pose to marsh, submerged aquatic vegetation (SAV) and wetlands;
- Incorporate and update dredged material disposal options currently included in the Mobile Bay Regional Sediment Management Strategy and include potentially impacted sites not currently in the management strategy;
- Study all methods of disposal to understand what methods may have the least/greatest environmental impact taking into account all costs associated, rather than just the disposal costs (i.e. erosion impacts have significant costs that should be included);
- The DSEIS should consider how harbor improvements might impact funded current and future restoration projects as well as how data generated from funded monitoring and restoration projects can be incorporated into the DSEIS;
- Examine the potential for increased loss of littoral drift sediments and the impact to Dauphin Island and Mobile Bay;

- Evaluate the long-term disposal needs associated with the enlarged ship channel dimensions and the ability to dispose of this increased amount of sediment in an environmentally responsible manner;
- Evaluate the impacts of increased disposal of sediment on benthic communities and the potential to lose fishing grounds in Mobile Bay;
- Ensure development of the DSEIS relies upon and utilizes the most up to date technique to capture new data;
- Examine impacts of saltwater intrusion resulting from harbor improvements, specifically potential impacts to freshwater supplies, oyster reefs, fisheries, and other estuarine habitats; and
- In planning for port expansion through an expanded ship channel, ensure all existing community plans are incorporated in the review to eliminate one plan contradicting another (e.g. Map for Mobile, Alabama Coastal Comprehensive Plan, Comprehensive Conservation Management Plan, Plan for Spanish Fort and Mobile Bay Causeway, Watershed Management Plans, etc.)

Thank you for your time and attention to this important issue. Overall, we ask that you keep all three elements of a successful community – quality of life, economy and environment – in mind as you develop your draft document.

Sincerely,



Casi Callaway
Executive Director & Baykeeper
Mobile Baykeeper



Jason Kudulis
Program Director
Mobile Baykeeper

Comment # 32

Parson, Larry E SAM

From: [REDACTED]
Sent: Monday, February 29, 2016 12:15 PM
To: Mobile Harbor GRR
Cc: [REDACTED]
Subject: [EXTERNAL] FP15-MH01-10 comments
Attachments: FP15-MH01-10-Murray Comments.pdf

To whom it may concern.

Please accept my attached comments to FP15-MH01-10.

Best Regards,

[REDACTED]

[REDACTED]

[REDACTED]

"It doesn't matter how beautiful your theory is, it doesn't matter how smart you are. If it doesn't agree with experiment, it's wrong." --- Richard P. Feynman.



[REDACTED]

Date: Feb. 29, 2016

Ms. Jennifer Jacobson
United States Army Corp of Engineers
Mobile District, Planning & Environmental Division
Coastal Environment Team
RE: Public Notice: FP15-MH01-10
PO Box 2288

Mobile, Alabama 36628-0001

Dear Ms. Jacobson,

Please accept the following comments to be considered by the USACOE for their preparation of the Supplemental Environmental Impact Statement for the widening of Mobile Channel.

1. Resolve the conflict between the 1980 EIS and the Corps 1976 report concluding maintenance of the outer bar channel contributes to the erosion of Dauphin Island.
2. Ensure that all dredging and dredging maintenance maintains (and restores) the littoral transport continuity
3. Verify the application of all GCRSM principles as a primary activity for this navigation project
4. Ensure that all project decisions are in the context of the sediment system and all regional implications are addressed.
5. Ensure that sediment transport along natural lines is re-established and maintained.
6. As stated in another USACOE EIS (Bayou Casotte Harbor Channel Improvement);
 - a. Enhance natural resources within the project area
 - b. Provide beneficial placement of dredged material
 - c. Contribute to the preservation of historically significant resources within the project area



7. Comply with Section 5 of the River and Harbor Act of 1935 and rectify noncompliance by the USACOE 1980 report and EIS

8. State a basis of acceptance of the USGS Open-File Report 2007-1161, “Historical Changes in the Mississippi-Alabama Barrier Islands and the Roles of Extreme Storms, Sea Level, and Human Activities”, especially concentrating on Discussions and Conclusions page 27 “Considering the three primary causes of land loss, the one that experienced the greatest change in historical time was the reduction in sand supply related to dredging the navigation channels through the outer bars of the tidal inlets. Sand supply is also the only factor where the historical trend of the factor (progressively increased reduction in sand supply attendant with increased dredging depths) temporally matched the trend of progressively increased land loss.”
 - a. With acceptance of this basis:
 - i. Please analyze continuing erosion impact of the economic activities of Dauphin Island

 - ii. Please analyze Dauphin Island continuing erosion impact of the Audubon Bird Sanctuary, the protected maritime forest habitat on the island and one of the first areas of migrant bird landfall and recently recognized by the National Audubon Society as being “Globally Important” for bird migrations.

 - iii. Please analyze Dauphin Island continuing erosion impact on Dauphin Island protection of oyster beds, and also the salt marshes that are critical to the juvenile shrimp, fish and crab communities.

 - iv. Please analyze Dauphin Island continuing erosion impact on Fort Gaines Historic site

9. Include explanation of dredging material drift zone deposition impact versus sediment transport along natural lines.

I hope that the USACOE will take this opportunity to address and resolve these issues. Addressing and fixing the previous EIS inconsistencies will also make this SEIS consistent with other work product that the USACOE has produced.

Sincerely,

████████████████████

Comment # 33

Parson, Larry E SAM

From: Parson, Larry E SAM
Sent: Wednesday, February 10, 2016 10:00 AM
To: Mobile Harbor GRR
Subject: FW: [EXTERNAL] Mobile District Contact Form: Deepening and widening of Mobile Ship Channel

-----Original Message-----

From: Campbell, LaTonya D SAM
Sent: Wednesday, February 10, 2016 9:43 AM
To: Parson, Larry E SAM <Larry.E.Parson@usace.army.mil>
Cc: webcontent SAM <webcontent@usace.army.mil>; Robbins, Ervin P SAM <Ervin.P.Robbins@usace.army.mil>
Subject: RE: [EXTERNAL] Mobile District Contact Form: Deepening and widening of Mobile Ship Channel

Larry,

Please response to the email below.

Thanks,

LaTonya Campbell
Planning and Environmental Division
Phone: (251) 690-2779
Fax: (251) 690-2727

-----Original Message-----

From: [REDACTED]
Sent: Tuesday, February 09, 2016 2:10 PM
To: Campbell, LaTonya D SAM <Latonya.D.Campbell@usace.army.mil>; webcontent SAM <webcontent@usace.army.mil>; Robbins, Ervin P SAM <Ervin.P.Robbins@usace.army.mil>
Subject: [EXTERNAL] Mobile District Contact Form: Deepening and widening of Mobile Ship Channel

This message was sent from the Mobile District website.

Message From: [REDACTED]
[REDACTED]

Response requested: Yes

Message:

I am writing to urge you to:

Consider all parties affected by your planned activities, not just the Alabama State port Authority.
Make all plans for disposal of dredged material "Public", and not secret.
Include Dauphin Island in your Regional Sediment Management Strategy for Mobile Bay.
Comply with Section 5 of the River and Harbor Act of 1935.
Stop ignoring the erosion on Dauphin Island caused by your past practices.

Comment # 34

Parson, Larry E SAM

From: Dauphin Island Restoration <info@dauphinislandrestoration.org>
Sent: Monday, February 29, 2016 11:59 PM
To: Mobile Harbor GRR
Subject: [EXTERNAL] Comments on the Public Scoping Meeting in January 2016

Email to:

Ms. Jennifer Jacobson

US Army Corps of Engineers

Mobile District, Planning & Environmental Division

Coastal Environment Team

PO Box 2288

Mobile, Alabama 36628-0001

On January 12, 2016, I attended a “scoping meeting” for the general public at the Alabama Cruise Terminal, regarding the proposed expansion in depth and width of the Mobile Bay Shipping Channel.

There are many issues to be addressed around the scope of the project, and some have been broached by other concerned citizens. Those concerns will be posted on the Dauphin Island Restoration website in the coming days, weeks and months.

My comments on the meeting (and the study) focus on two key points:

Meeting Format

First of all, the event was not a meeting by any stretch of the imagination.

A public “meeting” is generally constructed with guests/invitees/speakers at the front of a meeting room or conference space, and there is an audience of people who wish to ask questions, express support or concerns, etc. The typical format is a brief talk or presentation, with audience members allowed to ask questions. And those questions, and the answers provided by the speakers, are heard by everyone else in the room.

As I’m sure you know, the event was set up more like a trade show. A rectangle of tables were arranged around the center of the room. At each table were one or more representatives of the Corps. Each table also displayed posters, and prints of where the ASPA plans to widen the channel for a passing lane, as well as other information.

Attendees at the meeting could go up to the individual tables and ask questions of the people manning those tables, but there was no way for those individuals to ask questions where everyone else attending could hear them.

I find it troubling that the “trade show” format was employed for the event. This created a vacuum of information. Only those gathered around a specific table heard what was being asked by a single person and what was said in response.

The strategy employed here prevented important questions from being raised in front of those who had not considered such questions. A number of concerned citizens have become very educated on the proposed project, and on the history of dredging in Mobile Bay, and those people were, for all intents and purposes, "silenced" by this format which restricted the reach of information to the less-informed.

Conflicts of Interest

The 1978 study, performed by the Corps themselves, concluded that dredging did contribute to erosion on Dauphin Island. Some of the current parties involved (directly or indirectly) in this new study have stated both privately and publicly that the 1978 study was not "based on science." Yet there has never been any explanation of how the information in the 1978 study was "non-science" and how this new study will be performed differently. Conflicting statements have also been made by certain persons about the previous study and how the littoral drift is affected.

In light of the biased parties involved, I believe that it is a grievous conflict of interest to have the Corps perform the new study. That ship may have already sailed, as they say. But nevertheless, I wish to voice my concerns. I am skeptical that the results of the study will be impartial, and that it will be, in fact, "based on science" and not tilted toward a result desired by certain parties who wish to do nothing about the erosion problem on Dauphin Island.

Those are my two high-level points of concern. Other points will be posted on our website for the public to read.

Sincerely,



Dauphin Island Restoration

Task Force

P.O. Box 352

Dauphin Island, AL 36528

Comment # 35

Parson, Larry E SAM

From: [REDACTED]
[REDACTED] Monday, February 22, 2016 6:28 PM
To: Mobile Harbor GRR
Subject: [EXTERNAL] Public Notice: FP15-MH01-10
Attachments: LETTER TO CORPS ON DEEPENING AND WIDENING MOBILE HARBOR.docx

Find attached my comments to this public notice.

February 22, 2016

Ms. Jennifer Jacobson
US Army Corps of Engineers
Mobile District, Planning & Environmental Division
Coastal Environment Team
PO Box 2288
Mobile, Alabama 36628-0001

RE: Public Notice: FP15-MH01-10

Dear Ms. Jacobson:

This letter identifies the issues the US Army Corps of Engineers must address in its General Reevaluation Study and Environmental Impact Statement (EIS) to deepen and widen the Mobile Harbor Ship Channel as authorized by the Water Resources Development Act of 1986. I am submitting these issues in response to the Corps' January 12 Public Scoping Meeting.

- Conduct the study objectively to assure all concerned interests are given equal consideration and not just the views of the Alabama State Port Authority.
- If the Corps plans to dispose of dredged material in Mobile Bay (i.e., thin layer spreading, island creation, etc.) removed during initial deepening and widening of the ship channel and future maintenance, the Corps should prepare a Dredged Material Disposal Master Plan for Mobile Bay and make it part of the Study and EIS, with the extensive involvement of the public. No longer should the Corps hide behind the guise of the Interagency Working Group to secretly develop and implement dredged material disposal options under its so called "Mobile Bay Regional Sediment Management Strategy". The Corps should cease using this euphemism and begin calling this effort what it actually is: "Mobile Bay *Dredged Material Disposal* Management Strategy". It is essential that this effort be incorporated into the General Reevaluation Study and EIS, with information finally being made public in the early planning stages and not at the end of the process when all decisions have essentially been made as has been the case to date.
- The Corps should no longer purposefully exclude Dauphin Island from its "Regional Sediment Management Strategy (RMS)" for Mobile Bay. Instead, the Study should incorporate Dauphin Island in the existing RMS approach because the island's erosion is affected by maintenance of the Outer Bar Channel and devote major attention to the beneficial use of dredged sands to counter erosion. The public will no longer accept Dauphin Island being penalized and excluded because of the 2000-2009 lawsuit.
- Comply with Section 5 of the River and Harbor Act of 1935 that requires every Corps report involving an "improvement" to an inlet (i.e., Mobile Harbor Outer Bar Channel through Mobile Pass) to evaluate shoreline erosion for a distance of not less than ten miles on either side of the inlet channel. The Corps' 1980 report and EIS did not comply with that law.

- Thoroughly address the cumulative historical sand losses to Dauphin Island dating back to at least 1958 that correspond with increasing deepening of the Outer Bar Channel according to U.S. Geological Survey's 2007 report. This analysis is needed to establish the historical and baseline and projected future conditions to describe the No Action Alternative against which the deepening and widening alternatives will be compared. The Corps cannot ignore the losses in millions and millions of littoral drift sands due to its maintenance practices and the erosion of Dauphin Island that occurred over time.
- Explain why the Corps no longer agrees with the agency position stated in its draft 1978 report on Dauphin Island's beach erosion that concluded maintenance of the Outer Bar Channel is contributing to at least 40% of Dauphin Island's erosion problem. Document why the findings and conclusions of that report are now considered to be invalid? The Corps not only ignores its own 1978 report now, but is of the new position that maintenance dredging of the channel has no impact on the erosion of Dauphin Island. How can the Corps expect the public to believe the results of the impending Study and EIS, when its change in position on the erosion issue appears to have been influenced by its desire to win the 2000-2009 lawsuit with the Dauphin Island Property Owners Association and by the desire keep the non-federal share of the costs borne by the Alabama State Port Authority to maintain the Mobile Harbor project as low as possible?
- The scientific literature is replete with numerous examples where navigation channels dredged through coastal inlets have interrupted the littoral drift of nearshore sands along the beach, causing beaches downdrift of the inlets to erode. This phenomenon is common along the entire US Gulf Coast, the rest of the nation, and around the world. Yet, the Mobile District has maintained this scientific model widely accepted by coastal scientists and engineers does not apply to dredging the Outer Bar Channel through the Mobile Pass Inlet and the erosion of Dauphin Island. The General Evaluation Study and EIS must devote considerable attention to this issue and provide convincing information to support whatever conclusion the Corps develops.
- The Corps has dumped dredged sands in the Sand Island Beneficial Use Area (SIBUA) south of the lighthouse for years with the position being that these sands are moved by currents to Dauphin Island to counter erosion. However, the observed evidence indicates most of the sands are not moved, but accumulate at that location, while Sand Island has almost disappeared and Dauphin Island continues to erode. This leads to the conclusion that the SIBUA is failing to meet its intended purpose. The General Reevaluation Study and EIS should thoroughly evaluate why the SIBUA fails to meet its purpose.
- In lieu of continuing to use the SIBUA, the Corps should adopt the same shallow water (<10 to 15 feet) deposition methods the Mobile District has recently recommended be used to build back Petit Bois Island's eroded Gulf shoreline west of Dauphin Island.
- Establish a Citizen Advisory Committee that will meet at least two to four times a year with the Corps to assess how public concerns are being addressed in the General Reevaluation Study and EIS. The next time the public hears from the Corps should not be when Draft EIS is released for review at the end of the 4-year study.

Thank you for considering my recommendations.



Comment # 36

Parson, Larry E SAM

From: [REDACTED]
Sent: Monday, February 22, 2016 4:48 PM
To: Mobile Harbor GRR
Subject: [EXTERNAL] Public Notice: FP15-MH01-10
Attachments: #2144476-v1 [REDACTED] -_Dauphin_Island_Letter_-_Corps.pdf

Ms. Jennifer Jacobson

US Army Corps of Engineers

Mobile District, Planning & Environmental Division

Coastal Environment Team

PO Box 2288

Mobile, Alabama 36628-0001

RE: Public Notice: FP15-MH01-10

Dear Ms. Jacobson:

This letter is in response to the request for comments regarding public notice FP15-MH01-10, the proposed widening and deepening of the Mobile ship channel.

As part of the economic, engineering and environmental components of the preparation of this general reevaluation report and draft supplemental environmental impact statement, the Corps should make specific scientific studies focused on an improved understanding of the fate of the disposed sands which are placed in the sand island beneficial use area for the next several years (and that have been placed there over the past several years). The existing scientific evidence is that dredged sand is now being placed in locations where the water depth is too deep to migrate to the beach in our lifetime. The study should be done objectively in order to assure all concerned interests are given equal consideration and not just the views of the Alabama State Port Authority.

It is important that we have improved disposal of dredge materials, especially those consisting of beach quality sand. The southern portion of the Mobile ship channel requires routine maintenance and offers a prime source of sandy materials on a regular basis. Unfortunately, the current practice is to deposit the material in a deep water disposal site (Sand Island Beneficial Use Area) some five miles south of the east end of Dauphin Island; an area that arguably provides little to no benefit to this barrier island.

We all recognize the economic impacts of the shipping industry are significant to the Mobile region, State of Alabama and our entire nation. Enlarging the dimensions of the channel to accommodate larger and more vessels should only enhance those positive returns and likely help justify such a project. Assuming the proposal to widen and deepen the channel is approved, I respectfully request the Corps assistance in ensuring that all beach quality sand removed from the aforementioned section of the channel is placed in the most beneficial location possible to stabilize and protect Dauphin

Island. This includes both the sand retrieved from the initial deepening and widening measure as well as all sand dredged during routine maintenance procedures going forward.

Please feel free to contact me if you have any questions or need additional information.



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February 22, 2016

Ms. Jennifer Jacobson
US Army Corps of Engineers
Mobile District, Planning & Environmental Division
Coastal Environment Team
PO Box 2288
Mobile, Alabama 36628-0001

RE: Public Notice: FP15-MH01-10

Dear Ms. Jacobson:

This letter is in response to the request for comments regarding public notice FP15-MH01-10, the proposed widening and deepening of the Mobile ship channel.

As part of the economic, engineering and environmental components of the preparation of this general reevaluation report and draft supplemental environmental impact statement, the Corps should make specific scientific studies focused on an improved understanding of the fate of the disposed sands which are placed in the sand island beneficial use area for the next several years (and that have been placed there over the past several years). The existing scientific evidence is that dredged sand is now being placed in locations where the water depth is too deep to migrate to the beach in our lifetime. The study should be done objectively in order to assure all concerned interests are given equal consideration and not just the views of the Alabama State Port Authority.

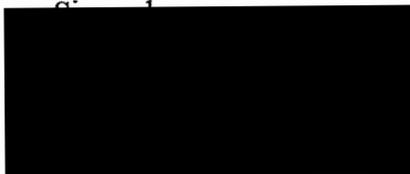
It is important that we have improved disposal of dredge materials, especially those consisting of beach quality sand. The southern portion of the Mobile ship channel requires routine maintenance and offers a prime source of sandy materials on a regular basis. Unfortunately, the current practice is to deposit the material in a deep water disposal site (Sand Island Beneficial Use Area) some five miles south of the east end of Dauphin Island; an area that arguably provides little to no benefit to this barrier island.

We all recognize the economic impacts of the shipping industry are significant to the Mobile region, State of Alabama and our entire nation. Enlarging the dimensions of the channel to accommodate larger and more vessels should only enhance those positive returns and likely help justify such a project. Assuming the proposal to widen and deepen the channel is approved, I respectfully request the Corps assistance in ensuring that all beach quality sand removed from the aforementioned section of the channel is placed in the most beneficial location possible to stabilize and protect Dauphin Island. This includes both the sand retrieved from the initial

February 22, 2016
Page 2

deepening and widening measure as well as all sand dredged during routine maintenance procedures going forward.

Please feel free to contact me if you have any questions or need additional information.



LAH:kdd (2144476)

Comment # 37

Parson, Larry E SAM

From: [REDACTED]
Sent: Monday, February 22, 2016 6:01 PM
To: Mobile Harbor GRR
Subject: [EXTERNAL] Public Comment
Attachments: US Army Corp Letter.pdf

Please take this as my public comment letter.

Thank you,

[REDACTED]

02/22/2016

US Army Corp of Engineers
Mobile District, Planning & Environmental Division
Coastal Environment Team
PO Box 2288
Mobile, Alabama 36628-0001

RE: Public Notice: FP15-MH01-10

To whom it may concern:

Please take this letter as public input concerning the widening and deepening the Mobile Harbor channel. The comments below reflect my thoughts and concerns after attending the meeting on January 12 (Public Scoping Meeting) and reflections on the general process.

Since 1802 the U.S. Army Corps of Engineers has been undertaking monumental projects for our Country including constructing buildings, monuments, canals, lighthouses hydroelectric energy, 9/11 recovery efforts and numerous other excellent projects. One of the large and ongoing efforts consists of environmental preservation and restoration within our wetlands and waterways. This has been such a vital contribution to the strength and health of our Nation today. Thank you!

While discussing and listening to others speak about this specific project it seems many (U.S. Corps and public) have lost sight of the goal and the reason the U.S. Army Corps of Engineers exists. Many discussions sound as though the U.S. Corps and the general public are working against each other. I hear from the U.S. Corps side that "it would be cost prohibitive to have to haul the dredge back (north) to drop in the appropriate spot hoping to allow the continued natural flow of sand towards the west end of Dauphin Island". I hear from the public that "the U.S. Corp doesn't care" or "they are only going to do what is the least amount of money" or "they are going to do what they want regardless of what we think".

After reflecting on all, I have come to the conclusion that we need to take a different approach (both groups). The U.S. Corps of Engineers is funded by the public (Government) and is for the good of the public. Other programs including the wetlands mitigation requirements set out to preserve our wetlands. How this is accomplished is by replacing the same amount of disrupted wetlands with other wetlands. The purpose is to have no change at the end of the day to the amount of wetlands.

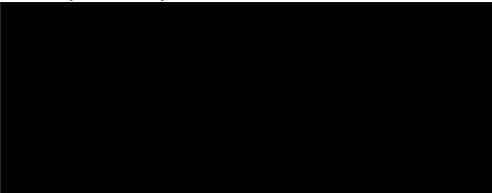
If we can relate this concept to any type of dredging etc. we would have much less of the issues I currently am hearing (in relation to this specific project). If the cause (dredging) is have a negative effect on some natural project then it should simply be mitigated. In this case, the proper way to mitigate the negative impact is to dispose of the dredge material in the best place for the continuation of the natural process and flow of sand to prevent continuing erosion of Dauphin Island or dropping the dredge in the place most economical but mitigating the negative beach impact by pumping the beach back on a periodic basis.

Economic feasibility study should never be a discussion if it is to determine the process to please the general public. The study should be conducted to figure which of the several options minimize damage caused by the dredging (de minimis impact to our environment and coastline). Currently, it seems we

are losing sight of the goal (doing good for the general public without negative impact the environment (the same environment the U.S. Corp has created programs to protect). The last thing we need is an ironic event to occur that the very same entity that is protecting our waterways and wetlands is slowly destroying our fragile coastline.

In summary, I would suggest focusing on the solution to confirm minimal coastline impact. Once the solutions have been determined then select what solution would be the most effective economically. Although I am far from an expert on this matter, it seems the general solution would either (1) discharge dredge material in the proper spot for continued flow and coastline distribution or (2) conduct a coastline restoration project (pump up beaches) each time you dredge the channel past the mouth southward. Yes, both will most likely cost more than the current dredge cost but the current way is not proper. It is slowly destroying our beautiful coast.

Respectfully,



Comment # 38

Parson, Larry E SAM

From: [REDACTED]
To: Monday, February 22, 2016 4:34 PM
Subject: Mobile Harbor GRR
[EXTERNAL] Mobile Channel Widening

We would like to go on record as strongly encouraging the Corps of Engineers to accept that past dredging has contributed greatly to the erosion of Dauphin Island beaches. And, we would expect that any future dredging would take that into consideration, and the Corps would leave dredged materials where they can replenish Dauphin Island. We cannot exist with further erosion due to your periodic dredging.

[REDACTED]

Comment # 39

Parson, Larry E SAM

From: MEJAC <infomejac@gmail.com>
Sent: Thursday, February 11, 2016 11:57 AM
To: Mobile Harbor GRR
Subject: [EXTERNAL] RE: Public Notice: FP15-MH01-10, scoping for Mobile Harbor EIS
Attachments: MEJAC Public Comment on Mobile Harbor EIS Scoping.pdf

Hi Mr. Parson,

Please reply with confirmation that you have received the attached public comment from Mobile Environmental Justice Action Coalition.

Thank you very much!
Ramsey Sprague, President
Mobile Environmental Justice Action Coalition

Parson, Larry E SAM

From: Mobile Harbor GRR
Sent: Thursday, February 11, 2016 12:41 PM
To: 'MEJAC'
Subject: RE: [EXTERNAL] RE: Public Notice: FP15-MH01-10, scoping for Mobile Harbor EIS

Mr. Sprague,

Your comments have been received. Thank you for your interest in the Mobile Harbor General Reevaluation Report.

Sincerely,

Larry Parson
U.S. Army Corps of Engineers, Mobile
Coastal Environment Team
(251) 690-3139

-----Original Message-----

From: MEJAC [mailto:infomejac@gmail.com]
Sent: Thursday, February 11, 2016 11:57 AM
To: Mobile Harbor GRR <MobileHarborGRR@usace.army.mil>
Subject: [EXTERNAL] RE: Public Notice: FP15-MH01-10, scoping for Mobile Harbor EIS

Hi Mr. Parson,

Please reply with confirmation that you have received the attached public comment from Mobile Environmental Justice Action Coalition.

Thank you very much!
Ramsey Sprague, President
Mobile Environmental Justice Action Coalition

Mobile Environmental Justice Action Coalition
P.O. Box 717
Mobile, AL 36601

February 11, 2016

Jennifer Jacobson
US Army Corps of Engineers
Mobile District, Planning & Environmental Division
Coastal Environment Team
PO Box 2288
Mobile, Alabama 36628-0001

RE: Public Notice: FP15-MH01-10

Dear Ms. Jacobson:

The Mobile Environmental Justice Action Coalition (MEJAC) was formed in 2013 with the mission being "...to engage and organize with Mobile's most threatened communities in order to defend the inalienable rights to clean air, water, soil, health, and safety and to take direct action when government fails to do so, ensuring community self-determination".

MEJAC representatives attended the Mobile District's January 12, 2016 Public Scoping Meeting for the General Reevaluation Study and Environmental Impact Statement (EIS) to consider deepening and widening Mobile Harbor. This letter identifies the environmental justice issues MEJAC believes should be addressed in the Study and fully analyzed in the EIS to comply with Executive Order 12898. E.O. 12898 requires Federal agencies to assure minority and low-income populations do not experience disproportionately high and adverse environmental and human impacts from Federal activities and projects.

Our organization is most concerned with the indirect, secondary, and cumulative effects that could be induced to occur over time within portions of the Greater Mobile Area as a result of deepening and widening Mobile Harbor. Primary areas of concern are the Africatown Community located on either side of Bay Bridge Road between Three Mile Creek and Chickasaw Creek and the Orange Grove Community located north of Beauregard Street and west of I-65 and Telegraph Road. These two environmental justice communities are located immediately adjacent to Alabama State Port Authority lands and other industrial waterfront properties that depend upon both inland and deep draft navigation.

The potential also exists for other environmental justice communities in the Greater Mobile Area to be affected by the considered enlargement of Mobile Harbor. Extensive rail and truck traffic originate from and have as their destination the Port of Mobile and associated material handling

facilities located on both sides of the Mobile River. A wide variety of commodities, ranging from inert to hazardous and flammable are transported to and from the Port each day on the railways and highways that extend from the Mobile waterfront. These overland transportation corridors pass through a wide range of communities and neighborhoods, including those dominated by minority and low-income populations. Even though these communities are located some distance from the Port, they nevertheless have the potential, due to their proximity to major transportation arteries, to be disproportionately affected by Port-related activities should the spill of hazardous or flammable materials in route to or from the Port occur in their vicinity.

MEJAC is also concerned that deepening and widening Mobile Harbor could generate indirect and secondary pressures that could ultimately affect present zoning and land use designations on properties adjacent to and within the Africatown and Orange Grove communities. These two communities are already dealing with a variety of land use issues, including the proposed expansion of an oil storage tank farm and approval of a coal handling facility. The concerns are associated with potential health and safety issues associated with such facilities. For instance, residents of both communities report to us about smelling noxious asphalt and oil fumes on an almost-weekly basis. From oil storage facility Clean Air Act-required Major Source Operating Permits, it is plain to see that these facilities are permitted to release many tons of Hazardous Air Pollutants, all of which are human health hazards, some of which like benzene have no known safe exposure level. Orange Grove residents have maintained frustration with the frequency of upkeep required to keep toxic black coal dust from settling into noticeable piles on their properties.

As is it, community leaders are struggling to not only protect their communities and their residents from such issues, but also to improve their quality of life and to maintain their cultural heritage. For example, through their efforts, Africatown was placed on Mobile's African American Heritage Trail in 2009 and the Africatown Historic District was designated by the National Park Service and listed on the National Register of Historic Places in 2012. Expansion of the Mobile Harbor project has the potential to introduce a wide range of new land use, zoning, and environmental contaminant challenges for these communities that could threaten their future existence.

Most environmental documents addressing federal projects all too often give only perfunctory attention to environmental justice issues. That must not be the case in the EIS that is to be prepared in connection with the Corps study. MEJAC believes the following steps should be taken and questions addressed in order to assess the potential direct and indirect; primary and secondary; and cumulative effects on the Africatown and Orange Grove communities in particular, as well as other environmental justice communities, as appropriate.

- Identify types of commodities projected to benefit from the project.
- Will any of the anticipated commodities be considered to be hazardous, flammable, toxic, or otherwise deleterious to human health and safety?
- Conduct an air quality analysis model study that includes reliable baselines from these environmental justice communities to assess Clean Air Act “criterion” air contaminants in

order to appropriately estimate future potential changes in contaminants of concern to human health and to Mobile County's present "Attainment" status.

- Assess potential risks to human health and safety as a result of the proposed project.
- Analyze the effects of the project on jobs, income, and other socioeconomic variables that are considered to be indicative of the overall quality of life.
- Identify any other indirect, secondary and/or cumulative adverse socioeconomic and environmental effects potentially associated with project that could impact on the environmental justice communities.
- Will the volume of petroleum products transported via water, rail, and truck be expected to increase?
- Will additional waterfront petroleum storage capacity need to be developed?
- Are increases in coal shipments anticipated and where will any increased coal volumes be stored?
- What future changes will the Alabama State Port Authority have to make to its land holdings along the Mobile River waterfront to accommodate the anticipated commodity movements?
- Identify potential future requirements for additional lands to be converted from existing uses to port and industrial uses as a result of the enlarged ship channel.
- How will the present volume of truck and rail traffic departing from and entering the Port Authority facilities and other waterfront handling facilities be changed?
- Assess the risk for accidents to occur on existing railways and highways.
- Over the 50-year economic life of the project, are any traffic congestion problems anticipated?

One last point to be made, MEJAC highly recommends that the Corps hold an Environmental Justice Workshop in the early stages of work on the Study to give potentially affected low-income communities of color an opportunity to learn about the proposed enlargement of Mobile Harbor, elaborate upon the above listed issues, and voice additional concerns that should be addressed in the study but which may be missed through lack of community engagement.

MEJAC appreciates the opportunity to provide input into the Scoping Process and hopes the Corps will consider the issues we have raised to be relevant to the Study.

Sincerely,



Ramsey Sprague, President

Comment # 40

Parson, Larry E SAM

From: [REDACTED]
[REDACTED] Tuesday, January 12, 2016 8:40 AM
To: Parson, Larry E SAM
Subject: [EXTERNAL] Seacliff Agency Supports the project to improve the Mobile navigational channel

Mr. Parson,

I am aware that there will be a public hearing to discuss the merits of expansion and improvements to the Mobile ship channel. I regret that I will not be able to attend this public hearing but would like to submit this letter as an endorsement of the support for the proposed project. I feel that it would greatly enhance the Port of Mobile's ability to compete regionally, nationally and internationally. It is a vital project that will enable our port to move forward in a very positive direction for years to come. In what is already a very competitive environment, many of our competing regional and national ports are expanding their capacities and gaining valuable market share as a result. Mobile must do the same not just to gain advantage, but to keep up.

Mobile's and the state of Alabama's economy thrives from its ability to operate a competitive maritime industry. I urge anyone interested in the future vitality of the Port of Mobile and the state of Alabama to follow my support for this project.

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Comment # 41

Parson, Larry E SAM

From: [REDACTED]
Sent: Monday, February 29, 2016 1:55 PM
To: Mobile Harbor GRR
Subject: [EXTERNAL] UPPER MOBILE BAY BENEFICIAL USE WETLAND CREATION SITE-PLANNING

I thank Larry Parson for his detailed explanation of this project to me. Having had the pleasure of working with the Mobile Area Office for many years and having seen the building of dredged material ponds on North Blakeley Island for the turning basin at the Africatown Cochrane Bridge and seeing the silt and silky clay, I am concerned about the material that will go into this proposed tidal marsh.

I met with a retired person from the Corps that was present for the building of Gaillard Island and he said the material used there was number one sand and land clay. The Corps did a fine job there and it has many benefits.

Please see my below concerns:

1. Along with the SEIS , I assume the Corps will do a Benefit/Cost Study in accordance with the Principles and Guideline published by the Water Resource Council. Sometimes the mitigation costs reduce the B/C ratio and thus are not aggressively evaluated or rejected early in the study process. One reason the tidal marsh alternative is being promoted is that it may be the cheapest spoil disposal alternative. Consideration will have to be given to disposal alternatives including upland, thin layer and transport to the Gulf.
2. There are myriad potential impacts that may be associated with the creation of a tidal marsh at this area. These include navigation, aesthetics, archaeological, the flight path to Brookley, fishery, wildlife, water quality, etc.
3. Observation of Gaillard Island and the containment used during construction, there may be a real difference in the containment of the silky clay fine grain material that may require containment structures such as rip-rap, sheet pile, bulkhead, etc. Given the location, it will be subject to strong and persistent hydraulic forces from upstream currents and tides as well as winds. The erosion of this marsh could be a problem for the remaining sea grasses on the Eastern Shore. Having lived many summers at Point Clear and having grass beds and clear water when winds were calm, there are no grass beds there now and the water is never clear.

Please put my name on any publications or reports regarding this project

[REDACTED]

Again, I thank Mr. Parson for his assistance and concern for Mobile Bay.

Comment # 42

Parson, Larry E SAM

From: [REDACTED]
Sent: Thursday, February 18, 2016 2:53 PM
To: Mobile Harbor GRR
Subject: [EXTERNAL] Dauphin Island Erosion and Shoreline Restoration Issues

Importance: Low

Ms. Jennifer Jacobson

US Army Corps of Engineers

Mobile District, Planning & Environmental Division

Coastal Environment Team

PO Box 2288

Mobile, Alabama 36628-0001

RE: Public Notice:FP15-MH01-10

Dear Ms. Jacobson:

As a long-time property and home owner on Dauphin Island, we share with many others, on and off Dauphin Island, our interest and concern relative to the New Study and Supplemental Environmental Impact Statement (SEIS) to deepen and widen the Mobile Harbor Ship Channel.

We believe it is critical, pursuant to 40 CFR 1502.9(c)(1)(ii), the SEIS must address the changed environmental conditions within the study area that have occurred due to the significant erosion of Dauphin Island. The original 1980 EIS failed to consider at all, the potential of an enlarged ship channel to affect the Dauphin Island's erosion problem existing at that time. We believe the 1980 EIS was deficient since it failed to consider the relationship of the ship channel to the erosion of Dauphin Island and how the island's erosion could be further affected by enlarging the channel. It is urgent and critical the SEIS must thoroughly address the cumulative sand losses dating back to 1958 that correspond with increasing deepening the Outer Bar Channel according to U.S. Geological Survey's 2007 report. The conclusions of the Corp's 1976 report concluded SEIS maintenance of the Outer Bar Channel contributes to the erosion of Dauphin Island also cannot be ignored in the New Study to further deepen and widen the channel.

We also believe it is critical to identify new dredged sand disposal sites nearer Dauphin Island and to apply the same shallow water deposition concepts recommended by the Corps be employed to build back Petit Bois Island's eroded shoreline west of Dauphin Island.

The study must fully implement the Corp's planning concepts to make beneficial use of the dredged sands to counter erosion. We believe that, to date, the Mobile District has intentionally excluded Dauphin Island from its RSM planning efforts, while it has pursued numerous RSM projects along the coast including within Mobile Bay.

We urge that a public involvement program be established to keep the public aware of ongoing progress in the study.

Thank you, in advance for your consideration of these important matters.

Sincerely,

[REDACTED]

[REDACTED]

[REDACTED]

Sent from Mail <Blocked<https://go.microsoft.com/fwlink/?LinkId=550986>> for Windows 10

Comment # 43

Parson, Larry E SAM

From: [REDACTED]
Sent: Friday, February 19, 2016 8:20 PM
To: Mobile Harbor GRR
Subject: [EXTERNAL] Public Notice: FP15-MH01-10

mobileharborgrr@usace.army.mil <mailto:mobileharborgrr@usace.army.mil>

Three generations of our family have enjoyed visits to Dauphin Island for almost 40 years. For 25 years we owned a home there. Over the years we have watched the sand fade away from a barrier island we love, not only because of hurricanes in a steadily increasing year by year decline. I write to ask your assistance in helping us mitigate the portion of this decline that is the result of dredging activity. Please ensure that all beach quality sand removed from the nearby sections of the channel be placed in the most beneficial location possible to stabilize and protect Dauphin Island. This includes both the sand retrieved from the initial deepening and widening of Mobile Bay channel as well as all sand dredged during routine maintenance procedures going forward. Improved disposal of dredged materials should be incorporated as part of the business plan. This barrier island is important to the families who live and visit there, to the economy of the wider area and, most importantly in its role as a natural buffer for the coastline. It deserves the attention and respect of the Army Corps of Engineers in their planning process.

Comment # 44

Parson, Larry E SAM

From: [REDACTED]
Sent: Sunday, February 21, 2016 6:02 PM
To: Mobile Harbor GRR
Subject: [EXTERNAL] WIDENING AND DEEPENING OF THE MOBILE SHIP CHANNEL

REF: PUBLIC NOTICE: FP15-MH01-10

While recognizing the importance of widening and deepening of the Mobile Ship Channel, the CORPS desperately needs to improve the manner in which it disposes of the dredged materials. Dauphin Island has been robbed of the normal flow east to west of sand that is now being dredged and disposed of some five miles offshore.

Please make the beneficial use area closer to Dauphin Island. The current disposal site is of no benefit to the island.

Thanks,

[REDACTED]

[REDACTED]

Comment # 45

Parson, Larry E SAM

From: [REDACTED]
To: [REDACTED]
Subject: Wednesday, February 24, 2016 10:43 AM
Mobile Harbor GRR
[EXTERNAL] 2008 letter from Mayor to Corps of Engineers & Col Bryon Jorns reply
Attachments: COE 12182008.pdf; 2009-03-25 Ltr Col Bryon Jorns to Jeff Collier re SIBUA to Nort.pdf

February 24, 2016

Ms. Jennifer Jacobson

US Army Corps of Engineers

Mobile District, Planning & Environmental Division

Coastal Environment Team

PO Box 2288

Mobile, Alabama 36628-0001

RE: Public Notice: FP15-MH01-10

Dear Ms. Jacobson:

Being that the deadline for the public scoping comment period will end February 29th, I am sending you this e-mail to make the following request provided below to be included as a component of the Environmental Impact Statement (EIS) of the Mobile Harbor Widening and Deepening of the Mobile Navigation Ship Channel.

Per the attached December 18, 2008 letter (attached) from Mayor Jeff Collier, Town of Dauphin Island, the Mayor wrote that the "The proposal to deposit beach-quality dredge material further south seems counterproductive to the needs of an island that is literally washing away. While I admit I have not had an opportunity to review any data the Corps may have that would indicate material dumped in this new location will in fact benefit Dauphin Island, it would seem our chances of success would be greatly increased if the material was placed in closer proximity to the intended target." In fact, the Corps has already extended the SIBUA south and southwest and there is still continued erosion of Dauphin Island shoreline.

And apparently the Mobile District never gave any consideration to the Mayor's request "Is it possible to extend the site north and/or west versus southward? Has the Corps researched the implementation of a by-pass dredge program? These are just a few of the questions we have about the proposed SIBUA expansion."

The request of Mayor Collier is in line with the Mobile District's 1978 study to deposit dredged sand from the Mobile Ship Channel closer to Dauphin Island. Therefore, the EIS should consider Mayor Collier's a request and this request to be included in the Environmental Impact Statement.

Sincerely,

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]



Town of Dauphin Island

1011 Bienville Blvd. • Dauphin Island, Alabama 36528
Phone: (251) 861-5525 • Fax: (251) 861-2154 • Email: dialgovmt@townofdauphinisland.org

December 18, 2008

Town Council

Mayor
Jeff Collier

Council Members
Stephen Denmark
Mary Thompson
Lisa Hansen
Sherry Carney
Clinton Collier

Town Clerk
Nannette Davidson

Department of the Army
Mobile District, Corps of Engineers
P.O. Box 2288
Mobile, Alabama 36628-0001

Dear Sirs,

As Mayor of the Town of Dauphin Island and on behalf of the Town Council, I write in reference to Public Notice No. FP08-MH14-05 which proposes a 2000 foot southward extension of the Sand Island Beneficial Use Area (SIBUA). Recognizing that our barrier island community is situated "down drift" of the existing SIBUA and is closest in proximity to the site than any other community in Mobile County, I appreciate the opportunity to express our thoughts and concerns regarding the proposed changes to the SIBUA.

Dauphin Island has experienced decades of erosion along the entire southern shoreline. Today, we find ourselves in a critical situation where Gulf waters threaten critical infrastructure, critical habitats and public and private lands. Without some type of shoreline stabilization project in the very near future the island, along with its many cultural, recreational, environmental and historical resources, will be lost.

The proposal to deposit beach-quality dredge material further south seems counterproductive to the needs of an island that is literally washing away. While I admit I have not had an opportunity to review any data the Corps may have that would indicate material dumped in this new location will in fact benefit Dauphin Island, it would seem our chances of success would be greatly increased if the material was placed in closer proximity to the intended target.

What is the primary reason for moving outside of the existing SIBUA? Is the area completely filled? Is the water too shallow to afford access by

1011 Bienville Blvd.
Dauphin Island, Alabama 36528
Phone: (251) 861-5525 Fax (251) 861-2154
Email: dialgovmt@townofdauphinisland.org

hopper dredge? Is it possible to extend the site north and/or west versus southward? Has the Corps researched the implementation of a by-pass dredge program? These are just a few of the questions we have about the proposed SIBUA expansion.

On behalf of our entire community, I respectfully request a public hearing be held on Dauphin Island to allow citizen input regarding this important matter. Thank you in advance for your favorable response.

Respectfully Submitted,



Jeff Collier
Mayor



DEPARTMENT OF THE ARMY
MOBILE DISTRICT, CORPS OF ENGINEERS
P.O. BOX 2283
MOBILE, ALABAMA 36628-0001

March 25, 2009

REPLY TO
ATTENTION OF:

Coastal Environment Team
Planning and Environmental Division

Honorable Jeff Collier
Town of Dauphin Island
101 Bienville Boulevard
Dauphin Island, Alabama 36528-0001

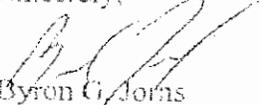
Dear Mr. Collier

This letter is written in response to your letter dated December 19, 2008, requesting a public hearing on the proposed southern expansion of the Sand Island Beneficial Use Area (SIBUA) as specified in Public Notice No. FP08-MH14-05. The U.S. Army Corps of Engineers (Corps), Mobile District is considering your request to expand the SIBUA dredged material disposal area to the north and west as referenced in your letter. As previously established, use of the SIBUA is restricted according to the depths required by the dredging equipment used to place the material within the site. The Corps, Mobile District is in the process of conducting hydrographic surveys and engineering analysis to determine the most effective placement options to allow the return of sand to the littoral system.

If these areas are considered suitable as effective placement options, the Corps will consider your request to expand the SIBUA to the north and west. In addition, we still plan on pursuing the proposed southern expansion for disposal operations along with any expansion to the north and west if deemed suitable. Based on this information and the actions of the Corps in consideration of your request, it has been determined that your request for a public hearing does not set forth the interest and manner that would provide additional information towards making a final decision for this action. I, therefore, see no additional benefits to conducting a public hearing at this time. We will inform your office of the results of our findings.

I appreciate your interest in responding to this Public Notice. Should you require any further assistance, please contact Mr. Larry Parson at (251) 690-3139, email larry.e.parson@usace.army.mil or Mr. Mike Malsom at (251) 690-2023, email michael.f.malsom@usace.army.mil.

Sincerely,


Byron G. Johns
Colonel, Corps of Engineers
District Commander

Comment # 46

Parson, Larry E SAM

From: [REDACTED]
[REDACTED] Tuesday, January 26, 2016 6:25 PM
To: Mobile Harbor GRR
Subject: [EXTERNAL] Public Notice No.FP15-MH01-10

I am a property owner on Dauphin Island and very concerned about expanding the shipping channel. The DSEIS should analyse the effects of all alternatives on Dauphin Island, including the beaches. Placement of the dredge spoils nearer to the island would likely help the beaches.

[REDACTED]

Parson, Larry E SAM

From: [REDACTED]
To: Parson, Larry E SAM
Subject: [EXTERNAL] Public Notice No. FP15-MH01-10 - Mobile Harbor Federal Navigation Channel Improvements

To:

ATTN: CESAM-PD-EC

District Commander

US Army Engineer District Mobile

PO Box 2288

Mobile, AL 36628-0001

Mr. Parson,

I am a Dauphin Island property owner. I am aware of the proposal to widen the Mobile Bay Ship Channel in order for the Alabama State Port Authority (ASPA) to handle more

ships more efficiently. I understand that this will provide economic benefit to our local area and our state.

I am also aware of the preparation of a Supplemental Environment Impact Statement to address potential impacts associated with improving the Mobile Harbor Federal Navigation Channel in Mobile County, Alabama. I am very concerned over the potential for a widened ship channel to intensify the ongoing erosion of Dauphin Island and create other significant adverse impacts on ecosystems within the project area.

I am writing to you to request that extensive considerations, appropriations and accommodations be made to ensure there is no negative impact to Dauphin Island. Dauphin Island plays a critical role in the local ecosystem and is a protective barrier reef for the mainland. If the dredging does occur, I urge you to use the sand to rebuild the Dauphin Island beaches and to stabilize the area around the historic Sand Island Lighthouse.

I respectfully ask that you honor this request. I am happy to discuss this further and appreciate your consideration. If this request requires an alternate form of submission for consideration please provide direction as to how to submit.

Sincerely,

[REDACTED]
[REDACTED]

[Redacted]

Knowing now matters.™

[Redacted]

[Redacted]

[Redacted]

****Confidentiality Notice****

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[Redacted]

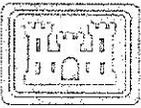
Comment # 48

Parson, Larry E SAM

From: [REDACTED]
Sent: Monday, January 18, 2016 12:30 PM
To: Mobile Harbor GRR
Subject: [EXTERNAL] Written comments
Attachments: corp.pdf

Please find attached written comments.

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**US Army Corps
of Engineers**
Mobile District

Thank You for Your Comments

**Mobile Harbor General Reevaluation Report, Mobile, Alabama
Public Scoping Meeting at the Mobile Alabama Cruise Terminal
201 S. Water Street, Mobile, Alabama 36602
Tuesday, January 12, 2016
5:00 - 8:00 PM**

In an effort to ensure that all public comments are captured for the Mobile Harbor General Reevaluation Report, Mobile, Alabama, we welcome your written comments. You may place them in the "Written Comments" box at this public meeting session, or send them to: U.S. Army Corps of Engineers, Mobile District, Planning & Environmental Division, Coastal Environment Team, P.O. Box 2288, Mobile, Alabama 36628-0001; (Phone: 251.690.3139); or by email to MobileHarborGRR@usace.army.mil.

Comment Category:

- Environmental Cultural Resources Threatened and Endangered Species
 Fish and Wildlife Water Quality Dredging/Disposal Economics Engineering
 Other

Comments (additional space on back): I attended a meeting in October in an attempt to find out what the

Corp was trying to accomplish with all the studies that were and are taking place for the dredging of the Mobile Bay Ship Channel.

I have realized that the Corp in the business of funding studies and not realizing what the adverse effect that the dredging has had on the shoreline of Dauphin Island. The people of the coastal communities are suffering from the lack of response of the current practices and need serious concerns addressed not more studies to fund. A citizen advisory board needs to be implemented to address the problems and solutions that are and will seriously affect the citizens of the coastal plains.

Name/Organization/Contact Information (Optional):

Comment # 49

February 5, 2016



Ms. Jennifer Jacobson
US Army Corps of Engineers
Mobile District, Planning & Environmental Division
Coastal Environment Team
PO Box 2288
Mobile, Alabama 36628-0001

Dear Ms. Jacobson:

It has been known for some time that breakfront sand migrates in an east to west direction. The sand continually moves in that direction along the southern coast of the U.S. and more specifically along the Gulf Coast.

The necessity to continually dredge this Mobile Bay entrance includes the movement of sand in the east to west manner. If there were no movement, no dredging would be required. Since the Corp of Engineers has maintained the Mobile Bay entrance, the "downstream" beaches have been cut off from the natural movement of supply necessary. The beaches west of Mobile Bay have been damaged for nearly 50 years.

The sand must be replaced, and the natural movement must be re-established. The desire to establish and maintain a wider channel width can be accomplished without damage of property to the west of the Bay. It can be a simple procedural adjustment which must be addressed prior to approach of the channel widening.

This letter identifies the issues the US Army Corps of Engineers must address in its General Reevaluation Study and Environmental Impact Statement (EIS) to deepen and widen the Mobile Harbor Ship Channel. I am submitting these issues in response to the Corps' January 12 Public Scoping Meeting and request they be addressed:

- Conduct the study objectively to assure all concerned interests are given equal consideration and not just the views of the Alabama State Port Authority.
- If the Corps plans to dispose of dredged material in Mobile Bay (i.e., thin layer spreading, island creation, etc.) removed during initial deepening and widening of the ship channel and future maintenance, the Corps should prepare a Dredged Material Disposal Master Plan for Mobile Bay and make it part of the Study and EIS, with the extensive involvement of the public. No longer should the Corps hide behind the guise of the Interagency Working Group to secretly develop and

implement dredged material disposal options under its so called "Mobile Bay Regional Sediment Management Strategy". The Corps should cease using this euphemism and begin calling this effort what it actually is: "Mobile Bay **Dredged Material Disposal** Management Strategy". It is essential that this effort be incorporated into the General Reevaluation Study and EIS, with information finally being made public in the early planning stages and not at the end of the process when all decisions have essentially been made as has been the case to date.

- The Corps should no longer purposefully exclude Dauphin Island from its "Regional Sediment Management Strategy (RMS)" for Mobile Bay. Instead, the Study should incorporate Dauphin Island in the existing RMS approach because the island's erosion is affected by maintenance of the Outer Bar Channel and devote major attention to the beneficial use of dredged sands to counter erosion. The public will no longer accept Dauphin Island being penalized and excluded because of the 2000-2009 lawsuit.
- Comply with Section 5 of the River and Harbor Act of 1935 that requires every Corps report involving an "improvement" to an inlet (i.e., Mobile Harbor Outer Bar Channel through Mobile Pass) to evaluate shoreline erosion for a distance of not less than ten miles on either side of the inlet channel. The Corps' 1980 report and EIS did not comply with that law.
- Thoroughly address the cumulative historical sand losses to Dauphin Island dating back to at least 1958 that correspond with increasing deepening of the Outer Bar Channel according to U.S. Geological Survey's 2007 report. This analysis is needed to establish the historical and baseline and projected future conditions to describe the No Action Alternative against which the deepening and widening alternatives will be compared. The Corps cannot ignore the losses in millions and millions of littoral drift sands due to its maintenance practices and the erosion of Dauphin Island that occurred over time.
- Explain why the Corps no longer agrees with its position stated in its draft 1978 report on Dauphin Island's beach erosion that concluded maintenance of the Outer Bar Channel is contributing to at least 40% of Dauphin Island's erosion problem. Document why the findings and conclusions of that report are now considered to be invalid? The Corps not only ignores its own 1978 report now, but is of the new position that maintenance dredging of the channel has no impact on the erosion of Dauphin Island. How can the Corps expect the public to believe the results of the impending Study and EIS, when its change in position on the erosion issue appears to have been influenced by its desire to win the 2000-2009 lawsuit with the Dauphin Island Property Owners Association and by the desire keep the non-federal share of the costs borne by the Alabama State Port Authority to maintain the Mobile Harbor project as low as possible?
- The scientific literature is replete with numerous examples where navigation channels dredged through coastal inlets have interrupted the littoral drift of nearshore sands along the beach, causing beaches downdrift of the inlets to erode. This phenomenon is common along the entire US Gulf Coast, the rest of the nation, and around the world. Yet, the Mobile District has maintained this

scientific model widely accepted by coastal scientists and engineers does not apply to dredging the Outer Bar Channel through the Mobile Pass Inlet and the erosion of Dauphin Island. The General Evaluation Study and EIS must devote considerable attention to this issue and provide convincing information to support whatever conclusion the Corps develops.

- The Corps has dumped dredged sands in the Sand Island Beneficial Use Area (SIBUA) south of the lighthouse for years with the position being that these sands are moved by currents to Dauphin Island to counter erosion. However, the observed evidence indicates most of the sands are not moved, but accumulate at that location, while Sand Island has almost disappeared and Dauphin Island continues to erode. This leads to the conclusion that the SIBUA is failing to meet its intended purpose. The General Reevaluation Study and EIS should thoroughly evaluate why the SIBUA fails to meet its purpose.
- In lieu of continuing to use the SIBUA, the Corps should adopt the same shallow water (<10 to 15 feet) deposition methods the Mobile District has recently recommended be used to build back Petit Bois Island's eroded Gulf shoreline west of Dauphin Island.
- Establish a Citizen Advisory Committee that will meet at least two to four times a year with the Corps to assess how public concerns are being addressed in the General Reevaluation Study and EIS. The next time the public hears from the Corps should not be when Draft EIS is released for review at the end of the 4-year study.

Very truly yours,



Comment # 50



February 4, 2016

Ms. Jennifer Jacobson
US Army Corps of Engineers
Mobile District, Planning & Environmental Division
Coastal Environment Team
PO Box 2288
Mobile, Alabama 36628-0001

Re: New Corps Study to Deepen and Widen the Mobile Harbor Ship Channel

Ms. Jacobson:

It is our understanding that the Corps of Engineers has begun a new study to deepen and widen the Mobile Harbor ship channel which will increase the amount of dredging performed. Based on numerous studies regarding dredging practices here and in other states, this increased dredging will likely make Dauphin Island's erosion worse.

The Corps has asked the public to identify environmental issues and concerns that should be considered in the study and in the evaluation of the environmental effects of a deeper and wider channel. To this end, we are submitting this letter to identify the issues the US Army Corps of Engineers must address in its General Reevaluation Study and Environmental Impact Statement (EIS) to deepen and widen the Mobile Harbor Ship Channel. I am submitting the following issues in response to the Corps' January 12 Public Scoping Meeting:

- Conduct the study objectively to assure **all** concerned interests are given equal consideration.
- The Corps should prepare a **Dredged Material Disposal Master Plan for Mobile Bay** and make it part of the Study and EIS, with extensive involvement of the public from the early planning stages rather than at the end of the process when all decisions have essentially been made. The Corps should cease secretly developing and implementing dredged material disposal options under its so called "Mobile Bay Regional Sediment Management Strategy" and begin calling this effort what it actually is: "**Mobile Bay Dredged Material Disposal Management Strategy**". It is essential that this effort be incorporated into the General Reevaluation Study and EIS, with information being made public in the early planning stages.
- The Corps should no longer **purposefully** exclude Dauphin Island from its "Regional Sediment Management Strategy (RMS)" for Mobile Bay. Instead, the Study should incorporate Dauphin Island in the existing RMS approach (**by recognizing that the island's erosion is affected by maintenance of the Outer Bar Channel**) and devote major attention to the beneficial use of dredged sands to counter erosion. **It is unacceptable that Dauphin Island continues to be penalized and excluded as "punishment" for the Corps 2000-2009 lawsuit with the Dauphin Island Property Owners Association.**
- Thoroughly address the cumulative historical sand losses to Dauphin Island dating back to at least 1958 that correspond with increasing deepening of the Outer Bar Channel according to

U.S. Geological Survey's 2007 report. This analysis is needed to establish the historical and baseline and projected future conditions to describe the No Action Alternative against which the deepening and widening alternatives will be compared. **The Corps cannot ignore the losses in millions and millions of littoral drift sands due to its maintenance practices and the erosion of Dauphin Island that occurred over time.**

- **Document why the Corps no longer agrees with its own agency's position (stated in its draft 1978 report on Dauphin Island's beach erosion) that concluded maintenance of the Outer Bar Channel is contributing to at least 40% of Dauphin Island's erosion problem.** The Corps not only ignores its own 1978 report, but is of the new position that maintenance dredging of the channel has no impact on the erosion of Dauphin Island. How can the Corps expect the public to believe the results of the impending Study and EIS, when its change in position on the erosion issue appears to have been influenced by its desire to win the 2000-2009 lawsuit with the Dauphin Island Property Owners Association as well as the desire to keep the non-federal share of the costs borne by the Alabama State Port Authority to maintain the Mobile Harbor project as low as possible?
- The scientific literature is replete with numerous examples where navigation channels dredged through coastal inlets have interrupted the littoral drift of nearshore sands along the beach, causing beaches downdrift of the inlets to erode. This phenomenon is common along the entire US Gulf Coast, the rest of the nation, and around the world. Yet, **the Mobile District has maintained this scientific model widely accepted by coastal scientists and engineers does not apply to dredging the Outer Bar Channel through the Mobile Pass Inlet and the erosion of Dauphin Island.** Given this inexplicable disregard of known cause and effect by the Corps, The General Evaluation Study and EIS must devote considerable attention to this issue and provide convincing information to support whatever conclusion the Corps develops.
- The Corps has dumped dredged sands in the Sand Island Beneficial Use Area (SIBUA) south of the lighthouse for years with their position being that these sands are moved by currents to Dauphin Island to counter erosion. However, the observed evidence indicates most of the sands are not moved, but rather accumulate at that location, while Sand Island has almost disappeared and Dauphin Island continues to erode. This leads to the conclusion that the SIBUA is failing to meet its intended purpose. **In lieu of continuing to use the SIBUA, the Corps should adopt the same shallow water (<10 to 15 feet) deposition methods that the Mobile District has recently recommended be used to build back Petit Bois Island's eroded Gulf shoreline west of Dauphin Island.**
- The General Reevaluation Study and EIS should thoroughly evaluate why the SIBUA fails to meet its purpose. To this purpose, **establish a Citizen Advisory Committee that will meet at least two to four times a year with the Corps to assess how public concerns are being addressed in the General Reevaluation Study and EIS.** The next time the public hears from the Corps should not be when Draft EIS is released for review at the end of the 4-year study.

Your consideration of these issues is much appreciated.

Sincerely,



Comment # 51

February 5, 2016



Ms. Jennifer Jacobson
US Army Corps of Engineers
Mobile District, Planning & Environmental Division
Coastal Environment Team
PO Box 2288
Mobile, Alabama 36628-0001

Dear Ms. Jacobson:

It has been known for some time that breakfront sand migrates in an east to west direction. The sand continually moves in that direction along the southern coast of the U.S. and more specifically along the Gulf Coast.

The necessity to continually dredge this Mobile Bay entrance includes the movement of sand in the east to west manner. If there were no movement, no dredging would be required. Since the Corp of Engineers has maintained the Mobile Bay entrance, the "downstream" beaches have been cut off from the natural movement of supply necessary. The beaches west of Mobile Bay have been damaged for nearly 50 years.

The sand must be replaced, and the natural movement must be re-established. The desire to establish and maintain a wider channel width can be accomplished without damage of property to the west of the Bay. It can be a simple procedural adjustment which must be addressed prior to approach of the channel widening.

This letter identifies the issues the US Army Corps of Engineers must address in its General Reevaluation Study and Environmental Impact Statement (EIS) to deepen and widen the Mobile Harbor Ship Channel. I am submitting these issues in response to the Corps' January 12 Public Scoping Meeting and request they be addressed:

- Conduct the study objectively to assure all concerned interests are given equal consideration and not just the views of the Alabama State Port Authority.
- If the Corps plans to dispose of dredged material in Mobile Bay (i.e., thin layer spreading, island creation, etc.) removed during initial deepening and widening of the ship channel and future maintenance, the Corps should prepare a Dredged Material Disposal Master Plan for Mobile Bay and make it part of the Study and EIS, with the extensive involvement of the public. No longer should the Corps hide behind the guise of the Interagency Working Group to secretly develop and

implement dredged material disposal options under its so called "Mobile Bay Regional Sediment Management Strategy". The Corps should cease using this euphemism and begin calling this effort what it actually is: "Mobile Bay **Dredged Material Disposal** Management Strategy". It is essential that this effort be incorporated into the General Reevaluation Study and EIS, with information finally being made public in the early planning stages and not at the end of the process when all decisions have essentially been made as has been the case to date.

- The Corps should no longer purposefully exclude Dauphin Island from its "Regional Sediment Management Strategy (RMS)" for Mobile Bay. Instead, the Study should incorporate Dauphin Island in the existing RMS approach because the island's erosion is affected by maintenance of the Outer Bar Channel and devote major attention to the beneficial use of dredged sands to counter erosion. The public will no longer accept Dauphin Island being penalized and excluded because of the 2000-2009 lawsuit.
- Comply with Section 5 of the River and Harbor Act of 1935 that requires every Corps report involving an "improvement" to an inlet (i.e., Mobile Harbor Outer Bar Channel through Mobile Pass) to evaluate shoreline erosion for a distance of not less than ten miles on either side of the inlet channel. The Corps' 1980 report and EIS did not comply with that law.
- Thoroughly address the cumulative historical sand losses to Dauphin Island dating back to at least 1958 that correspond with increasing deepening of the Outer Bar Channel according to U.S. Geological Survey's 2007 report. This analysis is needed to establish the historical and baseline and projected future conditions to describe the No Action Alternative against which the deepening and widening alternatives will be compared. The Corps cannot ignore the losses in millions and millions of littoral drift sands due to its maintenance practices and the erosion of Dauphin Island that occurred over time.
- Explain why the Corps no longer agrees with its position stated in its draft 1978 report on Dauphin Island's beach erosion that concluded maintenance of the Outer Bar Channel is contributing to at least 40% of Dauphin Island's erosion problem. Document why the findings and conclusions of that report are now considered to be invalid? The Corps not only ignores its own 1978 report now, but is of the new position that maintenance dredging of the channel has no impact on the erosion of Dauphin Island. How can the Corps expect the public to believe the results of the impending Study and EIS, when its change in position on the erosion issue appears to have been influenced by its desire to win the 2000-2009 lawsuit with the Dauphin Island Property Owners Association and by the desire keep the non-federal share of the costs borne by the Alabama State Port Authority to maintain the Mobile Harbor project as low as possible?
- The scientific literature is replete with numerous examples where navigation channels dredged through coastal inlets have interrupted the littoral drift of nearshore sands along the beach, causing beaches downdrift of the inlets to erode. This phenomenon is common along the entire US Gulf Coast, the rest of the nation, and around the world. Yet, the Mobile District has maintained this

scientific model widely accepted by coastal scientists and engineers does not apply to dredging the Outer Bar Channel through the Mobile Pass Inlet and the erosion of Dauphin Island. The General Evaluation Study and EIS must devote considerable attention to this issue and provide convincing information to support whatever conclusion the Corps develops.

- The Corps has dumped dredged sands in the Sand Island Beneficial Use Area (SIBUA) south of the lighthouse for years with the position being that these sands are moved by currents to Dauphin Island to counter erosion. However, the observed evidence indicates most of the sands are not moved, but accumulate at that location, while Sand Island has almost disappeared and Dauphin Island continues to erode. This leads to the conclusion that the SIBUA is failing to meet its intended purpose. The General Reevaluation Study and EIS should thoroughly evaluate why the SIBUA fails to meet its purpose.
- In lieu of continuing to use the SIBUA, the Corps should adopt the same shallow water (<10 to 15 feet) deposition methods the Mobile District has recently recommended be used to build back Petit Bois Island's eroded Gulf shoreline west of Dauphin Island.
- Establish a Citizen Advisory Committee that will meet at least two to four times a year with the Corps to assess how public concerns are being addressed in the General Reevaluation Study and EIS. The next time the public hears from the Corps should not be when Draft EIS is released for review at the end of the 4-year study.

Very truly yours,



Comment # 52

February 4, 2016

US Army Corps of Engineers
Mobile District, Planning & Environmental Division
Coastal Environment Team
PO Box 2288
Mobile, Alabama 36628-0001

Re: New Corps Study to Deepen and Widen the Mobile Harbor Ship Channel

To Whom It May Concern:

It is our understanding that the Corps of Engineers has begun a new study to deepen and widen the Mobile Harbor ship channel which will increase the amount of dredging performed. Based on numerous studies regarding dredging practices here and in other states, this increased dredging will likely make Dauphin Island's erosion worse.

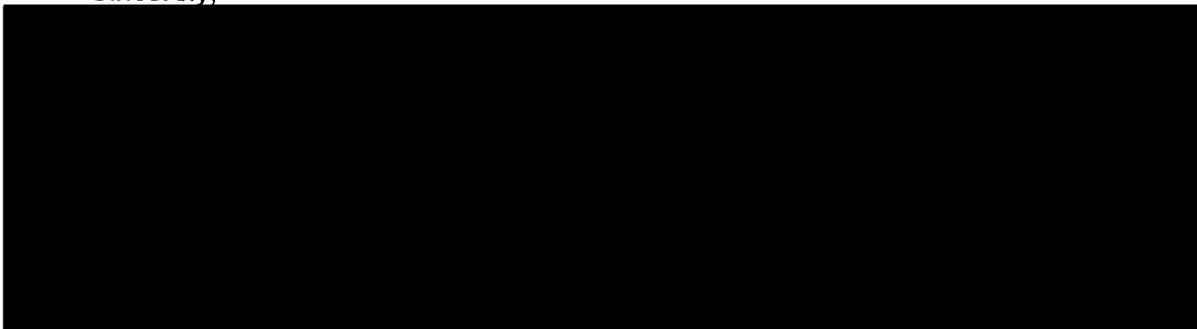
The Corps has asked the public to identify environmental issues and concerns that should be considered in the study and in the evaluation of the environmental effects of a deeper and wider channel. To this end, we are submitting this letter to identify the issues the US Army Corps of Engineers must address in its General Reevaluation Study and Environmental Impact Statement (EIS) to deepen and widen the Mobile Harbor Ship Channel. I am submitting the following issues in response to the Corps' January 12 Public Scoping Meeting:

- Conduct the study objectively to assure **all** concerned interests are given equal consideration.
- The Corps should prepare a **Dredged Material Disposal Master Plan for Mobile Bay** and make it part of the Study and EIS, with extensive involvement of the public from the early planning stages rather than at the end of the process when all decisions have essentially been made. The Corps should cease secretly developing and implementing dredged material disposal options under its so called "Mobile Bay Regional Sediment Management Strategy" and begin calling this effort what it actually is: "**Mobile Bay Dredged Material Disposal Management Strategy**". It is essential that this effort be incorporated into the General Reevaluation Study and EIS, with information being made public in the early planning stages.
- The Corps should no longer **purposefully** exclude Dauphin Island from its "Regional Sediment Management Strategy (RMS)" for Mobile Bay. Instead, the Study should incorporate Dauphin Island in the existing RMS approach (**by recognizing that the island's erosion is affected by maintenance of the Outer Bar Channel**) and devote major attention to the beneficial use of dredged sands to counter erosion. **It is unacceptable that Dauphin Island continues to be penalized and excluded as "punishment" for the Corps 2000-2009 lawsuit with the Dauphin Island Property Owners Association.**
- Thoroughly address the cumulative historical sand losses to Dauphin Island dating back to at least 1958 that correspond with increasing deepening of the Outer Bar Channel according to U.S. Geological Survey's 2007 report. This analysis is needed to establish the historical and baseline and projected future conditions to describe the No Action Alternative against which the deepening and widening alternatives will be compared. **The Corps cannot ignore the losses in millions and millions of littoral drift sands due to its maintenance practices and the erosion of Dauphin Island that occurred over time.**

- **Document why the Corps no longer agrees with its own agency's position (stated in its draft 1978 report on Dauphin Island's beach erosion) that concluded maintenance of the Outer Bar Channel is contributing to at least 40% of Dauphin Island's erosion problem.** The Corps not only ignores its own 1978 report, but is of the new position that maintenance dredging of the channel has no impact on the erosion of Dauphin Island. How can the Corps expect the public to believe the results of the impending Study and EIS, when its change in position on the erosion issue appears to have been influenced by its desire to win the 2000-2009 lawsuit with the Dauphin Island Property Owners Association as well as the desire to keep the non-federal share of the costs borne by the Alabama State Port Authority to maintain the Mobile Harbor project as low as possible?
- The scientific literature is replete with numerous examples where navigation channels dredged through coastal inlets have interrupted the littoral drift of nearshore sands along the beach, causing beaches downdrift of the inlets to erode. This phenomenon is common along the entire US Gulf Coast, the rest of the nation, and around the world. Yet, **the Mobile District has maintained this scientific model widely accepted by coastal scientists and engineers does not apply to dredging the Outer Bar Channel through the Mobile Pass Inlet and the erosion of Dauphin Island.** Given this inexplicable disregard of known cause and effect by the Corps, The General Evaluation Study and EIS must devote considerable attention to this issue and provide convincing information to support whatever conclusion the Corps develops.
- The Corps has dumped dredged sands in the Sand Island Beneficial Use Area (SIBUA) south of the lighthouse for years with their position being that these sands are moved by currents to Dauphin Island to counter erosion. However, the observed evidence indicates most of the sands are not moved, but rather accumulate at that location, while Sand Island has almost disappeared and Dauphin Island continues to erode. This leads to the conclusion that the SIBUA is failing to meet its intended purpose. **In lieu of continuing to use the SIBUA, the Corps should adopt the same shallow water (<10 to 15 feet) deposition methods that the Mobile District has recently recommended be used to build back Petit Bois Island's eroded Gulf shoreline west of Dauphin Island.**
- The General Reevaluation Study and EIS should thoroughly evaluate why the SIBUA fails to meet its purpose. To this purpose, **establish a Citizen Advisory Committee that will meet at least two to four times a year with the Corps to assess how public concerns are being addressed in the General Reevaluation Study and EIS.** The next time the public hears from the Corps should not be when Draft EIS is released for review at the end of the 4-year study.

Your consideration of these issues is much appreciated.

Sincerely,



Comment # 53

February 4, 2016

Ms. Jennifer Jacobson
US Army Corps of Engineers
Mobile District, Planning & Environmental Division
Coastal Environment Team
PO Box 2288
Mobile, Alabama 36628-0001

Dear Ms. Jacobson,

I am a beach front property owner on Dauphin and have personally witnessed the island being starved for sand since the early 1990's. The issue of how to handle dredge spoil from the ship channel in Mobile Bay is a very important issue to me and my family.

This letter identifies the issues the US Army Corps of Engineers must address in its General Reevaluation Study and Environmental Impact Statement (EIS) to deepen and widen the Mobile Harbor Ship Channel. I am submitting these issues in response to the Corps' January 12 Public Scoping Meeting.

- Conduct the study objectively to assure all concerned interests are given equal consideration and not just the views of the Alabama State Port Authority.
- If the Corps plans to dispose of dredged material in Mobile Bay (i.e., thin layer spreading, island creation, etc.) removed during initial deepening and widening of the ship channel and future maintenance, the Corps should prepare a Dredged Material Disposal Master Plan for Mobile Bay and make it part of the Study and EIS, with the extensive involvement of the public. No longer should the Corps hide behind the guise of the Interagency Working Group to secretly develop and implement dredged material disposal options under its so called "Mobile Bay Regional Sediment Management Strategy". The Corps should cease using this euphemism and begin calling this effort what it actually is: "Mobile Bay **Dredged Material Disposal** Management Strategy". It is essential that this effort be incorporated into the General Reevaluation Study and EIS, with information finally being made public in the early planning stages and not at the end of the process when all decisions have essentially been made as has been the case to date.
- The Corps should no longer purposefully exclude Dauphin Island from its "Regional Sediment Management Strategy (RMS)" for Mobile Bay. Instead, the Study should incorporate Dauphin Island in the existing RMS approach because the island's erosion is affected by maintenance of the Outer Bar Channel and devote major attention to the beneficial use of dredged sands to counter erosion. The public will no longer accept Dauphin Island being penalized and excluded because of the 2000-2009 lawsuit.
- Comply with Section 5 of the River and Harbor Act of 1935 that requires every Corps report involving an "improvement" to an inlet (i.e., Mobile Harbor Outer Bar Channel through Mobile Pass) to evaluate shoreline erosion for a distance of not less than ten miles on either side of the inlet channel. The Corps' 1980 report and EIS did not comply with that law.
- Thoroughly address the cumulative historical sand losses to Dauphin Island dating back to at least 1958 that correspond with increasing deepening of the Outer Bar Channel according to U.S. Geological Survey's 2007 report. This analysis is needed to establish the historical and baseline and

projected future conditions to describe the No Action Alternative against which the deepening and widening alternatives will be compared. The Corps cannot ignore the losses in millions and millions of littoral drift sands due to its maintenance practices and the erosion of Dauphin Island that occurred over time.

- Explain why the Corps no longer agrees with the its position stated in its draft 1978 report on Dauphin Island's beach erosion that concluded maintenance of the Outer Bar Channel is contributing to at least 40% of Dauphin Island's erosion problem. Document why the findings and conclusions of that report are now considered to be invalid? The Corps not only ignores its own 1978 report now, but is of the new position that maintenance dredging of the channel has no impact on the erosion of Dauphin Island. How can the Corps expect the public to believe the results of the impending Study and EIS, when its change in position on the erosion issue appears to have been influenced by its desire to win the 2000-2009 lawsuit with the Dauphin Island Property Owners Association and by the desire keep the non-federal share of the costs borne by the Alabama State Port Authority to maintain the Mobile Harbor project as low as possible?
- The scientific literature is replete with numerous examples where navigation channels dredged through coastal inlets have interrupted the littoral drift of nearshore sands along the beach, causing beaches downdrift of the inlets to erode. This phenomenon is common along the entire US Gulf Coast, the rest of the nation, and around the world. Yet, the Mobile District has maintained this scientific model widely accepted by coastal scientists and engineers does not apply to dredging the Outer Bar Channel through the Mobile Pass Inlet and the erosion of Dauphin Island. The General Evaluation Study and EIS must devote considerable attention to this issue and provide convincing information to support whatever conclusion the Corps develops.
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- In lieu of continuing to use the SIBUA, the Corps should adopt the same shallow water (<10 to 15 feet) deposition methods the Mobile District has recently recommended be used to build back Petit Bois Island's eroded Gulf shoreline west of Dauphin Island.
- Establish a Citizen Advisory Committee that will meet at least two to four times a year with the Corps to assess how public concerns are being addressed in the General Reevaluation Study and EIS. The next time the public hears from the Corps should not be when Draft EIS is released for review at the end of the 4-year study.

I will appreciate the Corps careful and scientifically accurate actions as pertains to the above issues in the best interests of our ecosystem.



Comment # 54

February 6, 2016

Ms. Jennifer Jacobson
US Army Corps of Engineers
Mobile District, Planning & Environmental Division
Coastal Environment Team
PO Box 2288
Mobile, Alabama 36628-0001

RE: Public Notice: FP15-MH01-10

Dear Ms. Jacobson:

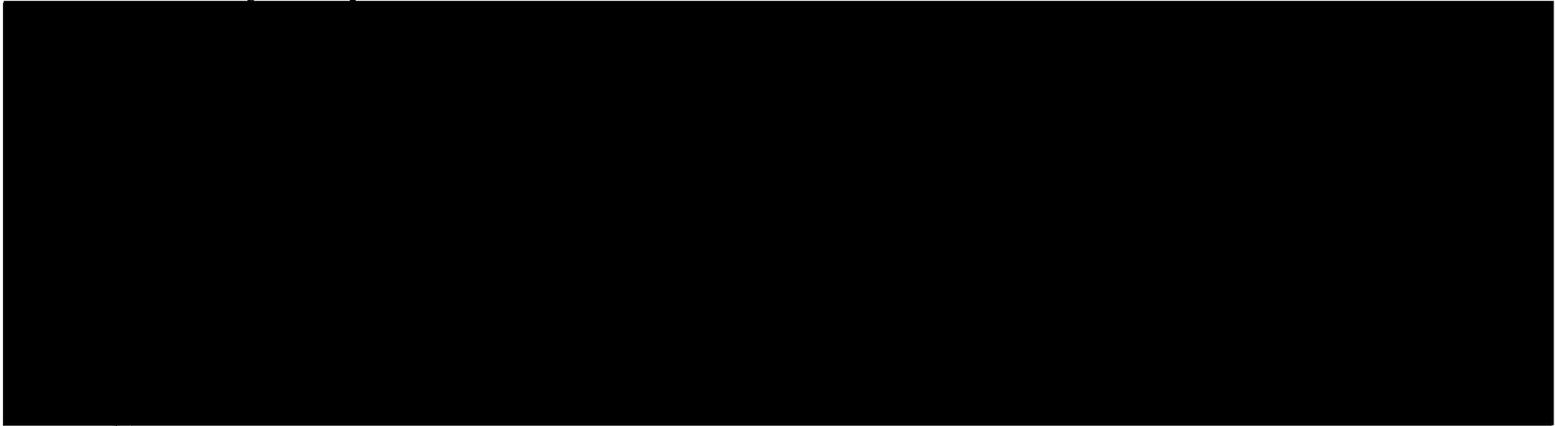
This letter identifies the issues the US Army Corps of Engineers must address in its General Reevaluation Study and Environmental Impact Statement (EIS) to deepen and widen the Mobile Harbor Ship Channel as authorized by the Water Resources Development Act of 1986. We are submitting these issues in response to the Corps' January 12 Public Scoping Meeting.

- Conduct the study objectively to assure all concerned interests are given equal consideration and not just the views of the Alabama State Port Authority.
- If the Corps plans to dispose of dredged material in Mobile Bay (i.e., thin layer spreading, island creation, etc.) removed during initial deepening and widening of the ship channel and future maintenance, the Corps should prepare a Dredged Material Disposal Master Plan for Mobile Bay and make it part of the Study and EIS, with the extensive involvement of the public. No longer should the Corps hide behind the guise of the Interagency Working Group to secretly develop and implement dredged material disposal options under its so called "Mobile Bay Regional Sediment Management Strategy". The Corps should cease using this euphemism and begin calling this effort what it actually is: "Mobile Bay *Dredged Material Disposal* Management Strategy". It is essential that this effort be incorporated into the General Reevaluation Study and EIS, with information finally being made public in the early planning stages and not at the end of the process when all decisions have essentially been made as has been the case to date.
- The Corps should no longer purposefully exclude Dauphin Island from its "Regional Sediment Management Strategy (RMS)" for Mobile Bay. Instead, the Study should incorporate Dauphin Island in the existing RMS approach because the island's erosion is affected by maintenance of the Outer Bar Channel and devote major attention to the beneficial use of dredged sands to counter erosion. The public will no longer accept Dauphin Island being penalized and excluded because of the 2000-2009 lawsuit.

- Comply with Section 5 of the River and Harbor Act of 1935 that requires every Corps report involving an “improvement” to an inlet (i.e., Mobile Harbor Outer Bar Channel through Mobile Pass) to evaluate shoreline erosion for a distance of not less than ten miles on either side of the inlet channel. The Corps' 1980 report and EIS did not comply with that law.
- Thoroughly address the cumulative historical sand losses to Dauphin Island dating back to at least 1958 that correspond with increasing deepening of the Outer Bar Channel according to U.S. Geological Survey's 2007 report. This analysis is needed to establish the historical and baseline and projected future conditions to describe the No Action Alternative against which the deepening and widening alternatives will be compared. The Corps cannot ignore the losses in millions and millions of littoral drift sands due to its maintenance practices and the erosion of Dauphin Island that occurred over time.
- Explain why the Corps no longer agrees with the agency position stated in its draft 1978 report on Dauphin Island’s beach erosion that concluded maintenance of the Outer Bar Channel is contributing to at least 40% of Dauphin Island’s erosion problem. Document why the findings and conclusions of that report are now considered to be invalid? The Corps not only ignores its own 1978 report now, but is of the new position that maintenance dredging of the channel has no impact on the erosion of Dauphin Island. How can the Corps expect the public to believe the results of the impending Study and EIS, when its change in position on the erosion issue appears to have been influenced by its desire to win the 2000-2009 lawsuit with the Dauphin Island Property Owners Association and by the desire keep the non-federal share of the costs borne by the Alabama State Port Authority to maintain the Mobile Harbor project as low as possible?
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- In lieu of continuing to use the SIBUA, the Corps should adopt the same shallow water (<10 to 15 feet) deposition methods the Mobile District has recently recommended be used to build back Petit Bois Island's eroded Gulf shoreline west of Dauphin Island.

- Establish a Citizen Advisory Committee that will meet at least two to four times a year with the Corps to assess how public concerns are being addressed in the General Reevaluation Study and EIS. The next time the public hears from the Corps should not be when Draft EIS is released for review at the end of the 4-year study.

Thank you for your consideration.



Comment # 55

Ms. Jennifer Jacobson
US Army Corps of Engineers
Mobile District, Planning & Environmental Division
Coastal Environment Team
PO Box 2288
Mobile, Alabama 36628-0001

RE: Public Notice: FP15-MH01-10

Dear Ms. Jacobson:

In this letter we identify several of the issues the US Army Corps of Engineers needs to address in its General Reevaluation Study and Environmental Impact Statement (EIS) to deepen and widen the Mobile Harbor Ship Channel as authorized by the Water Resources Development Act of 1986. We are submitting these issues in response to the Corps' January 12 Public Scoping Meeting.

- Conduct an unbiased study to ensure all concerned interests are given equal consideration and not just the views of the Alabama State Port Authority.
- The Corps **should no longer purposefully exclude Dauphin Island** from its "Regional Sediment Management Strategy (RMS)" for Mobile Bay. Instead, the Study should incorporate Dauphin Island in the existing RMS approach because the island's erosion is affected by maintenance of the Outer Bar Channel and devote major attention to the beneficial use of dredged sands to counter erosion. The public will no longer accept Dauphin Island being penalized and excluded because of the 2000-2009 lawsuit.
- Thoroughly address the cumulative historical sand losses to Dauphin Island dating back to at least 1958 that correspond with increasing deepening of the Outer Bar Channel according to U.S. Geological Survey's 2007 report. This analysis is needed to establish the historical and baseline and projected future conditions to describe the No Action Alternative against which the deepening and widening alternatives will be compared. The Corps cannot ignore the losses in millions and millions of littoral drift sands due to its maintenance practices and the erosion of Dauphin Island that occurred over time.
- Explain why the Corps no longer agrees with the agency position stated in its draft 1978 report on Dauphin Island's beach erosion that concluded *maintenance of the Outer Bar Channel is contributing to at least 40% of Dauphin Island's erosion problem.* Document why the findings and conclusions of that report are now considered to be invalid? The Corps not only ignores its own 1978 report now, but is of the new position that maintenance dredging of the channel has no impact on the erosion of Dauphin Island. How can the Corps expect the public to believe the results of the impending Study and EIS, when its change in position on the erosion issue appears to have been influenced by its desire to win the 2000-2009 lawsuit with the Dauphin Island Property Owners Association and by the desire keep the non-federal share of the costs borne by the Alabama State Port Authority to maintain the Mobile Harbor project as low as possible?
- The scientific literature is replete with numerous examples where navigation channels dredged through coastal inlets have interrupted the littoral drift of nearshore sands along the beach, causing beaches downdrift of the inlets to erode. This phenomenon is common along the entire US Gulf Coast, the rest of the nation, and around the world. Yet, the Mobile District has maintained this scientific model widely accepted by coastal scientists and engineers does not apply to dredging the Outer Bar Channel through the Mobile Pass Inlet and the erosion of

Dauphin Island. The General Evaluation Study and EIS must devote considerable attention to this issue and provide convincing information to support whatever conclusion the Corps develops.

- The Corps has dumped dredged sands in the Sand Island Beneficial Use Area (SIBUA) south of the lighthouse for years with the position being that these sands are moved by currents to Dauphin Island to counter erosion. However, the observed evidence indicates most of the sands are not moved, but accumulate at that location, while Sand Island has almost disappeared and **Dauphin Island continues to erode**. This leads to the conclusion that the SIBUA is failing to meet its intended purpose. The General Reevaluation Study and EIS should thoroughly evaluate why the SIBUA fails to meet its purpose.
- In lieu of continuing to use the SIBUA, the Corps should adopt the same shallow water (<10 to 15 feet) deposition methods the Mobile District has recently recommended be used to build back Petit Bois Island's eroded Gulf shoreline west of Dauphin Island.
- Establish a Citizen Advisory Committee that will meet at least two to four times a year with the Corps to assess how public concerns are being addressed in the General Reevaluation Study and EIS. The next time the public hears from the Corps should not be when Draft EIS is released for review at the end of the 4-year study.
- If the Corps plans to dispose of dredged material in Mobile Bay (i.e., thin layer spreading, island creation, etc.) removed during initial deepening and widening of the ship channel and future maintenance, the Corps should prepare a Dredged Material Disposal Master Plan for Mobile Bay and make it part of the Study and EIS, with the extensive involvement of the public. No longer should the Corps hide behind the guise of the Interagency Working Group to secretly develop and implement dredged material disposal options under its so called "Mobile Bay Regional Sediment Management Strategy". The Corps should cease using this euphemism and begin calling this effort what it actually is: "Mobile Bay **Dredged Material Disposal** Management Strategy". It is essential that this effort be incorporated into the General Reevaluation Study and EIS, with information finally being made public in the early planning stages and not at the end of the process when all decisions have essentially been made as has been the case to date.
- Comply with Section 5 of the River and Harbor Act of 1935 that requires every Corps report involving an "improvement" to an inlet (i.e., Mobile Harbor Outer Bar Channel through Mobile Pass) to evaluate shoreline erosion for a distance of not less than ten miles on either side of the inlet channel. The Corps' 1980 report and EIS did not comply with that law.

Thank you for your consideration of our concerns.



Comment # 56

February 24, 2016

Ms. Jennifer Jacobson
US Army Corps of Engineers
Mobile District, Planning & Environmental Division
Coastal Environment Team
PO Box 2288
Mobile, Alabama 36628-0001

RE: Public Notice: FP15-MH01-10 (DEEPENING AND WIDENING MOBILE HARBOR)

Dear Ms. Jacobson:

This letter identifies the issues the US Army Corps of Engineers must address in its General Reevaluation Study and Environmental Impact Statement (EIS) to deepen and widen the Mobile Harbor Ship Channel as authorized by the Water Resources Development Act of 1986.

I am submitting these issues in response to the Corps' January 12 Public Scoping Meeting.
<>Conduct the study objectively to assure all concerned interests are given equal consideration and not just the views of the Alabama State Port Authority.

<>If the Corps plans to dispose of dredged material in Mobile Bay (i.e., thin layer spreading, island creation, etc.) removed during initial deepening and widening of the ship channel and future maintenance, the Corps should prepare a Dredged Material Disposal Master Plan for Mobile Bay and make it part of the Study and EIS, with the extensive involvement of the public. No longer should the Corps hide behind the guise of the Interagency Working Group to secretly develop and implement dredged material disposal options under its so called "Mobile Bay Regional Sediment Management Strategy". The Corps should cease using this euphemism and begin calling this effort what it actually is: "Mobile Bay Dredged Material Disposal Management Strategy". It is essential that this effort be incorporated into the General Reevaluation Study and EIS, with information finally being made public in the early planning stages and not at the end of the process when all decisions have essentially been made as has been the case to date.

<>The Corps should no longer purposefully exclude Dauphin Island from its "Regional Sediment Management Strategy (RMS)" for Mobile Bay. Instead, the Study should incorporate Dauphin Island in the existing RMS approach because the island's erosion is affected by maintenance of the Outer Bar Channel. Also, devote major attention to the beneficial use of dredged sands to counter this erosion. The public will no longer accept Dauphin Island being penalized and excluded because of the 2000-2009 lawsuit.

<>Comply with Section 5 of the River and Harbor Act of 1935 that requires every Corps report involving an "improvement" to an inlet (i.e., Mobile Harbor Outer Bar Channel through Mobile Pass) to evaluate shoreline erosion for a distance of not less than ten miles on either side of the inlet channel. The Corps' 1980 report and EIS did not comply with that law.

<>Thoroughly address the cumulative historical sand losses to Dauphin Island dating back to at least 1958 that correspond with increasing deepening of the Outer Bar Channel according to U.S. Geological Survey's 2007 report. This analysis is needed to establish the historical and baseline and projected future conditions to describe the No Action Alternative against which the deepening and widening alternatives will be compared. The Corps cannot ignore the losses in millions and millions of littoral drift sands due to its maintenance practices and the erosion of Dauphin Island that occurred over time.

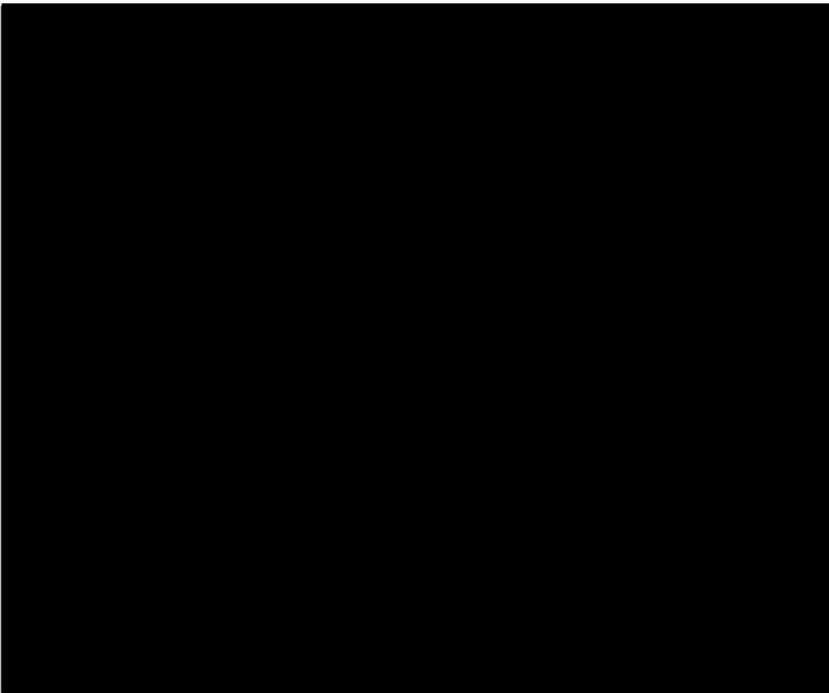
<>Explain why the Corps no longer agrees with the agency position stated in its draft 1978 report on Dauphin Island's beach erosion that concluded maintenance of the Outer Bar Channel is contributing to at least 40% of Dauphin Island's erosion problem. Document why the findings and conclusions of that report are now considered to be invalid? The Corps not only ignores its own 1978 report now, but is of the new position that maintenance dredging of the channel has no impact on the erosion of Dauphin Island. How can the Corps expect the public to believe the results of the impending Study and EIS, when its change in position on the erosion issue appears to have been influenced by its desire to win the 2000-2009 lawsuit with the Dauphin Island Property Owners Association and by the desire keep the non-federal share of the costs borne by the Alabama State Port Authority to maintain the Mobile Harbor project as low as possible?

Scientific literature is replete with numerous examples where navigation channels dredged through coastal inlets have interrupted the littoral drift of near shore sands along the beach, causing beaches down drift of the inlets to erode. This phenomenon is common along the entire US Gulf Coast, the rest of the nation, and around the world. Yet, the Mobile District has maintained this scientific model widely accepted by coastal scientists and engineers does not apply to dredging the Outer Bar Channel through the Mobile Pass Inlet and the erosion of Dauphin Island. The General Evaluation Study and EIS must devote considerable attention to this issue and provide convincing information to support whatever conclusion the Corps develops.

The Corps has dumped dredged sands in the Sand Island Beneficial Use Area (SIBUA) south of the lighthouse for years with the position being that these sands are moved by currents to Dauphin Island to counter erosion. However, the observed evidence indicates most of the sands are not moved, but accumulate at that location, while Sand Island has almost disappeared and Dauphin Island continues to erode.

This leads to the conclusion that the SIBUA is failing to meet its intended purpose. The General Reevaluation Study and EIS should thoroughly evaluate why the SIBUA fails to meet its purpose. In lieu of continuing to use the SIBUA, the Corps should adopt the same shallow water (10 to 15 feet) deposition methods the Mobile District has recently recommended be used to build back Petit Bois Island's eroded Gulf shoreline west of Dauphin Island.

Establish a Citizen Advisory Committee that will meet at least two to four times a year with the Corps to assess how public concerns are being addressed in the General Reevaluation Study and EIS. The next time the public hears from the Corps should not be when Draft EIS is released for review at the end of the 4-year study.





CITY OF BAYOU LA BATRE

13785 South Wintzell Avenue
Bayou La Batre, Alabama 36509-2408

Comment # 57

Annette Johnson, Mayor
13785 S. Wintzell Ave.
Bayou La Batre, Alabama 36509
251-824-2171
Mayor@cityofbayouylabatre.com

Ms. Jennifer Jacobson
US Army Corps of Engineers
Mobile District, Planning & Environmental Division
Coastal Environment Team
PO Box 2288
Mobile, Alabama 36628-0001

February 10, 2016

Ms. Jacobson,

Please accept this letter as a confirmation of my concern over potential development and changes of Mobile Bay and the surrounding area. I feel that it is vitally important that the US Army Corps of Engineers conduct an objective study on any development that could feasibly impact the coastal communities along the bay; most importantly, the study should reflect the views of all concerned stakeholders. Furthermore:

- If the Corps plans to dispose of dredged material in Mobile Bay (i.e., thin layer spreading, island creation, etc.) removed during initial deepening and widening of the ship channel and future maintenance, the Corps should prepare a Dredged Material Disposal Master Plan for Mobile Bay and make it part of the Study and EIS, with the extensive involvement of the public. No longer should the Corps hide behind the guise of the Interagency Working Group to secretly develop and implement dredged material disposal options under its so called "Mobile Bay Regional Sediment Management Strategy". The Corps should cease using this euphemism and begin calling this effort what it actually is: "Mobile Bay *Dredged Material Disposal* Management Strategy". It is essential that this effort be incorporated into the General Reevaluation Study and EIS, with information finally being made public in the early planning stages and not at the end of the process when all decisions have essentially been made as has been the case to date.
- The Corps should no longer purposefully exclude Dauphin Island from its "Regional Sediment Management Strategy (RMS)" for Mobile Bay. Instead, the Study should incorporate Dauphin Island in the existing RMS approach because the island's erosion is affected by maintenance of the Outer Bar Channel and devote major attention to the beneficial use of dredged sands to counter erosion. The public will no longer accept Dauphin Island being penalized and excluded because of the 2000-2009 lawsuit.
- Comply with Section 5 of the River and Harbor Act of 1935 that requires every Corps report involving an "improvement" to an inlet (i.e., Mobile Harbor Outer Bar Channel through Mobile Pass) to evaluate

shoreline erosion for a distance of not less than ten miles on either side of the inlet channel. The Corps' 1980 report and EIS did not comply with that law.

- Thoroughly address the cumulative historical sand losses to Dauphin Island dating back to at least 1958 that correspond with increasing deepening of the Outer Bar Channel according to U.S. Geological Survey's 2007 report. This analysis is needed to establish the historical and baseline and projected future conditions to describe the No Action Alternative against which the deepening and widening alternatives will be compared. The Corps cannot ignore the losses in millions and millions of littoral drift sands due to its maintenance practices and the erosion of Dauphin Island that occurred over time.
- Explain why the Corps no longer agrees with its position stated in its draft 1978 report on Dauphin Island's beach erosion that concluded maintenance of the Outer Bar Channel is contributing to at least 40% of Dauphin Island's erosion problem. Document why the findings and conclusions of that report are now considered to be invalid? The Corps not only ignores its own 1978 report now, but is of the new position that maintenance dredging of the channel has no impact on the erosion of Dauphin Island. How can the Corps expect the public to believe the results of the impending Study and EIS, when its change in position on the erosion issue appears to have been influenced by its desire to win the 2000-2009 lawsuit with the Dauphin Island Property Owners Association and by the desire keep the non-federal share of the costs borne by the Alabama State Port Authority to maintain the Mobile Harbor project as low as possible?
- The scientific literature is replete with numerous examples where navigation channels dredged through coastal inlets have interrupted the littoral drift of nearshore sands along the beach, causing beaches downdrift of the inlets to erode. This phenomenon is common along the entire US Gulf Coast, the rest of the nation, and around the world. Yet, the Mobile District has maintained this scientific model widely accepted by coastal scientists and engineers does not apply to dredging the Outer Bar Channel through the Mobile Pass Inlet and the erosion of Dauphin Island. The General Evaluation Study and EIS must devote considerable attention to this issue and provide convincing information to support whatever conclusion the Corps develops.
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- In lieu of continuing to use the SIBUA, the Corps should adopt the same shallow water (<10 to 15 feet) deposition methods the Mobile District has recently recommended be used to build back Petit Bois Island's eroded Gulf shoreline west of Dauphin Island.
- Establish a Citizen Advisory Committee that will meet at least two to four times a year with the Corps to assess how public concerns are being addressed in the General Reevaluation Study and EIS. The next time the public hears from the Corps should not be when Draft EIS is released for review at the end of the 4-year study.

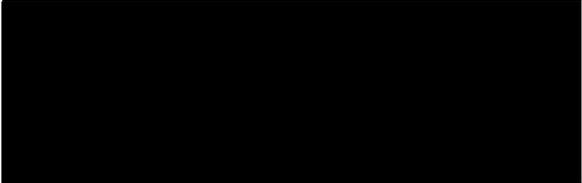
Kindest Regards,



Annette Johnson, Mayor

February 2, 2016

Comment # 58



US Army Corps of Engineers
Mobile District, Planning & Environmental Division
Coastal Environment Team
RE: Public Notice: FP15-MH01-10
P.O. Box 2288
Mobile, Alabama 36628-0001

Dear Sirs:

It has been known for some time that breakfront sand migrates in an east to west direction. The sand continually moves in that direction along the southern coast of the U.S. and more specifically along the Gulf Coast.

The necessity to continually dredge this Mobile Bay entrance includes the movement of sand in the east to west manner. If there were no movement, no dredging would be required. Since the Corp of Engineers has maintained the Mobile Bay entrance, the "downstream" beaches have been cut off from the natural movement of supply necessary. The beaches west of Mobile Bay have been damaged for nearly 50 years.

The sand must be replaced, and the natural movement must be re-established. The desire to establish and maintain a wider channel width can be accomplished without damage of property to the west of the Bay. It can be a simple procedural adjustment which must be addressed prior to approach of the channel widening.

I am requesting the following issues be addressed:

- Conduct the study objectively to assure all interest are given equal consideration and not just those of the Alabama State Port Authority.
- Comply with Section 5 of the River and harbor Act of 1935 that requires every Corps report involving an improvement of an inlet (i.e., Mobile Harbor Outer Bar Channel through Mobile Pass) to evaluate shoreline erosion for a distance of not less than ten miles on either side of the inlet channel. The Corps' 1980 report and EIS did not comply with that requirement.
- Thoroughly address the cumulative historical sand losses to Dauphin Island dating back to at least 1958 that correspond with increasing deepening of the Outer Bar Channel according to U.S. Geological Survey's 2007 report.
- Determine why dredged sands placed at the Sand Island Beneficial Use Area are not moved to Dauphin Island to counter erosion.
- Identify new dredged sand disposal sites nearer Dauphin Island. Apply the same shallow water deposition concepts that the Corps recommends be employed to build back Petit Bois Island's eroded shoreline west of Dauphin Island.

- Accept the well documented science that whenever natural sand migration across an inlet channel is interrupted by navigation channel dredging, the adjacent shoreline experiences erosion. If the Corps disagrees with this widely accepted scientific principal, it must thoroughly explain why Dauphin Island is the exception to that scientific principal.
- Fully implement the Corps' national Regional Sediment Management planning concepts to make beneficial use of the dredged sands to counter erosion. To date, the Mobile District has intentionally excluded Dauphin Island from its RSM planning efforts, while it has pursued numerous RSM projects along the coast, including within Mobile Bay.
- Establish a Citizen Advisory Committee like the Corps Mobile Bay Interagency Group that will meet from two to four times a year with the Corps to assess how public concerns are being addressed in the study.
- Implement a public involvement program so that the next time the public hears from the Corps is not with the Corps release of the Draft EIS at the end of the 4-year study.

Very truly yours,



Comment # 59

Ms. Jennifer Jacobson
US Army Corps of Engineers
Mobile District, Planning & Environmental Division
Coastal Environment Team
PO Box 2288
Mobile, Alabama 36628-0001

RE: Public Notice: FP15-MH01-10

Dear Ms. Jacobson:

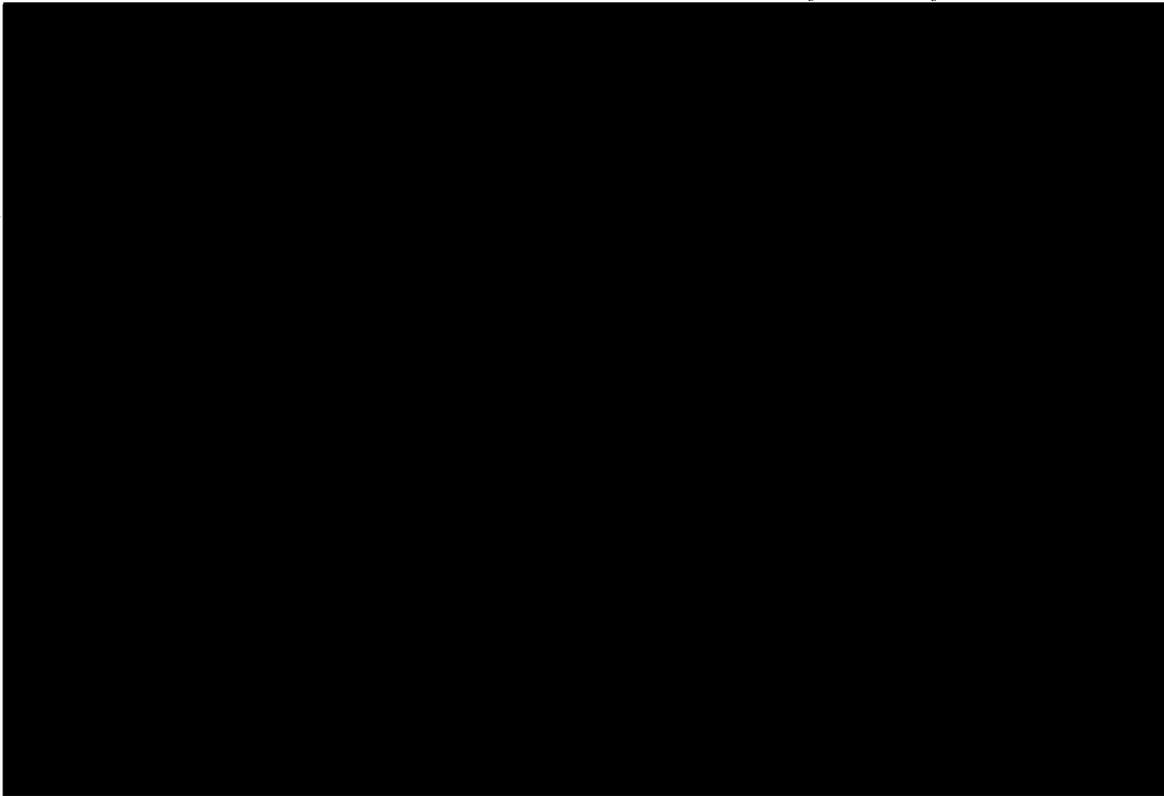
This letter identifies the issues the US Army Corps of Engineers must address in its General Reevaluation Study and Environmental Impact Statement (EIS) to deepen and widen the Mobile Harbor Ship Channel as authorized by the Water Resources Development Act of 1986. I am submitting these issues in response to the Corps' January 12 Public Scoping Meeting.

- Conduct the study objectively to assure all concerned interests are given equal consideration and not just the views of the Alabama State Port Authority.
- If the Corps plans to dispose of dredged material in Mobile Bay (i.e., thin layer spreading, island creation, etc.) removed during initial deepening and widening of the ship channel and future maintenance, the Corps should prepare a Dredged Material Disposal Master Plan for Mobile Bay and make it part of the Study and EIS, with the extensive involvement of the public. No longer should the Corps hide behind the guise of the Interagency Working Group to secretly develop and implement dredged material disposal options under its so called "Mobile Bay Regional Sediment Management Strategy". The Corps should cease using this euphemism and begin calling this effort what it actually is: "Mobile Bay *Dredged Material Disposal* Management Strategy". It is essential that this effort be incorporated into the General Reevaluation Study and EIS, with information finally being made public in the early planning stages and not at the end of the process when all decisions have essentially been made as has been the case to date.
- The Corps should no longer purposefully exclude Dauphin Island from its "Regional Sediment Management Strategy (RMS)" for Mobile Bay. Instead, the Study should incorporate Dauphin Island in the existing RMS approach because the island's erosion is affected by maintenance of the Outer Bar Channel and devote major attention to the beneficial use of dredged sands to counter erosion. The public will no longer accept Dauphin Island being penalized and excluded

because of the 2000-2009 lawsuit.

- Comply with Section 5 of the River and Harbor Act of 1935 that requires every Corps report involving an “improvement” to an inlet (i.e., Mobile Harbor Outer Bar Channel through Mobile Pass) to evaluate shoreline erosion for a distance of not less than ten miles on either side of the inlet channel. The Corps' 1980 report and EIS did not comply with that law.
- Thoroughly address the cumulative historical sand losses to Dauphin Island dating back to at least 1958 that correspond with increasing deepening of the Outer Bar Channel according to U.S. Geological Survey's 2007 report. This analysis is needed to establish the historical and baseline and projected future conditions to describe the No Action Alternative against which the deepening and widening alternatives will be compared. The Corps cannot ignore the losses in millions and millions of littoral drift sands due to its maintenance practices and the erosion of Dauphin Island that occurred over time.
- Explain why the Corps no longer agrees with the agency position stated in its draft 1978 report on Dauphin Island's beach erosion that concluded maintenance of the Outer Bar Channel is contributing to at least 40% of Dauphin Island's erosion problem. Document why the findings and conclusions of that report are now considered to be invalid? The Corps not only ignores its own 1978 report now, but is of the new position that maintenance dredging of the channel has no impact on the erosion of Dauphin Island. How can the Corps expect the public to believe the results of the impending Study and EIS, when its change in position on the erosion issue appears to have been influenced by its desire to win the 2000-2009 lawsuit with the Dauphin Island Property Owners Association and by the desire keep the non-federal share of the costs borne by the Alabama State Port Authority to maintain the Mobile Harbor project as low as possible?
- The scientific literature is replete with numerous examples where navigation channels dredged through coastal inlets have interrupted the littoral drift of nearshore sands along the beach, causing beaches downdrift of the inlets to erode. This phenomenon is common along the entire US Gulf Coast, the rest of the nation, and around the world. Yet, the Mobile District has maintained this scientific model widely accepted by coastal scientists and engineers does not apply to dredging the Outer Bar Channel through the Mobile Pass Inlet and the erosion of Dauphin Island. The General Evaluation Study and EIS must devote considerable attention to this issue and provide convincing information to support whatever conclusion the Corps develops.
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- In lieu of continuing to use the SIBUA, the Corps should adopt the same shallow water (<10 to 15 feet) deposition methods the Mobile District has recently recommended be used to build back Petit Bois Island's eroded Gulf shoreline west of Dauphin Island.
- Establish a Citizen Advisory Committee that will meet at least two to

four times a year with the Corps to assess how public concerns are being addressed in the General Reevaluation Study and EIS. The next time the public hears from the Corps should not be when Draft EIS is released for review at the end of the 4-year study.



Ms. Jennifer Jacobson
US Army Corps of Engineers
Mobile District, Planning & Environmental Division
Coastal Environment Team
PO Box 2288
Mobile, Alabama 36628-0001

Comment # 60

RE: Public Notice: FP15-MH01-10

Dear Ms. Jacobson:

This letter identifies the issues the US Army Corps of Engineers must address in its General Reevaluation Study and Environmental Impact Statement (EIS) to deepen and widen the Mobile Harbor Ship Channel as authorized by the Water Resources Development Act of 1986. I am submitting these issues in response to the Corps' January 12 Public Scoping Meeting.

* Conduct the study objectively to assure all concerned interests are given equal consideration and not just the views of the Alabama State Port Authority.

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Comply with Section 5 of the River and Harbor Act of 1935 that requires every Corps report involving an "improvement" to an inlet (i.e., Mobile Harbor Outer Bar Channel through Mobile Pass) to evaluate shoreline erosion for a distance of not less than ten miles on either side of the inlet channel. The Corps' 1980 report and EIS did not comply with that law.

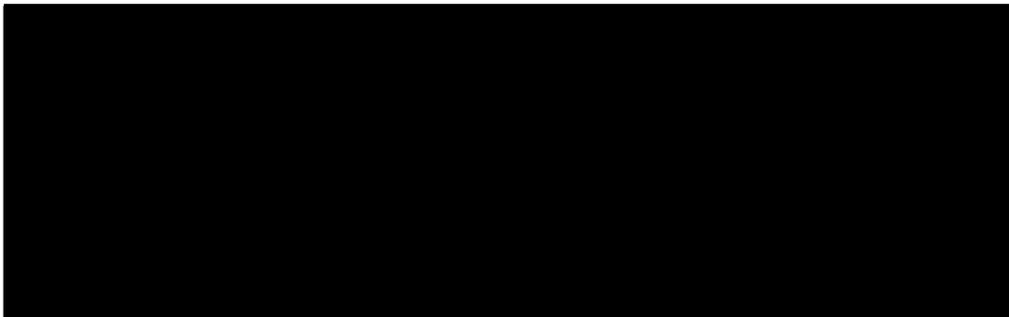
Thoroughly address the cumulative historical sand losses to Dauphin Island dating back to at least 1958 that correspond with increasing deepening of the Outer Bar Channel according to U.S. Geological Survey's 2007 report. This analysis is needed to establish the historical and baseline and projected future conditions to describe the No Action Alternative against which the deepening and widening alternatives will be compared. The Corps cannot ignore the losses in millions and millions of littoral drift sands due to its maintenance practices and the erosion of Dauphin Island that occurred over time.

* Explain why the Corps no longer agrees with the agency position stated in its draft 1978 report on Dauphin Island's beach erosion that concluded maintenance of the Outer Bar Channel is contributing to at least 40% of Dauphin Island's erosion problem. Document why the findings and conclusions of that report are now considered to be invalid? The Corps not only ignores its own 1978 report now, but is of the new position that maintenance dredging of the channel has no impact on the erosion of Dauphin Island. How can the Corps expect the public to believe the results of the impending Study and EIS, when its change in position on the erosion issue appears to have been influenced by its desire to win the 2000-2009 lawsuit with the Dauphin Island Property Owners Association and by the desire keep the non-federal share of the costs borne by the Alabama State Port Authority to maintain the Mobile Harbor project as low as possible? The scientific literature is replete with numerous examples where navigation channels dredged through coastal inlets have interrupted the littoral drift of near shore sands along the beach, causing beaches down drift of the inlets to erode. This phenomenon is common along the entire US Gulf Coast, the rest of the nation, and around the world. Yet, the Mobile District has maintained this scientific model widely accepted by coastal scientists and engineers does not apply to dredging the Outer Bar Channel through the Mobile Pass Inlet and the erosion of Dauphin Island. The General Evaluation Study and EIS must devote considerable attention to this issue and provide convincing information to support whatever conclusion the Corps develops.

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* In lieu of continuing to use the SIBUA, the Corps should adopt the same shallow water (<10 to 15 feet) deposition methods the Mobile District has recently recommended be used to build back Petit Bois Island's eroded Gulf shoreline west of Dauphin Island.

Establish a Citizen Advisory Committee that will meet at least two to four times a year with the Corps to assess how public concerns are being addressed in the General Reevaluation Study and EIS. The next time the public hears from the Corps should not be when Draft EIS is released for review at the end of the 4-year study.



February 2, 2016



Comment # 61

US Army Corps of Engineers
Mobile District, Planning & Environmental Division
Coastal Environment Team
RE: Public Notice: FP15-MH01-10
P.O. Box 2288
Mobile, Alabama 36628-0001

Dear Sirs:

It has been known for some time that breakfront sand migrates in an east to west direction. The sand continually moves in that direction along the southern coast of the U.S. and more specifically along the Gulf Coast.

The necessity to continually dredge this Mobile Bay entrance includes the movement of sand in the east to west manner. If there were no movement, no dredging would be required. Since the Corp of Engineers has maintained the Mobile Bay entrance, the "downstream" beaches have been cut off from the natural movement of supply necessary. The beaches west of Mobile Bay have been damaged for nearly 50 years.

The sand must be replaced, and the natural movement must be re-established. The desire to establish and maintain a wider channel width can be accomplished without damage of property to the west of the Bay. It can be a simple procedural adjustment which must be addressed prior to approach of the channel widening.

I am requesting the following issues be addressed:

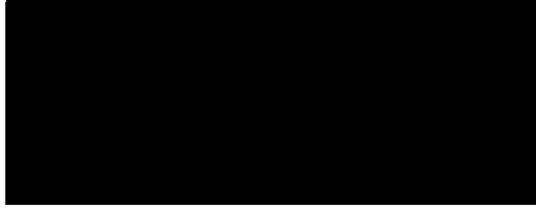
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- Accept the well documented science that whenever natural sand migration across an inlet channel is interrupted by navigation channel dredging, the adjacent shoreline experiences erosion. If the Corps disagrees with this widely accepted scientific principal, it must thoroughly explain why Dauphin Island is the exception to that scientific principal.
- Fully implement the Corps' national Regional Sediment Management planning concepts to make beneficial use of the dredged sands to counter erosion. To date, the Mobile District has intentionally excluded Dauphin Island from its RSM planning efforts, while it has pursued numerous RSM projects along the coast, including within Mobile Bay.
- Establish a Citizen Advisory Committee like the Corps Mobile Bay Interagency Group that will meet from two to four times a year with the Corps to assess how public concerns are being addressed in the study.
- Implement a public involvement program so that the next time the public hears from the Corps is not with the Corps release of the Draft EIS at the end of the 4-year study.

Very truly yours,



Comment # 62



February 4, 2016

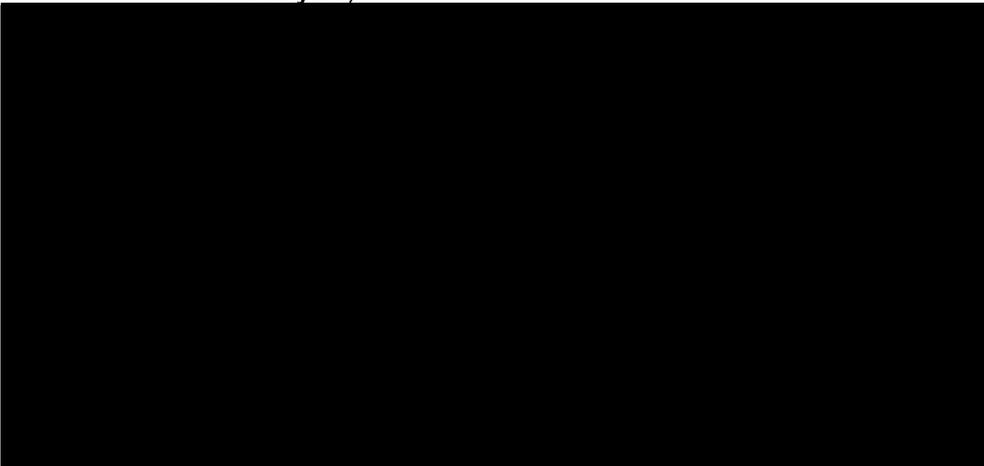
Ms. Jennifer Jacobson
US Army Corps of Engineers
Mobile District, Planning & Environmental Division
Coastal Environment Team
PO Box 2288
Mobile, Alabama 36628-0001

Re: Mobile Ship Channel Study

Dear Ms Jacobson,

As a 68 year old lifelong resident of coastal Mobile County I have experienced many sad, drastic changes in our coastal environment. These are elimination of old Sand Island, beach erosion, and significant siltation resulting in much shallower navigable waters. Therefore I am requesting that your Study consider impacts to coastal Alabama geological structure especially beach sand erosion at the mouth of Mobile Bay and Dauphin Island. Also please consider the effects of spoil disposal in Mobile Bay as it effects the water depths which are already very shallow in many locations.

Thank you,



Comment # 63

Feb.9,2016

Corps of Engineers

P.O. Box 2288

Mobile, Al. 36628-0001

Attn:CESAM-PD-E

The COE Public Notice No.FP15-MH01-10 released December 11, 2015- ' to evaluate improvements (which in reality provides the COE an opportunity to promote one of their make work missions -navigation) for the widening and deepening of the Mobile Bay Ship Channel with a 'full speed ahead-damn the torpedoes'- attitude .

The SDEIS mission and purpose is strictly to promote and permit the Al. State Port Authority request “to alleviate the delays being experienced by harbor users leaving and arriving in the port with their increased cargo.” The residents of the area are major stakeholders of Mobile Bay and resent this narrow concept as they presently are able to enjoy a home on

the bay shores with locals and tourists enjoying the benefits provided such as recreation, boating and fishing activities .

I personally resent this federal agency purposefully misusing the NEPA process in preparing a Supplemental DEIS instead of a proper DEIS. There is a real NEED to address the fact that the COE's frequent and questionable handling of dredged material with the heavy loads of sedimentation , release of hazardous materials and turbidity loads may be causing unidentified catastrophic impacts in this invaluable nationally and presently 'stressed' estuary.

Locals report that the major submerged grass beds in the Arlington Point /Brookley area have completely disappeared along with the soft shell crab fishery . This area was identified in the 80's as being a major northern natural productive shallow bay bottom area with grass beds proving nursery, feeding and staging areas

for a variety of marine, bird and terrestrial life for over 80 years-now gone. It is believed that the badly planned dumping of dredged material in the Brookley "hole" might have been one of the causes. Local fishermen may be reporting similar problems with other fisheries as they were dismissed with their concerns for losing one of the best oyster beds in the bay in the construction of Gaillard Island.

The western bay bottoms are becoming a mud flow mess because of open bay disposal and poses health threats to bay users.

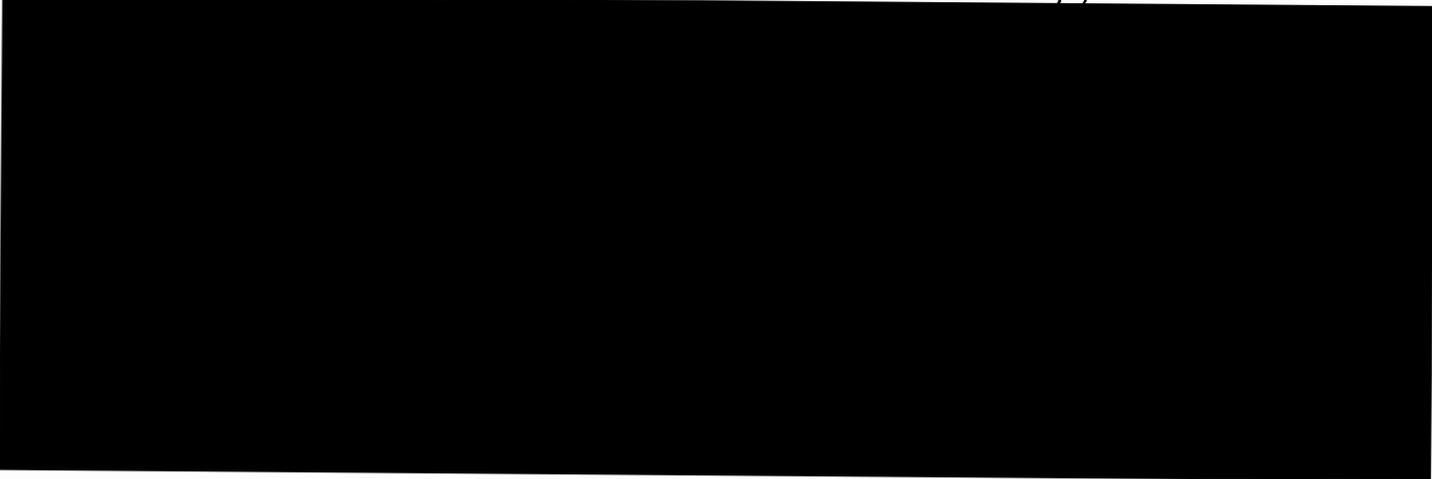
A DEIS should be prepared first as the last one addressing a similar proposal was done in the 80's . It completely ignored the erosion problems that could and did occur on Dauphin Island and a lawsuit should have been filed at that time or at least a Supplemental should have been required .

At this time a SDEIS will not "follow the NEPA process in fulfilling the spirit and the

letter of the act in order to be legally fulfilling and efficient, but will be a questionable and dismal document.

Hopefully “special interest” won't be served over the public interest! In order to allay these concerns the COE should hold a 'scoping report” and address what determinations will be addressed in the document being prepared and the ones that will not be considered- allowing the public additional input in the outcome of the document. This is called 'an open door policy.'

Sincerely,



Comment # 64



February 8, 2016

US Army Corps of Engineers
Mobile District, Planning & Environmental Division
Coastal Environment Team
PO Box 2288
Mobile, Alabama 36628-0001

Dear Ms. Jennifer Jacobson :

This letter proposes some of the issues we in our community hope the US Army Corps of Engineers addresses in its General Reevaluation Study and Environmental Impact Statement (EIS) to deepen and widen the Mobile Harbor Ship Channel.

If the project includes plans to dispose of dredged material in Mobile Bay (i.e., thin layer spreading, island creation, etc.) removed during initial deepening and widening of the ship channel and future maintenance, a Dredged Material Disposal Master Plan for Mobile Bay should be developed and make it part of the Study and EIS.

All studies should incorporate Dauphin Island because the island's erosion is affected by maintenance of the adjacent and nearby navigation channel. Attention should be given to the beneficial use of dredged sands to counter any erosion along the island's east end.

The studies should evaluate results of the past practice of dumping dredged sands in the vicinity of Sand Island Lighthouse with emphasis on determination of any benefits to Dauphin Island.

Consideration should be given to determining all possible impacts that deepening of the ship channel could cause with the resultant increase in salt water wedge movement into the upper Mobile Bay.

It is recommended that a Citizen Advisory Committee be established to meet several times a year with the Corps to assess how public concerns are being addressed in the General Reevaluation Study and EIS. Public involvement (CAC) should be scheduled frequently so that questions and concerns could be addressed before the Draft EIS is released for review at the end of the 4-year study.

Sincerely,

A handwritten signature in cursive script, appearing to read "Kenneth D. Underwood".

Kenneth D. Underwood, P.E.
Mayor, Town of Magnolia Springs, Alabama

Comment # 65

January 22, 2016

PN No. FP15-MHOI-10
District Commander
US Army Engineer District Mobile
P.O. Box 2288
Mobile, Al. 36628-0001
ATTN:CESAM-PD-E

RE: DEIS -- ASPA PROPOSED WIDENING AND DEEPENING OF MOBILE BAY SHIP CHANNEL

These are additional (previously submitted comments at January 12th meeting and was led to believe written suggestions were only ones to be allowed), social, economic and environmental comments on issues that should be addressed in the DEIS FOR THE AL. STATE PORT AUTHORITY(ASPA) PROPOSED WIDENING AND DEEPENING OF THE MOBILE BAY SHIP CHANNEL.

Why were people denied a proper public hearing instead of attending another COE's "dog and pony show?" This agency is violating people's right to speak and the NEPA process as it provides for public input and involvement- not handing in written question and suggestions ? A public hearing allows people to express their concerns regarding a project of this magnitude that will threaten a major national estuary's resources / water quality integrity , threaten people's health , lives and properties plus informing others in the audience . Could it be the ASPA and COE were afraid to allow concerned residents the opportunity to verbally express their utter disgust with the ASPA/COE latest effort to destroy Mobile Bay for maritime purposes only!

Jimmy Lyons-you- and the COE continue to show total disrespect for coastal residents and the bay 's resources . The public have more of a vested interest in keeping our Port healthy and competitive than you and a hearing would have informed each of you on just how intelligent and resourceful locals can be as we love and respect Mobile Bay's resources and question your priorities. In 1986 the people , integrity of the bay and lack of funding stopped the same dumb proposal of widening and deepening the channel-a major "**boondoggle**"

The DEIS needs to fully discuss how and why the ASPA and COE contend this project to be a general **re- authorization project- when the Scoping process is being held to "initiate a General Reevaluation Report."** When completed the Report should be made available to the public as people do not trust the COE to make the proper decisions. This is a new proposal! In the 1986 EIS's the economic thrusts were strong for the container port ,and in the "lopsided EIS's" there was little attention focused on the social, economic and environmental threats that would occur in the bay .It's been 30 years and the project wasn't proven to be economically feasible then and is even **more dastardly** at this time as the bay is stressed enough !. The 2016 DEIS -thirty years later had better identify and discuss social ,economic and environmental impacts on resources ,public health, safety and property as the natives are getting mad.

What grandiose plans do the ASPA/COE have in store for the bay this time? In my opinion they are already planning an illegal 1,200 acre dredge material island in the NW section of Mobile Bay that is presently on **greased skids for a permit? People attending a Sierra Club meeting on Jan. 5th were notified of this proposal so it hasn't gone through a public interest review for any corps permit and according to federal guidelines they cannot be granted one if it is "contrary to the public interest-which it definitely is . The local COE granted an illegal tar sand pipeline by doing an in-house EA and working through a NWP in granting the permit allowing it through Big Creek Lake's watershed-our major of source of drinking water.**

In the recent past the COE's 'red carpet' was laid out as the nation's tax payer was picking up the tab for another questionable channel project -known as the 'huge' **Gehrig** dredging operations. The vessel

sucked up millions of cubic yards of sediment loads coming down the lower channel /bar with the material being collected in the hull of the ship.. When the vessel became full it traveled 20-60 miles into the Gulf of Mexico- the hull doors were opened releasing the dredged material . My question was what kinds of impacts occurred on the Gulf's waters and marine resources . I was told there were none? In my opinion there could be major problems with dumping heavy sediment and turbidity loads which can easily smother and kill marine life. There is also the added potential for the material to contain hazardous chemicals and heavy metals and being ingested by fish then posing health threats for the human ..

As a participant on the Gehrig a COE individual discussed the "removal of the natural sediment and sand coming down the channel and bar that would naturally flow into the Gulf's **littoral drift** and end up on the beaches . He continued that capturing this material would have the potential of causing erosional processes on Dauphin Island! Wasn't that just what happened ,the COE denies they caused the problem ?

It appears that proper documentation for impacts for coastal inlet requirement of 10 miles from Gulf Shores and 10 miles for Dauphin Island wasn't validated as required in the **1935 Rivers and Harbor Act**. Was this done and why wasn't it released? This should be discussed in the DEIS. A respectable District Engineer in recent past was concerned about how to **improve the COE's image-we tried!** Costly efforts and tons of sand are being dredged from the shallows of the Gulf and placed in mountain piles on the barrier islands .It is then bulldozed and spread to **replenish or re-nourish** the eroded beaches of Alabama..

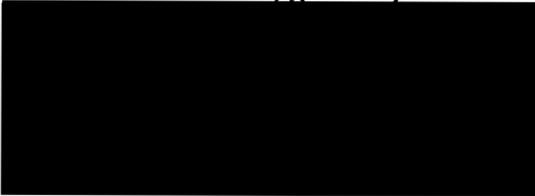
There will continue to be a need for bay maintenance dredging .Why not **replace** this costly and destructive option and **restore** the beaches with dredged material from the channel to **benefit** the locals and tourist and leave the Gulf alone? Discuss in DEIS as an option

Personally I don't support dredging sand from the Gulf for short-term gain as **Mother Nature's natural processes** recover barrier island resources constantly using the Gulf's submerged sand supplies along with the help of coastal wind activity in replenishing and re-nourishment of beach and dune systems. The COE maintains it would be too costly to place their dredged material on the public beaches-what kind of mentality does this show?

The Mobile Ship Channel has been identified as **the costliest in the Nation** to dredge and maintain with little recognition that it has always been a very shallow bay. Mobile Bay belongs to the people and the Alabama Constitution states this as a fact. We love and enjoy the Bay,and do not want short sighted, greedy "special interests' to try and overrule what is in the best interests for Mobile Bay and the public-Mobile Bay isn't meant to provide for just one special group.

The DEIS has to fully consider other alternatives as widening and deepening should be a NO OPTION -- it is ludicrous! The Port is vital and "**one**" of the major players in the state ,but the other **billion dollar industries** are the recreation, tourism, sport and commercial fisheries and they should receive **equal billing in the DEIS**.

In 1986 the Al. State Docks (ASD's) finally admitted that **transshipment** was financially acceptable and being used to keep wider and deeper vessels out of the bay and in the Gulf. In DEIS discuss what other port cities are considering for alternative options that lessen costly and destructive environmental impacts .There has been too many "takings or just outright "stealing of public lands "in the Mobile Bay ecosystem and this violates the Alabama Constitution.



Suggestions for areas of concerns to be addressed in COE's EIS proposal for Widening and deepening of the Mobile Ship Channel -Scoping Hearing January 12, 2016

Excuse the errors as my computer refused to behave

Pull out the 1986 EIS's as these will help identify some of the areas of concerns and issues that will be involved and need to be addressed and updated

These attached comments on the COE ,ASPA,Chamber of Commerce , and MBIWG latest proposal should be held in abeyance until they are discussed in the new EIS and questions answered such as

Is this a Mobile Harbor a Mobile Ship Channel project or both? They have always been separate in the past-both need to be addressed

If for Mobile Harbor discuss why is there a need as the existing dredge maintenance sites on Blakeley and Pinto have been using de-watering, recycling , reuse and sale of the material for years what **happened to the Alcoa Agreement? The 600 acres of recovered mud lakes into beautiful wildlife refuge areas were mitigated areas** that were supposed to be turned over to the Dept. of Conservation State lands. Who, when, why and how was the Agreement ignored ? Was this another 'shenanigan' ? Who took it upon themselves to cause the public to lose again ? Who and what special interests has gained access to the lands for what purpose?

If the 1,200 acre island is for the **Mobile Ship Channel then NEPA is being violated** and should be held in abeyance and discussed in this EIS .”

Filling the deep holes especially the old burrow in Brookley area was thought to be a good idea by the COE and states “baseline data revealed hypoxic/anoxic condition and resulted in degraded ecological production. July 2012 -1.2 mcy sediment from upper MB channel was placed in hole.

Post filling monitoring revealed no hypoxia/ anoxia and a 5,044% increase in benthic community density.**The question that needs answering is was it a healthy and good benthic community?? Identify the mix—more details are needed as they were heavily used in past .**

d.In 1986 the deep holes found in the bay were heavily utilized by the local sport and commercial fishermen for speckled trout, redfish, flounder, and schools of menhaden used the area. The holes provided catch in cold months as fishing would be slow in other parts of the bay. So they are not happy with these areas being destroyed by the COE for maritime interests. They believe the COE's dredge material being dumped in the hole caused heavy turbidity and high sediment loads during the questionable operation and could have caused more deadly impact then being reported. Today the “local soft sheller” who have been harvesting soft shell crabs for years in Arlington Point state there are no crabs to be caught - they also report there are no submerged grassbeds in the Arlington Point area.

Climate change should be addressed in the EIS as posing serious coastal threats to the Alabama area. Thank goodness some people actually are planning for sea level rise and the COE should show common sense and start denying permit requests regarding the illegal fill of estuarine areas for special interest islands as it is extremely bad planning and probably illegal **COE and EPA need to answer my question of how and why were prime wetlands along Mobile harbor illegally allowed to be filled and destroyed- no one is bothering to answer this question**

The surface of the bay provides 'free' assimilative, dispersal of floodwaters and pollution loads and loss of these lands will cause bottlenecks and back up flood waters causing major threats to homeowners property and lives and be costly with outlay of federal Flood Insurance monies

paid out when the next disaster strikes this area -- at present they receive this additional safety The 'emergency permits' are being overused-and need to be discussed further Re; these 'emergency permits' locals watch the aerial spreading over the water surface and wonder who and why allows the fill to be loaded up to a foot from the top of the water-that is a lot of mud that ends up affecting recreational usage -and pose health threats –Spraying and spreading thin layer aerial open water dredge material placement may be considered “significant savings in dredging costs ' BUT knowing the past history of the toxicity of the bay sediments and being a nurse questions the COE lack of knowledge in recognizing the potential dangers , questionable handling and promoting potential of small droplet release and spread of disease to be dismissed

sailors continue to get shoaled over dredged bars in the shallow bay --The COE and Coast Guard need **to update bay charts** if that hasn't been done in past few years

Explain why the oyster beds were relocated on the western shore above Dog River-who requested it -what problems resulted in removing hard based bottom to a muddy one as locals want answers

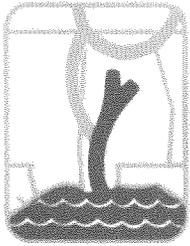
Discuss at length the unhealthy situations that now threaten users of bay waters- They didn't exist in the early years- dredging is releasing deadly toxics from the sediments of the bay and causing unidentified problems with the release of the organics such as DDT, PCB's, Dioxins -heavy metals such as mercury, cadmium, arsenic, leads and occasionally high fecal coliform levels have been identified in bay sediments. Mobile Bay was identified as the top contender having the highest levels of toxics in the country

There continues to be potential for local pollution related impacts from BP blowout—one that has not been identified as being a problem but obviously is air pollution droplets may be causing serious impacts on natural world and impacting on residents as well as no one has considered evaluating = it is subtle—impacting on frogs, turtles and lizards

Discuss the incidences of flesh eating bacteria , vibrio vulnificus- both caused local deaths --the extremely deadly red tide that recently covered the Gulf, Mobile Bay from Florida to Texas and lasted a month -identified as a deadly neurotoxin -- the news cautioned individuals to stay inside, not walk or swim on bay beaches-in the Gulf -don't eat the fish from these waters

Discuss reports such as being reported by the World Wild Life Fund and the Zoological Society of London that industrial scale overfishing, pollution and climate change have killed half of all marine life over the last 40 years. Healthy national estuarine systems play a vital role in providing this major food source and these people are now trying to threaten one of the major ones on the Gulf of Mexico -Mobile Bay.





**WARRIOR-TOMBIGBEE
WATERWAY ASSOCIATION**

Comment # 66

January 12, 2016

Chairman
Charles A. Haun
Parker Towing
Company
Tuscaloosa, Alabama

District Commander
U.S. Army Engineer
District Mobile
P.O. Box 2288
Mobile, Al. 36628-0001

Vice-Chairman
David Carroll
Hunt Refining
Company
Tuscaloosa, Alabama

Re: Public Notice No. FP15-MH01-10

To Whom It May Concern:

Secretary-Treasurer
Tom Leatherbury
SSA Marine
Mobile, Alabama

On behalf of the Warrior-Tombigbee Waterway Association, we would like to recommend the approval of this project.

President
Larry L. Merrihew
Mobile, Alabama

The Port of Mobile is the major economic driver for the Mobile area and is extremely important to the Southeastern United States. Numerous studies have proven time and again the numbers of jobs that depend upon the port and contributing waterways. Our Association contracted with Troy University to determine the economic value of the Warrior Tombigbee river system, which meanders through 15 of Alabama's counties (some of the lowest median income counties), impacting the lives of some 38% of the State's population. The study determined that the river's economic value, in employment, was the direct and indirect employment of approximately 65,000 Alabama citizens. In terms of dollars, the waterway has an economic impact of \$17 billion which generates almost \$500 million in taxes, of which 73% is returned to the federal treasury. Industries located along the waterway also depend upon timely shipments of raw materials for production and quick access to markets around the world. Transportation costs are one of industries major evaluations for new and expanding locations. Our waterway depends upon the Port of Mobile for its economic value and for its future growth, measured in terms of safety, efficiency, and reliability.

In order for our Port to maintain its competitive position in a world economy, and continue to supply timely and valuable shipments of products, it is extremely important that improvements in the Port infrastructure continue. Among those improvements, and perhaps, most important of all, is the widening of the ship channel itself. Industry has noted, that, as the Port receives more and more cargo for existing industry, inefficiencies occur. In addition, we know that the world of ocean shipments will depend more and more upon ports being able to handle the larger vessels, as the Port of Mobile is already experiencing.

For all these reasons, and more that we could express, we again, recommend that this project be approved.

Respectfully submitted,

Larry Merrihew, President



Island Watch

323 Polaris Street

Dauphin Island, AL 36528

Comment # 67

February 5, 2016

Dear Ms. Jacobson,

I am writing to you on behalf of Island Watch, a grassroots organization of concerned Dauphin Island property owners. After examining prior studies, we have some concerns regarding the Corps of Engineers study to deepen and widen the Mobile Harbor ship channel. It is most disconcerting that the public must research and "dig deep" to educate themselves regarding these issues when they should be clearly exposed to the light of day. The lack of transparency begs the public to question the pattern and practices used by the Corps to establish their conclusions and policies.

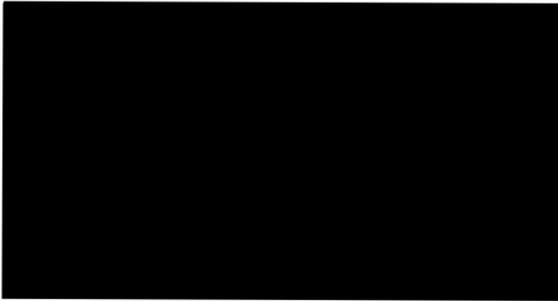
The 1978 report on beach erosion specifically stated that the Corps' practice of maintaining the Outer Bar Channel was responsible for almost half of the erosion problem of Dauphin Island. We would be interested in an explanation as to a reversal of the findings. On what basis does the Corps now find its own position invalid? It is our hope that this current study will entertain the interests of all concerned rather give a disproportionate consideration to the Port Authority.

For years, we were told that the dredged sand placed south of the lighthouse would counter erosion to Dauphin Island beaches. Clearly, evidence shows that not to be the case. Sand Island has all but disappeared and our beaches continue to erode. It is incumbent on the Corps to address this issue of failure to meet its purpose. Furthermore, Dauphin Island must be included

in Regional Management Strategies due to the potential to benefit from the dredged sands, thus offsetting erosion caused by current maintenance practices.

Island Watch will be monitoring efforts of the Corps to study the current and potential erosion problems created by said dredging practices and the Corps' efforts to implement appropriate and adequate solutions determined by the study.

Respectfully,





Sunset Capital of Alabama

TOWN OF DAUPHIN ISLAND

1011 Bienville Boulevard Dauphin Island, Alabama, 36528

Phone: (251) 861-5525 Fax (251)-861-2154

<http://TownOfDauphinIsland.Org>

Date: January 20, 2016

District Commander
U.S. Army Engineer District, Mobile
ATTN: CESAM-PD-EC
P.O. Box 2288
Mobile, AL 36628-0001

Comment # 68

REF: "Public Notice: FP15-MH01-10."

On behalf of the Town of Dauphin Island, I write in response to the request for comments regarding Public Notice: FP15-MH01-10, the proposed widening and deepening of the Mobile Ship Channel and the associated Environmental Impact Study currently being conducted by the Corps of Engineers.

The Town of Dauphin Island requests that the Corps, as part of the economic, engineering and environmental components of the preparation of this General Reevaluation Report and Draft Supplemental Environmental Impact Statement, make specific scientific studies focused on an improved understanding of the fate of the disposed sands which are placed in the Sand Island Beneficial Use Area for the next several years (and that have been placed there over the past several years). The existing scientific evidence is that dredged sand is now being placed in locations where the water depth is too deep to migrate to the beach in our lifetime. There are at least four lines of technical arguments that support that conclusion. First, the natural controlling depths across the outer bar of the ebb-tidal shoal were about 20 feet prior to any dredging. These shallow shoals acted like a natural underwater "sand bridge" allowing sand to move from the Dixie Bar shoals across to the Sand Island shoals and then eventually northwest to Dauphin Island via wave driven processes. A primary purpose of the Sand Island Beneficial Use Area was the re-establishment of that sand bridge and natural movement of the dredged sand to the west but it appears that placement, as it is accomplished now, is much less efficient at feeding the beaches of Mobile County than the natural system the ship channel interrupts. The second line of scientific evidence is that the 1987 "feeder berm" placement in about 18-20 feet depths migrated rapidly into the western side of the ebb-tidal shoal. The third line of

e. 3 1

evidence are some engineering tools developed in the 1990's at the University of South Alabama that indicate dredged sand should be placed in about 18 feet of water off the Alabama coast in order to experience wave processes that move it landward at an adequate rate. The fourth line of evidence is that sand that the USACE placed to rebuild Sand Island a few years ago very rapidly moved to the northwest toward Dauphin Island. And finally, it is noted that the USACE extension of the Sand Island Beneficial Use Area to the south a few years ago appears to confirm that dredged sand placed there is not moving north.

As you are aware, the Town of Dauphin Island has repeatedly stressed the importance of improved disposal of dredge materials, especially those consisting of beach quality sand. The southern portion of the Mobile Ship Channel requires routine maintenance and offers a prime source of sandy materials on a regular basis. Unfortunately, the current practice is to deposit the material in a deep water disposal site (Sand Island Beneficial Use Area) some five miles south of the east end of Dauphin Island; an area that arguably provides little to no benefit to our barrier island community.

The Town of Dauphin Island recognizes the economic impacts of the shipping industry are significant to the Mobile region, state of Alabama and our entire nation. Enlarging the dimensions of the channel to accommodate larger and more vessels should only enhance those positive returns and likely help justify such a project. Assuming the proposal to widen and deepen the channel is approved, we respectfully request your assistance to ensure all beach quality sand removed from the aforementioned section of the channel be placed in the most beneficial location possible to stabilize and protect Dauphin Island. This includes both the sand retrieved from the initial deepening and widening measure as well as all sand dredged during routine maintenance procedures going forward. Simply put, improved disposal of dredged materials should be incorporated as part of the business plan and, more importantly, it's the right thing to do!

Please feel free to contact me if you have any questions or need additional information. I would welcome an opportunity to meet with you in person to further discuss this important issue.

Respectfully,

Jeff Collier
Mayor

Cell: 251-209-9980
jcollier@townofdauphinisland.org

Allen -

Enjoyed meeting you - I tried to work with the COB for forty years as a concerned citizen, but seeing Pat again made me realize the same old people and connections are still controlling this agency.

If you plan to raise your family here then hope you try and make better things happen - as future generations will not thank you for threatening the bay and its history.

This federal agency is supposed to work with and for the general public and protect natural estuaries, but seeing him and learning about 13 Civil War vessels being found & to be covered - this was planned in previous D+F - made me realize nothing has changed - special interests (port in this instance) appears to be in forefront AGAIN -

Hope I'm wrong
Want a history lesson - get Chronicle
Of an Eld-Warrior AKA The Dawn
Book 'From Liberty



As Promised **Comment # 70**

January 8, 2016

Col Chytka, DE	Lance LeFleur, Dr.	Heather McTeer Toney	and others
Corps of Engineers	ADEM	USEPA Reg. IV	
P.O. Box 2288	P.O. Box 301463	Atlanta Federal Center	
Mobile, Al. 36628	Montgomery, Al. 36130	61 Forsythe St. NW	
		Atlanta, GA 30303	

Dear sirs,

What a horrible way to start off the New Year ! On January 5th the Mobile Bay Sierra Club invited Glenn Coffee to present the secret, in-house, behind closed doors Corps of Engineers'(COE), Al. State Port Authority (ASPA) ,Chamber of Commerce (The Big Three) and Mobile Bay Interagency Working Group's (MBIWG) proposed '**boondoggle**' for Mobile Harbor / Mobile Ship Channel.

Their one track, self centered, boggled minds are focusing on another grandiose , extremely costly, **destructive island** that would fill over **1,200 acres** of very **productive bay bottoms** in the NW section of the bay and east of the Mobile Bay Ship Channel .Local sport and commercial fishermen have identified this **area as being rich in aquatic resources and heavily utilized**. The area should be receive every protection-not be destroyed for a disposal site.

The Worldwide Wildlife Fund and the Zoological Society have jointly determined that **industrial-scale overfishing, pollution and climate change have killed half of all marine life** over the last 40 years. The Living Blue Planet Report cites that species essential to the global food supply are among the hardest hit, particularly due to humans catching them faster than they reproduce. Coral reefs, mangroves, and sea grasses have died decimating fish populations. Tuna and mackerel have declined by 75% ,number of species are declining, a quarter of all shark and ray species face extinction, half of all coral reefs have disappeared and harbor a third of ocean species.

There is an international need for estuaries such as Mobile bay to continue to remain healthy as their natural resources -water surfaces, bay bottoms, benthic community organisms, submerged grass beds, and wetlands provide nursery areas, food and other biological and economic benefits for the marine and human factors. Mobile Bay is stressed enough and some worry the ecosystem will 'collapse. '

The large island will be bad enough, but with the potential of two additional islands planned in same area on the west side of the channel an additional 1,480 acres of bay bottoms will be destroyed. Placing unstable structures near the busy entrance of a highly traveled port show extremely bad planning and these people don't know or care what they are doing. There will be a costly and constant effort to try and stabilize and contain any islands in this **high energy area**.. The channel will need frequent 'emergency' maintenance dredging to re-dredge sediments that have eroded from the islands and flow back into the channel. **Read on as the Gaillard Island is a good example of plain stupidity in placing an island in the bay.**

Global climatic changes are occurring and placement of islands in this high energy area will act as a 'bottleneck ' as Mobile Harbor presently acts as a funnel and handles the frequent tropical storms and their northerly downriver flood waters that flow south through the harbor into the bay. The loads are presently and capably handled by the wide open bay surfaces in dispersing and assimilating the flood waters providing free benefits. They will become even more valuable with the sea level rises now occurring. These natural processes now provides protection and saves **Flood Insurance monies** for the hundreds of residential, commercial and industrial facilities existing in the northern flood prone areas in the port and city of Mobile.

The Big Three have been working on this project for two years and intended to bypass public participation , but they are in for a surprise. They also intend to bypass the NEPA process as they are

using Restore Act monies, but this is a federal maritime project and one of this magnitude will always require federal funding -whether for Mobile Harbor or Mobile Ship Channel. This project **“poses significant environmental impacts , threatens human life, property and health “** requiring the NEPA process-- unless the COE plans to use their same ole EA process and **manipulate the permit** through a NWP such as was done for Plains tar sand pipeline through Big Creek Lake's watershed -our drinking water supply! If they do then there should be another legal action taken against this agency and this time “with teeth.” The COE should hold this proposal in abeyance and require it to be included in the upcoming widening and deepening EIS as it is **“another takings of public lands”** and there is **NO URGENT NEED** .

The Alabama 1901 Constitution prohibits the filling of navigable lands in Mobile Bay !

The **“takings” of public lands** for dredging needs in Mobile Harbor by the COE and ASD's (now ASPA) was a routine procedure in the '50's and into the 70's. Over 3-4,000 acres of bay bottoms, wetlands and water surfaces (public Lands) were diked and filled with dredge material and these special interests areas are now known as Blakeley, Pinto and McDuffie Islands . There was also no mitigation.

In 1986 a similar grandiose plan for widening and deepening the Mobile Bay Shipping Channel was presented to the public using NEPA and the EIS process --that was thirty years ago. In those days we had to try and deal with the same people. Their proposal consisted of filling and destroying 1,700 acres in Arlington Point which contained very productive bay bottoms, major submerged grass beds and water surfaces - invaluable for the aquatic resources-- for a huge dock and container port. There were other islands planned for the NW portion of the bay on either side of the channel plus the large transshipment coal handling island in the southern part of Mobile Bay just north of Fort Morgan.

The Fish & Wildlife Service saved the day by stating” **the shallow productive grass beds and bay bottom lands at Arlington** were essential for protecting the integrity of Mobile Bay” and the immense dredging and filling operations and impacts could further stress and possibly cause Mobile Bay to become a **'collapsed' estuary** .Saner minds realized the state had no money for a port and there were other funding needs such as paying for education . It took a great deal of public participation ,but the project was finally **stopped**.

The Big Three are in a time warp, using **outdated, out- mod-ed ideas** and probably don't accept the fact there are global climatic changes.. They need to realize we are in the 21st Century and the world is having enough problems without them adding to the situation.

It's always helpful to know the history of an area . When the new **Theodore Ship Channel and island** in the bay were being proposed I was President of the Mobile Bay Audubon Society and Larry Goldman of the Fish and Wildlife Service and we opposed the placement of the island in the bay . It would conservatively cover over 5 sq. miles of productive bay bottoms and surface waters and was being placed in an extremely high hazard zone. We thought the dredged resource should be placed on land and the material used for road and construction needs .This would have saved bay bottoms and lots of taxpayer's money . The only positive thing that occurred was the return of the endangered pelican who had not been planned for by anyone. Larry 's main concern was the impact that would occur with the loss of the benthic community or bottom aquatic food chain as this would lessen the catch of shrimp and fish. The extremely heavy loads of sediment and turbidity from the dredging operations did impact on the oyster catch. **Discuss recent catch in bay in new EIS and health of catch**

These are continued costs for the island gathered from the Internet. Hurricane Katrina decimated the man-made island in 2005 and the 17 foot dikes disappeared-as well as the taxpayers millions. The COE released a “critical need “to dredge portions of the Theodore Channel as shoaling was threatening ship usage and the material was to be used to restore Gaillard Island.” In 2006, 2007, 2011 and 2012 COE

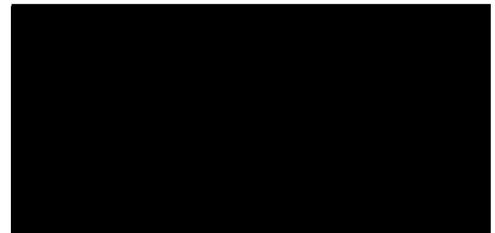
released notices notifying the public of the need to receive additional millions to counter island and dike erosion problems and dredging needs.”Another reason and **evidence** for not allowing any islands in the bay-they are **too costly to maintain** and the public taxpayer continues to pay the bills and aren't even aware they are doing it.

A citizens committee worked for years with the COE, agencies and others to **keep the Port open** and plan for Mobile Harbor needs, as the existing dredge material sites on Blakeley and Pinto were filling up . At the time Harbor needs were handled separately from the Ship Channel because of economics. The question is **why the sudden change?** The citizen committee helped to develop the innovative plan of de-watering, restoring , reuse and selling the dredge material as a commodity as the Waterways Experiment Station (the COE scientific group) determined the “ dredged waste” was in reality a resource. After a crew de-watered the material it was removed from the diked system which allowed open capacity for new material lengthening the life of the site for years to come. Explain what is being done now?

There was a nice surprise as **Alcoa's six mud lakes** had become full with their deadly alkaline waste waters and the citizen group were provided an opportunity to try and restore an additional 600 acres on Blakeley Island using harbor material. After 35 years of using this process the reclaimed mud lakes became beautiful natural re-vegetated wildlife refuge habitats with rain filled ponds and the birders identified the area as”one of the best birding sites in coastal Alabama.” According to the '**Agreement**' these lands were to be turned over as mitigation lands to the Dept. of Conservation State lands. Someone -somewhere along the way decided otherwise as obviously their shenanigans took over the lands and the re-vegetated acreage were never turned over as public lands. In a recent flight over the area I looked in horror as the whole diked area had been bulldozed and now looked like cemetery lots. All of the beautiful forested acreage with rain filled ponds were gone. “One of the best birding areas in coastal Alabama had been swept away. “ An **investigation** should be made to inform the citizens of Alabama how they lost the 600 acres-again? My question is what happened ,why as it was a legal contract and should be re-instated????

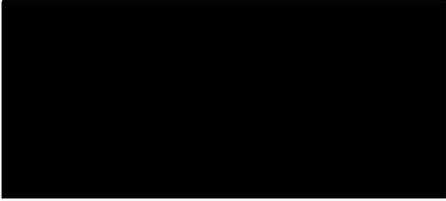
The public has been invited to attend the January 12th 2016 COE Mobile Bay proposed widening and deepening of the Mobile Ship Channel scoping hearing and will finally be allowed the opportunity to be involved and identify areas of concern to be discussed in the EIS.

Others citizens who are concerned :



Comment # 71

17February 2016



Subject: Proposed Widening and Deepening of the Mobile Ship Channel

Dear Ms Jacobson:

Attached is my 9 February 2016 letter stating some of my concerns with effect that dredging of the channel could have on Dauphin Island.

I also have concerns on what the widening of the channel will have on the Dixey Bar see second attachment. The Dixey Bar is a habitat that attracts numerous species of birds (gulls, terns, pelicans and gannets), sea turtles, mammals (dolphins), invertebrates and fish. I have personally observed or caught at least 20 species of fish in this area. The Dixey Bar is known by fishermen from all over the country as a prime place to catch large red drum. Large schools of Spanish mackerel and other species of fish can often be seen on the bar. Commercial gill netters fish there often. The area is full of life.

Widening and deepening of the ship channel will certainly alter or destroy the Dixey Bar habitat that has existed for at least for 150 years, probably much longer. The impact of this should be considered as one of the prime environmental issues that would be effected before this project could be approved. If an insignificant mouse, salamander, or darter can change or stop a large project surely a habitat like the Dixey Bar can be saved.

Please do all you can to protect this vital area.

Thank you.

Sincerely,



9 Feb 2016



Subject: Proposed Widening and Deeping of the Mobile Ship Channel

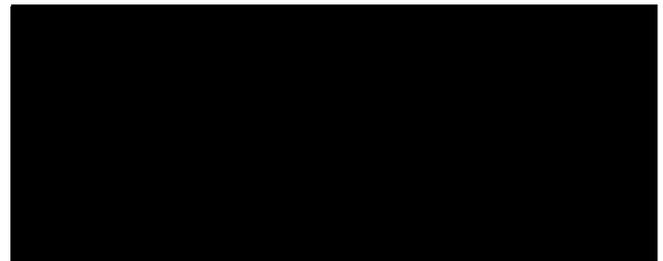
Dear Ms Jacobson:

As a retired Corps of Engineers Project Manager and Dauphin Island property owner I am concerned with the erosion of the Island's beaches that has resulted from off shore disposal of dredged sands from the Mobile ship channel. It seems that the proposed widening and deepening of the channel will only accelerate the problem if that sand is not disposed of in a way to re nourish the Dauphin Island shore line.

I am concerned that the interests of the Alabama Port Authority are given priority over other groups in this study and Dauphin Island is being excluded from sediment management studies.

Please assure that all that the proposed ship channel project and dredging will be done in such a way to restore damage that has occurred in the past and that re nourishment will continue.

Sincerely,





MOBILE BAY SIERRA CLUB

P.O. BOX 2682 MOBILE AL 36652

February 9, 2016

Ms. Jennifer Jacobson
US Army Corps of Engineers
Mobile District, Planning & Environmental Division
Coastal Environment Team
PO Box 2288
Mobile, Alabama 36628-0001

RE: Public Notice: FP15-MH01-10

Dear Ms. Jacobson:

Representatives of the Mobile Bay Sierra Club attended the Mobile District's January 12, 2016 Public Scoping Meeting held in connection with the start of the General Reevaluation Report (GRR) Study and Environmental Impact Statement (EIS) to decide if the Mobile Harbor Ship Channel should be deepened and widened as authorized by the Water Resources Development Act (WRDA) of 1986. This letter identifies the issues the Sierra Club believes must be addressed to assure the significant environmental impacts associated with the project are adequately evaluated and mitigated.

Before considering the below issues, please know that the Sierra Club is not opposed to the Mobile Harbor federal project or the Port of Mobile. Our members understand the Port makes important economic contributions to the Greater Mobile Area and to the State as a whole. However, for too long, actions have been pursued to maintain and improve the navigation project, while giving insufficient attention to the environmental consequences of those actions on the natural resources occurring within Mobile Bay, to Dauphin Island, and in the adjacent Mississippi Sound.

The Sierra Club submits the below list of environmental issues with the hope the Mobile District and the Alabama State Port Authority (ASPA) will view Mobile Bay and its surrounding environs as a valuable public natural resource, owned and shared by all of the citizens of Alabama, and not just as a body of water to be manipulated to primarily satisfy the

goal of deep draft navigation. The Sierra Club encourages the Mobile District to recognize that in addition to meeting the needs of navigation, federal law and policies also bestow upon the Corps the concomitant obligation to act as a good steward in conserving the nation's environmental resources. In short, neither Economic Development nor Environmental Quality are paramount in the Corps planning and decision-making process, but are instead, as touted by the Corps as an agency, to be co-equal objectives in Corps studies. In the GRR Study to enlarge the ship channel, the Sierra Club expects the Mobile District to also give full attention to the Environmental Quality (EQ) objective in addition to the National Economic Development (NED) objective.

Dredged Material Disposal Management Strategy. Significant quantities of “new work” material would be excavated within Mobile Bay during initial deepening and widening of the ship channel. In addition, it is anticipated that future volumes of sediment removed during each routine maintenance event will greatly exceed the present quantities routinely now dredged to maintain the existing channel dimensions.

Mobile Bay is one of 28 estuarine systems designated in the National Estuary Program established by Congress in 1987. That unique designation requires special attention be given to any action having the potential to adversely affect the ecological resources of the bay.

As a component of the Corps' Regional Sediment [i.e., dredged material] Management (RSM) Program for Mobile Bay, the Mobile District organized an Interagency Working Group (IWG) in 2011 to identify in-bay approaches to dispose of maintenance material dredged from the Ship Channel in lieu of transporting the sediments offshore. The two disposal options being pursued to date by the Mobile District are: (1) thin layer disposal of dredged material over the bottoms of Mobile Bay; and (2) construction of a 1,200-acre dredged material disposal island targeted as a future emergent tidal marsh creation site. The stated objectives of the IWG's efforts are to reduce the cost of the Mobile Harbor maintenance program while seeking beneficial uses of the dredged sediments. The Sierra Club strongly supports the beneficial use of dredged material. But, at the same time the Mobile District must substantiate the environmental benefits attributed to these disposal options are actually realized.

While the IWG's efforts have been focused on the disposal of maintenance dredged material from the existing channel, the timing of the RSM work with the new GRR Study indicates the IWG work should be extrapolated to and incorporated within the GRR analyses of the larger future quantities of dredged material that will have to be disposed of to maintain an enlarged Ship Channel. Like the public, the Sierra Club has not been involved in the work of the IWG to date. But, we have examined Mobile District meeting presentations discovered on the internet. These presentations consistently allude to undefined concerns that the existing practice of transporting dredged material out of Mobile Bay is contributing to some

sort of as yet undescribed adverse impact(s) within the bay. The nature of these cryptic, alleged adverse impacts should be clearly identified and quantified in the GRR Study and EIS if a recommendation calling for the return of in-bay disposal of maintenance dredged material is to be made. Scientifically based studies must be conducted to clearly substantiate the environmental benefits of in-bay disposal to Mobile Bay as a total ecological system.

Erosion of Dauphin Island. The ongoing erosion of Dauphin Island is an indisputable fact of major concern to the Sierra Club. Dauphin Island is essential to creating the estuarine conditions that characterize Lower Mobile Bay and the adjacent Mississippi Sound. The island also provides the protective barrier necessary for Alabama's largest expanse of salt marsh to thrive along south Mobile County's mainland coast, along with assuring the optimum range of salinities occur over Alabama's principal oyster reefs that have existed in the same place for thousands of years.

The U.S. Geological Survey's National Assessment of Shoreline Change Project's interactive map (<http://coastalmap.marine.usgs.gov/FlexWeb/national/ShoreLC/>) shows that Dauphin Island's West End Gulf shoreline has experienced a historic loss rate of 6-12 feet/year. The map shows the worst erosion begins at the point where littoral drift sands normally transported along Mobile Pass ebb tidal delta have traditionally been transported to the island. That same map shows Dauphin Island's neighboring islands to the west are also experiencing severe erosion. Lastly, the map illustrates that the coastline looking eastward from Fort Morgan, along all of Baldwin County, and well into the Florida Panhandle is relatively stable, with only small isolated areas of limited erosion.

Examination of the USGS historic shoreline change map leads one to conclude that something happens in Mobile Pass between Fort Morgan and Dauphin Island that interrupts the natural westward drift of nearshore sands. That "something" is the Mobile Harbor Outer Bar Channel. What was once a natural inlet channel having a depth of around 20 feet until around 1904, was periodically enlarged during the last century until 1999 when its present dimensions of 49 feet by 600 feet were dredged. Thus, the Outer Bar Channel is behaving in much the same way as a sediment deposition basin, collecting and trapping sand moved by littoral drift processes from the Fort Morgan Peninsula and the offshore ebb tidal delta referred to as Dixie Bar. The sand collected in the channel is then periodically dredged and transported offshore to be dumped in deeper Gulf waters. Interruption of the natural littoral drift system has resulted in the sustained "starvation of sand" for the entire Alabama-Mississippi Barrier Island system. A major consequence of which is the almost complete loss of the Sand-Pelican Island complex and the extensive erosion of Dauphin Island's West End.

A 1978 report prepared by the Mobile District Corps determined that Dauphin Island's West End was losing Gulf beach width at the rate of about 10.3 feet/year which agrees closely with

the above mentioned loss rate shown on the USGS's present interactive map. The 1978 report concluded that maintenance of the Outer Bar Channel was contributing to at least 40% of Dauphin Island's erosion problem and recommended the dredged sands be placed at a new site closer to the island's West End to enable the sands to be reincorporated into the littoral drift system to counter erosion. Although the 1978 draft report was never submitted for further action, then District Engineer, COL Drake Wilson said in a July 9, 1975 letter to then Congressman Jack Edwards:

“...the options for nourishment of the eroding shorelines with material dredged from the ship channel would be more appropriately considered under our ongoing *study of navigation modifications for Mobile Harbor* rather than under the study for beach erosion control and hurricane protection.”

The referenced *study of navigation modifications for Mobile Harbor* resulted in the 1980 Mobile District report and EIS Congress considered in its 1986 authorization to deepen and widen Mobile Harbor. However, the problem with the 1980 report is the commitment made in the Mobile District's July 9, 1975 letter to consider Dauphin Island's erosion in that report was not honored. In short, the 1980 report and EIS are both completely silent on the erosion issue. That means in the approximately 36 years that have passed since the 1980 report was prepared, erosion of Dauphin Island has been allowed to continue unabated, despite the fact the Mobile District's 1978 report concluded maintenance of the Outer Bar Channel was contributing significantly to the island's erosion issue¹. That continues to be the situation today.

It is of absolute importance that the GRR Study correct the serious deficiency in the 1980 report relative to its failure to consider the erosion of Dauphin Island. The GRR should document the shoreline and sand volume losses that have occurred since the 1978 report was completed. That information should be used to establish the baseline conditions for the “without project” condition for the purpose of developing appropriate mitigation measures to return the island's shoreline to the 1980 condition. That target baseline condition should be considered in developing the No Action Alternative and the Action Alternatives considered and their respective mitigation measures. To accept the present highly eroded status of Dauphin Island as the baseline condition for the No Action Alternative in the GRR would unfairly penalize both the natural resources and property ownerships that existed in 1980 and have been allowed to gradually disappear with no concrete action being taken by any responsible entity having the power to reverse that loss. The GRR Study now provides the opportunity to correct the serious flaw in the Mobile District's 1980 report.

No Action Alternative. For the GRR Study, the Sierra Club understands the No Action Alternative is to represent a continuation of the present conditions associated with

¹US Army Corps of Engineers. September 1978. Draft Mobile County, Alabama (Including Dauphin Island) Feasibility Report for Beach Erosion Control and Hurricane Protection. Mobile Engineer District, Mobile, Alabama.

maintenance of the existing channel dimensions. As such, the changed conditions projected to occur with the Action Alternatives are to be compared against the No Action Alternative to determine the environmental impacts that would result from project implementation.

It is crucial that the GRR Study's No Action Alternative clearly define the significant ongoing erosion affecting Dauphin Island and acknowledge that an unmet mitigation need exists that is associated with maintenance of the present Outer Bar Channel. Mitigation of the No Action Alternative is needed to restore the island's eroded shoreline and sand volume losses dating back to the 1980 report when the original recommendation to deepen and widen the project was first advanced. This loss is substantiated by a 2007 U.S. Geological Survey report that addressed the cumulative historical sand losses experienced by the Mississippi-Alabama barrier island chain. The 2007 report found the following:

“...After 1958, [Dauphin] Island entered into a net erosional phase that has persisted and most recently accelerated.”

“... [Maintenance dredging] practices conducted around the tidal inlets [including Mobile Pass] ...permanently removed large volumes of beach quality sand from the littoral drift system that otherwise would have nourished the adjacent barrier islands and mitigated land losses.”

“...Sand supply is also the only factor where the historical trend of...progressively increased reduction in sand supply attendant with increased dredging depths... temporally matches the trend of progressively increased land loss.”²

In addition, the scientific literature contains numerous examples where navigation channels dredged through coastal inlets, similar to the situation in Mobile Pass, have interrupted the littoral drift of nearshore sands, causing shorelines downdrift of the inlets to erode. This phenomenon is common along the entire US Gulf Coast, the rest of the nation, and around the world. So common in fact that the Corps has established the Coastal Inlets Research Program to assist in developing solutions encountered by Civil Works projects, including navigation channels, located in inlets (<http://cirp.usace.army.mil/>).

Despite the above information, the Mobile District has adopted the position that the flow of littoral drift sands across the Mobile Pass Inlet is not interrupted by maintenance of the Outer Bar Channel and that the erosion of Dauphin Island is not a consequence of the maintenance program. However, no conclusive scientific information has been provided to support the position as to why Mobile Pass would not fit the widely accepted paradigm of how coastal inlets react in response to dredged navigation channels.

²Morton, R. A. 2007. Historical Changes in the Mississippi-Alabama Barrier Islands and the Roles of Extreme Storms, Sea Level, and Human Activities. Open File Report 2007-1161. U.S. Geological Survey, Coastal and Marine Geology Program. St. Petersburg, Florida.

It is the Sierra Club's position that the GRR Study cannot ignore Dauphin Island's cumulative losses of millions upon millions of cubic yards of littoral drift sands that have occurred since the 1980 report was completed as a result of that report's complete failure to address the island's erosion problem. Simply stated, the GRR Study's No Action Alternative must clearly state that an **unmet mitigation need exists to reverse the erosion of Dauphin Island that has been allowed to occur in plain site since 1980.**

Federal Standard. The Sierra Club is aware that in evaluating alternatives for the Mobile Harbor project, the Corps is required to select for implementation the National Economic Development (NED) plan – the plan that reasonably maximizes net economic benefits consistent with protecting the nation's environment. The Sierra Club is also aware *the Mobile District can select a plan, other than the NED plan, if there is an important overriding reason for choosing an alternative that would not maximize net economic benefits.* For navigation projects, part of the overall NED plan is the "Federal Standard", or base plan, for disposal of dredged material. All other alternative plans considered and their respective costs are measured against the "Federal Standard"³. The "Federal Standard" is defined as the least costly dredged material disposal alternative consistent with sound engineering practices *and meeting applicable federal environmental requirements.* The "Federal Standard" defines the disposal costs assigned to the navigation project. The project costs assigned to the navigation purpose are shared with the non-federal sponsor, with the ratio of federal to non-federal costs depending on the nature and depth of the navigation project⁴.

Since ecosystem restoration is recognized as one of the primary missions of the Corps³, the Sierra Club is further aware that factors beyond cost can contribute to decisions on disposal options for dredging projects. *The selected disposal option for an ecosystem restoration project should maximize the sum of economic development and national environmental restoration benefits. Therefore, a beneficial use option may be selected for a project even if it is not the Federal Standard for that project.* In such cases, the Sierra Club is aware that the Mobile District has the discretion (after considering the views of the ASPA, the agencies, and the interested public) of determining which of two options may be pursued to allocate costs based on the contribution of the beneficial use to meeting the navigation purpose of the purpose:

Option 1 – *If the beneficial use (e.g., environmental restoration) project is (or is part*

³US Army Corps of Engineers. 2000. Planning Guidance Notebook. Engineering Regulation 1105-2-100. U.S. Army Corps of Engineers, Washington, DC.

⁴U.S. Environmental Protection Agency and U.S. Army Corps of Engineers. October 2007. The Role of the Federal Standard in the Beneficial Use of Dredged Material from U.S. Army Corps of Engineers New and Maintenance Navigation Projects: Beneficial Uses of Dredged Materials. EPA842-B-07-002. Washington, DC.

of) the Federal Standard, its costs are considered to be navigation construction or maintenance costs and will be funded accordingly; or

Option 2 – Where the beneficial use project is not (or is not part of) the Federal Standard to accomplish the project’s navigation purpose, the plan serves as a reference point for measuring the incremental costs of the beneficial use project that are attributable to the environmental purpose. Such incremental environmental costs are shared in a different ratio than the navigation project costs⁵.

Based upon the above, the Sierra Club is of the firm opinion that the GRR Study should select Option 1, that would include the cost of initial restoration and future periodic future renourishment of Dauphin Island’s eroded shoreline. That approach would recognize mitigation of Dauphin Island’s erosion to be a legitimate navigation related costs since it would be a required component of the Federal Standard for both the No Action Alternative and the Action Alternatives considered. Ample evidence already exists, as described above, that the present maintenance dredging program for the Outer Bar Channel is a major contributor to Dauphin Island’s severe erosion problem and has been for over 50 years. While the Sierra Club acknowledges that storms and sea level rise may also be contributing factors, we believe the navigation-related erosion has weakened the island through sand starvation so that its resilience to withstand other forces has been significantly degraded. The GRR Study must revise/develop a Federal Standard for the Mobile Harbor project that includes shoreline restoration mitigation as a navigation project cost.

Comply with all Applicable Statutes, Policies, and Regulations. Examination of the Mobile District’s 1980 report and EIS for the Mobile Harbor project revealed that the report also did not comply with Section 5 of the Rivers and Harbors Act of 1935. The 1935 law remains in effect and is referenced in various Corps’ engineering design guidance documents dealing with coastal projects. Section 5 requires every Corps report:

“...looking to the improvement of the entrance at the mouth of any river or at any inlet...shall contain information concerning the configuration of the shore line and the probable effect thereon that may be expected to result from the improvement having particular reference to erosion and/or accretion for a distance of not less than ten miles on either side of the said entrance.”⁶

⁵U.S. Environmental Protection Agency and U.S. Army Corps of Engineers. October 2007a. Beneficial Use Planning Manual: Identifying, Planning, and Financing Beneficial Use Projects Using Dredged Material. EPA842-B-07-001. Washington, D.C.

⁶Quinn, M. L. August 1977. The History of the Beach Erosion Board, U.S. Army Corps of Engineers 1930-63. Miscellaneous Report 77-9. U.S. Army Corps of Engineers, Coastal Engineering Research Center, Fort Belvoir, Virginia.

Deepening and widening the Mobile Harbor Outer Bar Channel through Mobile Pass should surely be considered to be an “improvement” for navigation. The 1980 report not only failed to consider the required evaluation distances on either side of the Ship Channel’s entrance into Mobile Bay mandated by Section 5, but was completely silent on the question of whether Dauphin Island could be affected by erosion attributable to the navigation project. That failure is inexplicable given the above referenced July 9, 1975 Mobile District letter and the 1978 report that clearly concluded maintenance of the Outer Bar Channel contributed to the erosion of Dauphin Island and recommended a new disposal site to counter the erosion problem. The GRR Study must comply with the required analyses required by Section 5.

Mitigation of Significant Impacts. A number of federal laws have direct applicability to the conduct of the GRR Study and EIS and must be considered to evaluate their applicability to mitigate the significant adverse environmental effects associated with both the No Action Alternative and Action Alternatives to enlarge the Mobile Harbor project. Further, since such laws could also result in cost-share implications that may not be favored by the ASPA as the non-Federal sponsor, the Mobile District must be prepared to look broader than just at the ASPA’s preferences and consider the larger issues and overall public interest that may be affected by the project. Too often in the past, the ASPA’s views appear to have taken precedence over the adverse effects on natural resources and individual property rights in order to minimize the project costs borne by the ASPA. Some of the laws that must be considered in the GRR to address mitigation of adverse environmental effects include:

- Section 216 of the River and Harbor Act of 1970 provides the authority to review the operation of completed projects in two situations: (1) when significantly changed physical or economic conditions make a review advisable, and (2) *to improve the environmental benefits to society*. This study authority can be used to seek specific Congressional authorization to *modify a navigation project to use dredged material for environmental restoration*.
- Section 145 of the WRDA of 1976 (as amended by Section 933 of WRDA 1986, Section 207 of WRDA 1992, and Section 217 of WRDA 1999) dealing with Beach Nourishment, authorizes the Corps, at the request of a state or local government, to place suitable dredged material from construction and maintenance of navigation channels and inlets onto local beaches.
- Section 907 of the WRDA of 1986 specified that in evaluating the “...benefits and costs of a water resources project, the benefits attributable to measures included in a project for the purpose of environmental quality, including improvement of the environment and fish and wildlife enhancement, shall be deemed to be at least equal to the costs of such measures.”
- Section 204 of the WRDA of 1992. Section 204 (as amended by Section 207 of WRDA 1996 and Section 209 of WRDA 1999) entitled “Beneficial Uses of Dredged Material”, authorizes the Corps to carry out projects for creating, protecting, and

restoring aquatic and ecologically related habitats, including wetlands, in connection with dredging for constructing, operating, or maintaining federal navigation projects. ***The authority allows selection of a disposal or placement method other than the least-cost Federal Standard option to achieve environmental benefits.*** It is primarily used for new navigation projects or for maintenance projects with large incremental costs. This section requires a specific Congressional appropriation for each project and is more applicable for larger projects.

- Section 302 of the WRDA of 1996 amended the authority to deepen and widen the Mobile Harbor project as provided by the WRDA of 1986 by ***allowing the Corps to “...consider alternatives to disposal of such material in the Gulf of Mexico, including environmentally acceptable alternatives for beneficial uses of dredged material and environmental restoration.”***
- Section 2036 of the WRDA of 2007 states that the Corps should not select a project alternative in any report submitted to Congress for authorization, unless the report contains: (1) ***a recommended plan to mitigate for damages to ecological resources created by the such project,*** or (2) a determination that the project will have negligible adverse impact on ecological resources without implementation of mitigation measures.
- Section 2037 of the WRDA of 2007 institutionalized Congress’ intent that stronger efforts be made to beneficially use dredged material removed from federal navigation projects through the above described Regional Sediment Management Program. To develop and carry out a Federal project involving the disposal of dredged material for environmental purposes, ***the Corps may select a disposal method that is not the least cost option if the Corps determines the incremental costs of the disposal method are reasonable in relation to the environmental benefits, including the benefits to the aquatic environment to be derived from the creation of wetlands and control of shoreline erosion*** (33 U.S.C. § 2326).

Designate More Suitable Site for Disposal of Beach Quality Sands Dredged from Outer Bar Channel. The GRR Study and EIS must identify a new disposal site to replace the existing Sand Island Beneficial Use Area (SIBUA) located south of the lighthouse. The Mobile District has increasingly used the SIBUA since 1987 with the stated goal being to ameliorate erosion of Dauphin Island. However, no Corps studies have been produced to scientifically and conclusively demonstrate the dredged sands deposited at this location are in fact moved by prevailing currents and wave action toward Dauphin Island in sufficient quantities to be reincorporated into the littoral drift system so as to counter the island’s erosion. But, there is considerable evidence to the contrary: (1) the Sand-Pelican Island complex has almost disappeared due to erosion; (2) The West End of Dauphin Island continues to erode and the East End of the island may soon experience intensified erosion since it is now more exposed to the open waves of the Gulf with the loss of the Sand-Pelican Island complex; and (3) the dredged sands placed in the SIBUA are accumulating instead of

being dispersed since the Mobile District found it necessary in 2008 to expand the limits of the disposal site farther south because the decreased depths in the original site were interfering with the operation of the hopper dredges⁷. Thus, the historic designation of this site as a true “beneficial use” is highly questionable and without scientifically documented merit. This leads to the conclusion that the SIBUA is failing to meet its intended purpose.

The Mobile District is pursuing a totally different approach to restore the eroded shorelines of Petit Bois Island and its sister Mississippi barrier islands according to the 2016 Final Comprehensive Barrier Island Restoration Report⁸. That \$500 million restoration project is directed at mitigating the erosion of neighboring Mississippi’s barrier islands that are in the same chain as Dauphin Island. The erosion of those islands, particularly Petit Bois Island, has been negatively affected in part by the same starvation of littoral drift sands created by the existing manner in which the Mobile Harbor Outer Bar Channel is maintained.

To restore the Mississippi barrier islands, the Mobile District recommends beach quality sands (obtained from a location south of Dauphin Island) be placed in shallow water (e.g., around 10 to 15 feet deep) near the islands. Based on that approach, it is obvious the Mobile District believes deposition of sands in shallow water is a more dependable approach to restore eroded shorelines in lieu of dumping sands in depths of around 30 feet as has been the historic practice in the SIBUA. The Mobile Harbor GRR Study and EIS should include an analysis of a similar approach to restore Dauphin Island’s eroded shoreline. Should the Mobile District conclude that shallow water placement of dredged sands near Dauphin Island for both the No Action Alternative and the Action Alternatives is not feasible, a thorough explanation must be provided that is based upon both technical and scientific investigations and not solely on cost considerations alone.

Salinity intrusion. Deepening and widening the Mobile Harbor Ship Channel by as much as 10 feet and 150 feet, respectively, will allow a larger volume of higher salinity Gulf waters to extend northward into Mobile Bay. The potential effects of salinity intrusion into the bay and accompanying organisms on existing estuarine habitats and ecological communities in the lower bay in particular should be analyzed in the GRR’s EIS.

Determination of Scientific Merit of GRR Studies. Senior Mobile District staff that will be involved in the conduct of the GRR Study and EIS have routinely discounted the work of others as “not being based on science”. Included in those ascertains are the Mobile District’s

⁷US Army Corps of Engineers. December 5, 2008. Expansion of the Sand Island Beneficial Use Area, Maintenance Dredging and Placement Activities, Mobile Harbor Navigation Project, Mobile County, Alabama. Public Notice No. FP08-MH14-05. Mobile Engineer District, Mobile, Alabama.

⁸US Army Corps of Engineers. January 2016. Final Supplemental Environmental Impact Statement, Mississippi Coastal Improvements Program (MsCIP), Comprehensive Barrier Island Restoration, Hancock, Harrison, and Jackson Counties, Mississippi. Mobile Engineer District, Mobile, Alabama.

above discussed 1978 report and the Town of Dauphin Island's design for a project to restore the island's eroded shoreline. The Sierra Club finds such ascertains to be disturbing, particularly since no explanation has been provided to explain why the work of others in question is considered to be invalid. We understand the GRR Study and EIS will depend heavily upon the results of the Alabama Barrier Island Restoration Assessment (ABIRA), which is a separate study also being managed by the Mobile District with no opportunity being provided for public involvement. Some members of Sierra Club have been told on more than one occasion that the ABIRA will be based on science. Such statements cause one to question whether previous work performed on the Mobile Harbor project and by the Mobile District may not have been based on science. We would hope and expect all work performed by the Mobile District would be based on sound scientific and engineering principals. The bottom line is, going forward in the GRR Study, the Mobile District should identify the entity that will be designated as the ultimate arbiter in deciding the scientific merits of the results of the ABIRA and the GGR Study, and who and how the designation of the "arbiter" is determined. This important issue should be resolved at the outset of the GRR Study to assure the public can have confidence in the scientific and engineering validity of the Study's eventual findings, conclusions, and recommendations.

Public Involvement. The Sierra Club understands the GRR Study time frame is 4 years. Since the information provided at the Scoping Meeting made no mention of a future public involvement program, we assume the Mobile District has no plans to conduct a proactive public information program as a component of the Study. The Sierra Club believes that because of the important environmental issues involved, some of which date back for decades, and the various resources and public constituencies that could be affected by enlarging the Ship Channel, the Mobile District should establish a Citizen Advisory Committee. Meetings with the Committee should occur to coincide with important internal decision points within the GRR Study, with the progress of work being shared with the Committee members and their opinions sought on appropriate issues. The Committee could serve as the nucleus of a public information program to help the Corps gage the pulse of the public on key issues that could prove to be controversial. In the absence of such a Committee, the Mobile District may insulate itself from the public by working with only the APSA and a few selected agencies, while the public would be kept uninformed. Without the proposed Committee, the next time the public will hear from the Mobile District will in all likelihood be when Draft EIS is released for review at the end of the 4-year study, well after most project formulation decisions will have been made. The Sierra Club believes such an approach is unacceptable since it indicates to the concerned public that the Mobile District is not sensitive to the concerns expressed during the Scoping Process. The Sierra Club would be willing to serve on the type of Committee recommended herein.

Scoping Report. Although it was not explicitly stated at the Scoping Meeting, the Sierra Club understands the Corps typically prepares a Scoping Report at the conclusion of the

Scoping Process. We also understand that the Scoping Report not only contains copies of the input received from the public, but also identifies: (1) the issues that will be addressed during conduct of the GRR Study and preparation of the EIS; and (2) those issues that will not be addressed with an explanation being provided as to why the Mobile District does not consider the eliminated issues to be relevant to the GRR Study. The Mobile Bay Sierra Club requests that it be included on the mailing list to receive a copy of the Scoping Report.

The Mobile Bay Sierra Club appreciates the opportunity to provide input into the Scoping Process for the Mobile Harbor Deepening and Widening GRR and EIS. We trust the Mobile District will consider the issues we have raised relevant to the Study and take appropriate actions to assure they are addressed during the conduct of the Study.

Sincerely yours,

A handwritten signature in cursive script that reads "Joseph Mahoney". The signature is written in black ink and is positioned below the "Sincerely yours," text.

Joseph Mahoney, Chair, Executive Committee
Mobile Bay Group Sierra Club

Comment # 73

February 8, 2016

Ms. Jennifer Jacobson
US Army Corps of Engineers
Mobile District, Planning & Environmental Division
Coastal Environment Team
PO Box 2288
Mobile, Alabama 36628-0001

RE: Public Notice: FP15-MH01-10

Dear Ms. Jacobson:

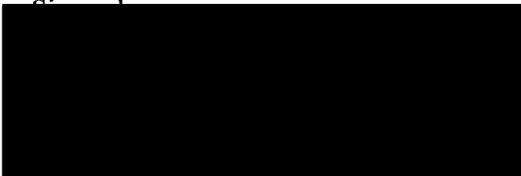
I am writing this letter as an update to my January 22, 2016 letter to Colonel Jon Chytka, Atten: CES-Pd-EC and referencing Public Notice FP15-MHH01-10 (letter is enclosed) to provide additional comments and concerns regarding the General Reevaluation Study and Environmental Impact Statement (EIS) to deepen and widen the Mobile Harbor Ship Channel. The comments in the January 22nd letter and these comments provided below should be considered when assessing the environmental impact of the Widening and Deepening of the Mobile Navigation Channel.

In the Final Supplemental Environmental Impact Statement (SEIS) Mississippi Coastal Improvements Program (MsCIP) Comprehensive Barrier Island Restoration project for Hancock, Harrison, and Jackson Counties, Mississippi, it is stated that the Mobile District is recommending the use Alabama Sand for the restoration of barrier islands in Mississippi. In the Executive Summary Section of the SEIS (page IX), it is specifically stated about the use of State of Alabama sand. In the section identified as **PBP-AL Borrow Areas** it references the **amount of sand to be excavated/dredged and used for Mississippi: PBP-AL West Option 1 (approx. 587 acres – 6.2 mcy of sand (fig 3-10) and PBP-AL East Option 1 (753 acres – 13.3 mcy of sand (fig 3-10).**

I disapprove and protest strongly against any removal of sand, a valuable resource, from the State of Alabama for the use in Mississippi when the Corps of Engineers dredging practices have resulted in a sand deficit of over 40 million cubic yards from the littoral system that has resulted in extreme shoreline erosion to Dauphin Island. If the dredged sand had not been deposited in open Gulf waters and had remained in the littoral system it would have helped to prevent the excessive shoreline erosion that has occurred to Dauphin Island over the past 40-50 years.

The sand in the borrow areas identified as **PBP-AL West Option 1 (approx. 587 acres – 6.2 mcy of sand (fig 3-10) and PBP-AL East Option 1 (753 acres – 13.3 mcy of sand (fig 3-10)** should be recommended in the Widening and Deepening of the Mobile Navigation Channel SEIS to address the sand deficit caused by maintenance dredging and to help restore the Shoreline of Dauphin Island.

Again I protest and object to any sale or use of the State of Alabama sand for restoration of a barrier island in Mississippi when a barrier island in Alabama, Dauphin Island, is in desperate need of sand to restore its eroded shoreline. This sand should be used to restore the shoreline of Dauphin Island.



Cc: Honorable Richard Shelby, Senator
Honorable Bradley Byrne, Congressman
Brigadier General C. David Turner, SAD
Jeff Collier, Mayor, Town of Dauphin Island
Domenic Carlucci, President, DIPOA

Enclosures

RE: Excerpt Executive Summary: Final Supplemental Environmental Impact Statement
Mississippi Coastal Improvements Program (MsCIP), Comprehensive Barrier Island Restoration
Hancock, Harrison, and Jackson Counties, Mississippi

Figure 3-10 showing Borrow sites

Figure ES-1 Project Area

January 22, 2016 public comments letter

Summary of Enclosures: This summary references some of the information used to provide the response for public input to the Corps of Engineers January 12, 2016 Public Scoping Meeting:

- 1. Pictures of Dauphin Island after Hurricane Camille and Frederic. Note the amount of sand on the shoreline. These hurricanes were devastating hurricanes but look at the amount of shoreline and houses compared with item #2 of the enclosures.**

Camille: Camille, based upon Saffir/Simpson a Category 5 storm and on August 17, 1969, Hurricane Camille roared out of the Gulf of Mexico and smashed into Mississippi's twenty-six miles of coastline. There were no records of winds near the eye of the storm, but estimates ranged up to 190 mph. The tidal surge reached an unprecedented height of 22.6 feet above mean sea level at Pass Christian and was nearly 6 feet above mean sea level as far east as Gulf Shores, Alabama (USACE 1970).

Frederic: Wednesday, September 12, 1979, making landfall at about 10 p.m. CDT, passing over Dauphin Island and crossed the coastline near the Alabama/Mississippi border. A wind gust of 145 miles per hour was measured on equipment atop the Dauphin Island Bridge. The bridge was destroyed. A wind gust of 139 mph was measured at the Dauphin Island Sea Lab before the equipment failed. A storm surge of 12 feet was observed in Gulf Shores.

- 2. Pictures of Dauphin Island: 2003, 2005, 2015**

February 2003: Picture shows view of Dauphin Island's West End with 3 tiers of lots/homes, but lacking shoreline.

August 2005: Picture post Katrina. View of Dauphin Island's West End. Note loss of two most seaward tiers of lots/home which indicates magnitude of land loss.

October 28, 2015: Remnant of Hurricane Patricia that hit Mexico. Note no shoreline and the severity of the erosion on the West End. This was a very low level storm that caused excessive over-wash of the gulf.

- 3. Aerial picture of Dauphin Island 1950's Note shoreline**

- 4. Aerial picture of Dauphin Island 1950's Note shoreline**

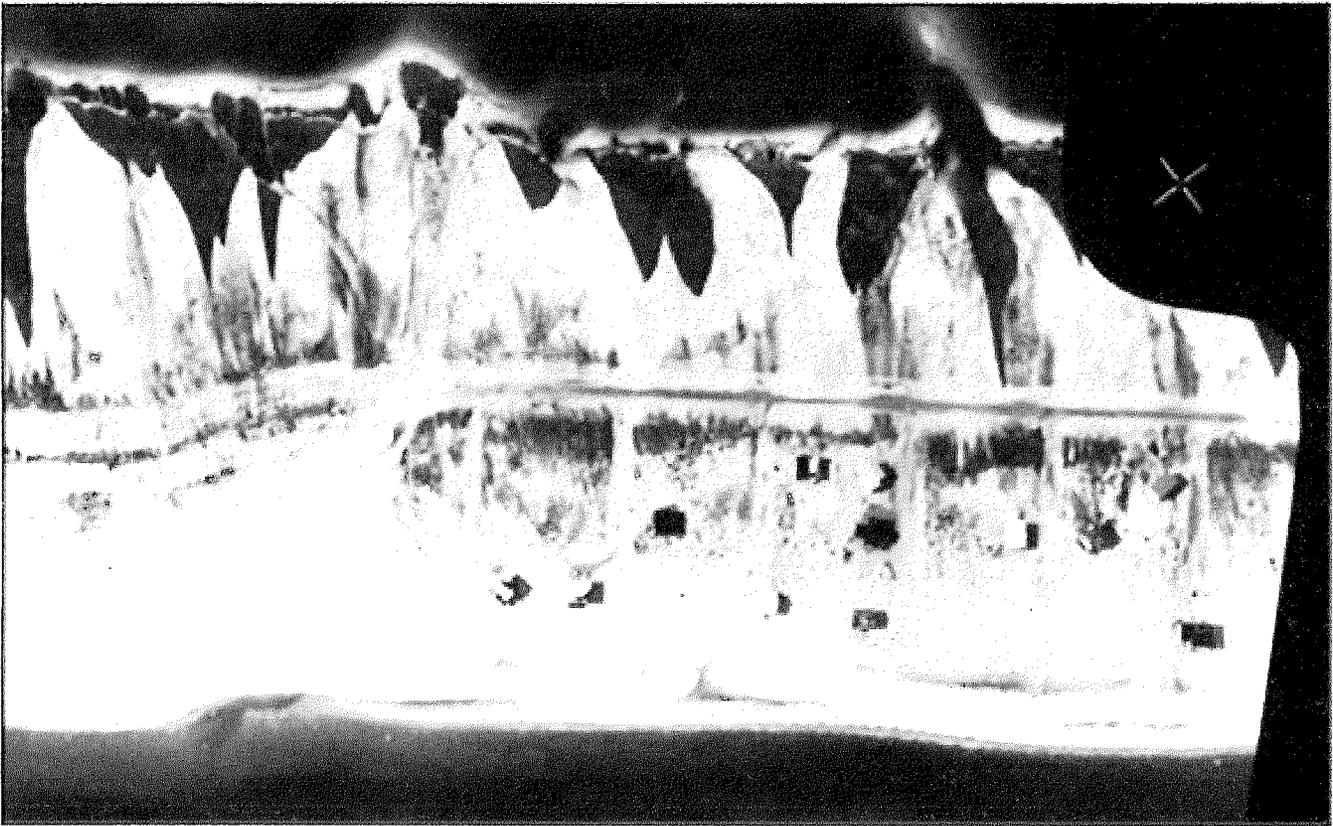
- 5. March 31, 2014 Dauphin Island Property Owners Association (DIPOA) Board of Director's letter to Col. Jon Chytka, Commander, Mobile District.** This letter spells out and conveys the serious concerns of the DIPOA Board of Directors over the manner in which the Mobile District of the Corps is complying with the National Environmental Policy Act (NEPA) in the preparation of the Limited Re-evaluation Report (LRR) for widening of the Mobile Harbor Ship Channel. The concerns are associated with the longstanding view held by many interests that maintenance of the Mobile Harbor bar channel is contributing to the significant shoreline erosion problems that have plagued Dauphin Island for the last several decades. And the intent of the Mobile District to conduct an Environmental Assessment as opposed to a Supplement to the original 1980 EIS, which, at the September 2009 Fairness Hearing, Dr. Susan Rees stated, in testimony, would be required if there was any expansion of the Mobile Ship Channel.

Contains Excerpts of Testimony of Dr. Susan Ivester Rees: September 15, 2009 Fairness Hearing, Mobile, Alabama; Questioned by Wells D. Burgess, US Department of Justice

- 6. October 1980 Survey Report on Mobile Harbor:** Title Page, Content Page, and Excerpt of document. The referenced October 1980 Corps EIS that was prepared to analyze the environmental effects of deepening and widening the ship channel gave no consideration at all to the potential effects to Dauphin Island of the project and specifically on the erosion of Dauphin Island.

7. **November 1985 Supplemental Environmental Impact Statement Mobile Harbor, Alabama, Channel Improvements Offshore Dredged Material Disposal. Includes record of Decision and Listing of Contents:** As with the October 1980 EIS, this EIS also does not give consideration to the potential effects to Dauphin Island of the project and specifically on the erosion of Dauphin Island due to dredging.
8. **Corps of Engineers 1978 Feasibility Report for Beach Erosion Control and Hurricane Protection:** Excerpts of this 1978 study signed by Charlie L. Blalock, Colonel, CE District Engineer, sets forth that Chief of Engineers recommendation to modify the present maintenance dredging of the Mobile Ship Channel according to the Selected Plan; states that one of the primary causes of shore erosion is maintenance dredging; states that the Nearshore Nourishment Plan should be implemented.
9. **Corps February 1987 Beneficial Use of Dredged Material, Sand Island Bar, Al Beach Nourishment, Berm Creation test:** This test, conducted offshore of Sand Island, Alabama at certain depth was to determine whether the sand would be retained in the nearshore zone or lost seaward. It showed indications of migrating northwest, but it was too far offshore to directly influence beach volumes....
10. **Corps Excerpt from MsCIP about Impacts to Mississippi Barrier Islands and Processes (6.3.2), 2009:** Principal causes of Mississippi barrier island erosion and land loss are frequent intense storms, a relative rise in sea level, and a deficit in the sediment budget. Of these causes, the one that experienced the greatest change over the last 100+ years is the reduction in sand supply related to dredging of navigation channels. (Morton 2007).
11. **December 15, 2011 US Army Corps of Engineers Mobile District Memorandum:** This elaborates on decision for the State of Alabama to receive information about available sand sources off of the Alabama Coast and selling sand to Mississippi and sand tests. USACE stated that USACE sand surveys that were provided for the sediment budget analysis were incorrect. The results were corrected and compared with uncorrected surveys. **This flawed data affected the Corps Byrnes 2008 & 2010 studies.**
12. **Summary of information concerning the Corps 2008 and 2010 Byrnes Studies:** This provides information about the sand sediment surveys that had incorrect data.
13. **Mobile Harbor Dredging History:** Summary of the Mobile Harbor Channel Dredging History that reflects how much dredged sand has been deposited to an Environmental Protection Agency's approved Ocean Disposal Area in the Open Gulf of Mexico.
14. **Fairness Hearing September 2009: Testimony of Jimmy Lyons, Alabama Port Authority.** This testimony discloses statements that Mr. Lyons made during the Fairness Hearing concerning the probability of the Widening and Deepening of the Mobile Ship Channel ever taking place. Excerpts of the testimony, at the Fairness Hearing, of Dr. Susan Rees, Corps of Engineers, are included in the letter providing input for the public scoping meeting.

A - Camille



B - Frederick

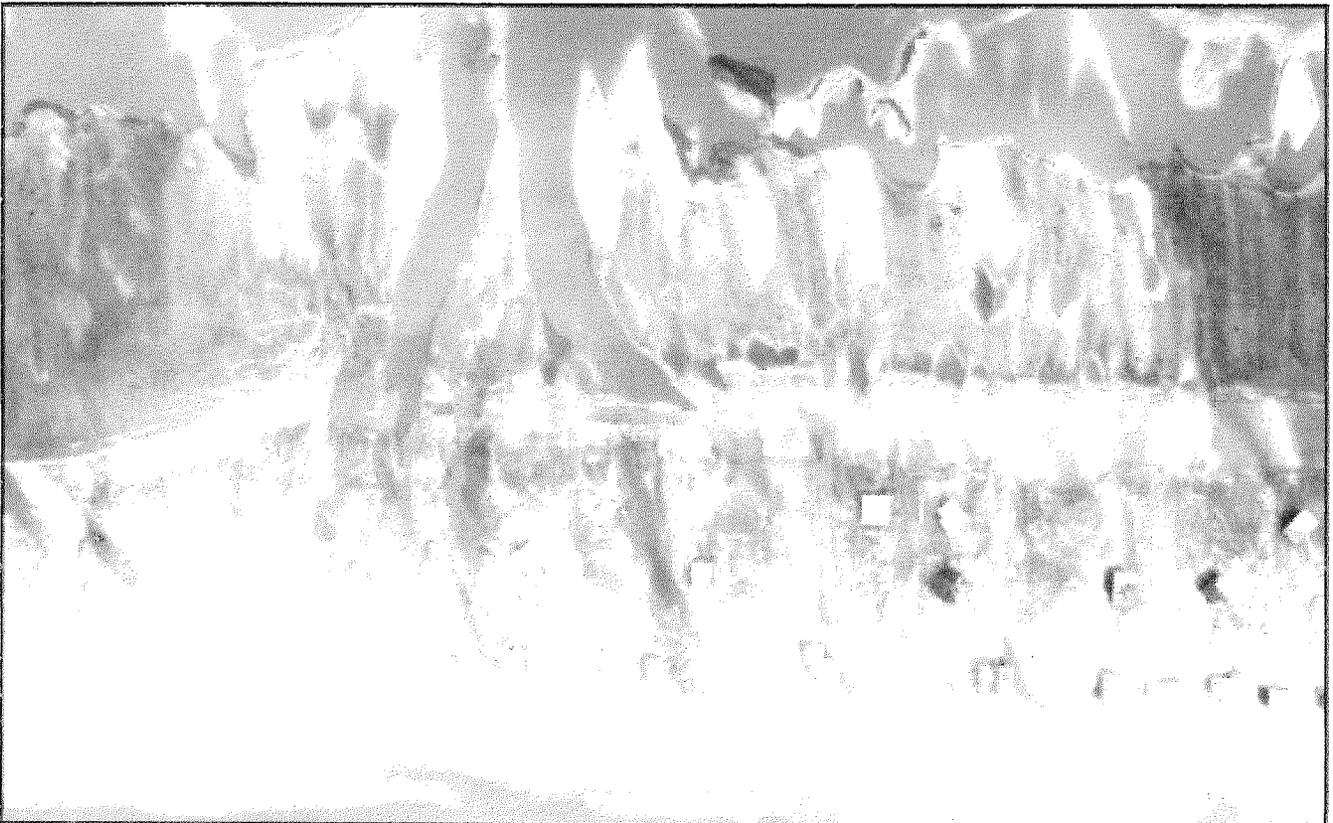


Figure 2-12. Surge channels and washover deposits on Dauphin Island follow Hurricanes *Camille* (A) and *Fredric* (B) (from Morton, 2007).

Dauphin Island



Figure B-15. February 2003 Condition of Dauphin Island's West End
(Note three tiers of lots on Gulf shore on right hand side of photo.)

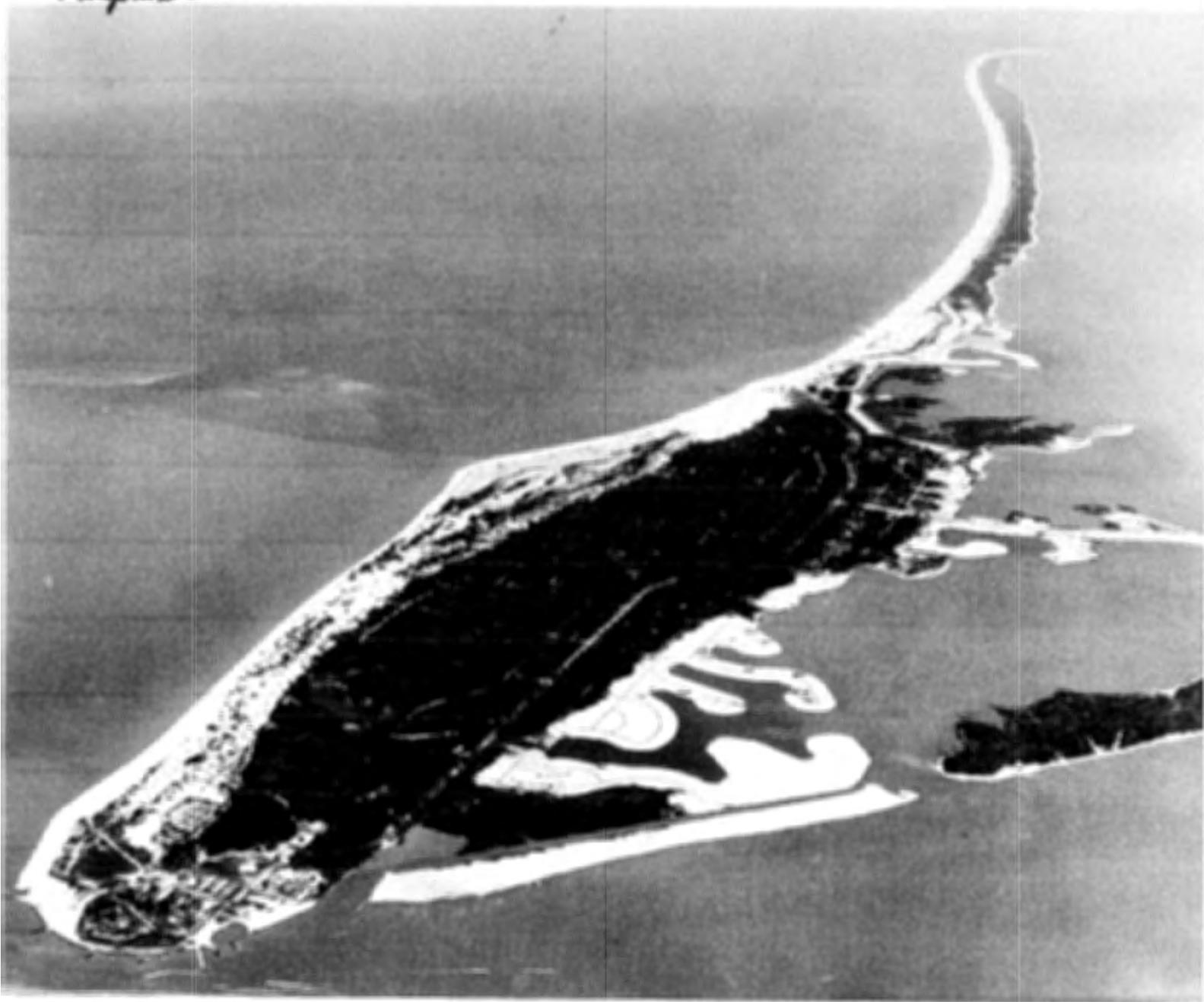


Figure B-16. August 2005 (Post Katrina) View of Island's West End
(Note loss of two most seaward tier of lots that indicate the magnitude of land loss.)



(Photo/Courtesy of Sam St. John | flythecoast.com) The severity of erosion of Dauphin Island's west end is evident in an aerial photo taken Oct. 28, 2015.

Seaplex Island 1950'



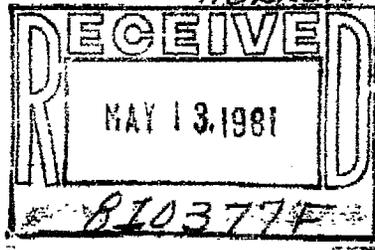
Danphin Island 1950's



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OCTOBER 1980



VOL. 1
1980 EIS

SURVEY REPORT

on

MAY 2

Mobile Harbor, Alabama



**United States Army
Corps of Engineers**
... Serving the Army
... Serving the Nation

Mobile District

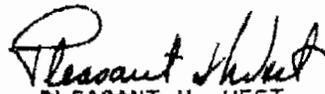
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SADPD-P (3 Nov 80) 1st Ind
SUBJECT: Mobile Harbor, Alabama - 55480

DA, South Atlantic Divison, Corps of Engineers, 510 Title Building,
30 Pryor Street, S.W., Atlanta, Georgia 30303 4 November 1980

TO: Board of Engineers for Rivers and Harbors, Kingman Building,
Fort Belvoir, Virginia 22060

I concur in the recommendations of the District Engineer.


PLEASANT H. WEST
Colonel, Corps of Engineers
Acting Division Engineer

FOREWORD

This feasibility report presents a recommended plan and detailed alternatives for navigation improvements at Mobile Harbor, Alabama. All plans are compared based on October 1978 cost and benefit data. The cost and benefits of the recommended plan have been updated to August 1980 price levels and construction time shown as four and one-half years. This information is available in attachment 1 of the Summary Report.

MOBILE HARBOR, ALABAMA
FEASIBILITY REPORT
CHANNEL DEEPENING FOR NAVIGATION

VOLUME INDEX

VOLUME 1

SUMMARY REPORT

- ATTACHMENT - BENEFIT AND COST UPDATE
- APPENDIX 1 - ENVIRONMENTAL IMPACT STATEMENT
- APPENDIX 2 - SECTION 404(b)
- APPENDIX 3 - PUBLIC VIEWS AND RESPONSES
- APPENDIX 4 - FISH AND WILDLIFE COORDINATION ACT REPORT

VOLUME 2

APPENDIX 5 - TECHNICAL REPORT

- SECTION A - THE STUDY AND REPORT
- SECTION B - RESOURCES AND ECONOMY OF STUDY AREA
- SECTION C - PROBLEMS AND NEEDS
- SECTION D - FORMULATION OF PLANS
- SECTION E - THE SELECTED PLAN
- SECTION F - ECONOMICS OF SELECTED PLAN
- SECTION G - DIVISION OF PLAN RESPONSIBILITIES

SUMMARY REPORT
MOBILE HARBOR, ALABAMA

FEASIBILITY REPORT
CHANNEL DEEPENING FOR NAVIGATION

TABLE OF CONTENTS

Item	Page
<u>INTRODUCTION</u>	1
STUDY AUTHORITY	2
SCOPE OF THE STUDY	2
STUDY PARTICIPANTS AND COORDINATION	3
OTHER STUDIES	3
THE REPORT AND STUDY PROCESS	5
<u>PROBLEM IDENTIFICATION</u>	6
NATIONAL OBJECTIVES	6
EXISTING CONDITION (PROFILE)	6
Principal Industries and Activities	6
Employment and Income	7
Transportation	8
Port of Mobile	8
Human Resources	12
Natural Resources	23
Ecology and Environmental Quality	25
CONDITIONS IF NO FEDERAL ACTION TAKEN (WITHOUT CONDITION PROFILE)	27
Demographic Aspects	27
Regional Growth	27
Community Growth	29
National Economic Development	29
Transportation	30
Projected Waterborne Commerce	30
Noise	31
Air Quality	33
Housing	33
Displacement of People	34
Aesthetic Values	34
Community Cohesion	34
History and Archaeology	34
Water and Land Use	34
Projected Recreation Uses	35
Environmental Effects	35

RECOMMENDED PLAN

In view of overall evaluation, design criteria and planning objectives, the plan defined herein as the Brookley Expansion Area and Gulf Disposal Plan No. 1 (Modified) is considered the best plan for implementation. This plan, in combination with other structural endeavors to improve water quality that were identified in the report as requiring additional model studies, will best solve existing problems and meet the needs of the study area.

The recommended plan was analyzed in light of the requirements set forth in Section 150 of the Water Resource Development Act of 1976 (Public Law 94-587) to determine the feasibility of establishing wetland areas by using disposal material. About 70 acres of wetlands will be created for mitigation. The establishment of additional wetlands as provided for in Section 150 is currently being studied under the Mobile Harbor operation and maintenance program.

Fill of any wetland or water areas for expansion of port facilities is environmentally undesirable. Also, the responsibilities outlined in Executive Order 11988 for evaluating potential effects of actions on flood plains were considered in this study; however, there are no practical alternatives to the Brookley area in the upper harbor if significant additional port development areas are to be provided. Consideration of the area adjacent to Brookley Industrial Complex for fill and development is consistent with plans that are supported by the city of Mobile and the Alabama State Docks Department. The area would be adjacent to deeper channels and could be easily connected with existing highway, rail, and intra-harbor cargo transfer facilities. Physically, the area is characterized by submerged and emergent dredged material deposition mounds, borrow

are pulled into the area as the result of the shadowing of river flow by McDuffie Island and remains of the Arlington Pier. Although recent recovery trends have been noted in the area, it continues to have persistently low dissolved oxygen in the borrow depression, and marine life and water quality have been degraded from years of pollution from the Garrows Bend area. During initial dike construction for the Brookley fill resulting turbidities would be unavoidable. However, upon closure of the peripheral dike, all disposal within the area would be controlled and the material permanently contained. Model tests to date do not indicate any significant effects of the Brookley fill on circulation in Mobile Bay although more detailed tests would be conducted before any actual construction would be undertaken.

A southwesterly slant of the southern side of the fill could minimize entrapping effects such as presently exist as the result of McDuffie Island. The Brookley site would be the most beneficial to port and economic development and would represent the least environmental loss when compared to other bay bottom areas within Mobile Bay. The recommended plan would also provide for an opening in the McDuffie Island causeway as a mitigative measure to further enhance water circulation and biological productivity in the Garrows Bend area.

Model tests of overall bay effects of the channel enlargement indicate a slight increase in the average salinity in the northeast quadrant of the bay and a slight reduction in the Bon Secour Bay area. It is unclear at this time whether the changes are the result of more or less freshwater in the respective areas. Further model tests and evaluations of these effects will be a part of any recommendations for enlargement of the Mobile Harbor Channel. In view of the extreme natural fluctuations of Mobile Bay between fresh and saline conditions, assessments of the small variations in the averages have been inconclusive as to whether net impacts may be beneficial or adverse.

Essentially all material from past dredging of navigation channels in Mobile Bay has been deposited in open waters adjacent to the ship channel. Physical buildups have occurred in the upper portion of the bay but little long-term effects are indicated in the lower bay. The effects of these operations on the chemistry of the bay have been the subject of much hypothesis and conjecture. However, little scientific data exist to support any firm conclusions. Regardless of the available data that indicates only minor impacts of estuarine open-water disposal of dredged material, many agencies and other interests advocate deep ocean or gulf disposal of dredged material. Gulf disposal is recommended for most of the new work and all future maintenance for Mobile Harbor, although we have limited data on potential gulf impacts at this time. The data limitations are largely due to the still-emerging criteria for evaluating ocean disposal impacts. However, all appropriate studies would be accomplished before any ocean disposal of new work is initiated. In the interim much of the needed studies and evaluations may be accomplished by our dredged material disposal study for Mississippi Sound and Adjacent Areas. The scope of that study will include an evaluation of the impacts of both ocean and estuarine open-water disposal with either remaining a future option depending upon more detailed study outcomes.

Modification of the US Highway 90 Causeway across Mobile Bay will require additional studies in order to identify this measure as the most cost effective and environmentally desirable method of mitigating the loss of bay bottom taken for the Brookley expansion area.

Overall, many long-term and complex investigations have been performed in connection with our studies for Mobile Harbor. This information indicates that modifications to the recommended plan can be made within the scope of work identified in this study to correct or mitigate environmental damage related to the proposed harbor

improvements. However, due to the complexity of the affected resources, increasing knowledge of water resource behavior and changing policies and legislation regulating the planning process, additional studies will be required before some of the recommended harbor modifications can be identified in detail.

IMSAND 7

Filed w/ EPA
21 Feb 1986

FINAL

SUPPLEMENTAL ENVIRONMENTAL IMPACT STATEMENT

MOBILE HARBOR, ALABAMA, CHANNEL IMPROVEMENTS

OFFSHORE DREDGED MATERIAL DISPOSAL



**US Army Corps
of Engineers**
Mobile District

NOVEMBER 1985

RECORD OF DECISION
MOBILE HARBOR CHANNEL IMPROVEMENTS
MOBILE COUNTY, ALABAMA

I have reviewed the Corps of Engineers' Final Feasibility Report, the Chief of Engineers' Report and Environmental Impact Statement addressing the need to provide deep-draft navigation improvements to Mobile Harbor. Based on the review of these documents and associated correspondence received in response to coordination of these documents, the plan recommended by the Chief of Engineers was found to be needed, technically sound, economically justified and in the public interest, and was subsequently authorized by Congress in P.L. 99-88. This Record of Decision describes the project as authorized by PL 99-88. P.L. 99-662 would eliminate the Brookley disposal area and may require a supplement at a later date. This would not affect the first phase of project construction or the Local Cooperation Agreement. The authorized plan of improvement provides that Mobile Harbor be modified to provide deep-draft navigation improvements by constructing and maintaining the following:

*. Deepen and widen the entrance channel over the bar to 57 by 700 feet, a distance of about 7.4 miles to the mouth of Mobile Bay.

*. Deepen and widen Mobile Bay Channel to 55 by 550 feet from the mouth of Mobile Bay to a point about 3.6 miles south of Mobile River, a distance of about 27.0 miles.

*. From the above point south of Mobile River, deepen and widen an additional 4.2 miles of Mobile Bay channel to 55 by 650 feet.

*. Provide a 55-foot deep anchorage area and a 55-foot deep turning basin in the vicinity of Little Sand Island just south of the Interstate 10 Highway tunnel.

*. construct a 1,710-acre diked industrial expansion area from dredged material disposal adjacent to the Brookley industrial complex.

The project involves dredging and disposal of about 141.2 million cubic yards of new work material as well as all future maintenance material for a 50-year economic life. Of this total, approximately 63.4 million cubic yards of new work material in the upper bay reach would be excavated and placed in the 1,710-acre diked bay disposal area to be constructed in the vicinity of the Brookley waterfront area. Construction of the lower bay reach and bar channel would involve removal of about 77.8 million cubic yards of material with placement in a Gulf disposal area approved by the Environmental Protection Agency. All future maintenance material will be transported to this approved site for disposal.

The improvements for Mobile Harbor may be phased in justifiable increments, related to priority of needs and the local sponsors' willingness to participate.

From (name) C. W. ... Ofc Symbol CWP-5 Telephone No. (202) 272-0137
To (name) Mc Donald Ofc Symbol SAM Telephone No. 205-622-2122 pages 3

The Mobile Harbor Deep Draft Navigation project will be cost shared in accordance with provisions authorized by Congress.

Along with a no-action plan, alternatives considered included changes in the width and depths of the existing channels and various methods of excavation and disposal of dredged material. Dredged material disposal alternatives included: constructing islands and fill areas in upper and lower Mobile Bay, open-water disposal in the bay and/or gulf, upland disposal, disposal in existing disposal sites after recycling material from these areas for off-site uses, and shoreline nourishment to abate erosion. These plans are described in the Corps of Engineers reports.

All practicable means to avoid or minimize environmental harm from the authorized plan will be adopted. Anticipated adverse impacts due to the establishment of the Brookley disposal area will be offset to a large extent by the recommended environmental mitigation measures contained in the Chief of Engineers' Report. Other potential environmental improvement measures will be studied prior to project implementation to determine their technical feasibility and cost effectiveness.

The social and environmental concerns for the authorized plan and alternative plans have been evaluated and coordinated with Federal, state and environmental agencies and the public. The proposed discharge of dredged material into the Brookley disposal area has been specified in accordance with the 404 (b) (1) guidelines. The dredged material proposed for discharge into a gulf disposal site has been evaluated in accordance with 11 January 1977 Ocean Dumping Criteria, developed pursuant to the Marine Protection, Research and Sanctuaries Act of 1972. The authorized plan is in full compliance with the National Environmental Policy Act; the Clean Air Act; the Clean Water Act; the Fish and Wildlife Coordination Act; the Coastal Zone Management Act; the Endangered Species Act; National Historic Preservation Act; the Marine Protection, Research and Sanctuaries Act; and Executive Orders 11988 and 11990. Certification of compliance with the Coastal Zone Management Program was granted by the State of Alabama for an indefinite period conditioned upon the continued compliance with the management program and the development of an acceptable mitigation plan.

The adverse effects of the plan recommended by the Chief of Engineers have been minimized to the extent practicable, and the proposed action is consistent with national policy, statutes and administrative directives. The total public interest would best be served by the implementation of navigation improvements to the Mobile Harbor Project as authorized by Congress. Phased or incremental improvement is an acceptable and prudent approach toward achieving the overall plan in which each phase is incrementally justified and meets all requirements for environmental compliance. The original decision document was preempted by Congressional authorization (P.L. 99-88). This record of decision completes the NEPA process.

8 Jan '87
DATE

H. J. Hatch
FOR H. J. Hatch
Major General, USA
Director of Civil Works

TABLE OF CONTENTS

		<u>Page</u>
	LIST OF FIGURES.....	iv
	LIST OF TABLES.....	v
	LIST OF APPENDICES.....	vii
	ABSTRACT.....	I
	FINDINGS AND CONCLUSIONS.....	II
SECTION 1	INTRODUCTION	
	1.1 Purpose.....	1-1
	1.2 Objectives.....	1-2
	1.3 Summary.....	1-2
SECTION 2	SITE SELECTION CRITERIA	
	2.1 Geographical Position, Depth of Water and Distance From Coast.....	2-1
	2.2 Location in Relation to Breeding, Spawning, Nursery, Feeding, or Passage Areas of Living Resources in Adult or Juvenile Phases.....	2-1
	2.3 Location in Relation to Beaches and Other Amenity Areas.....	2-13
	2.4 Types and Quantities of Waste Proposed to be Disposed of, and Proposed Methods of Release, Including Methods of Packing the Waste if Any.	2-14
	2.5 Feasibility of Surveillance and Monitoring....	2-18
	2.6 Dispersal, Horizontal Transport, and Vertical Mixing Characteristics of the Area Including Prevailing Current Direction and Velocity.....	2-19
	2.7 Existence and Effects of Current and Previous Discharges and Dumping In The Area, Including Cummulative Effects.....	2-19
	2.8 Interference with Shipping, Fishing, Recreation, Mineral Extraction, Desalination, Fish and Shellfish Culture, Areas of Special Scientific Importance, and Other Legitimate Uses of the Ocean.....	2-24
	2.9 The Existing Water Quality and Ecology of the Site, as Determined by Available Data or by Trend Assessment or Baseline Survey.....	2-27
	2.10 Potential for Development or Recruitment of Nuisance Species in the Disposal Site.....	2-33
	2.11 Existence at or in Close Proximity to the Site of Any Significant Natural or Cultural Features of Historical Importance.....	2-33

TABLE OF CONTENTS (Continued)

	<u>Page</u>
SECTION 3	RESULTS AND DISCUSSION
3.1	Introduction..... 3-1
3.2	Hydrography and Bathymetry..... 3-1
3.3	Sediments..... 3-4
3.3.1	Grain Size..... 3-4
3.3.2	Nutrients..... 3-5
3.3.3	Heavy Metals..... 3-8
3.3.4	Pesticides and PCB's..... 3-14
3.3.5	High Molecular Weight Hydrocarbons..... 3-14
3.3.6	Oil and Grease and Total Organic Carbon..... 3-21
3.4	Water..... 3-23
3.4.1	Metals..... 3-23
3.4.2	Pesticides and PCB's..... 3-25
3.4.3	High Molecular Weight Hydrocarbons..... 3-29
3.5	Tissue..... 3-29
3.5.1	Introduction..... 3-29
3.5.2	Metals..... 3-29
3.5.3	Pesticides and PCB's..... 3-33
3.5.4	High Molecular Weight Hydrocarbons..... 3-35
3.6	Elutriate Analyses..... 3-41
3.6.1	Metals..... 3-41
3.6.2	Pesticides and PCB's..... 3-44
3.6.3	High Molecular Weight Hydrocarbons..... 3-49
3.7	Benthic Macroinvertebrates..... 3-49
3.8	Comparison of Survey Sites Sediment Quality to Proposed Dredged Material Quality..... 3-52
3.8.1	Sediment Texture..... 3-52
3.8.2	Nutrients..... 3-52
3.8.3	Metals..... 3-54
3.8.4	Elutriates..... 3-54
SECTION 4	METHODS AND MATERIALS
4.1	Introduction..... 4-1
4.2	Site Location and Navigation..... 4-1
4.3	Sample Collection Techniques..... 4-1
4.3.1	Water..... 4-1
4.3.2	Sediments..... 4-2
4.3.3	Tissue..... 4-4
4.3.4	Water and Sediment - Elutriate Analysis 4-4
4.4	On-Board Recordkeeping..... 4-4
4.5	Bathymetry and Hydrography..... 4-5
4.6	Sediments..... 4-5
4.6.1	Grain Size..... 4-5
4.6.2	Nutrients..... 4-5
4.6.3	Heavy Metals..... 4-6
4.6.4	Pesticides and PCBs..... 4-6
4.6.5	Oil & Grease..... 4-6
4.6.6	Total Organic Carbon..... 4-6
4.6.7	High Molecular Weight Hydrocarbons..... 4-6

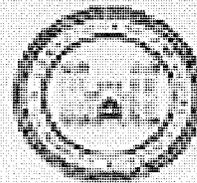
TABLE OF CONTENTS (Continued)

	<u>Page</u>
4.7 Water.....	4-7
4.7.1 Total Suspended Solids.....	4-7
4.7.2 Metals.....	4-7
4.7.3 High Molecular Weight Hydrocarbons.....	4-8
4.7.4 Pesticides and PCBs.....	4-8
4.8 Tissue.....	4-8
4.8.1 Metals.....	4-8
4.8.2 High Molecular Weight Hydrocarbons.....	4-8
4.8.3 Pesticides and PCBs.....	4-8
4.9 Preparation of Elutriate Samples.....	4-9
4.10 Method Validation and Quality Control.....	4-9
4.10.1 Methods Validation.....	4-9
4.10.2 Quality Control.....	4-10
SECTION 5 REFERENCES.....	5-1

MOBILE COUNTY, ALABAMA
(Including Dauphin Island)



FEASIBILITY REPORT FOR
BEACH EROSION CONTROL
AND
HURRICANE PROTECTION



SEPTEMBER 1974 126

1978 Corps study about Dauphin Island

204. Studies *herein* indicate that the only acceptable measures that would be economically feasible that would partially resolve any of the flooding or erosion problems of the area would be the nearshore Nourishment Plan defined herein as The Selected Plan. This plan would produce net economic benefits, is considered environmentally acceptable and subject to EPA approval of the disposal site designation, could be implemented under the authority of the Chief of Engineers for operation and maintenance of Mobile Harbor without additional authority from the Congress. Accordingly, the District Engineer recommends that the Chief of Engineers modify the present maintenance dredging practice for the entrance channel to Mobile Harbor to conform to the procedures outlined herein for the Selected Plan as soon as practical with such other modifications as he may deem appropriate.


LL

CHARLIE L. BLALOCK
Colonel, CE
District Engineer

183. The principal causes of shore erosion along the westernmost 11 miles of Dauphin Island are attributable to rise in *sea* level and maintenance dredging of the Mobile Bay entrance channel. Based on sea level stages recorded at Biloxi, Mississippi, the rates of rise of sea level between 1896 and 1972 and between 1940 and 1972 were .009 feet per year and .012 feet per year respectively. These data are shown on Place II. Per Brunn, in the reference, Sea-Level Rise as a Cause of Shore Erosion, proposed the following formula for computing the rate of shoreline recession from the rate *of* sea level *rise*:

108. By letter, dated 21 July 1975, the Mobile County Commission, it was proposed that, in view of the indications from the workshop meeting, the ongoing beach erosion and hurricane study for Mobile County should be terminated. The Commission was also advised that the feasibility of placing dredged material from the Mobile ship channel onto the eroding shore would be pursued as part of the ongoing survey study for modifications of the existing Federal Navigation Project for Mobile Harbor. By letter, dated 1 October 1975, the Mobile Commission advised the District Engineer that the Commission concurred with the action stated in the 21 July 1975 letter.

110. In a letter dated 11 February 1977, the Mayor of Mobile requested that the Corps of Engineers investigate the feasibility of providing hurricane protection for the City of Mobile and shoreline erosion protection for the western shoreline of Mobile Bay. It was suggested that hurricane protection could be provided by construction seawalls or a series of ungated barriers strategically positioned in the Bay.

169. Effect assessment identifies the effects of all considered plans to determine the impacts that can be expected. Further, Section 122 of **Public Law 91-611 supplements and extends the requirement of the National Environmental Policy Act of 1969 (PL 91-190)** by requiring that the **effect assessment identify the economic, social, and environmental factors associated with plans under consideration.** Section 404 of **Public Law 92-500 and Section 103 of Public Law 532 also requires that certain impacts on water quality be investigated and quantified before undertaking any action involving the discharge of dredged material into waters of the United States or ocean waters.** Further criteria are established by Executive Orders 11990 and 11988 which direct that all **Federal water resource planning minimize destruction, loss or degradation of wetlands and development in the flood plain.** Therefore, the effect assessment process is carried out to assure that all **significant effects have been identified and their impacts evaluated.** A **summary of the effects of the considered plans is given in the following paragraphs.**

116. Socioeconomic and Environment Criteria - The criteria for socioeconomic and environment consideration in water resource planning are prescribed by the National Environmental Policy Act of 1969 (PL 91-190), section 122 of the River and Harbor and Flood Control Act of 1970, (PL-611), and Section 404b of the Federal Water Pollution Control Act Amendments of 1972. The criteria prescribed that all significant adverse and beneficial economic, social and environmental effects of planned developments be considered and evaluated during formulation.

175. The No Action Alternative perceives a continuation of present conditions and practices without any provisions to reduce potential hurricane flooding or occurring beach erosion. Under this alternative

dredged material would continue to be deposited in the closest suitable area to the entrance channel. No monetary or other resources would be expended to transfer the dredged material to Dauphin Island's littoral system, and erosion along the western end of the island could be expected to continue at its present pace. Erosion would continue to claim valuable property on the island, ultimately causing hard-ships for island property owners and a lessening of the area's attractiveness for recreational activities.

176. The Nearshore Nourishment Plan should significantly reduce the present rate of erosion along the western 11 miles of Dauphin Island producing a net savings in land values over the additional cost for implementing the plan, While not eliminating, it would delay the ultimate effects of the No Action Plan. The savings realized from the Nearshore Nourishment Plan should be beneficially of National economic development; local property values, employment, business activities, **tax** revenues, and general *economic* growth; public services and facilities; natural and manmade resources; recreation and aesthetic values; and community and regional cohesion **and growth**. The plan should have no effects on air quality, noise, known archaeological remains, municipal water supply, or threatened or endangered species. As previously noted the Nearshore Nourishment Plan would have temporary, adverse effects on water quality, benthic life, fisheries, and other marine life similar to the present (No Action Plan) method of operations. No known vegetation or wetlands other than submerged bottoms would be affected. The plan is considered acceptable to local interests and would be completely reversible. It is reasonably certain **that** benefits for the considered plan will be achieved; however, the effectiveness of the considered plan cannot be fully documented. The area of geographical impact would be limited to the southern shoreline **of** Dauphin Island and adjoining offshore waters.

Sand Island Bar, AL

Beneficial Uses:	Beach Nourishment, Berm Creation
Lead Agency:	<u>Mobile District, South Atlantic Division</u>
Placement Date(s):	February 1987
Location:	4 miles (6.5 km) south of the eastern end of Dauphin Island and 1.5 miles (2.5 km) west of the Mobile Bay entrance channel.
Placement Method:	Split-hull, shallow draft hopper dredge
Substrate Type:	Sand (0.22 mm)
Energy Source:	Open ocean (Gulf of Mexico)
Project Size:	<i>Volume: 464,000 cy (355,000 cu m); Length: 6000 ft (1,830 m); Width (crest): 150 ft (46 m); Thickness: 6 ft (2m); Side Slopes: 1V:25H; End Slopes: 1V:20H to 1V:50H; Plan View: L-shaped; Water Depth: 20 ft (6 m)</i>
Monitoring:	Parameters measured included bathymetry, sediment samples, side-scan sonar.
Comments:	This test, conducted in 1987 offshore of Sand Island, Alabama, expands experience using fine sand in intermediate depths, i.e., below depths where onshore transport has already been demonstrated, but shallow enough for potential movement. The major question is whether sand at this depth will be retained in the nearshore zone or lost seaward. The berm showed indications of migrating northwest. It was too far offshore to directly influence beach volumes, but the sand was apparently becoming part of the littoral system.

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1 unnecessary or undue reduction of wilderness values, and applying the "minimum requirement"
2 concept of the 1964 Wilderness Act to all proposed projects involving these islands.

3 Based on federal statutes such as the National Park Service Organic Act and the Seashore's
4 enabling legislation, NPS Management Policies, and management plans, the NPS is mandated to
5 preserve and protect the natural conditions and processes affecting the barrier islands, and to
6 preserve the significant cultural resources existing on the islands. In addition, the Seashore's
7 enabling statute directs that beach erosion control measures and spoil deposition activities in the
8 park undertaken by the U.S. Army Corps of Engineers must be carried out in a manner that is
9 acceptable to the NPS and consistent with the park's purposes (16 U.S.C. § 459h-5). NPS decision-
10 making must also integrate the results of scientific study (16 U.S.C. § 5936).

11 **6.3.2 Impacts to Mississippi Barrier Islands and Processes**

12 Net longshore sand transport is from east to west along the Mississippi barrier islands, although
13 local reversals in the net transport occur adjacent to the tidal passes. Based on analysis of
historical

14 shoreline and bathymetry data, Ship Island is the terminus to the longshore sand transport system in
15 this region. Modern Cat Island beaches, located west of Ship Island, appear to be affected by littoral
16 processes not directly related to those of the islands to the east. Thus, the regional shortage of
17 littoral sand for barrier island maintenance is best observed at Ship Island (Rosati et al., 2007).

18 Between the late 1840s and 2005, all of the Mississippi barrier islands managed by the NPS have
19 eroded and migrated appreciably. Petit Bois Island lost about 56% of its surface area, Horn
Island

20 lost approximately 24%, East and West Ship Islands have cumulatively lost about 64%, and Cat
21 Island lost approximately 26% (Morton, 2007). Furthermore, island erosion rates have increased
22 more than three fold between 1847 and 2000/2002. For example, Ship Island lost about 0.9
23 hectares/year between 1848 and 1917, increasing to approximately 2.5 hectares/year between
1917

24 and 2000 (Rosati, et al., 2007). Additionally, *between* 2000 and 2005, a period of significant storm
25 events, the Ship Islands lost about 22 hectares/year (Morton, 2007). In 1847, Ship Island had a
26 surface area of approximately 603 hectares (Rosati, et al., 2007), but by 2005 the total surface
area

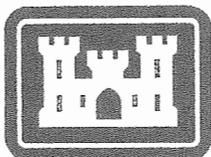
27 for East and West Ship Islands had decreased to about 216 hectares (Morton, 2007).

28 The principal causes of Mississippi barrier island erosion and land loss are frequent intense storms,
29 a relative rise in sea level, and a deficit in the sediment budget. Of these causes, the one that
30 experienced the greatest change over the last 100+ years is the reduction in sand supply related to
31 dredging of navigation channels through the outer bars of the tidal inlets near the islands (Morton
32 2007). According to Rosati et al. (2007), maintenance dredging operations conducted between
1897

33 and 1948 in the Horn Island Pass Outer Bar Channel removed sediment at a rate of approximately
34 34000 cubic yards per year (cy/yr). After the channel was modified to 38-feet deep by local interests
35 in 1949 at their expense, maintenance dredging quantities continued to increase as authorized
36 channel depths increased. Maintenance dredging rates increased to 161,104 cy/yr in 1949-1965,
37 increased again to 515,320 cy/yr in 1965-1993, and decreased to a rate of 245,483 cy/yr in
38 1993-2005.

39 Therefore, between 1909 and 2005, a total of approximately 22 million cubic yards of sand were
40 removed from the Horn Island Pass Outer Bar Channel by maintenance dredging (Rosati et al.,
41 2007). Much of the sand dredged from the outer bar channel during maintenance dredging
42 operations likely originated from littoral zone transport east of the channel. Offshore disposal of
sand

43 dredged during channel maintenance operations conducted in the past may have removed such
44 sand from the barrier island sediment budget downdrift of the channel. However, a detailed analysis



MEMORANDUM

US Army
Corps of Engineers
Mobile District

DATE: 15 December 2011

SUBJECT: Mississippi Coastal Improvements Program Comprehensive Plan - Multi-Agency Working Group
LOCATION: Teleconference
TIME: 10:00 am – 11:00 am CDT

1. Introduction:

a. Attendees.

U.S. Army Corps of Engineers (USACE), Mobile District: Justin McDonald, Elizabeth Godsey, Megan Alesce, Michael FitzHarris, Tom Smith, Susan Rees, and Larry Parson.

USACE Engineering Research and Development Center (ERDC): Alison Sleath

Mississippi Department of Marine Resources (MDMR): Jeff Clark and Jan Boyd

National Park Service (NPS): Bruce McCraney, Jolene Williams, Steve Wright, Rick Clark, Pam Marsh, Rebecca Beavers, and Jodi Eshleman

CH2MHill: Steven Layman and David Stejskal

U.S. Fish & Wildlife Service (USFWS) – Paul Necaize

Applied Coastal Research & Engineering – Mark Byrnes

University of Southern Mississippi – Mark Peterson

USGS - Mickey Plunket.

NMFS - Mark Thompson

David Spatk
Nick Windstead
Jody NPS
Todd Slack
Alision Sleath

USGS - ???
Jolene and Pam Gulf Islands
Barry Vittor
Linda York
NPS
Andy Sanderson Mississippi Science Museum

Any problems getting agenda let us know. Some have had issues.

2. Barrier Island Restoration:

a. North Shore West Ship Island Restoration:

USACE (*Justin McDonald*): The contractor is approximately 65% – 70% complete with the dredging/placement work at West Ship Island. The work is taking longer than originally anticipated due to bad weather conditions. He was only able to dredge for 6 or 7 days in the month of November. The work is anticipated to be finished early next year. The contractor estimates that the work can be completed in 2.5 weeks if the weather cooperates. Draft plans and specs have also been completed for the revegetation contract. USACE is currently working with NPS to finalize this plan.

At stat 62 430,000 cy placed and accepted. Apprxo, 75% complete with work. Started back last night. Not sure either last night or two day should have 4 to 5 days of good weather.

Barrier holding up really well. Can't see barrier but good photos of the progression. Will send out whole group.

P&S for west ship island north shore. Design complete within the next few weeks. Garry Hopkins and Jolene working with on P&S. Mid to later part of March for work. 1st will place sand fencing to start establishing dunes. Plant stock from Mississippi. Will come from other islands other than ship. Discussed on Tuesday beside area of west ship east ship and western end of horn island as discussed with Jolene and garry. Looking to start planting this fall 350,000 plants.

Jolene - Question related to sand. Looking to pull from another borrow source?

No same channel just deeper. Susan says 34 plus 2 plus 2. Originally 34 eliminated. 0+00 to 9+00 not suitable material on western side. We are confident on stat 9+00 and 19+00. 70,000 to 80,000 left to -34. He was asking to go west we said no lets just go deeper since this is shoaled material. Have directed josh to stop contractor is we hit unsuitable material.

b. Camille Cut and East Ship Island Restoration:

USACE (*Justin McDonald*): No additional information to report on the design of Camille Cut and East Ship Island restoration at this time. USACE is currently working on providing Patty

Powell, the Director of the Alabama Department of Conservation and Natural Resources, the information she requested which shows all of the available sand sources off the coast of Alabama. This effort should be complete by the end of next week. USACE will deliver this information to Patty the first week of January and hopes to have a final decision from Alabama by the end of January. USACE will begin preparing plans and specs the first phase of the Camille Cut and East Ship Island Restoration once the Alabama sand issue is resolved.

USACE met with NPS and CH2MHill last week to discuss the Wetlands Statement of Findings (WSOF). USACE is currently working on computing the impacted areas for the WSOF. This effort should be complete next week.

Kick off meeting phase 1 plans and specs last week. Some work to be done to get go head from state of Alabama to get sand from petit bois.

Data base and report wrapping up this week will discuss with patty Kelly next week to discuss.

Will proceed with SEIS and plans and specs if go ahead from state is received.

Wetland statement of findings - Camille Cut. Equilibrium of DA 10.

Jetty on south side west end. Barrier on south side on west ship. Groin?// Current no plans for groin or jetty on west south end of ship.

c. Cat Island East Beach Restoration status:

USACE (*Justin McDonald*): As discussed at last month's meeting, a preliminary Cat Island restoration plan has been developed which includes the placement of approximately 1.8 MCY of sand with approximately 2.1 MCY from an offshore borrow area. The average cut depth in the borrow area is approximately 5 feet. The fill elevation along the eastern face from the northern and southern tip is approximately +5 feet NAVD88 with the northern segment including a foredune with an elevation of approximately 7.5 feet NAVD88. USACE is currently working on computing the impacted areas for the Wetland Statement of Findings for the NPS. This effort should be complete next week.

Draft design and borrow area design. BP still owns. Wetland statement of findings completed.

d. Upland River Sand Field Test – Located at the east end of Dauphin Island:

USACE (*Megan Alesce*): Sampling event #10 has been completed, except for the hydrographic survey portion, and the sand appears to be lightening up. The hydrographic survey for sampling event #10 has not been performed yet due to the bad weather but it should be completed soon. USACE will start computing the quantity change for each sampling event this month and the information can be provided to those who are interested. The PowerPoint presentation will be updated this month as well.

EPA – SEIS update - Larry mentioned next version of preliminary draft. Is there a schedule. Larry no waiting on the state of Alabama. Would not be before the end of Feb. Stated Susan.

Todd met on 5th of January. Gulf sturgeon update at that time had 21 receivers on 20th of Sept in pass Camille cut and either ends. 11 gs. Recorded at ship 4 from peral 3 black 3 pascagoula 1 blackwater.

At that time no 13 gulf stergon with 1 additional from black and Pascagoula. 7731 decetions. We are seeing hits on all receives but go hot spots on end of islands and in the pass.

Turbidity and dredging records provided from Mobile.

LTMP - Mickey Don sends her regards. Alyssia science coordinator for ecosystem she sits in dons position. Mickey is holding this for the time. All review comments on the draft plan. Short work week . Scanned over the comments. The significant portion of the adaptive management piece.

No supprises. Setting aside next week to go through the comments.

Susan and Justin would like to get with you to discuss water quality and wave direction mointoring. Any questions on item 12?

Any other comments or questions.

USACE (*Justin McDonald*): Asked NPS if they had been to the site to see the sand.

NPS (*Jolene Williams*): Said they went to the site and the sand still looked to orange.

e. Geotechnical Report:

USACE (*Michael FitzHarris*): No work has been completed this month because he was pulled off the report to work on the Alabama sand location database. He plans on getting back to work on the report after the first of the year.

f. Sediment Budget Update:

Applied Coastal (*Mark Byrnes*): The final sediment budget report has been completed and will be published by ERDC during the first quarter of next year.

USACE (*Justin McDonald*): Stated that the USACE surveys that were provided for the sediment budget analysis were incorrect. They have been corrected and a comparison of the corrected and

uncorrected surveys is being performed to determine the magnitude of the difference. The results will be provided to Mark Byrnes so that he can decide if any additional analysis is needed to correct for the "busted" USACE surveys.

Applied Coastal (*Mark Byrnes*): He used mostly the USGS data, not the USACE data, so he doesn't think that there will be an issue.

f. ERDC Modeling Update:

ERDC (*Alison Sleath*): All storm runs have been completed on the recommended alternative. ERDC is currently finalizing the draft report and will have it ready for USACE (Mobile) review by the end of the year.

g. Delft 3D Modeling Update:

USACE (*Elizabeth Godsey*): Work under task 3 Evaluation of barrier island restoration alternatives of the current Task Order is almost complete. They anticipate being complete on January 5, 2012. Work has also begun on the additional modeling services that were added to their effort under a contract modification last month.

h. SEIS Update:

USACE (*Larry Parson*): USACE is waiting on a final decision from the State of Alabama regarding the Petit Bois sand before proceeding forward with the SEIS. USACE is currently incorporating the NPS comments on the preliminary draft as well as working on the WSOE and draft BA. The schedule for the completion of the SEIS needs to be revised to reflect the most recent decreased review requirements. Next step is the multi-agency review, but this will be held until further decision is made from the state of Alabama.

USACE met with NPS yesterday about Section 106 coordination. USACE will draft the initial coordination letter to SHPO and NPS will coordinate with the tribes. USACE anticipates performing shoreline archeology surveys in February.

i. Benthic Study Update:

USACE (*Larry Parson*): Vittor & Associates is finalizing the processing of the first 3 sampling events and wrapping up the draft monitoring report. They have begun preliminary processing of the sturgeon monitoring and collected the first set of samples for this effort.

j. Sturgeon Monitoring

USM (*Mark Peterson*): One of the monitoring buoys located south of the west end of West Ship Island was lost last week. They plan on replacing it tomorrow. He asked USACE and NPS to be on the lookout for the lost buoy.

The monitoring results show the sturgeon are spending a lot of time around the tip of West Ship Island as well as Camille Cut. They have identified 11 different sturgeon around Ship Island – 4 from the Pearl River, 3 from the Pascagoula River, 3 from the Blackwater River, and 1 from the Yellow River.

USACE (*Justin McDonald*): Said that he would make the contractor and USACE staff working on the West Ship Island North Shore Restoration Project aware of the lost buoy.

k. Adaptive Management and Long Term Monitoring

USACE (*Justin McDonald*): Dawn Lavioe sent the draft plan out to the group after last month's call.

USFWS (*Paul Necaize*): Requested that language be inserted for sea turtle monitoring. He should have this language to Dawn within the next couple of weeks.

3: Other Discussion and Closing:

a. Meetings:

Next meeting tentatively scheduled for 10:00 am CST January 19, 2012.

MOBILE HARBOR DREDGING HISTORY

Based on data provided by the Corps, the Bar Channel requires maintenance dredging approximately every other year. However, dredging can be required yearly and sometimes more than once in a single year if accelerated shoaling occurs caused by tropical cyclonic events that can strike the North Central Gulf Coast between June and November each year. Table D-1 identifies the quantities of material removed from the Bar Channel from 1974 through 2006, along with the total cost of dredging, the average price per cubic yard dredged, and the disposal area within which the material was placed.

Hopper dredges are used to maintain Mobile Harbor's Bay Channel and Bar Channel. This type of equipment is used to contain the material dredged from the channel for transport

Table D-1. Summary of Mobile Harbor Bar Channel Dredging History

Dredge Date	Gross Quantity Dredged (yd ³)	Total Cost (\$)	Cost/Gross (yd ³)	Disposal Area Used ^{2/}
Jul-Aug 1974	349,260	209,556.00	0.60	Ocean DA
Feb 1975	982,829	599,525.69	0.61	Ocean DA
May-Jun 1976	1,364,113	844,693.00	0.62	Ocean DA
May-Jun 1976	1,272,432	307,907.00	0.24	Ocean DA
Oct 1979	707,142	375,245.36	0.53	Ocean DA
Feb-Mar 1980	190,300	775,755.50	4.08	Ocean DA
Jan-Mar 1981	610,623	488,498.40	0.80	Ocean DA
Dec 1982-Jan 1983	312,408	573,697.83	1.84	Ocean DA
Jan 1984	218,672	570,050.80	2.61	Ocean DA
Oct-Nov 1984	340,935	557,960.00	1.64	Ocean DA
Aug-Oct 1985	1,386,536	2,215,696.24	1.60	Ocean DA
Jan-Feb 1987	656,089	1,279,493.58	1.95	Ocean DA
Feb 1989-May 1990	^{1/} 6,755,352	5,813,101.00	0.86	Ocean DA
Aug-Sep 1992	466,607	900,551.51	1.93	Ocean DA
Sep 1995-Mar 1996	662,244	1,278,130.92	1.93	Ocean DA
Dec 1996-Feb 1997	530,456	1,023,780.08	1.93	Ocean DA
Mar-Oct 1998	443,761	856,458.73	1.93	Ocean DA
Nov 1997-Aug 1998	180,540	348,442.20	1.93	Ocean DA
Oct 1998	836,054	1,613,584.22	1.93	Ocean DA
Oct 1998-Jul 1999	70,980	136,991.40	1.93	Ocean DA
Oct 1998-Jul 1999	54,600	105,378.00	1.93	Ocean DA
May-Sep 1999	^{1/} 3,061,598	3,806,525.84	1.24	SIBUA
Apr-Jul 2000	758,280	1,486,228.80	1.96	Ocean DA
Mar 2002-May 2002	92,820	282,067.51	3.04	SIBUA
Jun 2004	230,110	424,584.40	1.85	SIBUA
Oct 2004-Jan 2005	1,808,765	-	-	SIBUA
Oct 2004-Nov 2004	1,184,817	2,991,147.61	1.00	Lighthouse
Apr 2006-Jun 2006	487,975	848,919.38	1.74	SIBUA

Source: U.S. Army Corps of Engineers

^{1/} Not maintenance material

^{2/} Ocean DA . EPA approved open water disposal site in the offshore Gulf of Mexico
SIBUA . Sand Island Beneficial Use Area

to an approval disposal site at which it is discharged. Typically, hopper dredges are designed with bottom gates that are opened to allow the material to fall to the bottom. A variety of hopper dredges are available in the commercial dredging fleet, having different draft requirements to allow them to operate in different water depths.

Until 1999, all material dredged from the Bar Channel was transported to the Environmental Protection Agency's approved Ocean Disposal Area in the open Gulf of Mexico several miles to the southwest of the Sand Island Lighthouse. In the mid 1990s, a second site was approved for disposal of dredged material removed for the Bar Channel. This broad area comprising approximately 1,000 acres located to the west of the Bar Channel is collectively referred to as the Feeder Berm and Sand Island Beneficial Use Areas. The location of the beneficial use areas are shown on Figure D-2.

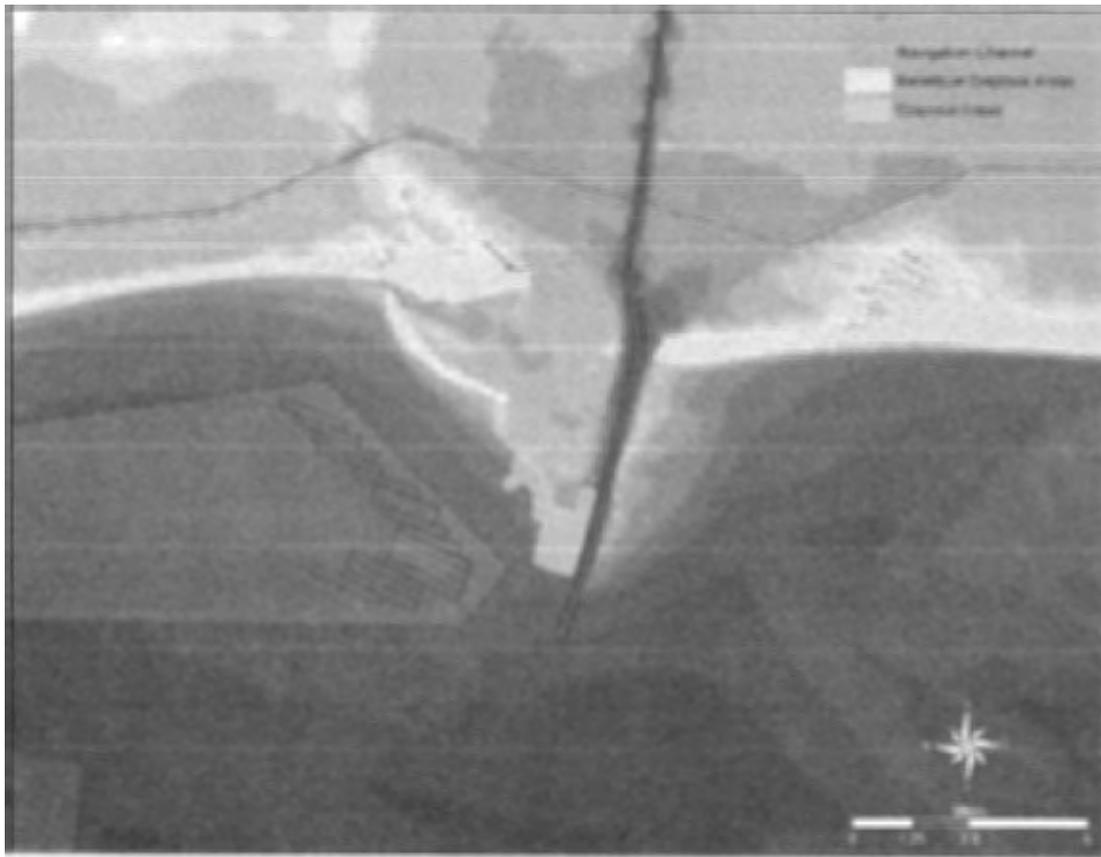
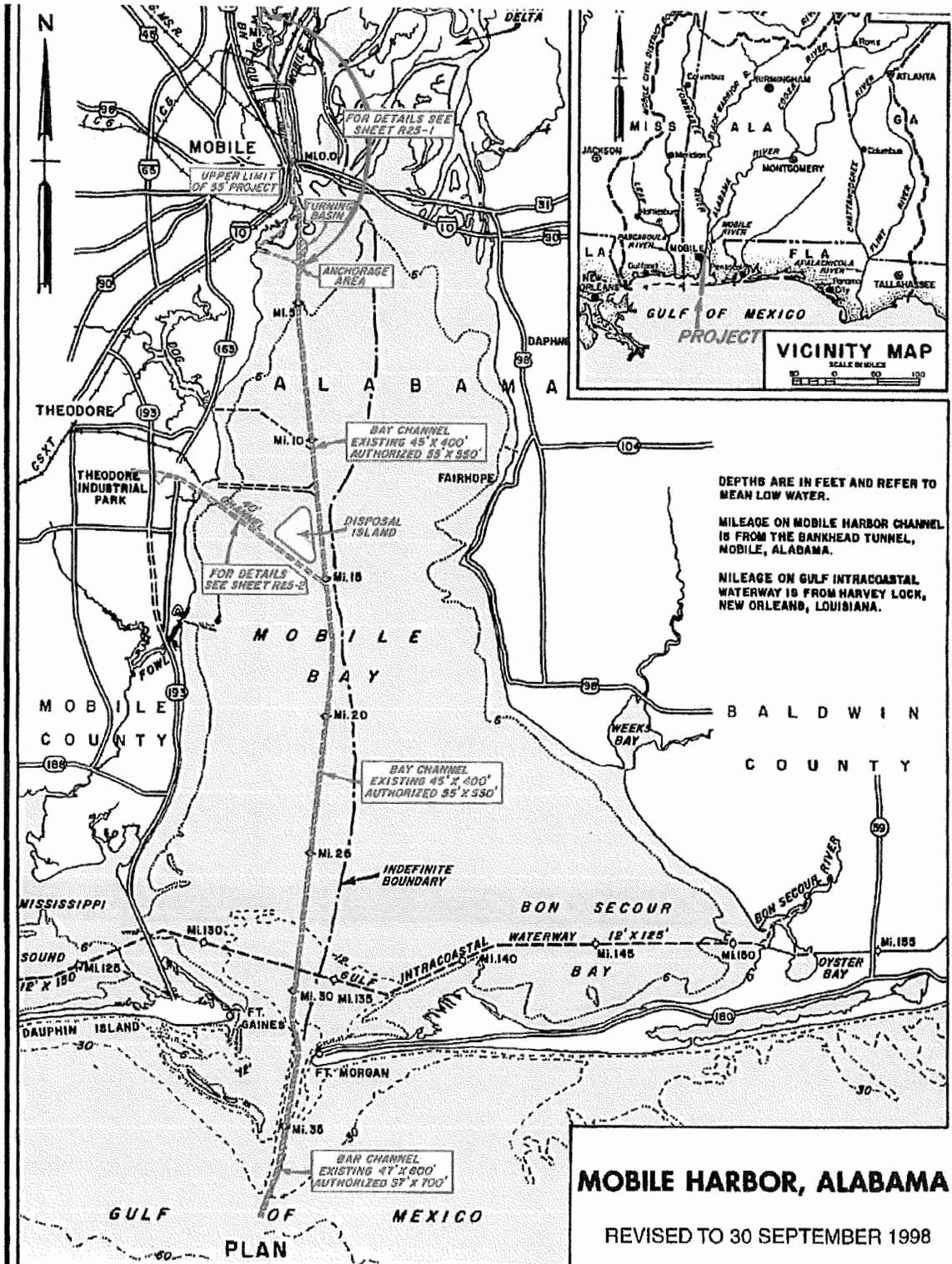


Figure D-2. Location of Mobile Outer Bar Channel in Relation to the Sand Island Beneficial Use Area and Dauphin Island (from Byrnes et al, 2008)



Testimony Excerpts of Jimmy Lyons: Fairness Hearing Sept 2009

Questioning by Wells Burgess, Natural Resources Section Environmental & Natural Resource Division U.S. Department of Justice

Q. Okay. All right. Now, we talked about an expansion of the outer bar, the bar channel to the authorized limits. Are you familiar with any estimates of how much that would cost to do?

A. Well, I heard \$2.7 billion here today. But I have not really seriously looked at it. When I first got to the board in 1999, that was an issue. The channel extensions was probably the number 1 issue. But the Corps had done some work and I saw some of the work that had been done on deepening and widening and the numbers that were just so far out of line, I've never really given them any serious consideration.

Q. You don't remember how much it was?

A. Oh, it was, you know, 150, 200 million. Very, very -- pretty high number.

Q. Annually. Well, all right. How would the assumption of the debt and the service on the debt on this \$100 million that you might have to come up with and also the payment of the 50 percent of the dredging maintenance costs, how would that affect your budget as it is right now?

A. It would bankrupt us. We couldn't do it. I mean, there's no way we could do it.

Q. What is your understanding of the percentages that have to be paid by the State for their costs of that project that's extending the dredging to the authorization?

A. It gets very, very bad. It goes up to -as far as the construction goes, it goes up to 50 percent and then all of a sudden we would have to pick up half of the maintenance.

Right now the maintenance of the Mobile ship channel runs -- for the whole channel, I don't know what's attributed to the bay or the bar or upper harbor, how the percentage breaks out -- but right now we need from the federal budget, we need to get appropriated almost every year between 20 and \$25 million. So we would pick up at least half that much I would think.

Q. You're saying the cost of current dredging is 20 to \$25 million and you would be asked to pick up half of that?

A. At least on the 55-foot portion of the channel, yes. Quite honestly, there's not going to be -- anything else would be the 40-foot channel that runs above the Mobile Container Terminal.

Q. And the estimated cost of that, \$200 million, you would be asked to pick up a hundred million of that?

A. Correct. But I think the number would be much more than 200 today. I think it would probably be approaching -- could be well over double that.

Q. So you would say you have over \$400 million in debt you're servicing?

A. Correct. We debt service on the 300 million, the 22 million. We haven't done a long-term issue on the other, but probably would be in the vicinity of 7 to \$8 million, depending on where we end from interest rates. So we'll have a debt service -- when we finally do the long-term, we'll probably have a debt service somewhere in the vicinity of 28, \$29 million, annually.

Q. Annually. Well, all right. How would the assumption of the debt and the service on the debt on this \$100 million that you might have to come up with and also the payment of the 50 percent of the dredging maintenance costs, how would that affect your budget as it is right now?

A. It would bankrupt us. We couldn't do it. I mean, there's no way we could do it.

Q. Okay. So you feel like you have a lot of economic gain or economic benefit from the turning basin?

A. Absolutely. You know, that was a big, big point in the negotiations on our second agreement for the container terminal. In fact, we had to actually commit to our best efforts to construct this turning basin, because they felt the length of the ship in Mobile would be a limitation for us in the future and that was actually written into the concession agreement. It said that we would make the best efforts and if we didn't get it done in five years that they would have the ability to walk away from the deal.

Q. Okay. Compare that to the economic benefit you see -- you can foresee from the expansion of the ship channel to the authorized limits.

A. I really don't see any. The only time it's really ever been discussed is one of my board members asked me I did see any benefit in the deepening of the channel and I said I really don't. It's such a huge number. They said well, check it out. So the obvious, biggest driver in Mobile tonnage-wise is the coal. As far as deep draft, we do have a lot of petroleum here, but it's all north of the tunnel, so it'll never be any deeper than 40 feet. But I talked to a couple of my coal customers, I said: Is there anything benefit of bringing anything more than 45 feet, and the answer was no, and that was pretty much the end of it.

Q. All right. Given what you've said about the economic benefit or lack thereof, of dredging to the authorized limits and given what you said about the cost to the State of Alabama -- excuse me -- to the Port Authority, of its share of financing that project, do you feel like it's likely that the Port Authority is going to ask that that dredging be done anytime soon?

A. No, I really don't. It's one of these things that -- in fact, I looked at a lot of things. Part of my job is to do a lot of what-if'ing and strategic planning, that sort of thing. I have to try to look to the future and talk to people and try to look at things and where they're going. The trends in ship design. The controversy here in Mobile is about the bridge over the Mobile River; and we ended up taking a position on that based on what we felt like was going to be the maximum ship size to ever come in here and none of those have ever indicated a need for anything more than 45 feet. Yeah, there might be a few ships, but I don't think there would be enough business to justify it. I don't think I would even ask the Corps or try to even spend any money on trying to study it.

Comment # 74

February 21, 2016

Ms. Jennifer Jacobson
US Army Corps of Engineers
Mobile District, Planning & Environmental Division
Coastal Environment Team
PO Box 2288
Mobile, Alabama 36628-0001

RE: Public Notice: FP15-MH01-10

Dear Ms. Jacobson:

This letter is an update to my previous two letters dated February 8, 2016 and January 22, 2016. I have attached both letters for reference. I have not included the enclosures previously provided, but will be happy to provide if needed again.

The Supplemental Environmental Impact Statement (EIS) must consider:

1. The effect of boat wake of ships, on shoreline erosion of Dauphin Island, that navigate the Mobile Ship Channel; and as stated in my previous letters:
2. The effect of maintenance dredging and the new dredging to widen and deepen the Mobile ship channel to its authorized limits on adjacent shorelines as required by the 1935 federal law and all other federal laws and Corps manuals to mitigate the damages to the adjacent beaches caused by the Corps dredging of a Federal Navigation Project for a deep draft channels,
3. The Environmental Impact Statement must also address the historical sand deficit caused by the dredging of the Mobile Harbor Navigation channel as a result of the Corps of Engineers depositing of dredged sand in the Open Gulf of Mexico.

All three of the above listed erosion impacts must become an integral component of the EIS and appropriate mitigation plans must be put in place to prevent shoreline erosion from occurring in the future.

Sincerely,

Enclosures: Letter, January 22, 2016
Letter, February 8, 2016

January 22, 2016

Colonel Jon Chytka
District Commander
US Army Corps of Engineers
Mobile District
P.O. Box 2288
Mobile, Alabama 36628-0001

ATTEN: CESAM-PD-EC

RE: Public Notice: FP15-MH01-10

On January 12, 2016 I attended the Public Scoping Hearing to learn about and provide my public comments in preparation of the US Army Corps of Engineering developing an Environmental Impact Statement (EIS) to evaluate the impact of the proposed Widening and Deepening of the Mobile Harbor Federal Navigation Channel from its present 47 ft. deep X 600 ft. wide to the authorized 57 ft. deep X 700 ft. wide dimensions. Initially, I would like to comment that the public scoping hearing that was setup was not conducive for effective public input. There should have been at the outset of the hearing an initial period of time for the Corps representatives to explain the process and to allow for public comment/questions. This approach restricts effective and important public comment.

1. A fact unknown to me, and others of the public, was revealed by two Corps representatives: Elizabeth Godsey and Justin McDonald. Both Corps representatives stated that the SEIS of the General Re-evaluation Report (GRR) study does not and will not consider or address the historic sand losses/sand deficit caused by the Corps maintenance dredging practices of the Mobile Harbor Shipping Channel. Initially, the dredged sand from the Mobile Ship Channel was deposited in the EPA approved open water disposal site. From 1974 to 2000 the amount of dredged sand deposited in the open Gulf was over 20,000,000 cu yds. If you go back prior to 1974, the amount of dredged sand in the open water site would be greater going back to 1904 o 47 million cu yds. The historical sand loss/deficit must be addressed as an integral component of the GRR/ EIS. This loss sand to **Dauphin Island** must be replenished as part of the project.
2. One of the placards? states "The SEIS prepared in the study will review and update the findings of the existing Environmental Impact Statement (EIS) "Mobile Harbor Channel Improvements, Mobile County, Alabama" prepared for the current Mobile Harbor authorization in October 1980..." The referenced October 1980 Corps EIS that was prepared to analyze the environmental effects of deepening and widening the ship channel **gave no consideration at all to the potential environmental impacts to Dauphin Island of the project and specifically on the erosion of Dauphin Island.** Since there are no impacts provided, there must be a new **Environmental Impact Statement** that addresses the historic sand deficit and the potential impact caused by the proposed dredging to the new authorized limits on the erosion of Dauphin Island. The EIS must address the effect of dredging to the shoreline for 10 miles on both sides of the Mobile Ship Channel, as required by the 1935 Federal Law.

1935 Section 5 of Public Law 409, 74th Congress, approved August 30, 1935, Section 5 of this law required that all reports dealing with improvements at a river mouth or inlet contain "information concerning the configuration of the shoreline and the probable effect thereon" that might result if the improvements under consideration were built. *Particular reference was to be given to erosion* and

accretion "for a distance of not less than *ten miles on either side of the said entrance.*" Because of its *concern with erosion problems....associated with the Corps of Engineers' harbor activities*, 33 U.S. Code § 546a.

Also, the November 1985 "Final Supplemental Environmental Impact Statement Mobile Harbor, Alabama, Channel Improvements Offshore Dredged Material Disposal" also stated no impacts to the potential effects of erosion on Dauphin Island.

Since neither 1980 Corps EIS and the 1985 Supplemental EIS for the Widening and Deepening of the Mobile Ship Channel provides no consideration to the effects of erosion on Dauphin Island nor addresses sand deficit, **it is imperative that an Environmental Impact Statement be conducted to address erosion of Dauphin Island and the sand deficit caused by dredged sand historically being deposited in the open waters of the Gulf.**

3. **September 1978 Feasibility Report for Beach Erosion Control and Hurricane Protection.** This Corps study stated sand should be placed closer to Dauphin Island, but the Study recommendation were never followed and implemented. **This study should be considered as the basis for the EIS.** The 1978 study was primarily concerned with an investigation of the cause of beach erosion within Mobile County including Dauphin Island, and a determination of the economic, social and environmental feasibility of controlling this erosion. Hurricane protective measures were a secondary consideration. The depth and detail of the study were commensurate with the objectives of selecting the most suitable plan and establishing its feasibility and acceptability.

The findings of the 1978 shoreline erosion study of Dauphin Island concluded that maintenance dredging of the Outer Bar channel was contributing to the erosion of the island's Gulf shoreline by disposing of sand materials in deeper water offshore. To mitigate for those offshore impacts, the Corps' 1978 report proposed a plan that would deposit sand "in an area about 2 miles long and 900 feet wide at about the 28-foot depth in the Gulf of Mexico south of Dauphin Island." "The selected plan can be accomplished under the existing authority of the Chief of Engineers for maintenance of Mobile Harbor"

"...provides for placing this material offshore in an area extending west about 2 miles from longitude 88° 7.8'. The shoreward and seaward boundary of the dumping area would be about the existing 26-foot depth contour and the 30-foot depth contour, respectively."

The 1978 Corps report concluded that the "Nearshore Nourishment Plan" warranted implementation. The report also stated that "...there is no more appropriate alternative ... that could more meaningfully address the [shoreline erosion] problems of the area at this time. The report "...recommended that the Chief of Engineers modify the present maintenance dredging practice for the entrance channel to Mobile Harbor to conform to the Nearshore Plan as soon as practical." It is important to note that this plan can be implemented:

"...under the existing operation and maintenance authority of the Chief of Engineers for the existing Federal Navigation Project for Mobile Harbor, subject to EPA approval of site selection, without further action by Congress. All that would be required would be to determine the entity that would have to pay the increased differential cost to modify the existing disposal operations."

Pertinent Sections of the 1978 Study:

183. The principal causes of shore erosion along the westernmost 11 miles of Dauphin Island are attributable to rise in *sea* level and maintenance dredging of the Mobile Bay entrance channel....

204. Studies *herein* indicate that the only acceptable measures that would be economically feasible that would partially resolve any of the flooding or erosion problems of the area would be the nearshore Nourishment Plan defined herein as The Selected Plan.

176. The Nearshore Nourishment Plan should significantly reduce the present rate of erosion along the western 11 miles of Dauphin Island...

Note: 10.3 ft. a year of Dauphin Island shoreline lost to erosion

4. It has been learned at an ACCP public meeting from statements made by Dr. Susan Rees that the Byrnes' (the Corps Lawsuit Principal Investigator) 2008 Study will be used as the baseline study for the Dauphin Island Restoration Assessment study (funded by National Fish & Wildlife). Per Elizabeth Godsey and Justin McDonald, and the Corps Mobile Harbor PACR Schedule – Risk-By Down Plan, the Dauphin Island Barrier Island Restoration Assessment Study's data collection, modeling, and analysis will be applied to the Widening and Deepening Project. Robert Dean respectfully dissented from concurring "that the Corps' construction, operation and Maintenance Dredging Practices of and at the Channel have not resulted in at least Minimum Measurable Erosion of Dauphin Island's shoreline." In the Judges' final Order it stated "Dr. Dean dissented and indicated that the Final Report was fundamentally flawed, not reliable and at best inconclusive." Dr. Dean in his concluding report:

"However, my Draft Report review and the review herein have raised valid questions regarding some of the arbitrary methodology applied and findings to the degree that I regard the findings inconclusive with regard to any impact of dredging and channel maintenance of Mobile Bay Entrance. Thus, I respectfully dissent from concurring "that the Corps' construction, operation and Maintenance Dredging Practices of and at the Channel have not resulted in at least Minimum Measurable Erosion of Dauphin Island's shoreline."

In addition and per a Corps December 2011 memorandum, the Corps Byrnes 2008 Final Report and Corps 2010 study had flawed data. Using the Corps 2008 Byrnes final report/study as a base line for the Dauphin Island Barrier Island Restoration Assessment and inclusion for the EIS would be a conflict of interest. Since this Coastal Engineer and the 2008 Study were integral in the DIPOA vs Corps lawsuit, his participation and its inclusion in the GRR/EIS should be considered as a conflict of interest.

"USACE (Justin McDonald): Stated that the USACE surveys that were provided for the sediment budget analysis were incorrect. They have been corrected and a comparison of the corrected and uncorrected surveys is being performed to determine the magnitude of the difference. The results will be provided to Mark Byrnes so that he can decide if any additional analysis is needed to correct for the "busted" USACE surveys."

5. **The Corps needs to following all of the following Federal Laws listed below and an laws that apply :**

The 1935 Federal Law: Shoreline Changes. Pursuant to Section 5 of the River and Harbor Act of 1935, each investigation on navigation improvements potentially affecting adjacent shoreline will include analysis of the probable effects on shoreline configurations. A distance of not less than ten miles along the shore on either side of the improvement should be analyzed. The public needs to be assured that the 1935 law is referenced and followed. Other specific policies and laws that applicable to using dredged material for shoreline nourishment and restoration. Excerpts of these policies and laws are provided below. The public needs to also be assured that these policies and laws are followed in the GRR/EIS process:

1971 USACE Manual 1110-2-38 Policy: Maintenance and improvement of the environment--including avoidance of destruction or degradation, preservation, and enhancement (including restoration)--in a manner calculated to foster and promote the general welfare, allow man and nature to exist in productive harmony, and fulfill social, economic, and other requirements of present and future generations of Americans, is established by PL 91-190 as a valid objective of Federal programs. Therefore, it shall be treated equally with other established objectives in the design of Civil Works projects.

.... **Specific ecological considerations include actions to preserve or enhance critical habitats of fish and wildlife; accomplish sedimentation and erosion control,**

1976 The Water Resources Development Act (WRDA) of 1976, Public Law (PL) 94-587, enacted October 22, 1976 contains the first congressional authorization specifically providing the Secretary of the Army with discretionary authority to use dredged material for beach nourishment purposes, although the Secretary's use of that authority was conditioned on several requirements; namely, a State must request the work, it must be in the public interest, and non-Federal interests must pay the added costs for beach placement. A complete reading of Section 145 of PL 94-587 is as 1976 Water Resources Development Act 1976 Authorizing the construction, repair, and preservation of certain public works Oct. 22, 1976 on rivers and harbors for navigation, flood control, and for other purposes

SEC. 145. Beaches 33 USC 426: The Secretary of the Army, acting through the Chief of Engineers, is authorized upon request of the State, *to place on the beaches of such State beach-quality sand which has been dredged in constructing and maintaining navigation inlets and channels adjacent to such beaches*, if the Secretary deems such action to be in the public interest and upon payment of the increased cost thereof above the cost required for alternative methods of disposing of such sand.

1984 SHORE PROTECTION MANUAL VOLUME I, Coastal Engineering Research Center Waterways Experiment Station, Corps of Engineers: Man-induced erosion occurs when human endeavors impact on the natural system. Much of the man-induced erosion is caused by a lack of understanding and can be successfully alleviated by good coastal zone management. However, in some cases coastal erosion can be due to construction projects that are of economic importance to man. *When the need for such projects is compelling, the coastal engineer must understand the effects that the work will have on the natural system and then strive to greatly reduce or eliminate these effects through designs which work in harmony with nature.*

2. Man- Induced Causes: b. *Interruption of Material in Transport.* This factor is probably the most important cause of man-induced erosion. Improvement of inlets by both channel dredging and channel control and by harbor structures impounds littoral material ... Often, the material is permanently lost from the down coast beach regime either by the deposition of dredged material outside of the active littoral zone... This can be mitigated by sand-bypassing systems. Realignment of the shoreline by the use of such structures as groins also interrupts the transport of littoral material. These structures may not only reduce the rate of a longshore transport but also may reduce littoral material reaching down coast beaches by entrapment.

1986 The Water Resources Development Act of 1976 (P.L. 94-587), section 145 covering the placement of sand dredged during maintenance activities on adjacent beaches;

Section 1135, 1986 Water Resources Development Act of 1986 (PL-104-303), Project Modification for Improvements to the Environment: Under this authority, if the construction or operation of a USACE project has contributed to the degradation of the quality of the environment, measures for restoration through modification of the structure or operation of the structure may be undertaken at the project site if such measures do not conflict with the authorized project purposes. A nonfederal sponsor for projects implemented under this authority must pay 25 percent of project construction costs,

1987 Environmental Engineering for Deep-Draft Navigation Projects Manual No. 1110-2-1202

Environmental Engineering for Deep-Draft Navigation Projects

Chapter 6 Mitigation Decision Analysis:

6-1. Policy...Damage from Federal navigation work along the shorelines of the United States must be prevented or mitigated

1987 Sand Island Bar, AL Test: Beneficial Uses of Dredged Material: Mobile District

This test, conducted in 1987 offshore of Sand Island, Alabama, expands experience using fine sand in intermediate depths, i.e., below depths where onshore transport has already been demonstrated, but shallow enough for potential movement. **The major question is whether sand at this depth will be retained in the nearshore zone or lost seaward. The berm showed indications of migrating northwest. It was too far offshore to directly influence beach volumes, but the sand was apparently becoming part of the littoral system.**

1990 Results of Monitoring the Disposal Berm at Sand Island, Alabama Technical report DRP-90-2

A presently underway deepening operation will expand these dimensions to 47 by 600 ft. at the entrance ...***The bar channel traps littoral drift.*** Historically, hopper dredges remove an average of 324,000 cu yd. of material annually.

...Historically, ***material from the bar channel has been placed in an open-water site outside the active zone of littoral transport.***

First, SAM wants to evaluate the feasibility of conserving clean sands dredged to maintain the navigation channel into Mobile Bay. Conventionally, this sand would be disposed of in a designated offshore open-water site seaward of the littoral zone. Retention of the material in the nearshore sand prism or placement in the westward moving littoral stream may help alleviate regional erosion problems. Returning sand to the littoral system is a fairly simple task from the technical standpoint. **The challenge is to accomplish the task without increasing the cost of channel maintenance.**

.... Coastal erosion occurs where sand is removed faster than it is replaced. ***Such imbalance often causes problems which can be reduced by placement of new material in the shore compartment.*** The value of such action will depend on the nature of the local problem plus the location, quantity, and rate of sand replacement. Man's concerns are usually at the shoreline.

The bar channel traps littoral drift. Historically, hopper dredges remove an average of 324,000 cu yd. of material annually. Historically, material from the bar channel has been placed in an open-water site outside the active zone of littoral transport.

Note: In 1935, the U.S. Army Corps of Engineers (USACE) built a sand bar along the 6.7-m contour off the updrift end of eroding beaches south of Santa Barbara, California. The intent of this bar was to alleviate severe coastal erosion downdrift of the harbor. After 21 months, with no measurable movement of the bar and no alleviation of the shore erosion, **the USACE began pumping sand directly onto the beach** (U.S. Congress 1948).

1990 Beach And Nearshore Placement Of Material Dredged: From Federally Authorized Navigation Projects U.S. Army Engineer Institute For Water Resources Water Resources Support Center

"The latter is comprised of authorities given by the Congress to the Secretary of the Army, acting through the Chief of Engineers, to investigate and construct certain types of small projects. Accordingly, there are a number of authorities which provide a broad base of alternatives to beneficially use dredged material for the nourishment of beaches when placement of the materials does not constitute the least costly and approved dredged material disposal, or the material is not placed under the authority of Section 145, WRDA 1976 as amended. These alternative authorities and possibilities are enumerated below."

"If an existing **Federal navigation project is identified** as the causal factor of a quantifiable degree of **erosion** and attendant damage **along an adjacent shore**, placement of dredged material could be used as a corrective measure under authority of Section 111, RHA 1968, as amended by Section 940, WRDA 1986."

With respect to the execution of legislative authority provided by **Section 933, WRDA 1986, ER 1165-2-130** contains the following guidance: It is Corps policy to accomplish construction and maintenance dredging in the least costly and most environmentally sound manner possible (ER 1130-2-307).

If placement of dredged material on a beach or beaches is determined by the Corps to be the least costly acceptable means for disposal of the material, then such placement should be considered integral to accomplishment of the project work and not subject to any special non-Federal cost sharing requirements.

Most of the navigation projects using dredged material for beach nourishment are located in the Jacksonville, **Mobile**, Los Angeles and Detroit Districts.

* Most uses of dredged material for beach nourishment do not involve financial participation by entities other than the Corps.

1990 Water Resources Development Act of 1990 §2316. Environmental protection mission

(a) General rule: The Secretary shall include environmental protection as one of the primary missions of the Corps of Engineers in planning, designing, constructing, operating, and maintaining water resources projects.

1992 Water Resources Development Act of 1992 (P.L. 102-580), as amended-Beneficial Uses of Dredged Material Section 204..... Project costs consist of the incremental costs of the beneficial use as compared to the disposal plan that would have otherwise been used. A nonfederal sponsor is responsible for paying 25 percent of these costs, including LERRD.The total federal costs associated with a beneficial use of sediments project shall not exceed \$5 million. This cost limit refers to the incremental cost over the Base Plan. There is authorized to be appropriated not to exceed \$15 million annually to carry out this section. Such sums remain available until expended.

1996 Water Resources Development Act of 1996 (P.L. 104-303), Sec. 204. Restoration Of Environmental Quality.

“(C) Restoration Of Environmental Quality -- If the Secretary determines that construction of a water resources project by the Secretary or operation of a water resources project constructed by the Secretary has contributed to the degradation of the quality of the environment, the Secretary may undertake measures for restoration of environmental quality and measures for enhancement of environmental quality that are associated with the restoration, through modifications either at the project site or at other locations that have been affected by the construction or operation of the project, if such measures do not conflict with the authorized project purposes. 33 USC 2215

'SEC. 207. BENEFICIAL USES OF DREDGED MATERIAL.

“(e) SELECTION OF DREDGED MATERIAL DISPOSAL METHOD.— In developing and carrying out a project for navigation involving the disposal of dredged material, the Secretary may select, with the consent of the non-Federal interest, a disposal method that is not the least-cost option if the Secretary determines that the incremental costs of such disposal method are reasonable in relation to the environmental benefits, including the benefits to the aquatic environment to be derived from the creation of wetlands and control of shoreline erosion. The Federal share of such incremental costs shall be determined in accordance with subsection (c).”.

SEC. 302. MOBILE HARBOR, ALABAMA.

The undesignated paragraph under the heading “MOBILE HARBOR, ALABAMA” in section 201(a) of the Water Resources Development Act of 1986 (100 Stat. 4090) is amended by striking the 1st semicolon and all that follows and inserting a period and the following: “In disposing of dredged material from such project, the Secretary, after compliance with applicable laws and after opportunity for public review and comment, may consider alternatives to disposal of such material in the Gulf of Mexico, including environmentally acceptable alternatives for beneficial uses of dredged material and environmental restoration.”.

1998 Transmittal of the National Dredging Team Guidance Close coordination and planning at all governmental levels, and with all aspects of the private sector, are essential to developing and maintaining the Nation's ports and harbors in a manner that will increase economic growth and protect, conserve, and restore coastal resources. Dredged material is a resource, and environmentally sound beneficial use of dredged material for such projects as wetland creation, beach nourishment, and development projects must be encouraged

1998 Title I Department Of Defense—Civil

Department Of The Army Corps Of Engineers—Civil General Investigations

Congressional Record, House

September 25, 1998

The summary tables at the end of this title set forth the conference agreement with respect to the individual appropriations, programs, and activities of the Corps of Engineers. Additional items of conference agreement are discussed below. <http://www.gpo.gov/fdsys/pkg/CREC-1998-09-25/pdf/CREC-1998-09-25-pt1-PgH8842-2.pdf>

The conferees recognize the serious erosion problems being experienced on the east end of Dauphin Island, Alabama. To counter this threat to property and habitat, the conferees urge the U.S. Army Corps of Engineers, acting in coordination with non-Federal interests, to initiate a small beach restoration project on the east end of Dauphin Island, Alabama, utilizing alternative sand recapture technologies.

1998 "USACOE Coastal Engineering Research Committee Meeting on Dauphin Island, recommended the creation of a Regional Sediment Management plan to replace the ad hoc individual site approaches."

1999 Regional Sediment Management Plan (RSMP) adopted by Mobile Office, covering the Coast from St Marks to Miss off shore Islands. (Town of Dauphin Island Erosion Task Force Report)
2 miles east of Fort Morgan Pt. to the west end of Dauphin Island

"The demonstration initiatives identified within the Sub-Regions are:

1. Mobile Bay/Dauphin Island

2000 Action on Mobile Bay/Dauphin Island Demonstration Initiative by the USACE suspended.

6. **Erosion Control Measures:** In the past, particularly prior to passage of the WRDA of 1986, beach fill or beach restoration was frequently considered an erosion control measure, and erosion control was treated as a project output or project purpose. **As a result of enactment of the law, however, erosion control has no separate status as a project purpose or as a project output. Thus, erosion control measures (e.g., beach**

fill) shall be treated as means to the ends of hurricane and storm damage reduction, ecosystem restoration, or recreation; similar to breakwaters or revetments. We need to be assured that Erosion Control Measures are included in the GRR/EIS for Dauphin Island.

7. The Public Scoping Notice states that the purpose of the study will be to determine improvements for safety and efficiency of the harbor users. It does not state that the purpose of the study will address the effects of dredging on Dauphin Island and this objective must also be included in the GRR/EIS.
8. The Mobile District has continually stated that Sand deposited in the SIBUA makes its way to Dauphin Island. The EIS must document and prove that the sand (dredged) deposited in the SIBUA makes it to Dauphin Island. The EIS must address where the dredged sand is to be deposited to maximize shoreline erosion with proof and facts that this is true.
9. There needs to be a Citizen Advisory Committee for the public to participate in the GRR/EIS process.
10. **Dr. Susan Rees expert testimony Corps Lawsuit:** Dr. Rees was an expert witness for the Corps and gave testimony on 9-15-09 at the Corps Lawsuit Fairness Hearing. Her testimony is applicable to the Corps plans as public input for the Widening and Deepening of the Mobile Harbor. Dr. Rees testimony **must be considered and followed by the Corps in the development of the GRR/EIS for Dauphin Island and Mobile harbor.**

Below are Excerpts of the Testimony of Dr. Susan Ivester Rees: September 15, 2009 Fairness Hearing, Mobile, Alabama; Questioned by Wells D. Burgess, US Department of Justice.

Q= Question. A = Answer

Q. And could you briefly state your employment history?

A. I have been employed with the Mobile District Corps of Engineers since 1981. Since that time I've held a number of positions with the Corps. Primarily in what is called the Coastal Environment Section of the Planning Division. The **duties** of that section are **to ensure** the environmental compliance of all of the federally authorized projects and military activities that are undertaken by the district.

Q. What are your current responsibilities?

A. Currently, I'm the program manager for the Mississippi Coastal Improvements Program.

Q. Are you familiar with the Corps' dredging operations on what we call the outer bar channel?

A. Yes, I am. The Mobile Harbor Project was one of the projects that I was responsible for.

Q. So I and the Court and everybody else understands this, are you telling us, then, if you increase the channel over what it's currently maintained, the State is going to have to pick up half the footing – half the bill?

A. That's correct

Q. And that includes construction and maintenance?

A. That's correct.

Q. Thank you, Dr. Rees. I'm going to ask you now that are going to basically – there's been some suggestion here that the Corps already has the funds to do this and it can just go out and basically start digging. And I need you to take the Court and also the class members here through the process that you believe needs to happen or that you know needs to happen based on your knowledge of the regulations and your experience and your current position before this additional dredging could occur.

A. **Engineering regulation 1105-2-100, Chapter 4**, dictates that for post-authorization projects -- and in this case if we were to try to deepen Mobile Harbor that would be considered post-authorization -- that we have to do a re-evaluation report utilizing current planning criteria and current policy and regulations.

There are two types of reports that you can do. And basically the period of time that has elapsed since the original report was done and a consideration of whether conditions have changed since that original report was done, those two factors drive the level of reporting that is required.

For the case of Mobile Harbor, we would have to do what is called a general re-evaluation report. That basically brings all up to current condition. It looks project is still justified or not.

If you take Mobile Harbor specifically, it was originally authorized on the coal trade and the use of the McDuffie Coal Terminal. Today, the through-port and the port is vastly different from what it was in the late '80s, so there's **different economics** obviously, the cost of dredging and the placement of dredge material has changed significantly and the environment has changed. **And so we would have to take into consideration all of those aspects in preparing that general re-evaluation report.**

And as far as the environmental compliance goes, because of the age of the original EIS we would have to do a supplement to that EIS.

Q. And I had asked you before, did I not, obviously you have years of experience with the National Environmental Policy Act compliance; is that correct?

A. Yes, I do.

Q. Now, would that also take into account engineering feasibility?

A. Yes.

Q. And economic benefit?

A. That's correct.

Q. And the cost benefit ratio?

A. Yes.

Q. I understand has that changed?

A. The cost benefit ration for a budgetable project changed last year.

Q. Now, how about would you have to have a new project agreement with the State?

A. If the findings of the general re-evaluation report were in the affirmative, prior to any construction activities, we would have to have a new partnership agreement with the State and the State Port Authority that would detail their costs for the initial construction and for the future maintenance as well as their other responsibilities.

Q. And is it correct to say -- I'll probably let the State speak to this, but the State would have to figure out how -- whether they could shoulder this additional expense; is that correct?

A. Well, they would have to figure out that and then they would also have to work with the Congressional delegation to get the Corps the money as well.

Q. You mentioned that an environmental impact statement would be issued if there was any expansion over the current -- currently maintained dredging depths and width. Would that environmental impact statement examine the impact on Dauphin Island of any expansion?

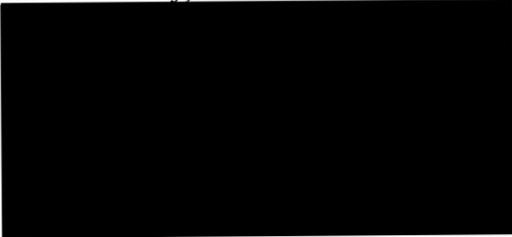
A. It would definitely examine the impacts to the coastal processes of the entire region, not just Dauphin Island.

Q. But including Dauphin Island?

A. Definitely.

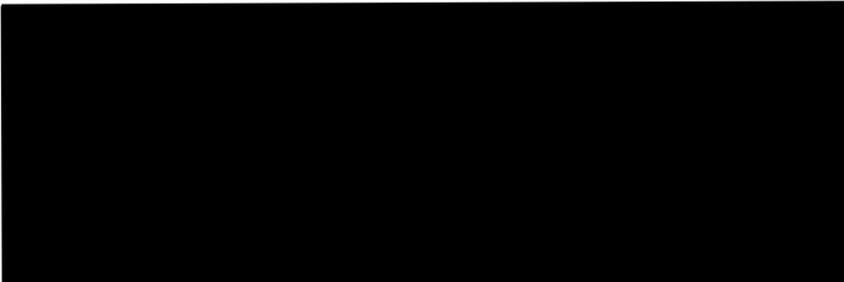
Having knowledge of the public input at the January 12th Public Scoping Hearing is important and critical to understanding the concerns of those individuals present at the hearing. Some attendees to the hearing provided written input and some provided verbal input. I was told that 48 concerned citizens signed the attendance form. Please advise me by e-mail at sgraves1@bellsouth.net how to obtain copies of the written and transcribed comments. In addition, since the date for submission of public comments, please advise how to obtain copies of future comments. Please provide me with a copy of all public comments.

Sincerely,



Enclosures

Cc:
Senator Richard Shelby
Senator Jeff Sessions
Congressman Bradley Byrne
Lt. General Thomas P. Bostick
Brigadier General C. David Turner
State Senator Bill Hightower
State Representative David Sessions
Jeff Collier, Mayor, Dauphin Island & Town Council
Dom Carlucci, President, DIPOA
EPA/NEPA - Southeast



January 22, 2016

Colonel Jon Chytka
District Commander
US Army Corps of Engineers
Mobile District
P.O. Box 2288
Mobile, Alabama 36628-0001

ATTEN: CESAM-PD-EC

RE: Public Notice: FP15-MH01-10

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accretion "for a distance of not less than *ten miles on either side of the said entrance.*" Because of its *concern with erosion problems....associated with the Corps of Engineers' harbor activities*, 33 U.S. Code § 546a.

Also, the November 1985 "Final Supplemental Environmental Impact Statement Mobile Harbor, Alabama, Channel Improvements Offshore Dredged Material Disposal" also stated no impacts to the potential effects of erosion on Dauphin Island.

Since neither 1980 Corps EIS and the 1985 Supplemental EIS for the Widening and Deepening of the Mobile Ship Channel provides no consideration to the effects of erosion on Dauphin Island nor addresses sand deficit, **it is imperative that an Environmental Impact Statement be conducted to address erosion of Dauphin Island and the sand deficit caused by dredged sand historically being deposited in the open waters of the Gulf.**

3. **September 1978 Feasibility Report for Beach Erosion Control and Hurricane Protection.** This Corps study stated sand should be placed closer to Dauphin Island, but the Study recommendation were never followed and implemented. **This study should be considered as the basis for the EIS.** The 1978 study was primarily concerned with an investigation of the cause of beach erosion within Mobile County including Dauphin Island, and a determination of the economic, social and environmental feasibility of controlling this erosion. Hurricane protective measures were a secondary consideration. The depth and detail of the study were commensurate with the objectives of selecting the most suitable plan and establishing its feasibility and acceptability.

The findings of the 1978 shoreline erosion study of Dauphin Island concluded that maintenance dredging of the Outer Bar channel was contributing to the erosion of the island's Gulf shoreline by disposing of sand materials in deeper water offshore. To mitigate for those offshore impacts, the Corps' 1978 report proposed a plan that would deposit sand "in an area about 2 miles long and 900 feet wide at about the 28-foot depth in the Gulf of Mexico south of Dauphin Island." "The selected plan can be accomplished under the existing authority of the Chief of Engineers for maintenance of Mobile Harbor"

"...provides for placing this material offshore in an area extending west about 2 miles from longitude 88° 7.8'. The shoreward and seaward boundary of the dumping area would be about the existing 26-foot depth contour and the 30-foot depth contour, respectively."

The 1978 Corps report concluded that the "Nearshore Nourishment Plan" warranted implementation. The report also stated that "...there is no more appropriate alternative ... that could more meaningfully address the [shoreline erosion] problems of the area at this time. The report "...recommended that the Chief of Engineers modify the present maintenance dredging practice for the entrance channel to Mobile Harbor to conform to the Nearshore Plan as soon as practical." It is important to note that this plan can be implemented:

"...under the existing operation and maintenance authority of the Chief of Engineers for the existing Federal Navigation Project for Mobile Harbor, subject to EPA approval of site selection, without further action by Congress. All that would be required would be to determine the entity that would have to pay the increased differential cost to modify the existing disposal operations."

Pertinent Sections of the 1978 Study:

183. The principal causes of shore erosion along the westernmost 11 miles of Dauphin Island are attributable to rise in *sea* level and maintenance dredging of the Mobile Bay entrance channel....

204. Studies *herein* indicate that the only acceptable measures that would be economically feasible that would partially resolve any of the flooding or erosion problems of the area would be the nearshore Nourishment Plan defined herein as The Selected Plan.

176. The Nearshore Nourishment Plan should significantly reduce the present rate of erosion along the western 11 miles of Dauphin Island...

Note: 10.3 ft. a year of Dauphin Island shoreline lost to erosion

4. It has been learned at an ACCP public meeting from statements made by Dr. Susan Rees that the Byrnes' (the Corps Lawsuit Principal Investigator) 2008 Study will be used as the baseline study for the Dauphin Island Restoration Assessment study (funded by National Fish & Wildlife). Per Elizabeth Godsey and Justin McDonald, and the Corps Mobile Harbor PACR Schedule – Risk-By Down Plan, the Dauphin Island Barrier Island Restoration Assessment Study's data collection, modeling, and analysis will be applied to the Widening and Deepening Project. Robert Dean respectfully dissented from concurring "that the Corps' construction, operation and Maintenance Dredging Practices of and at the Channel have not resulted in at least Minimum Measurable Erosion of Dauphin Island's shoreline." In the Judges' final Order it stated "Dr. Dean dissented and indicated that the Final Report was fundamentally flawed, not reliable and at best inconclusive." Dr. Dean in his concluding report:

"However, my Draft Report review and the review herein have raised valid questions regarding some of the arbitrary methodology applied and findings to the degree that I regard the findings inconclusive with regard to any impact of dredging and channel maintenance of Mobile Bay Entrance. Thus, I respectfully dissent from concurring "that the Corps' construction, operation and Maintenance Dredging Practices of and at the Channel have not resulted in at least Minimum Measurable Erosion of Dauphin Island's shoreline."

In addition and per a Corps December 2011 memorandum, the Corps Byrnes 2008 Final Report and Corps 2010 study had flawed data. Using the Corps 2008 Byrnes final report/study as a base line for the Dauphin Island Barrier Island Restoration Assessment and inclusion for the EIS would be a conflict of interest. Since this Coastal Engineer and the 2008 Study were integral in the DIPOA vs Corps lawsuit, his participation and its inclusion in the GRR/EIS should be considered as a conflict of interest.

"USACE (Justin McDonald): Stated that the USACE surveys that were provided for the sediment budget analysis were incorrect. They have been corrected and a comparison of the corrected and uncorrected surveys is being performed to determine the magnitude of the difference. The results will be provided to Mark Byrnes so that he can decide if any additional analysis is needed to correct for the "busted" USACE surveys."

5. **The Corps needs to following all of the following Federal Laws listed below and an laws that apply :**

The 1935 Federal Law: Shoreline Changes. Pursuant to Section 5 of the River and Harbor Act of 1935, each investigation on navigation improvements potentially affecting adjacent shoreline will include analysis of the probable effects on shoreline configurations. A distance of not less than ten miles along the shore on either side of the improvement should be analyzed. The public needs to be assured that the 1935 law is referenced and followed. Other specific policies and laws that applicable to using dredged material for shoreline nourishment and restoration. Excerpts of these policies and laws are provided below. The public needs to also be assured that these policies and laws are followed in the GRR/EIS process:

1971 USACE Manual 1110-2-38 Policy: Maintenance and improvement of the environment--including avoidance of destruction or degradation, preservation, and enhancement (including restoration)--in a manner calculated to foster and promote the general welfare, allow man and nature to exist in productive harmony, and fulfill social, economic, and other requirements of present and future generations of Americans, is established by PL 91-190 as a valid objective of Federal programs. Therefore, it shall be treated equally with other established objectives in the design of Civil Works projects.

.... **Specific ecological considerations include actions to preserve or enhance critical habitats of fish and wildlife; accomplish sedimentation and erosion control,**

1976 The Water Resources Development Act (WRDA) of 1976, Public Law (PL) 94-587, enacted October 22, 1976 contains **the first congressional authorization specifically providing the Secretary of the Army with discretionary authority to use dredged material for beach nourishment purposes**, although the Secretary's use of that authority was conditioned on several requirements; namely, a State must request the work, it must be in the public interest, and non-Federal interests must pay the added costs for beach placement. A complete reading of Section 145 of PL 94-587 is as 1976 Water Resources Development Act 1976 Authorizing the construction, repair, and preservation of certain public works Oct. 22, 1976 on rivers and harbors for navigation, flood control, and for other purposes

SEC. 145. Beaches 33 USC 426: The Secretary of the Army, acting through the Chief of Engineers, is authorized upon request of the State, *to place on the beaches of such State beach-quality sand which has been dredged in constructing and maintaining navigation inlets and channels adjacent to such beaches*, if the Secretary deems such action to be in the public interest and upon payment of the increased cost thereof above the cost required for alternative methods of disposing of such sand.

1984 SHORE PROTECTION MANUAL VOLUME I, Coastal Engineering Research Center Waterways Experiment Station, Corps of Engineers: Man-induced erosion occurs when human endeavors impact on the natural system. Much of the man-induced erosion is caused by a lack of understanding and can be successfully alleviated by good coastal zone management. However, in some cases coastal erosion can be due to construction projects that are of economic importance to man. *When the need for such projects is compelling, the coastal engineer must understand the effects that the work will have on the natural system and then strive to greatly reduce or eliminate these effects through designs which work in harmony with nature.*

2. Man- Induced Causes: b. *Interruption of Material in Transport.* This factor is probably the most important cause of man-induced erosion. Improvement of inlets by both channel dredging and channel control and by harbor structures impounds littoral material ... Often, the material is permanently lost from the down coast beach regime either by the deposition of dredged material outside of the active littoral zone... This can be mitigated by sand-bypassing systems. Realignment of the shoreline by the use of such structures as groins also interrupts the transport of littoral material. These structures may not only reduce the rate of a longshore transport but also may reduce littoral material reaching down coast beaches by entrapment.

1986 The Water Resources Development Act of 1976 (P.L. 94-587), section 145 covering the placement of sand dredged during maintenance activities on adjacent beaches;

Section 1135, 1986 Water Resources Development Act of 1986 (PL-104-303), Project Modification for Improvements to the Environment: Under this authority, if the construction or operation of a USACE project has contributed to the degradation of the quality of the environment, measures for restoration through modification of the structure or operation of the structure may be undertaken at the project site if such measures do not conflict with the authorized project purposes. A nonfederal sponsor for projects implemented under this authority must pay 25 percent of project construction costs,

1987 Environmental Engineering for Deep-Draft Navigation Projects Manual No. 1110-2-1202

Environmental Engineering for Deep-Draft Navigation Projects

Chapter 6 Mitigation Decision Analysis:

6-1. Policy...Damage from Federal navigation work along the shorelines of the United States must be prevented or mitigated

1987 Sand Island Bar, AL Test: Beneficial Uses of Dredged Material: Mobile District

This test, conducted in 1987 offshore of Sand Island, Alabama, expands experience using fine sand in intermediate depths, i.e., below depths where onshore transport has already been demonstrated, but shallow enough for potential movement. **The major question is whether sand at this depth will be retained in the nearshore zone or lost seaward. The berm showed indications of migrating northwest. It was too far offshore to directly influence beach volumes, but the sand was apparently becoming part of the littoral system.**

1990 Results of Monitoring the Disposal Berm at Sand Island, Alabama Technical report DRP-90-2

A presently underway deepening operation will expand these dimensions to 47 by 600 ft. at the entrance ...***The bar channel traps littoral drift.*** Historically, hopper dredges remove an average of 324,000 cu yd. of material annually.

...Historically, ***material from the bar channel has been placed in an open-water site outside the active zone of littoral transport.***

First, SAM wants to evaluate the feasibility of conserving clean sands dredged to maintain the navigation channel into Mobile Bay. Conventionally, this sand would be disposed of in a designated offshore open-water site seaward of the littoral zone. Retention of the material in the nearshore sand prism or placement in the westward moving littoral stream may help alleviate regional erosion problems. Returning sand to the littoral system is a fairly simple task from the technical standpoint. **The challenge is to accomplish the task without increasing the cost of channel maintenance.**

.... Coastal erosion occurs where sand is removed faster than it is replaced. ***Such imbalance often causes problems which can be reduced by placement of new material in the shore compartment.*** The value of such action will depend on the nature of the local problem plus the location, quantity, and rate of sand replacement. Man's concerns are usually at the shoreline.

The bar channel traps littoral drift. Historically, hopper dredges remove an average of 324,000 cu yd. of material annually. Historically, material from the bar channel has been placed in an open-water site outside the active zone of littoral transport.

Note: In 1935, the U.S. Army Corps of Engineers (USACE) built a sand bar along the 6.7-m contour off the updrift end of eroding beaches south of Santa Barbara, California. The intent of this bar was to alleviate severe coastal erosion downdrift of the harbor. After 21 months, with no measurable movement of the bar and no alleviation of the shore erosion, **the USACE began pumping sand directly onto the beach** (U.S. Congress 1948).

1990 Beach And Nearshore Placement Of Material Dredged: From Federally Authorized Navigation Projects U.S. Army Engineer Institute For Water Resources Water Resources Support Center

"The latter is comprised of authorities given by the Congress to the Secretary of the Army, acting through the Chief of Engineers, to investigate and construct certain types of small projects. Accordingly, there are a number of authorities which provide a broad base of alternatives to beneficially use dredged material for the nourishment of beaches when placement of the materials does not constitute the least costly and approved dredged material disposal, or the material is not placed under the authority of Section 145, WRDA 1976 as amended. These alternative authorities and possibilities are enumerated below."

"If an existing **Federal navigation project is identified** as the causal factor of a quantifiable degree of **erosion** and attendant damage **along an adjacent shore**, placement of dredged material could be used as a corrective measure under authority of Section 111, RHA 1968, as amended by Section 940, WRDA 1986."

With respect to the execution of legislative authority provided by **Section 933, WRDA 1986, ER 1165-2-130** contains the following guidance: It is Corps policy to accomplish construction and maintenance dredging in the least costly and most environmentally sound manner possible (ER 1130-2-307).

If placement of dredged material on a beach or beaches is determined by the Corps to be the least costly acceptable means for disposal of the material, then such placement should be considered integral to accomplishment of the project work and not subject to any special non-Federal cost sharing requirements.

Most of the navigation projects using dredged material for beach nourishment are located in the Jacksonville, **Mobile**, Los Angeles and Detroit Districts.

* Most uses of dredged material for beach nourishment do not involve financial participation by entities other than the Corps.

1990 Water Resources Development Act of 1990 §2316. Environmental protection mission

(a) General rule: The Secretary shall include environmental protection as one of the primary missions of the Corps of Engineers in planning, designing, constructing, operating, and maintaining water resources projects.

1992 Water Resources Development Act of 1992 (P.L. 102-580), as amended-Beneficial Uses of Dredged Material Section 204..... Project costs consist of the incremental costs of the beneficial use as compared to the disposal plan that would have otherwise been used. A nonfederal sponsor is responsible for paying 25 percent of these costs, including LERRD.The total federal costs associated with a beneficial use of sediments project shall not exceed \$5 million. This cost limit refers to the incremental cost over the Base Plan. There is authorized to be appropriated not to exceed \$15 million annually to carry out this section. Such sums remain available until expended.

1996 Water Resources Development Act of 1996 (P.L. 104-303), Sec. 204. Restoration Of Environmental Quality.

“(C) Restoration Of Environmental Quality -- If the Secretary determines that construction of a water resources project by the Secretary or operation of a water resources project constructed by the Secretary has contributed to the degradation of the quality of the environment, the Secretary may undertake measures for restoration of environmental quality and measures for enhancement of environmental quality that are associated with the restoration, through modifications either at the project site or at other locations that have been affected by the construction or operation of the project, if such measures do not conflict with the authorized project purposes. 33 USC 2215

‘SEC. 207. BENEFICIAL USES OF DREDGED MATERIAL.

“(e) **SELECTION OF DREDGED MATERIAL DISPOSAL METHOD.**— In developing and carrying out a project for navigation involving the disposal of dredged material, the Secretary may select, with the consent of the non-Federal interest, a disposal method that is not the least-cost option if the Secretary determines that the incremental costs of such disposal method are reasonable in relation to the environmental benefits, including the benefits to the aquatic environment to be derived from the creation of wetlands and control of shoreline erosion. The Federal share of such incremental costs shall be determined in accordance with subsection (c).”.

SEC. 302. MOBILE HARBOR, ALABAMA.

The undesignated paragraph under the heading “MOBILE HARBOR, ALABAMA” in section 201(a) of the Water Resources Development Act of 1986 (100 Stat. 4090) is amended by striking the 1st semicolon and all that follows and inserting a period and the following: “In disposing of dredged material from such project, the Secretary, after compliance with applicable laws and after opportunity for public review and comment, may consider alternatives to disposal of such material in the Gulf of Mexico, including environmentally acceptable alternatives for beneficial uses of dredged material and environmental restoration.”.

1998 Transmittal of the National Dredging Team Guidance Close coordination and planning at all governmental levels, and with all aspects of the private sector, are essential to developing and maintaining the Nation's ports and harbors in a manner that will increase economic growth and protect, conserve, and restore coastal resources. Dredged material is a resource, and environmentally sound beneficial use of dredged material for such projects as wetland creation, beach nourishment, and development projects must be encouraged

1998 Title I Department Of Defense—Civil

Department Of The Army Corps Of Engineers—Civil General Investigations

Congressional Record, House

September 25, 1998

The summary tables at the end of this title set forth the conference agreement with respect to the individual appropriations, programs, and activities of the Corps of Engineers. Additional items of conference agreement are discussed below. <http://www.gpo.gov/fdsys/pkg/CREC-1998-09-25/pdf/CREC-1998-09-25-pt1-PgH8842-2.pdf>

The conferees recognize the serious erosion problems being experienced on the east end of Dauphin Island, Alabama. To counter this threat to property and habitat, the conferees urge the U.S. Army Corps of Engineers, acting in coordination with non-Federal interests, to initiate a small beach restoration project on the east end of Dauphin Island, Alabama, utilizing alternative sand recapture technologies.

1998 "USACOE Coastal Engineering Research Committee Meeting on Dauphin Island, recommended the creation of a Regional Sediment Management plan to replace the ad hoc individual site approaches."

1999 Regional Sediment Management Plan (RSMP) adopted by Mobile Office, covering the Coast from St Marks to Miss off shore Islands. (Town of Dauphin Island Erosion Task Force Report) 2 miles east of Fort Morgan Pt. to the west end of Dauphin Island

"The demonstration initiatives identified within the Sub-Regions are:

1. Mobile Bay/Dauphin Island

2000 Action on Mobile Bay/Dauphin Island Demonstration Initiative by the USACE suspended.

6. **Erosion Control Measures:** In the past, particularly prior to passage of the WRDA of 1986, beach fill or beach restoration was frequently considered an erosion control measure, and erosion control was treated as a project output or project purpose. **As a result of enactment of the law, however, erosion control has no separate status as a project purpose or as a project output. Thus, erosion control measures (e.g., beach**

fill) shall be treated as means to the ends of hurricane and storm damage reduction, ecosystem restoration, or recreation; similar to breakwaters or revetments. We need to be assured that Erosion Control Measures are included in the GRR/EIS for Dauphin Island.

7. The Public Scoping Notice states that the purpose of the study will be to determine improvements for safety and efficiency of the harbor users. It does not state that the purpose of the study will address the effects of dredging on Dauphin Island and this objective must also be included in the GRR/EIS.
8. The Mobile District has continually stated that Sand deposited in the SIBUA makes its way to Dauphin Island. The EIS must document and prove that the sand (dredged) deposited in the SIBUA makes it to Dauphin Island. The EIS must address where the dredged sand is to be deposited to maximize shoreline erosion with proof and facts that this is true.
9. There needs to be a Citizen Advisory Committee for the public to participate in the GRR/EIS process.
10. **Dr. Susan Rees expert testimony Corps Lawsuit:** Dr. Rees was an expert witness for the Corps and gave testimony on 9-15-09 at the Corps Lawsuit Fairness Hearing. Her testimony is applicable to the Corps plans as public input for the Widening and Deepening of the Mobile Harbor. Dr. Rees testimony **must be considered and followed by the Corps in the development of the GRR/EIS for Dauphin Island and Mobile harbor.**

Below are Excerpts of the Testimony of Dr. Susan Ivester Rees: September 15, 2009 Fairness Hearing, Mobile, Alabama; Questioned by Wells D. Burgess, US Department of Justice.

Q= Question. A = Answer

Q. And could you briefly state your employment history?

A. I have been employed with the Mobile District Corps of Engineers since 1981. Since that time I've held a number of positions with the Corps. Primarily in what is called the Coastal Environment Section of the Planning Division. The **duties** of that section are **to ensure** the environmental compliance of all of the federally authorized projects and military activities that are undertaken by the district.

Q. What are your current responsibilities?

A. Currently, I'm the program manager for the Mississippi Coastal Improvements Program.

Q. Are you familiar with the Corps' dredging operations on what we call the outer bar channel?

A. Yes, I am. The Mobile Harbor Project was one of the projects that I was responsible for.

Q. So I and the Court and everybody else understands this, are you telling us, then, if you increase the channel over what it's currently maintained, the State is going to have to pick up half the footing – half the bill?

A. That's correct

Q. And that includes construction and maintenance?

A. That's correct.

Q. Thank you, Dr. Rees. I'm going to ask you now that are going to basically – there's been some suggestion here that the Corps already has the funds to do this and it can just go out and basically start digging. And I need you to take the Court and also the class members here through the process that you believe needs to happen or that you know needs to happen based on your knowledge of the regulations and your experience and your current position before this additional dredging could occur.

A. **Engineering regulation 1105-2-100, Chapter 4**, dictates that for post-authorization projects -- and in this case if we were to try to deepen Mobile Harbor that would be considered post-authorization -- that we have to do a re-evaluation report utilizing current planning criteria and current policy and regulations.

There are two types of reports that you can do. And basically the period of time that has elapsed since the original report was done and a consideration of whether conditions have changed since that original report was done, those two factors drive the level of reporting that is required.

For the case of Mobile Harbor, we would have to do what is called a general re-evaluation report. That basically brings all up to current condition. It looks project is still justified or not.

If you take Mobile Harbor specifically, it was originally authorized on the coal trade and the use of the McDuffie Coal Terminal. Today, the through-port and the port is vastly different from what it was in the late '80s, so there's **different economics** obviously, the cost of dredging and the placement of dredge material has changed significantly and the environment has changed. **And so we would have to take into consideration all of those aspects in preparing that general re-evaluation report.**

And as far as the environmental compliance goes, because of the age of the original EIS we would have to do a supplement to that EIS.

Q. And I had asked you before, did I not, obviously you have years of experience with the National Environmental Policy Act compliance; is that correct?

A. Yes, I do.

Q. Now, would that also take into account engineering feasibility?

A. Yes.

Q. And economic benefit?

A. That's correct.

Q. And the cost benefit ratio?

A. Yes.

Q. I understand has that changed?

A. The cost benefit ration for a budgetable project changed last year.

Q. Now, how about would you have to have a new project agreement with the State?

A. If the findings of the general re-evaluation report were in the affirmative, prior to any construction activities, we would have to have a new partnership agreement with the State and the State Port Authority that would detail their costs for the initial construction and for the future maintenance as well as their other responsibilities.

Q. And is it correct to say -- I'll probably let the State speak to this, but the State would have to figure out how -- whether they could shoulder this additional expense; is that correct?

A. Well, they would have to figure out that and then they would also have to work with the Congressional delegation to get the Corps the money as well.

Q. You mentioned that an environmental impact statement would be issued if there was any expansion over the current -- currently maintained dredging depths and width. Would that environmental impact statement examine the impact on Dauphin Island of any expansion?

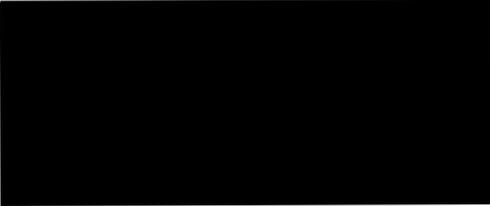
A. It would definitely examine the impacts to the coastal processes of the entire region, not just Dauphin Island.

Q. But including Dauphin Island?

A. Definitely.

Having knowledge of the public input at the January 12th Public Scoping Hearing is important and critical to understanding the concerns of those individuals present at the hearing. Some attendees to the hearing provided written input and some provided verbal input. I was told that 48 concerned citizens signed the attendance form. Please advise me by e-mail at sgraves1@bellsouth.net how to obtain copies of the written and transcribed comments. In addition, since the date for submission of public comments, please advise how to obtain copies of future comments. Please provide me with a copy of all public comments.

Sincerely,



Enclosures

Cc:

Senator Richard Shelby
Senator Jeff Sessions
Congressman Bradley Byrne
Lt. General Thomas P. Bostick
Brigadier General C. David Turner
State Senator Bill Hightower
State Representative David Sessions
Jeff Collier, Mayor, Dauphin Island & Town Council
Dom Carlucci, President, DIPOA
EPA/NEPA - Southeast

Ms. Jennifer Jacobson
US Army Corps of Engineers
Mobile District, Planning & Environmental Division
Coastal Environment Team
PO Box 2288
Mobile, Alabama 36628-0001

Comment # 75

February 20, 2016

Dear Ms. Jacobson

I am writing to share my concerns regarding the General Reevaluation Study and Environmental Impact Statement to deepen and widen the Mobile Harbor Ship Channel. In response to the Corps of Engineers Public Scoping Meeting held January 12, I have a number of concerns and ask that you take the below items into consideration.

- If the Corps plans to dispose of dredged material in Mobile Bay (i.e., thin layer spreading, island creation, etc.) removed during initial deepening and widening of the ship channel and future maintenance, the Corps should prepare a Dredged Material Disposal Master Plan for Mobile Bay and make it part of the Study and EIS. Information should be made available to the public in a timely manner, allowing for public involvement and feedback throughout the process.
- The Corps should no longer purposefully exclude Dauphin Island from its "Regional Sediment Management Strategy (RMS)" for Mobile Bay. Instead, the Study should incorporate Dauphin Island in the existing RMS approach because the island's erosion is affected by maintenance of the Outer Bar Channel. The Corps should devote major attention to the beneficial use of dredged sands to counter erosion.
- Comply with Section 5 of the River and Harbor Act of 1935 that requires every Corps report involving an "improvement" to an inlet (i.e., Mobile Harbor Outer Bar Channel through Mobile Pass) to evaluate shoreline erosion for a distance of not less than ten miles on either side of the inlet channel. The Corps' 1980 report and EIS did not comply with that law.
- Thoroughly address the cumulative historical sand losses to Dauphin Island dating back to at least 1958 that correspond with increasing deepening of the Outer Bar Channel according to U.S. Geological Survey's 2007 report. This analysis is needed to establish the historical and baseline and projected future conditions to describe the No Action Alternative against which the deepening and widening alternatives will be compared. The Corps cannot ignore the losses in millions and millions of littoral drift sands due to its maintenance practices and the erosion of Dauphin Island that occurred over time.
- Explain why the Corps no longer agrees with the agency position stated in its draft 1978 report on Dauphin Island's beach erosion that concluded maintenance of the Outer Bar Channel is contributing to at least 40% of Dauphin Island's erosion problem. Document why the findings and conclusions of that report are now considered to be invalid? The Corps not only ignores its own 1978 report now, but is of the new position that maintenance dredging of the channel has no impact on the erosion of Dauphin Island. How can the Corps expect the public to believe the results of the impending Study and EIS, when its change in position on the erosion issue appears to have been influenced by its desire to win the 2000-2009 lawsuit with the Dauphin Island Property Owners Association and by the desire keep the non-federal share of the costs borne by the Alabama State Port Authority to maintain the Mobile Harbor project as low as possible?
- The scientific literature is replete with numerous examples where navigation channels dredged through coastal inlets have interrupted the littoral drift of nearshore sands along the beach, causing beaches downdrift of the inlets to erode. This phenomenon is common along the entire US Gulf Coast, the rest of the nation, and around the world. Yet, the Mobile District has maintained this scientific model widely accepted by coastal scientists and engineers does not apply to dredging the Outer Bar Channel through the Mobile Pass Inlet and the erosion of Dauphin Island. The General Evaluation Study and EIS must devote considerable attention to this issue and provide convincing information to support whatever conclusion the Corps develops.
- The Corps has dumped dredged sands in the Sand Island Beneficial Use Area (SIBUA) south of the lighthouse for years with the position being that these sands are moved by currents to Dauphin Island to counter erosion. However, the observed evidence indicates most of the sands are not moved, but accumulate at that location, while Sand Island has almost disappeared and Dauphin Island continues to erode. This leads to the conclusion that the SIBUA is failing to meet its intended purpose. The General Reevaluation Study and EIS should thoroughly evaluate why the SIBUA fails to meet its purpose.
- In lieu of continuing to use the SIBUA, the Corps should adopt the same shallow water (<10 to 15 feet) deposition methods the Mobile District has recently recommended be used to build back Petit Bois Island's eroded Gulf shoreline west of Dauphin Island.

- Establish a Citizen Advisory Committee that will meet at least two to four times a year with the Corps to assess how public concerns are being addressed in the General Reevaluation Study and EIS. The next time the public hears from the Corps should not be when Draft EIS is released for review at the end of the 4-year study.

In conclusion, as a Dauphin Island property owner, I expect the study to be conducted objectively and in a manner that will assure all concerned interests are given equal consideration and not just the views of the Alabama State Port Authority. Thank you for your time and consideration.

Sincerely,



Ms. Jennifer Jacobson
US Army Corps of Engineers
Mobile District, Planning & Environmental Division
Coastal Environment Team
PO Box 2288
Mobile, Alabama 36628-0001

Comment # 76

February 20, 2016

Dear Ms. Jacobson

I am writing to share my concerns regarding the General Reevaluation Study and Environmental Impact Statement to deepen and widen the Mobile Harbor Ship Channel. In response to the Corps of Engineers Public Scoping Meeting held January 12, I have a number of concerns and ask that you take the below items into consideration.

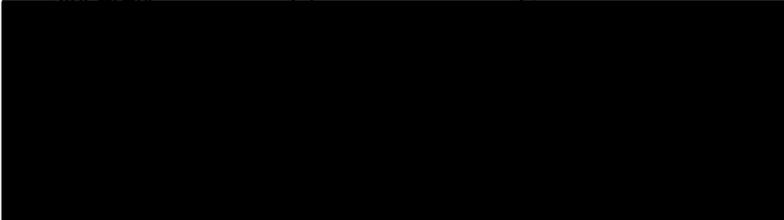
- If the Corps plans to dispose of dredged material in Mobile Bay (i.e., thin layer spreading, island creation, etc.) removed during initial deepening and widening of the ship channel and future maintenance, the Corps should prepare a Dredged Material Disposal Master Plan for Mobile Bay and make it part of the Study and EIS. Information should be made available to the public in a timely manner, allowing for public involvement and feedback throughout the process.
- The Corps should no longer purposefully exclude Dauphin Island from its "Regional Sediment Management Strategy (RMS)" for Mobile Bay. Instead, the Study should incorporate Dauphin Island in the existing RMS approach because the island's erosion is affected by maintenance of the Outer Bar Channel. The Corps should devote major attention to the beneficial use of dredged sands to counter erosion.
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Coastal Environment Team
PO Box 2288
Mobile, Alabama 36628-0001

Comment # 77

February 20, 2016

Dear Ms. Jacobson

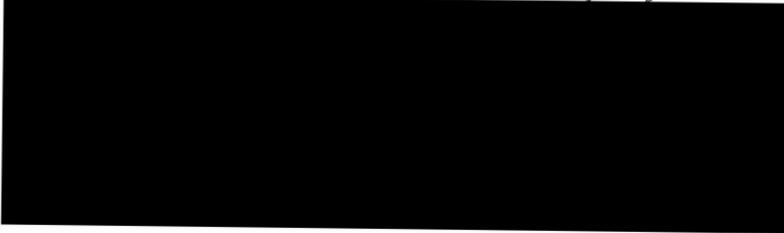
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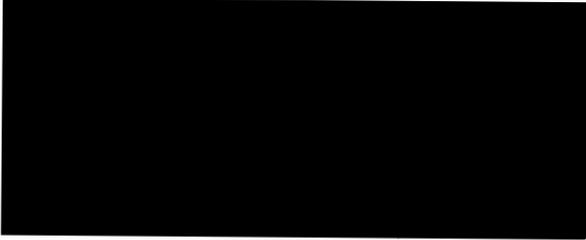
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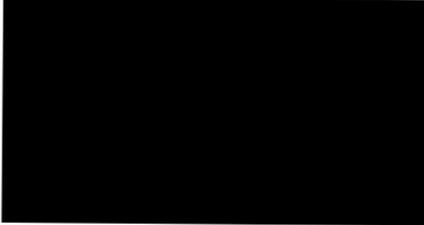
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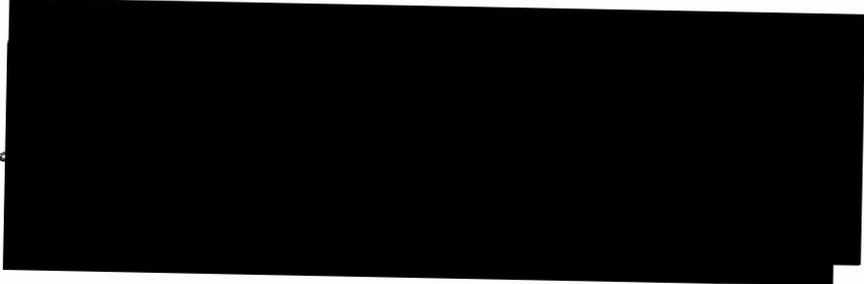
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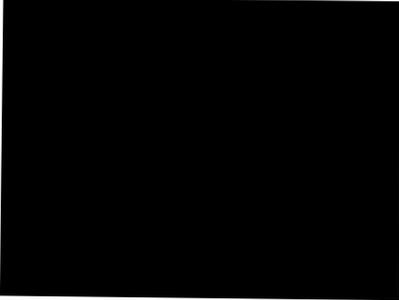
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US Army Corps of Engineers
Mobile District, Planning & Environmental Division
Coastal Environment Team
PO Box 2288
Mobile, Alabama 36628-0001

Comment # 83

February 20, 2016

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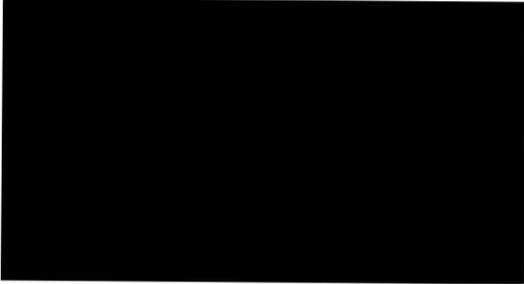
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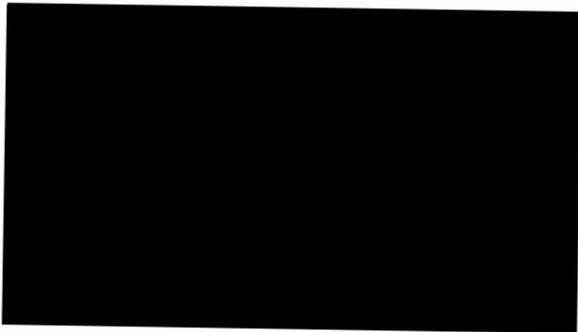
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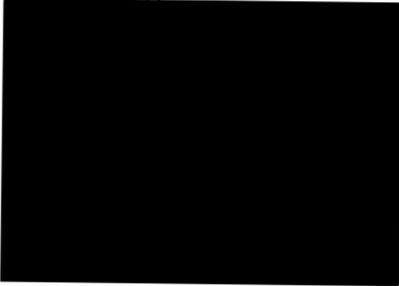
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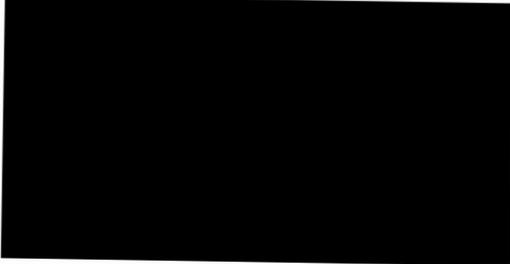
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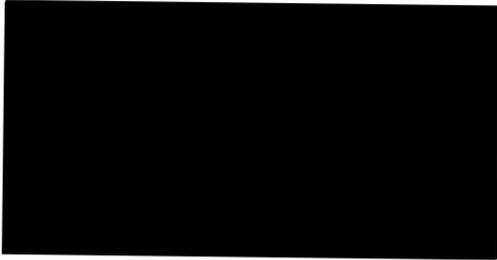
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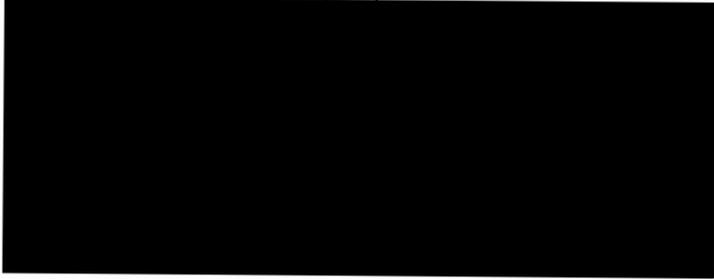
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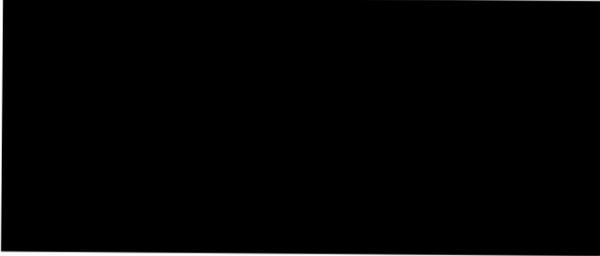
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Ms. Jennifer Jacobson
US Army Corps of Engineers
Mobile District, Planning & Environmental Division
Coastal Environment Team
PO Box 2288
Mobile, Alabama 36628-0001

Comment # 90

February 20, 2016

Dear Ms. Jacobson

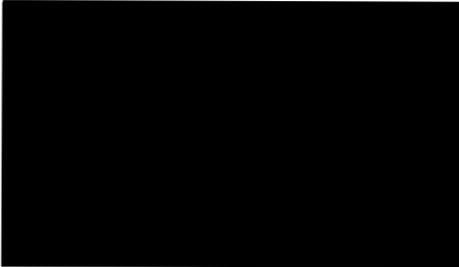
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Comment # 91

February 20, 2016

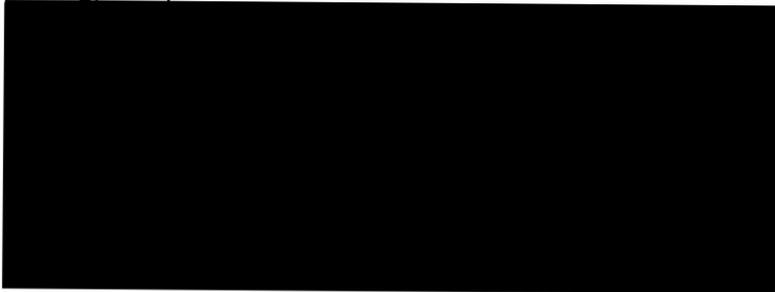
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Comment # 92

February 20, 2016

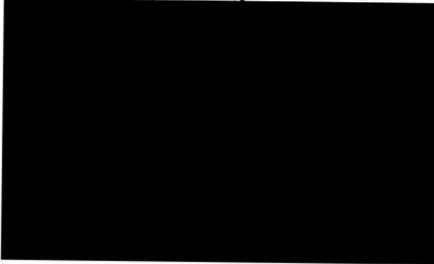
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Comment # 93

February 20, 2016

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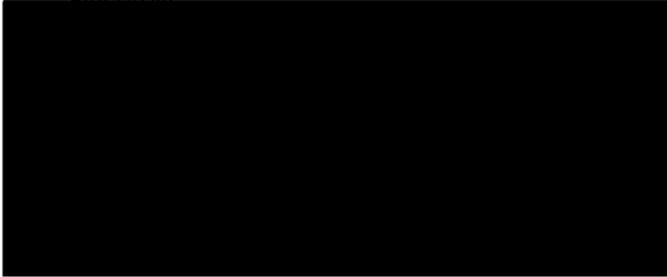
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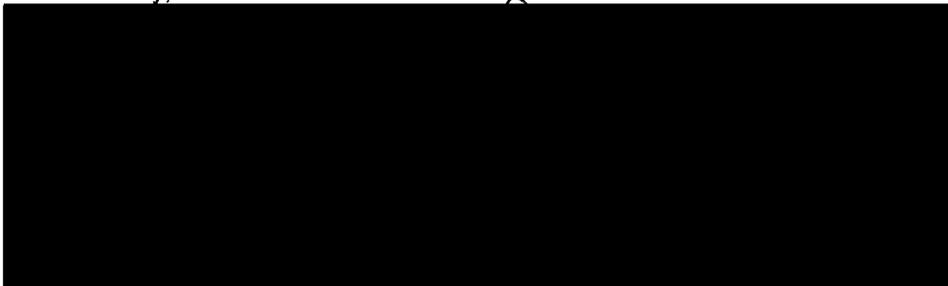
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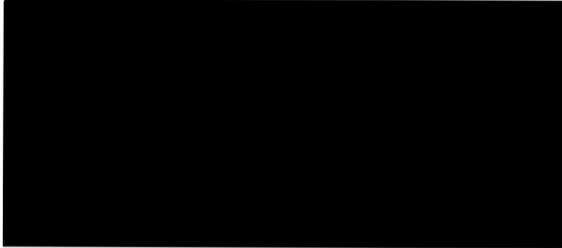
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Sincerely,



Ms. Jennifer Jacobson
US Army Corps of Engineers
Mobile District, Planning & Environmental Division
Coastal Environment Team
PO Box 2288
Mobile, Alabama 36628-0001

Comment # 96

February 20, 2016

Dear Ms. Jacobson

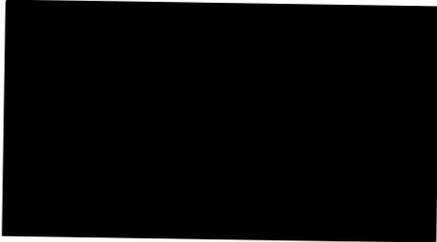
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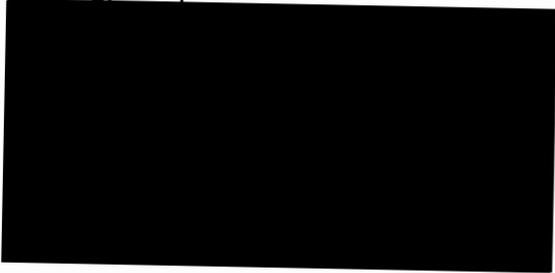
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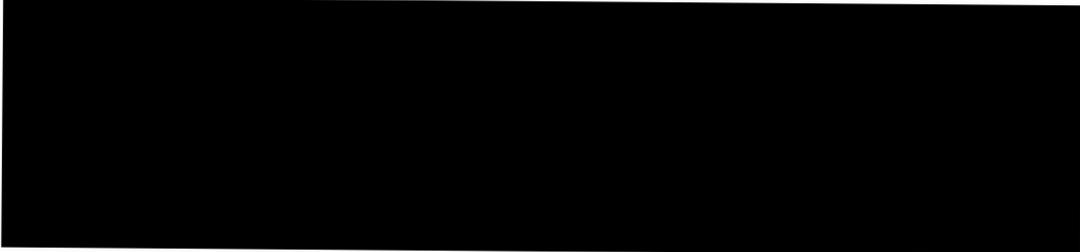
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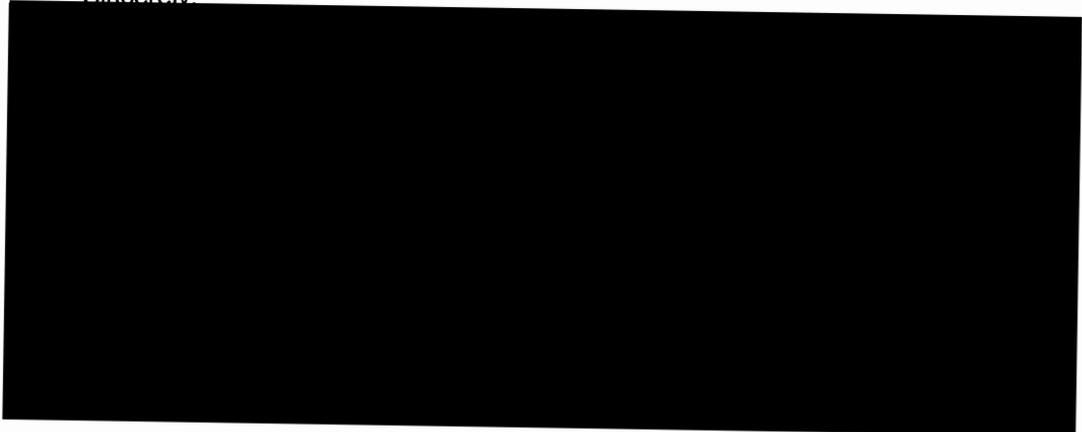
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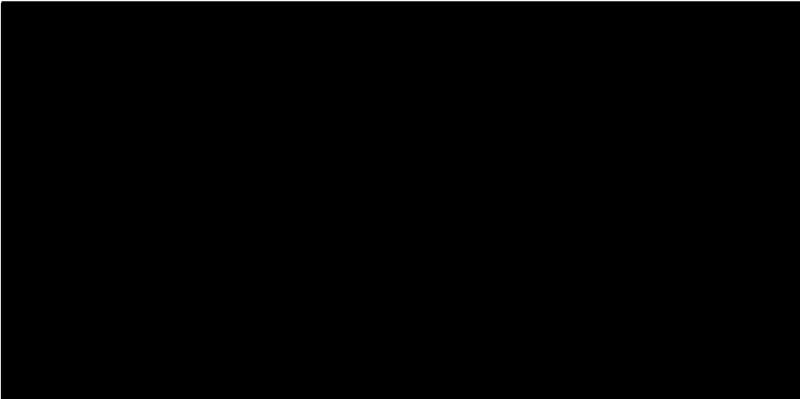
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Comment # 103

February 20, 2016

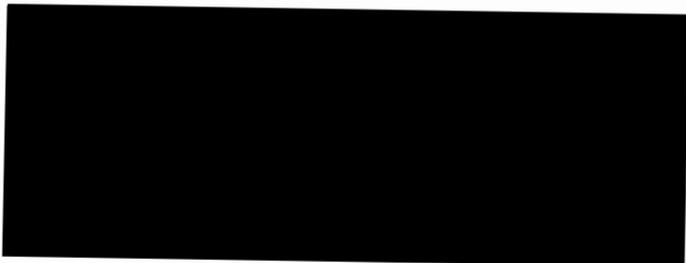
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Comment # 104

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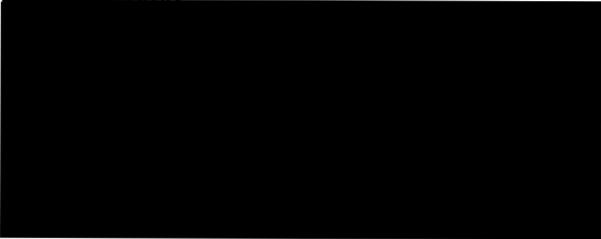
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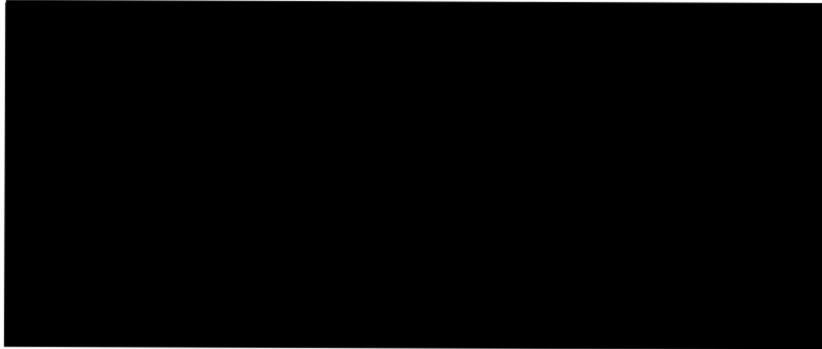
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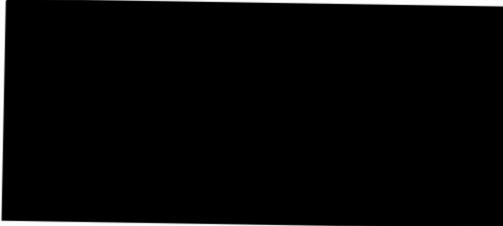
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Comment # 109

February 20, 2016

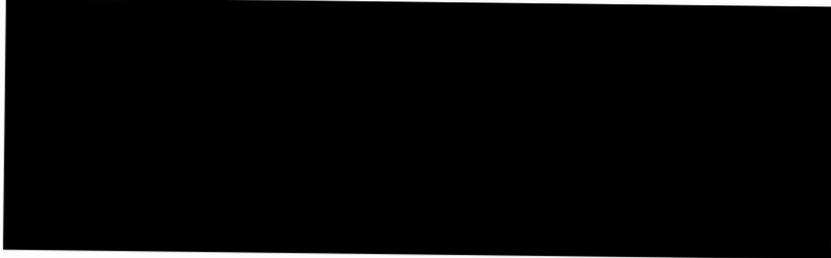
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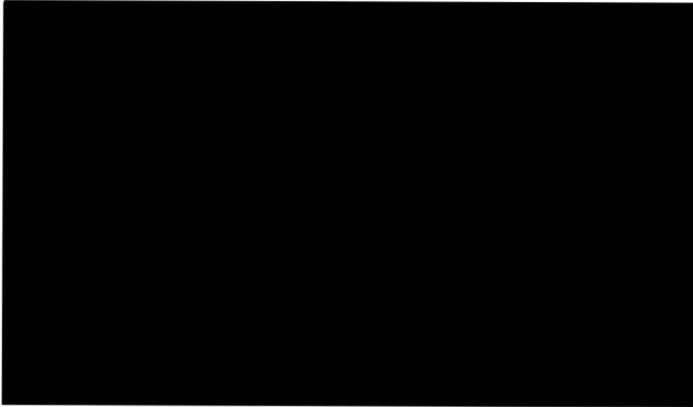
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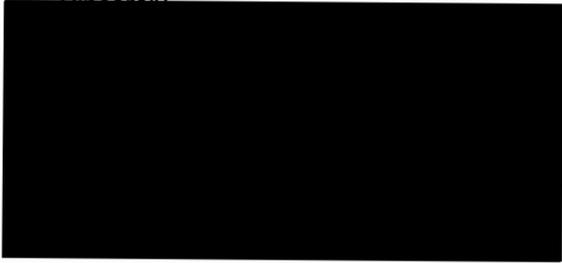
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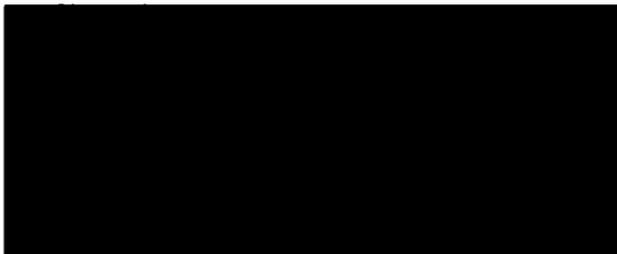
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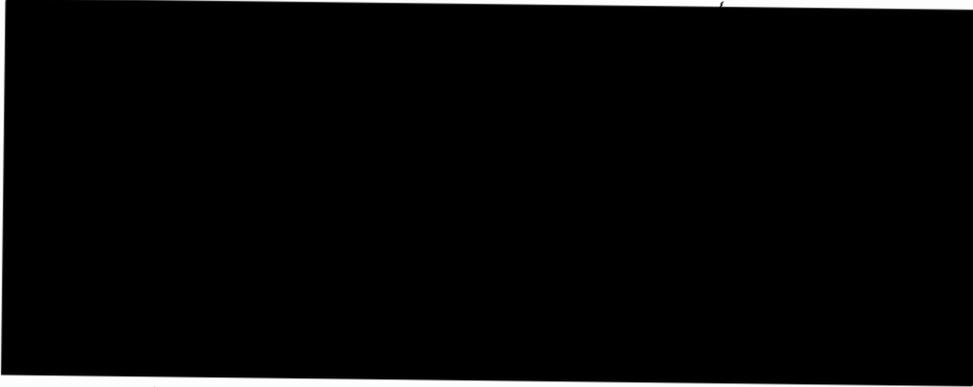
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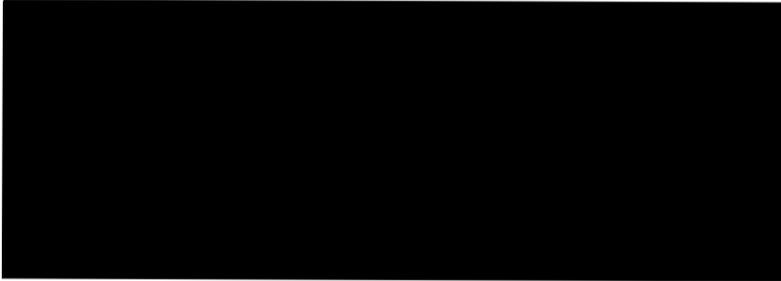
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- Explain why the Corps no longer agrees with the agency position stated in its draft 1978 report on Dauphin Island's beach erosion that concluded maintenance of the Outer Bar Channel is contributing to at least 40% of Dauphin Island's erosion problem. Document why the findings and conclusions of that report are now considered to be invalid? The Corps not only ignores its own 1978 report now, but is of the new position that maintenance dredging of the channel has no impact on the erosion of Dauphin Island. How can the Corps expect the public to believe the results of the impending Study and EIS, when its change in position on the erosion issue appears to have been influenced by its desire to win the 2000-2009 lawsuit with the Dauphin Island Property Owners Association and by the desire keep the non-federal share of the costs borne by the Alabama State Port Authority to maintain the Mobile Harbor project as low as possible?
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Ms. Jennifer Jacobson
US Army Corps of Engineers
Mobile District, Planning & Environmental Division
Coastal Environment Team
PO Box 2288
Mobile, Alabama 36628-0001

Comment # 116

February 20, 2016

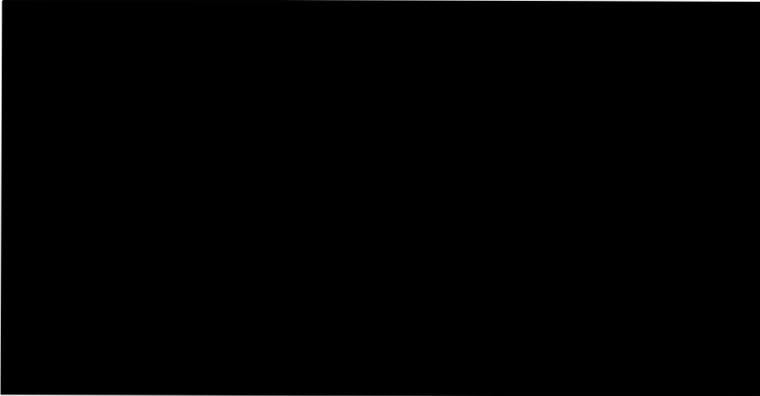
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Ms. Jennifer Jacobson
US Army Corps of Engineers
Mobile District, Planning & Environmental Division
Coastal Environment Team
PO Box 2288
Mobile, Alabama 36628-0001

Comment # 117

February 4, 2016

Dear Ms. Jacobson

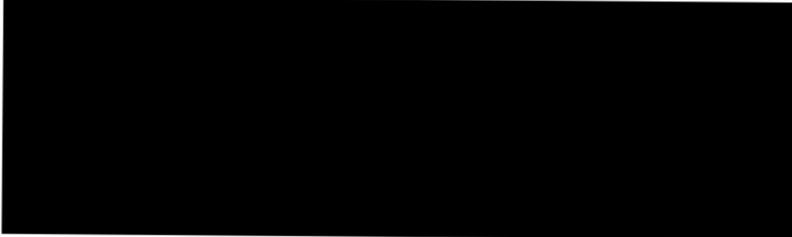
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US Army Corps of Engineers
Mobile District, Planning & Environmental Division
Coastal Environment Team
PO Box 2288
Mobile, Alabama 36628-0001

Comment # 118

February 20, 2016

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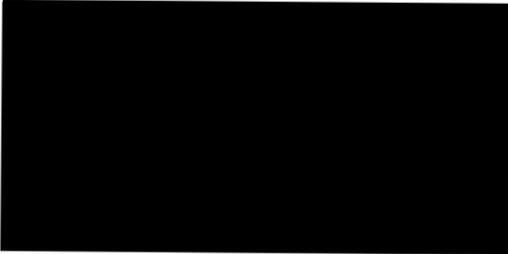
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Comment # 119

February 20, 2016

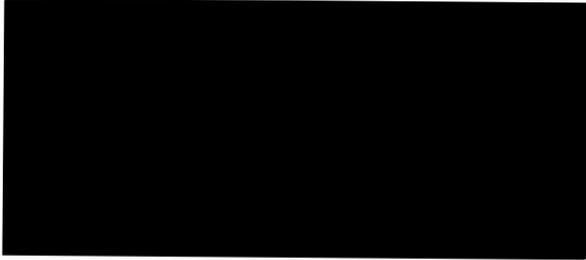
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Comment # 120

February 20, 2016

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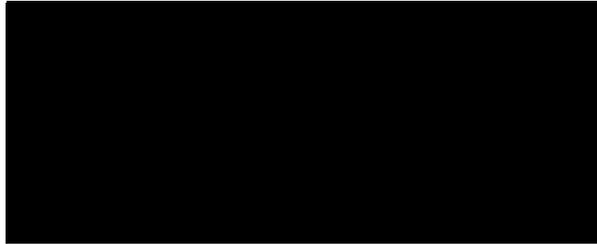
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Comment # 121



February 8, 2016

Ms. Jennifer Jacobsen
U.S. Army Corps of Engineers
Mobile District Planning and Environmental Division
Coastal Environmental Team
P.O. Box 2288
Mobile, Alabama 36628-0001

And Via Hand Delivery to Ms. Jacobsen at:

109 St. Joseph Street
Mobile, Alabama

RE: Mobile Ship Channel Widening and Deepening/Dauphin Island

Dear Ms. Jacobsen:

I am writing to express my concerns regarding the possible effects of the proposed widening and deepening of the Mobile Ship Channel on Dauphin Island (sometimes hereinafter referred to as "the Island"). My immediate awareness of and interest in this matter arises out of the fact that I own a house and lot on the south (Gulf of Mexico) side of the Island. While I am concerned about my property on the Island, I also own a residence in Mobile and have an office in downtown Mobile, and I am therefore as concerned about the mainland as I am about the Island itself.

As you know, the issue is the continuing erosion of the Dauphin Island coastline. This erosion affects not only those who have property on the Island but also residents of the coastal mainland of southwest Alabama because the Island is a barrier island, the natural function of which is to protect the mainland from high tides and surges caused by storms. This protective effect is proven and beyond debate.¹

¹ The barrier island protective effect of the Island is itself sufficient to debunk the position of those who maintain that efforts to reverse the erosion of the Dauphin Island coastline and replenish that coastline will benefit only those

Erosion of DI
sand migration on Mobile Bay

Further, it is proven science that sand migrates from east to west along the Gulf of Mexico coast of the United States and that sand migrating from the east continuously replaces sand which has migrated to the west. Therefore, if the east to west migration of sand along the Alabama Gulf Coast functions as it should, the coastline should remain roughly the same. I know if no reason that this should not hold true with the Dauphin Island coastline as well.

The adverse effects of the dredging of this ship channels on sand migration is well documented along the coasts of the United States, and the Mobile Ship Channel is no exception. It cannot be mere chance that the dredging of the Mobile Ship Channel has coincided with the drastic erosion of the Dauphin Island coast. The Corps of Engineers recognized this in its draft 1978 report on Dauphin Island's beach erosion which concluded that maintenance of the outer bar channel is responsible for at least 40% of Dauphin Island's erosion problems.² The widening and deepening of the channel can only make the problem worse.

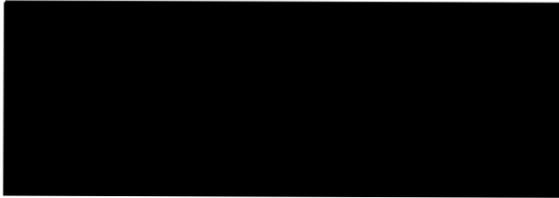
It seems to me that what I have outlined above is more than enough to require that the Corps, in order to be objective, at least include the Dauphin Island erosion situation in any study undertaken in connection with the widening and deepening of the ship channel. This would include environmental impact statements and any studies dealing with the disposal of dredged material. Regarding the latter, much more attention than at present must be paid to where dredged material must be placed in order to put it back into the natural east to west migration pattern. In this regard, it is more than clear that whatever the Corps is now doing with the dredged material is not working. The process considering the dredge disposal issue should be publicized and transparent and should encourage input from the general public and from Dauphin Island residents in particular. The ongoing erosion problem merits at least that much from the Corps.

I want to thank you in advance for your attention to and consideration of this letter.



who own property on the Island. And, while it is beyond the scope of this letter, it bears mentioning that the economies of Mobile and the entire state of Alabama benefit enormously from the commerce resulting from or enhanced by the traffic moving through the ship channel.

² The Corps has changed its position on that issue and now maintains that the dredging of the channel has no effect on the erosion of Dauphin Island. To my knowledge, the Corps has not offered an explanation of that change of position. Considered more broadly, the fact that the Corps takes the position that the Dauphin Island situation does not fit the generally accepted science of the erosive effect of dredging navigational channels through coastal inlets is perplexing.



February 8, 2016

Ms. Jennifer Jacobsen
U.S. Army Corps of Engineers
Mobile District Planning and Environmental Division
Coastal Environmental Team
P.O. Box 2288
Mobile, Alabama 36628-0001

And Via Hand Delivery to Ms. Jacobsen at:

109 St. Joseph Street
Mobile, Alabama

RE: Mobile Ship Channel Widening and Deepening/Dauphin Island

Dear Ms. Jacobsen:

I am writing to express my concerns regarding the possible effects of the proposed widening and deepening of the Mobile Ship Channel on Dauphin Island (sometimes hereinafter referred to as "the Island"). My immediate awareness of and interest in this matter arises out of the fact that I own a house and lot on the south (Gulf of Mexico) side of the Island. While I am concerned about my property on the Island, I also own a residence in Mobile and have an office in downtown Mobile, and I am therefore as concerned about the mainland as I am about the Island itself.

As you know, the issue is the continuing erosion of the Dauphin Island coastline. This erosion affects not only those who have property on the Island but also residents of the coastal mainland of southwest Alabama because the Island is a barrier island, the natural function of which is to protect the mainland from high tides and surges caused by storms. This protective effect is proven and beyond debate.¹

¹ The barrier island protective effect of the Island is itself sufficient to debunk the position of those who maintain that efforts to reverse the erosion of the Dauphin Island coastline and replenish that coastline will benefit only those

Further, it is proven science that sand migrates from east to west along the Gulf of Mexico coast of the United States and that sand migrating from the east continuously replaces sand which has migrated to the west. Therefore, if the east to west migration of sand along the Alabama Gulf Coast functions as it should, the coastline should remain roughly the same. I know if no reason that this should not hold true with the Dauphin Island coastline as well.

The adverse effects of the dredging of this ship channels on sand migration is well documented along the coasts of the United States, and the Mobile Ship Channel is no exception. It cannot be mere chance that the dredging of the Mobile Ship Channel has coincided with the drastic erosion of the Dauphin Island coast. The Corps of Engineers recognized this in its draft 1978 report on Dauphin Island's beach erosion which concluded that maintenance of the outer bar channel is responsible for at least 40% of Dauphin Island's erosion problems.² The widening and deepening of the channel can only make the problem worse.

It seems to me that what I have outlined above is more than enough to require that the Corps, in order to be objective, at least include the Dauphin Island erosion situation in any study undertaken in connection with the widening and deepening of the ship channel. This would include environmental impact statements and any studies dealing with the disposal of dredged material. Regarding the latter, much more attention than at present must be paid to where dredged material must be placed in order to put it back into the natural east to west migration pattern. In this regard, it is more than clear that whatever the Corps is now doing with the dredged material is not working. The process considering the dredge disposal issue should be publicized and transparent and should encourage input from the general public and from Dauphin Island residents in particular. The ongoing erosion problem merits at least that much from the Corps.

I want to thank you in advance for your attention to and consideration of this letter.



who own property on the Island. And, while it is beyond the scope of this letter, it bears mentioning that the economies of Mobile and the entire state of Alabama benefit enormously from the commerce resulting from or enhanced by the traffic moving through the ship channel.

² The Corps has changed its position on that issue and now maintains that the dredging of the channel has no effect on the erosion of Dauphin Island. To my knowledge, the Corps has not offered an explanation of that change of position. Considered more broadly, the fact that the Corps takes the position that the Dauphin Island situation does not fit the generally accepted science of the erosive effect of dredging navigational channels through coastal inlets is perplexing.

Ms. Jennifer Jacobson
US Army Corps of Engineers
Mobile District, Planning & Environmental Division
Coastal Environment Team
PO Box 2288
Mobile, Alabama 36628-0001

Comment # 122

RE: Public Notice: FP15-MH01-10

Dear Ms. Jacobson:

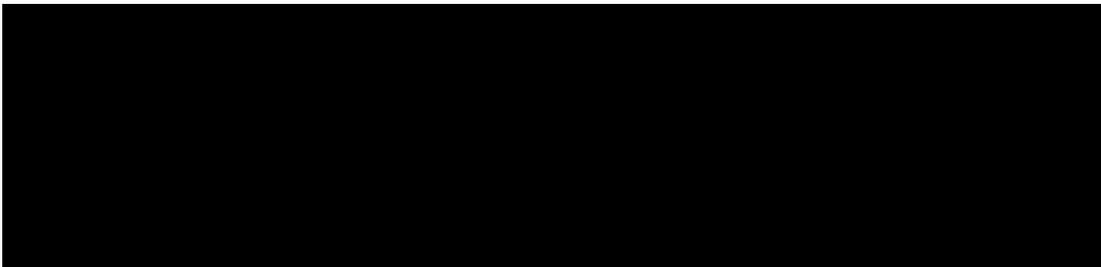
I am sure you receive many versions of a basic form letter requesting a different approach to the sand erosion on Dauphin Island. I'd prefer to give you a personal perspective; however, one that has a direct and severe economic impact on me and my family.

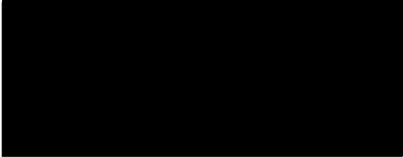
After visiting beaches from Mississippi to Florida, our family settled on Dauphin Island to build an investment property. Why? The beaches are beautiful, crowds minimal, private ownership of our beachfront property to the high tide line, and the overall family atmosphere.

We built our five-bedroom beachfront home this summer and are renting it as much as possible to be able to have it pay for itself. Obviously, beach erosion is a very real concern. We were told there were programs being considered, even possible funding from monies received by Alabama after Katrina.

All we ask is that you be impartial in your decision-making. If the Corps has mistakenly calculated how sand levels will increase on the island, please don't cover the facts. What is of prime importance is how we move forward from here to insure the pristine beach on Dauphin Island is being preserved and not further eroded due to policies that could be modified and updated.

Our investment of a half million dollars is a substantial one for us. This year, there has been an enormous building boom on the island; so the taxable revenue to be gained from the dramatic increase of rental revenues should not be taken lightly. The economic impact of losing our beach would be disastrous, not only for those of us who have significant financial investments, but also to the overall economy because renters will not keep coming if the beach quality erodes!





Comment # 123

US Army Corps of Engineers
Mobile District, Planning and Environmental Division
Coastal Environment Team
RE: Public Notice FP15-MH01-10
PO Box 2288
Mobile, Alabama 36628-0001

Dear Coastal Environment Team,

As property owners on Dauphin Island since the early 1970's we have seen many storms and erosion problems during this time. As owners of a house on the north shore of the west end, we have endured these problems because of our love of the Island. We have seen our beaches come and go but mostly go. The widening and deepening of the ship channel will have a catastrophic effect on beach front property if sand is taken away and not allowed to migrate from east to west. The natural migration is interrupted every time the ship channel is deepened. It would appear that the dumping of the dredge on the west side of the channel close to Dauphin Island would allow those sands to migrate west as nature intends.

In 1935, two years after my birth, Congress approved Section 5 of Public Law 409, which deals with erosion at river mouths and inlets. Any improvements that would cause erosion for distances of not less than 10 miles on either side would create considerable erosion. The law obviously covers Dauphin Island and would seem to be applicable to our erosion problem that dredging causes.

The law is clear. There will be damage when the spoils are deposited far off shore, thereby depriving our Island of natural replenishment which normally falls to the bottom of the channel as it migrates from east to west.

Other factors must also be considered:

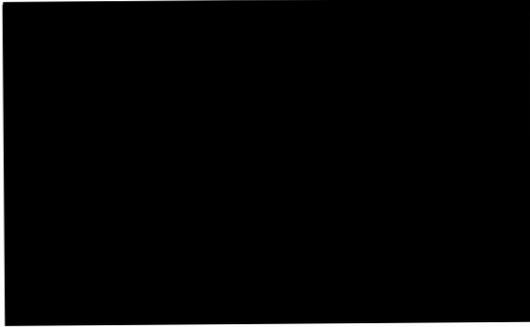
Bird Sanctuaries on the Island with nestings both inland and the uninhabited west end will be reduced due to continued erosion of bird habitats.

Marine life formed in marsh areas on Alabama mainland north of the Island would be exposed should the Island continue to erode.

Destruction of the natural barriers for the Alabama mainland would occur should the Island continue to erode at its present accelerated pace.

We hope you will consider our plea as our only reason for this letter is to protect the property owners and to preserve the natural beauty of Dauphin Island.

We trust that you will consider Public Law 409 as you make your decision. Depositing spoils near the Island would solve most of our erosion problems. We hope you will agree.



US Army Corps of Engineers
Mobile District, Planning & Environmental Division
Coastal Environment Team
RE: Public Notice: FP15-MH01-10
PO Box 2288
Mobile, Alabama 36628-0001

Comment # 124

To Whom It May Concern,

January 26, 2016

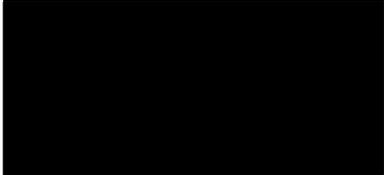
I own a home on the south beach of Dauphin Island about 1-1/2 miles from the west end of Bienville Blvd. I lost the original house to Katrina and rebuilt setting the structure back 50 feet due to erosion of the south beach. At present, the water's edge is at the property line which is another 50 feet of shoreline erosion since rebuilding in 2007.

Would you all please consider the impact of this shoreline by placing sand in the areas that will help migration toward the central south shore of Dauphin Island when removal of sand from the ship channel occurs?



January 27, 2016

Comment # 125



US Army Corps of Engineers
Mobile District, Planning & Environmental Division
Coastal Environment Team
RE: Public Notice: FP15-MH01-10
PO Box 2288
Mobile, Alabama 36628-0001

Sir / Madam:

My wife and I own a beachfront home at Dauphin Island. Her parents owned one before us and her grandmother before them. We are not normally politically active but the continuing egregious actions by the Corps have made us so.

Dauphin Island deserves greater consideration from the Corps. It is a fragile and beautiful ecosystem and it is under a tremendous environmental strain that can be directly connected to past, and worse still, present Corps practices. 'Too big to sue' is a poor excuse for what the Corps is doing.

For my part I plan to come out of my shell and lend my stubborn ounces to the fight against the Corps' plan for sand management practices that have and are continuing to cause damage to the island we love so much. Little though it may matter to you, since discussions have failed to produce a rational outcome and plan, we are now committed to actively participate in the opposition to your agency's actions.

Sincerely,



Comment # 126

February 1, 2016

US Army Corps of Engineers

Mobile District, Planning and Environmental Division, Coastal Environment Team

RE: Public Notice: FP-MH01-10

PO Box 2288

Mobile, Alabama 36628-0001

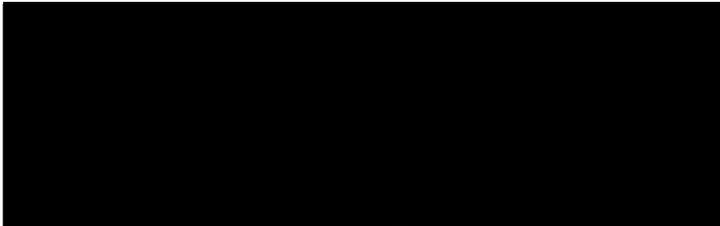
Gentlemen,

This letter is written to seek your support and attention to the cumulative historical losses of sand to Dauphin Island corresponding to increasing and deepening of the Outer Bar Channel according to U.S. Geological Survey's 2007 report. We urge that you determine why dredged sands placed at the Sand Island Beneficial Use Area are not moved to Dauphin Island to counter the historical erosion.

In the study of Mobile Harbor Channel Widening and Deepening Study, we urge that study objectively assures all interests be given equal consideration, not just those of the Alabama State Port Authority. Compliance with Section 5 of the River and Harbor Act of 1935 is a critical factor, to evaluate shoreline erosion for a distance of not less than ten miles on either side of the inlet channel and the Corps 1980 report and EIS did not comply with that requirement.

Furthermore, we urge that the Corps implement a public involvement program so that the public is kept aware of the Corps' direction not simply with the Corps release of the Draft EIS at the end of the 4-year study.

We appreciate your consideration and anticipate that the Corps will take these and other related matters into its planning process and to keep the public aware of its direction.



January 27, 2016



Comment # 127

US Army Corps of Engineers
Mobile District, Planning & Environmental Division
Coastal Environment Team
RE: Public Notice: FP15-MH01-10
P. O. Box 2288
Mobile, AL 36628-0001

To whom it may concern:

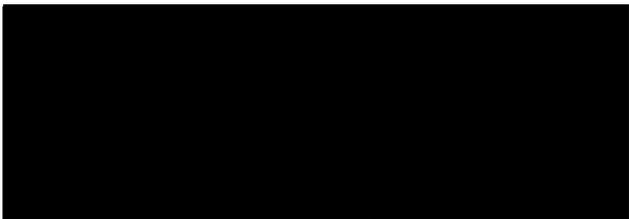
I am deeply concerned about Dauphin Island and the loss of sand over the last decade.

My home was taken by Katrina after just three years of enjoyment as a vacation home. I continue to vacation there since then and have been dismayed over the loss of homes on the west end and the continuing erosion throughout the property. The island has changed its shape dramatically since I purchased my home in 2003.

I urge you to look beyond the need to dredge the channel and consider the long term consequences of man's need to change nature's plan. Nature put Dauphin Island where it is to protect the mainland.

The island has been ignored long enough. Perhaps it is time to consider what can be done to turn back the clock and repair the damage already done. You are a large government entity and with that goes responsibility to the people, the animals, the beaches and the future.

I hope that your will be conscientious enough to stop and consider your plans carefully and objectively conduct your study with equal consideration and not just the Alabama State Port Authority, build up the sand on the shores to counter erosion and work with the habitants of the island.



FOR THE DIRECTOR
U.S. ARMY CORPS OF ENGINEERS

MOBILE DISTRICT
PLANNING & ENVIRONMENTAL DIVISION



January 26, 2016

U. S. Army Corps of Engineers
Mobile District, Planning & Environmental Division
Coastal Environment Team
P. O. Box 2288
Mobile, AL 36628-0001

Comment # 128

RE: Public Notice: FP15-MH01-10

To Whom It May Concern:

I am writing to you as a citizen of the Mobile Bay community who has several concerns about the proposed deepening and widening of the Mobile ship channel. I would like to encourage you to consider the concerns of all Mobile citizens, not just the wishes of the Mobile Port Authority, who normally has the only input to projects such as these. You could accomplish this with a Citizen Advisory Committee that meets several times a year, as well as keeping the public informed throughout the EIS study period, rather than waiting until publication of the draft EIS.

The Environmental Impact Study should address the following concerns:

- Comply with Section 5 of the River and Harbor Act of 1935 to evaluate shoreline erosion for a distance of at least 10 miles on either side of the inlet channel.
- Deny any additional deepening and widening project that will increase sand loss to Dauphin Island. We need to first understand the cumulative historical sand losses to Dauphin Island dating back to at least 1958 that correspond with increasing deepening of the Outer Bar Channel. I understand that whenever natural sand migration across an inlet channel is interrupted by navigation channel dredging, the adjacent shoreline experiences erosion. If this is the case, why would you do anything to place Dauphin Island at increased risk of erosion?
- Identify new dredged sand disposal sites nearer Dauphin Island. Apply the same shallow water deposition concepts that the Corps recommends be employed to build back Petit Bois Island's eroded shoreline west of Dauphin Island.

Thank you for considering my concerns. Thank you, too, for ensuring that ALL voices are heard and for taking necessary actions to protect our barrier island.



Comment # 129

GREER, RUSSELL, DENT & LEATHERS, PLLC

ATTORNEYS AT LAW

ATTORNEYS:

MICHAEL D. GREER

FRANK A. RUSSELL

GEORGE E. DENT

JEFFREY D. LEATHERS

JOSEPH A. MURPHY

MAILING ADDRESS:

POST OFFICE BOX 907

TUPELO, MISSISSIPPI 38802

TELEPHONE: (662) 842-5345

FACSIMILE: (662) 842-6870

WEBSITE: www.greerlawfirm.com

STREET ADDRESS:

117 NORTH BROADWAY STREET

TUPELO, MISSISSIPPI 38804

WRITER'S E-MAIL ADDRESS:

mgreer@greerlawfirm.com

January 11, 2016

Mr. Curtis M. Flakes
Department of the Army
Mobile District, Corps of Engineers
P. O. Box 2288
Mobile, AL 36628-0001

Re: CESAM-PD-EC, Public Notice No. FP15-MH01-10

Dear Mr. Flakes:

I own two houses on Dauphin Island, Alabama [REDACTED]
[REDACTED] When I purchased these houses almost ten years ago, there was several feet of beach area in front of each home. Since then, beach erosion has gradually caused me to expend over \$60,000 per house to move them to the very rear of each lot. One of the houses now has no beach area and has become a total loss due to beach erosion.

It is my understanding that many years ago, before I moved to Dauphin Island, the Corps of Engineers would dredge the channel and take the sand and dump it out toward Dauphin Island so that the sand would actually grow the beach in Audubon Subdivision.

On behalf of me and my family, we would kindly request that you consider widening and deepening the ship channel in such a way that the dredged sand could be used to the benefit of restoring the beach on the southeast side of Dauphin Island.

Thank you very much for your consideration.

Sincerely,

[REDACTED]

[REDACTED]



REPLY TO
ATTENTION OF:

DEPARTMENT OF THE ARMY
MOBILE DISTRICT, CORPS OF ENGINEERS
P.O. BOX 2288
MOBILE, ALABAMA 36628-0001

CESAM-PD-EC
Public Notice No. FP15-MH01-10

December 11, 2015

PUBLIC NOTICE

**U.S. ARMY CORPS OF ENGINEERS,
MOBILE DISTRICT**

**PUBLIC SCOPING MEETING
PREPARATION OF A SUPPLEMENTAL ENVIRONMENTAL IMPACT STATEMENT
TO
EVALUATE IMPROVEMENTS TO THE MOBILE HARBOR FEDERAL NAVIGATION
CHANNEL, MOBILE, ALABAMA**

TO ALL INTERESTED PARTIES:

The U.S. Army Corps of Engineers (USACE), Mobile District is hosting a public scoping meeting January 12, 2016 at the Mobile Alabama Cruise Terminal, 201 S. Water Street, Mobile, Alabama 36602 from 5:00 pm to 8:00 pm. The purpose of the workshop is to receive public input regarding the preparation of a Draft Supplemental Environmental Impact Statement (DSEIS) to address potential impacts associated with improving the Mobile Harbor Federal Navigation Channel in Mobile County, Alabama. The DSEIS will be used as a basis for ensuring compliance with the National Environmental Policy Act (NEPA) and evaluating alternative plans, including the "No Action" plan. The proposed alternatives being identified in the Alternatives Milestone analysis that will be evaluated include widening and deepening of selected areas of the navigation channel within the federally authorized dimensions.

The evaluation will examine the costs and benefits as well as the environmental impacts of modifying the maintained dimensions of the existing Federal project within its federally authorized limits. The purpose of the study will be to determine improvements for safety and efficiency of harbor users. Vessels are experiencing delays leaving and arriving at port facilities and inefficiencies have increased as increased cargo volumes and larger vessels call on the port to handle these increases which have resulted in traffic delays. The Alabama State Port Authority requested the USACE, Mobile District undertake studies to determine the feasibility of deepening and widening the channel to its full federally authorized depths and widths. On October 20, 2014, the Assistant Secretary of the Army approved the direction of General Investigation funds to complete Preconstruction Engineering and Design of channel widening for Mobile Harbor to initiate a General Reevaluation Report, which includes preparation of the DSEIS, to evaluate deepening and widening of the channel to its full federally authorized dimensions.

CORRESPONDENCE: Public comments can be submitted through a variety of methods. Comments may be submitted to the USACE, Mobile District by mail or electronic methods by *January 26, 2016*. In addition, comments (written or oral) may be submitted at the public meeting. Correspondence concerning this notice should refer to Public Notice No. FP15-MH01-10 and should be directed to the District Commander, U.S. Army Engineer District Mobile, P.O. Box 2288, Mobile, Alabama 36628-0001, ATTN: CESAM-PD-EC. For additional information please contact Mr. Larry Parson at (251) 690-3139 or by email at larry.e.parson@usace.army.mil.

A handwritten signature in black ink, appearing to read 'Curtis M. Flakes', with a long horizontal line extending to the right.

CURTIS M. FLAKES
U.S. Army Corps of Engineers
Mobile District

Comment # 130

District Commander
U.S. Army Engineer District Mobile
P.O.Box 2288
Mobile, AL 36628-0001

ATTN: CESAM-PD-EC

January 7, 2016

Subject: Public Notice No. FP15-MH01-10

I am unable to attend the USACE Mobile District public scoping meeting on January 12, 2016. However, I wanted to make known my grave concern regarding the impact of the widening and deepening of the navigation channel.

It is my understanding that to maintain a deeper and wider channel, larger volumes of sands will likely be dredged from the Outer Bar Channel east of Dauphin Island. I feel strongly that depending on where the Corps decides to place the dredged sands that one of two things will happen;

- 1) Further erosion of Dauphin Island will occur
- 2) The erosion of Dauphin Island can be reversed

I understand and fully support progress. However, progress should not be made at the expense of Dauphin Island and the protection it provides. It is my firm belief that any progress achieved should be used to support and even improve the conditions of a very important barrier Island such as Dauphin Island. The location of where the dredged material is placed will have a huge impact on Dauphin Island. That impact can either be positive or negative for Dauphin Island. If a decision is made on how the channel will be widened I would like to know how the Corps will analyze the effects of an enlarged channel and its effect on the erosion Dauphin Island.

It is my firm belief that the dredged material application to the Mobile Harbor Outer Bar Channel would help reverse Dauphin Island's erosion over the long-term. I was shocked to find out that there are existing laws that require the placement of dredged sands onto adjacent eroding shorelines already in force in Alabama's four neighboring Gulf Coast states. Only Alabama does not have such a law.

Thank you for considering my input and I apologize that I could not attend in person.

Sincerely,



Comment # 131



January 8, 2016

District Commander
U.S. Army Engineers
District Mobile
Post Office Box 2288
Mobile, Alabama 36628
ATTN: CESAM-PD-EC

Re: *Public Notice No. FP15-MH01-10*

Gentlemen:

I find myself unable to attend the public meeting scheduled for January 12, 2016. I understand that any comments I may have will be considered, and that I should address them to you.

I have grave concerns regarding the dredging of Mobile Harbor Outer Bar Channel and the effect it will have on Dauphin Island. The erosion of Dauphin Island has been a problem for years. The loss of our shoreline has resulted in homes left standing in water that were once on the beach. Many have been required to relocate. The situation simply cannot be allowed to continue. I am a homeowner on Dauphin Island, so these concerns are particularly troubling to me and others similarly situated, however, the adverse effect of dredging is affecting all south Alabamians, not just those with property on Dauphin Island.

Over the last decade man-made and natural disasters (the Deep Water Horizon Oil Spill, Hurricane Katrina, prolonged closures of oyster reefs, the ongoing erosion of the sands, etc.) have had a disproportionately adverse impact on Dauphin Island.

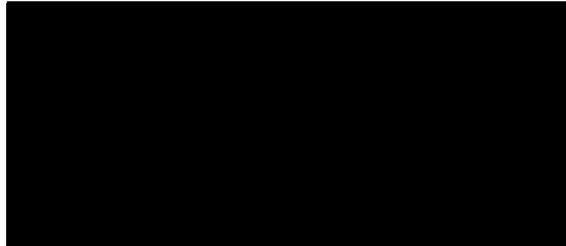
The eroding beaches of Dauphin Island is a problem not only for those who live on the Island, but also for all Alabama gulf coast residents, including those who live on the mainland. Dauphin Island serves as a barrier, shielding, not only a fragile ecosystem, Heron Bay, salt marsh, seagrass beds, oyster reefs, etc., but also the mainland itself. Without Dauphin Island all others in south Alabama would not fare well in the next hurricane. And there will be a next hurricane.

January 8, 2016

Page 2

I have substantial concern that the proposed dredging will have major adverse effects on Dauphin Island and all living on the Alabama gulf coast. If the dredged material were to be placed on Dauphin Island, my fears would be lessened.

Thank you for your consideration.



Comment # 132



January 8, 2016

The District Commander
U.S. Army Engineer District Mobile
P.O. Box 2288
Mobile, AL 36628-0001
ATTN: CESAM-PD-EC

Ref: Public Notice No. FP15-MH01-10

I am writing to express my concerns regarding the potential impact of the proposed widening and deepening of the Mobile Bay ship channel. I understand the issues and need for the project, but I am concerned about how this project may harm, or potentially benefit, Dauphin Island and its residents.

As you are well aware, the island has suffered for decades from sand deprivation attributed to the interruption of the littoral drift of sand from east to west caused by the presence of the ship channel. Numerous academic and engineering studies have cited this as the primary issue and further widening and deepening of the ship channel will logically make this worse.

Additionally, for what I understand are cost reasons, the dredged sand is dumped in a location that precludes it from ever replenishing Dauphin Island.

I, and my fellow residents & homeowners, academics and environmentalists, believe any further dredging/sand removal should be done in such a way that the sand is deposited to a location where it will nourish the island and rebuild its beaches as nature intended.

Dauphin Island's future must be stabilized for many reasons. As a barrier island, it has a critical value in protecting the mainland from the effects of storms and hurricanes. It also supports marine life by separating the gulf from the estuary and reducing the salinity in the Mississippi Sound, necessary to support shrimp, oysters and other flora & fauna valuable as an industry and sportsman's resource. Dauphin Islands' residents will obviously suffer more damage to real property and income if the beaches continue to erode and tourism, a vital source of revenue for the area will decline.

Mobile's port is an important economic driver for Alabama and the South and understandably needs these improvements, but Dauphin Island, the fishing industry, tourism and homeowners are just as important and their needs should be considered too. I urge you to ensure any future dredging of the channel result in a win-win scenario for the Port of Mobile and Dauphin Island.

Sincerely,



Comment # 133

January 11, 2016

District Commander
U S Army Engineer District Mobile
P O Box 2288
Mobile, Alabama 36628-0001
ATTN: CESAM-PD-EC

RE: Public Notice No. FP15-MH01-10

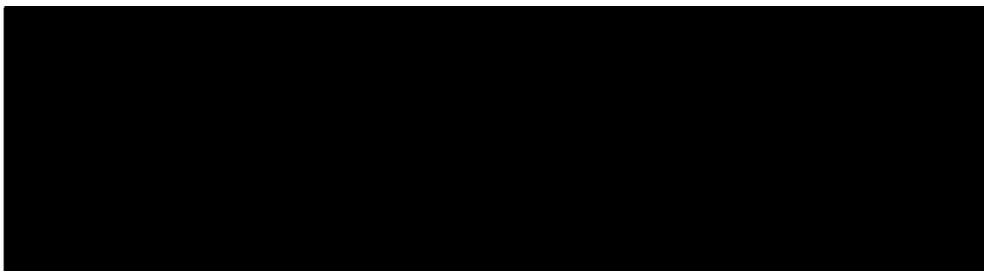
To whom it may concern:

In comment on the proposed deepening and widening of the Mobile ship channel I have the following comments:

1. Dauphin Island has suffered severe erosion for many years. My property near the Audubon Bird Sanctuary on the island has lost over **200 feet** of lot depth in the last twenty years. Storms began to physically impact my home because of its proximity to the ocean after all those years of erosion causing me to have the house move back as far as possible from the encroaching shoreline.
2. It is believed and has been shown through studies that the ship channel has allowed much of this erosion due to disruption of sand migration from the Fort Morgan point across the mouth of Mobile Bay thereby starving Dauphin Island of sand replenishment.
3. A new sand replenishment project is at this time pumping sand to the bird sanctuary shoreline on the east end of the island. It is being done as a one-time project with federal and state funding. This is only a small area of erosion that is being fixed though. Many other property owners on the island are affected as well.

The points above indicate a serious ongoing problem that should be addressed regularly and not in a haphazard 'one emergency project a time' manner. There will always be the necessity of dredging the Mobile ship channel even if it is not enlarged. I propose that with each maintenance dredging or enlargement project a portion of those monies should be set aside for beach nourishment on Dauphin Island.

I am opposed to the enlargement of the Mobile ship channel unless monetary consideration is provided for proper and timely beach nourishment on Dauphin Island.





Comment # 134

Date: January 10, 2016

Re: Addressing the Erosion of Dauphin Island

Dauphin Island has been confronted with an erosion problem for a number of years now. The past dredging of the Mobile Bay Canal has been shown to have continually added to this problem, so why now would the core want to greatly increase the dredging effort and cause even more erosion. In the years I have owned on Dauphin Island, I have not seen this problem addressed. It has progressively worsened with Ivan and Katrina. I have owned property in other beachfront communities with lesser erosion problems, and have seen these shore lines rebuilt numerous times. I do not understand why the Dauphin Island erosion problem has not been addressed. Even now with all the BP funds coming into the state, the money is being diverted from this island, that was greatly effected by the oil spill to other enterprises in the state that were not effected by the spill. It makes me wonder what the Government's agenda is for this area. Our property values are much less than any other beachfront areas along the coast. Alabama has so little beachfront and yet this part of it is not being protected.

I could not sell my property if I wanted to for anything close to what I paid for it. It is worth 1/5 of what I paid for it and now with the increased dredging about to take place, it will only get worse for all the residents and owners of property on the Island. Seems to me before they begin to dredge Dauphin Island, the erosion needs to be considered, and a plan needs to be developed immediately for the now and future rebuilding of its shoreline. With all the dredging that will be taking place, this sand should be routed to Dauphin Island.

I sincerely hope you are listening to all the folks and environmental groups that are expressing their concern and offering solutions to the erosion problem Dauphin Island has been experiencing for some time and since the original dredging of the canal.



Comment # 135

District Commander
U.S. Army Engineer District Mobile
P.O.Box 2288
Mobile, AL 36628-0001

ATTN: CESAM-PD-EC

January 7, 2016

Subject: Public Notice No. FP15-MH01-10

I would like to express my concern that the widening and deepening of the navigation channel could have a negative impact on Dauphin Island. I feel that further erosion of Dauphin Island will occur if the sands dredged from the Outer Bar Channel east of Dauphin Island are not placed in an area that will bring the sand back to Dauphin Island's shoreline. I would like to know how the Corps will determine what the effects of an enlarged channel will have on Dauphin Island's shoreline.

Thank you for listening.

Sincerely,



Comment # 136

February 11, 2016

Ms. Jennifer Jacobson
U.S. Army Corp of Engineer
Mobile District, Planning and Environmental Division
Coastal Environment Team
P.O. Box 2288
Mobile, AL 36628-0001

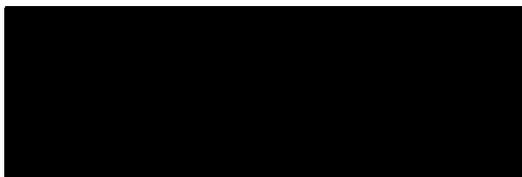
Re: Corp Jan 12th, 2016 Public Scoping Meeting

Ms. Jackson:

As a property owner in Dauphin Island, Alabama, I am very concerned about the rapid loss of our shoreline. The erosion is so severe that homes are dropping into the water and little beach remains for the public to enjoy.

My home resides on the East End of the island in the community of Audubon Place. The rate at which the beach is presently eroding is alarming. The widening of the Mobile ship channel will only exacerbate the problem further. If the channel is further dredged and widened, then it is **IMPERATIVE** that the sand be placed where it will properly nourish our shoreline and beaches. Not dumped in the middle of the Gulf at the expense of Dauphin Island's coastline.

Dauphin Island plays a major part in the tourism industry for the State of Alabama, as people come from all over the country to enjoy its beaches, bird sanctuary, and many other historical monuments. The historical relevance of the island is unprecedented. Therefore, the preservation of Dauphin Island, should be of the utmost concern, as it's demise would be a tragedy.



February 1st, 2016

Comment # 137

Ms. Jennifer Jacobson
Mobile District, Planning & Environmental Division
Coastal Environment Team
RE: Public Notice: FP15-MH01-10
PO Box 2288
Mobile, Alabama 36628-0001

Re: Public Notice FP15-MH01-10

Dear Ms. Jacobson

As a property owner in Dauphin Island, Alabama, I am very concerned about the rapid loss of our shoreline. The erosion is so severe that homes are dropping into the water and little beach remains for the public to enjoy.

My home resides on the East End of the island in the community of Audubon Place. The rate at which the beach is presently eroding is alarming. The widening of the Mobile ship channel will only exacerbate the problem further. If the channel is further dredged and widened, then it is IMPERATIVE that the sand be placed where it will properly nourish our shoreline and beaches. Not dumped in the middle of the Gulf at the expense of Dauphin Island's coastline.

Sincerely,



Comment # 138

[REDACTED]

January 25, 2016

District Commander
U.S. Army Engineer District Mobile
P.O. Box 2288
Mobile, AL 36628-0001

Re: Public Notice FP15-MH01-10

To Whom It May Concern:

As a property owner in Dauphin Island, Alabama, I am very concerned about the rapid loss of our shoreline. The erosion is so severe that homes are dropping into the water and little beach remains for the public to enjoy.

My home resides on the East End of the island in the community of Audubon Place. The rate at which the beach is presently eroding is alarming. The widening of the Mobile ship channel will only exacerbate the problem further. If the channel is further dredged and widened, then it is IMPERATIVE that the sand be placed where it will properly nourish our shoreline and beaches. Not dumped in the middle of the Gulf at the expense of Dauphin Island's coastline.

Dauphin Island plays a major part in the tourism industry for the State of Alabama, as people come from all over the country to enjoy its beaches, bird sanctuary, and many other historical monuments. The historical relevance of the island is unprecedented. Therefore, the preservation of Dauphin Island, should be of the utmost concern, as it's demise would be a tragedy.

[REDACTED]

FEB 1 2016

Comment # 139

February 27, 2016



Ms. Jennifer Jacobson
US Army Corps of Engineers
Mobile District, Planning & Environmental Division
Coastal Environment Team
PO Box 2288
Mobile, Alabama 36628-0001

Dear Ms. Jacobson:

This letter supplements my February 10, 2016 Scoping Comment letter submitted in connection with the Supplemental Environmental Impact Statement (SEIS). The SEIS will update the environmental impacts associated with deepening and widening the Mobile Harbor Ship Channel. The projected impacts were originally addressed in the 1980 EIS^{1/} which accompanied the Mobile District's survey report that recommended the channel be enlarged.

I made the decision to supplement my original letter after considering the Council on Environmental Quality's (CEQ) 2005 "Regulations for Implementing the Procedural Provisions of the National Environmental Policy Act (NEPA)". This letter stresses the very important point that the Study Area's baseline conditions described in the SEIS must consider the historical erosion of Dauphin Island and the cumulative losses of millions of cubic yards of beach quality sands that the 1980 EIS failed to address. The erosion sand losses have continued to occur unabated, and will continue into the future unless action is taken to restore the natural littoral drift volumes of sand to the island. The 1980 EIS ignored Dauphin Island's erosion issue despite the following commitment being made by the Mobile District in 1975:

"The prospect for satisfactorily alleviating erosion problems on Dauphin Island by depositing the sandy material dredged from the Mobile Bay entrance channel upon the Gulf shoreline of the island appears promising and will be pursued [emphasis added]. The viability of depositing future "new work" material dredged from the ship channel within Mobile Bay upon the western shoreline cannot be determined without estuarian [sic] and other environmental impact studies but is considered meritorious of further consideration. Under the above concepts the eroding shorelines would be nourished by the dredged material primarily as disposal areas in support of the maintenance and modification of the Mobile Harbor navigation project. This plan would preserve any accreted land as the property of adjoining land owners and limit local costs resulting from the accreted land, to the amount required for necessary stabilization and a portion of the

^{1/} US Army Corps of Engineers. October 1980. Survey Report on Mobile Harbor (Includes Environmental Impact Statement). Mobile Engineer District, Mobile, Alabama.

cost allocated to land enhancement. Therefore, *the options for nourishment of the eroding shorelines with material dredged from the ship channel would be more appropriately considered under our ongoing study of navigation modifications for Mobile Harbor* [emphasis added] rather than under the study for beach erosion control and hurricane protection.”²

As demonstrated in the Mobile County Commission’s response to the above Mobile District commitment, all parties believed Dauphin Island’s erosion problem would be addressed in the ongoing survey study that culminated in the preparation of the 1980 EIS:

“We also feel your consideration of the deposition of the dredged material from the ship channel along the eroding shorelines is definitely a necessary part of the survey study for modifications of the existing Federal project for Mobile Harbor.”³

It would be a grievous error in the impending SEIS should the Corps attempt to establish the Study Area’s baseline conditions as those that currently define Dauphin Island in 2016. That approach would continue the error made in the 1980 EIS to ignore the island’s erosion problem and the historic sand losses and resulting reduction in the width of its Gulf Shoreline. Such an approach would violate key provisions of the CEQ regulations pointed out below that explain when and why an SEIS is appropriate and should be prepared. This would result in the preparation of a deficient SEIS that fails to comply with the intent of the CEQ regulations.

The SEIS must thoroughly analyze the historical erosion losses that have adversely affected (1) the natural sand budget Dauphin Island should receive from the east, (2) Dauphin Island’s Gulf shoreline, and (3) the diminished topography of Dauphin Island’s West End because of the sustained reduction in the supply of littoral drift sand reaching the island. The Corps was fully aware of the Dauphin Island erosion problem before the 1980 EIS was prepared to disclose the environmental impacts projected to result from deepening and widening the Mobile Harbor ship channel. Further, it would be appropriate if the SEIS considered a period in time earlier than 1980 as the starting point to analyze the erosion of Dauphin Island based upon the following two important documents that addressed earlier timeframes related to the island’s erosion problem:

- The Corps’ 1978⁴ report on the Dauphin Island’s beach erosion problem concluded that maintenance of the Mobile Harbor Outer Bar channel was contributing significantly to the island’s erosion problem after considering dredging data and shoreline erosion losses dating back to 1939. As pointed out above, the Corps elected to incorporate the

² July 9 and 21, 1975 SAMPD-N letters signed by Mobile District Commander Drake Wilson and sent to Congressman Jack Edwards, the Mobile County Commission, and the City of Mobile.

³ October 1, 1975 letter of reply from Mobile County Commission to the July 21, 1975 Mobile District SAMPD-N letter.

⁴ US Army Corps of Engineers. September 1978. Draft Mobile County, Alabama (Including Dauphin Island) Feasibility Report for Beach Erosion Control and Hurricane Protection. Mobile Engineer District, Mobile, Alabama.

erosion issue into its ongoing study to deepen and widen Mobile Harbor that ultimately resulted in the development of the 1980 EIS that the impending SEIS is to supplement.

- Morton's 2007^{5/} report on historical changes in the Mississippi-Alabama Barrier Island system included the following statements:
 - "...after 1958 [Dauphin] island entered into a net erosional phase that has persisted and most recently accelerated."
 - "... [maintenance dredging] practices conducted around the tidal inlets between the barrier islands permanently removed large volumes of beach quality sand from the littoral drift system that otherwise would have nourished the adjacent barrier islands and mitigated land losses."
 - "...***Sand supply is also the only factor where the historical trend of the factor (progressively increased reduction in sand supply attendant with increased dredging depths) temporally matches the trend of progressively increased land loss [emphasis added].***"

According to §1502.9(c)(1) of the CEQ's NEPA regulations, Federal agencies are required to prepare an SEIS if:

- (i) The agency makes substantial changes in the proposed action that are relevant to environmental concerns; or
- (ii) There are significant new circumstances or information relevant to environmental concerns and bearing on the proposed action or its impacts.

Both conditions apply in the case of the impending SEIS. First, the new set of Panama Canal locks, increasing numbers of new Post-Panamax ships calling on U.S. ports, and a change in the mix of commodities anticipated to flow through the Port of Mobile represent a change in the conditions from those considered in the original 1980 EIS. Second, the extensive erosion of Dauphin Island attributed to maintenance of the Mobile Harbor Outer Bar Channel that was first acknowledged in the 1978 Corps report and ignored in the subsequent 1980 EIS has continued through the intervening 38 years to the present. The ongoing erosion continues to significantly affect the Sand-Pelican Island complex, Dauphin Island, and the Mississippi barrier islands to the west. As a result, the Dauphin Island historic and continuing erosion problem actually represents a significant "new" circumstance for the SEIS because the erosion problem was completely and totally ignored in the 1980 EIS. Evidence presented later in this letter clearly demonstrates the erosion issue is both relevant to and has a direct bearing on the proposal to enlarge the Mobile Harbor ship channel. The impending SEIS finally presents the opportunity for the Corps to correct the major failure of omission of a significant impact associated with the Mobile Harbor navigation project, and hence a critical deficiency of the 1980 EIS.

The CEQ regulations §1501.7(a)(2) state a principal purpose of the Scoping Process is to

^{5/} Morton, R. A. 2007. Historical Changes in the Mississippi-Alabama Barrier Islands and the Roles of Extreme Storms, Sea Level, and Human Activities. Open File Report 2007-1161. U.S. Geological Survey, Coastal and Marine Geology Program. St. Petersburg, Florida.

associated with new work and maintenance at Ship Island Pass be placed southeast of Cat Island ‘so as to maintain the natural littoral drift patterns’.”

In a study of the Alabama-Mississippi barrier island chain, of which Dauphin Island is the lead island based on its geological position in the littoral drift system, Morton (2008) concluded the following:

“...the Mississippi barriers are undergoing rapid systematic land loss and translocation associated with: (1) ***unequal lateral transfer of sand related to greater updrift erosion compared to downdrift deposition*** [emphasis added]; (2) barrier narrowing resulting from simultaneous erosion of shores along the Gulf and Mississippi Sound; and (3) barrier segmentation related to storm breaching. ***Dauphin Island, Alabama, is also losing land for some of the same reasons as it gradually migrates landward*** [emphasis added]. The principal causes of land loss are frequent intense storms, a relative rise in sea level, and a ***sediment-budget deficit*** [emphasis added]. Considering the predicted trends for storms and sea level related to global warming, it is certain that the Mississippi-Alabama (MS-AL) barrier islands will continue to lose land area at a rapid rate unless the trend of at least one causal factor reverses. ***Historical land-loss trends and engineering records show that progressive increases in land-loss rate correlate with nearly simultaneous deepening of channels dredged across the outer bars of the three tidal inlets*** [the Mobile Outer Bar Channel crossing the Mobile Pass Inlet represents one of the three inlet situations] ***maintained for deep-draft shipping. This correlation indicates that channel-maintenance activities along the MS-AL barriers have impacted the sediment budget by disrupting the alongshore sediment transport system and progressively reducing sand supply.*** Direct management of this causal factor can be accomplished by strategically placing dredged sediment where adjacent barrier-island shores will receive it for island nourishment and rebuilding.

Development of the Corps’ plan to restore Mississippi’s barrier islands west of Dauphin Island required close coordination with and sensitivity to the National Park Service’s management goals and objectives for the Gulf Islands National Seashore islands since that agency is the responsible management entity for the much of the islands’ land areas. An early product of that coordination was the NPS Vision Statement for the Management of the Mississippi Barrier Islands (2007)^{8/}. Information from the NPS Vision Statement of particularly relevance to Dauphin Island’s erosion problem and should be considered in the Mobile Harbor SEIS is summarized in the following bullets:

^{7/} Morton, R.A. November 2008. Historical Changes in the Mississippi-Alabama Barrier-Island Chain and the Roles of Extreme Storms, Sea Level, and Human Activities. *Journal of Coastal Research*. 24(6): 1587–1600.

^{8/} National Park Service. June 2007. Vision Statement for the Management of the Mississippi Barrier Islands, Gulf Islands National Seashore. Included in Chapter 2 of the June 2009 Mississippi Coastal Improvements, Hancock, Harrison, and Jackson Counties, Mississippi, Appendix H: Barrier Islands. Mobile District, Mobile Alabama.

- After sea levels stabilized around 5,000 years ago following the last Ice Age event, Dauphin Island became the transmission site for large volumes of littoral sand. Dauphin Island probably played an important role in originally determining the general offshore position of the whole barrier island chain, which extended well into southeastern Louisiana.
- Sand dredged from any of the adjacent navigational/shipping channels should be re-deposited within the littoral system of the barrier islands. Sand should be placed to mimic to the greatest extent possible natural sediment depositional processes, including within the surf zones, or as otherwise prescribed based on analysis of the longshore transport system. Sand placement should supplement the supply to the islands where it has been significantly diminished or eliminated by dredging of shipping channels over the last +100 years. The additional sand supply would assist the island's natural recovery from recent storm events, and partially offset prior disruption to sediment transport and deposition from human-caused intervention (i.e., dredging of deep draft navigation channels).
- The quantity of sand should be assessed that has entered the Mississippi barrier island system through time from Mobile Pass and the Mobile ebb tidal delta, the primary origin of sand supply to the Mississippi's barrier islands. A sediment budget should be developed for the Dauphin Island area that would quantify sediment transport from Mobile Pass and the Mobile Pass ebb tidal delta to Dauphin Island, and from Dauphin Island westward towards Petit Bois Island. A historical sediment budget should be developed from bathymetric change, shoreline position change, and dredging records. A hypothetical present-day sediment budget should also be developed based upon present-day bathymetric data and shoreline positions, incorporating dredging activities in and around Mobile Pass.

The Mobile District recently released the Final SEIS for the Mississippi Barrier Island Restoration Plan (2016)^{2/}. That document states the main goal of the plan is to restore the sediment budget of the island system. That goal reflect the similar need that exists for Dauphin Island to address the island's erosion problem that dates back to the first half of the last century. That need consists of restore the natural sand budget crossing the Mobile Pass Inlet that has been interrupted for decades by maintenance of the Outer Bar Channel. Since Dauphin Island is an integral component of the Alabama-Mississippi barrier island system, the Mobile Harbor SEIS provides the appropriate vehicle to finally address the island's significant erosion issue that has been both ignored and rejected countless times over the years, while almost \$500,000,000 have been appropriated by Congress to address the same island restoration needs in Mississippi. Because of the relevance to Dauphin Island of the **pre-1969 conditions as the target for**

^{2/} U.S. Army Corps of Engineers. January 2016. Appendix C: Hydrodynamic, Wave, and Sediment Transport Modeling. Mississippi Coastal Improvements Program (MsCIP), Comprehensive Barrier Island Restoration, Hancock, Harrison, and Jackson Counties, Mississippi, Final Supplemental Environmental Impact Statement. Modeling Mobile District, Mobile, Alabama.

restoration of the Mississippi barrier islands, the Mississippi restoration goal is presented in the following:

“The main goal of the restoration of the barrier islands in the Mississippi Coastal Improvements Program (MsCIP) is to restore the sediment budget, including littoral zone geologic processes around Ship, Horn, and Petit Bois islands as close to their natural state as possible. The restoration effort seeks to return sediment into the system within the barrier islands to pre-Hurricane Camille [i.e., **pre-1969**] conditions as much as possible given the realities of navigation channel dredging, climate change (sea level rise, increased frequency of storms, etc.) and other anthropogenic activities [i.e., channel dredging]. The scale of the restoration is based on adding approximately the same volume of sand to the system that has been removed over the past decades due to maintenance dredging...Restoring the Mississippi barrier islands to a condition similar to the natural system that functioned before human intervention (generally defined as the pre-Camille conditions) offers the best opportunity to ensure the long-term viability of these islands.”

In conclusion, based upon a consideration of relevant CEQ regulatory guidance, the inexplicable complete failure of the 1980 EIS to address the Dauphin Island erosion problem, and subsequent data that clearly demonstrates maintenance of the Mobile Outer Bar Channel has and is continuing to contribute to the erosion of Dauphin Island; the impending SEIS for the Mobile Harbor deepening and widening study must address the following:

1. Consider the Dauphin Island erosion problem as a “significant new circumstances” relevant to environmental concerns which has direct bearing on the impacts associated with the proposed action. The erosion problem should be termed “new” solely because the 1980 EIS failed to address the problem even though the Corps was well aware of the problem’s existence. Thus, in accordance with the CEQ regulations, the Mobile Harbor SEIS is required to address Dauphin Island’s longstanding erosion problem.
2. Since the 1980 EIS completely ignored the Dauphin Island erosion issue despite the Corps being well aware of the problem at least as early as 1975 that maintenance of the Outer Bar Channel was contributing to the erosion problem, the SEIS is obligated to investigate the historical losses of sand that have occurred dating back to an earlier date in time. The various documents referenced in this letter indicate that it would be appropriate to consider a period extending back to either pre-1969, 1958, or even as early as 1939. Based on the information presented above, should the Corps attempt to base all erosion studies and analyses on the current state and condition of Dauphin Island in 2016, an entirely inadequate NEPA document would be produced. Such a document would be easily susceptible to a legal challenge that the baseline conditions were arbitrarily selected in order to continue to ignore and to avoid having to finally address the very real and longstanding and significant Dauphin Island erosion problem.

3. At least one “mitigation measure” must be developed and evaluated in the SEIS to address the Dauphin Island erosion problem. That measure should consist at a minimum of two equally important components:
- First, a plan to restore the historical sand losses that have reduced the overall width of the Dauphin Island Gulf shoreline and the topography of the island’s West End. The Dauphin Island restoration plan should identify a specified target condition such as the pre-1969 conditions selected for the Mississippi Barrier Restoration Plan.
 - Second, restore the natural littoral drift of beach quality sands crossing Mobile Pass Inlet by modifying the location at which sands dredged from the Outer Bar Channel are deposited to assure they are readily reincorporated into the littoral system to renourish and maintain Dauphin Island’s Gulf shoreline.

Thank you for considering this supplement to my original Scoping Comment letter. I and other members of the concerned public look forward to hearing from the Mobile District as to how the comments received will be addressed in the SEIS.



Cy:
Mr. Chris Militscher, Chief
US Environmental Protection Agency, Region 4
NEPA Program Office
61 Forsyth Street, SW
Atlanta, GA 30303

Comment # 140

February 10, 2016



Ms. Jennifer Jacobson
US Army Corps of Engineers
Mobile District, Planning & Environmental Division
Coastal Environment Team
PO Box 2288
Mobile, Alabama 36628-0001

Dear Ms. Jacobson:

I am writing to convey my comments on the issues that should be addressed by the Mobile District in the General Reevaluation Report (GRR) Study and Supplemental Environmental Impact Statement (SEIS) to determine if the Mobile Harbor Ship Channel should be deepened and widened.

I have developed my comments from three basic points of view. First, as a private citizen who has observed firsthand the excessive erosion of Sand and Dauphin Islands since 1973, once owned property on Dauphin Island, and is very familiar with Mobile Bay. Second, as a retired Corps employee whose +31-year career was centered around environmental evaluations of Civil Works projects, plan formulation, and project management. Third, as a consultant now working for another Corps district to prepare a GRR and EIS for a deep draft navigation project authorized in 1965 – a scenario with many similarities to the Mobile Harbor project.

The issues that I believe should be addressed are as follows:

Dauphin Island. I first became actively engaged in the Dauphin Island erosion issue near the end of the 2000-2009 lawsuit initiated by the Dauphin Island Property Owners Association (DIPOA) against the U.S. Government and the State of Alabama. The class action lawsuit alleged the Mobile Harbor project is causing the island to erode. The lawsuit was settled in 2009 with no judgement being rendered on the issue, with the government paying the DIPOA \$1.5 million in exchange for the Class members agreeing to never sue the government again over the erosion issue. Since 2009, I have continued to study information related to Dauphin Island's erosion problem in particular and the effects of shoreline induced erosion by inlet navigation channels in general.

The Corps completed a report on Mobile Bay shoreline and Dauphin Island beach erosion in 1978. That report concluded maintenance of the Mobile Harbor Outer Bar Channel was contributing to the erosion of Dauphin Island and recommended a new site for the placement of dredged sands to counter erosion. However, instead of implementing that recommendation, the

Corps elected to incorporate the erosion issue into its study to deepen and widen the ship channel that was being conducted at the same time. Since no written record is available to explain the basis of that decision, I presume the decision was intended to handle the erosion problem created by channel maintenance and the desire to enlarge the channel in a single comprehensive report. Instead of that happening, the resulting 1980 report and EIS on Mobile Harbor that eventually led to the 1986 authorization to improve the channel (the subject of the present GRR Study) did not address the Dauphin Island erosion problem in any way, shape, or form. In recent years, when present Corps staff have been asked why the 1978 report's recommendations were neither implemented nor the erosion problem addressed in the 1980 report, the answer always given is the 1978 report was not based on science, with no explanation being given as to what the problems with that report are.

Also not explained in the subsequent 1980 report is why an analysis of the shorelines of Fort Morgan Peninsula to the east of Mobile Pass and Sand-Pelican Island and Dauphin Island to the west for a distance of at least 10 miles in both directions **was not** performed as required by Section 5 of the Rivers and Harbors Act of 1935. Such an analysis is required to determine if the recommended channel deepening and widening could cause the shorelines on either side of the Mobile Pass Inlet to accrete or erode.

In the decades that have passed since the 1978 and 1980 reports were completed, the Corps has adopted the consistent position that maintenance of the Outer Bar Channel does not contribute to the erosion of Dauphin Island, and that the island's erosion is due to storm activity and sea level rise. That view remains the publicly stated position of the Corps today, even though the Corps has never produced any scientific evidence to support that position. What I find strange is that in maintaining that position, the Corps continues to ignore the overwhelming body of scientific and engineering information that universally concludes that navigation channels dredged through coastal inlets, like Mobile Pass, interrupt the littoral drift of sand and cause downdrift shorelines to erode, unless proactive actions are taken to place dredged sands at a location to allow them to remain in the littoral drift system.

The Corps did commission a contract study in connection with the above mentioned DIPOA lawsuit. The resulting 2008 report, ignored the Corps' 1978 report and weakly stated that "there is no conclusive evidence that maintenance of the Mobile Harbor ship channel was responsible for causing Dauphin Island's erosion problem". It is important to point that one of the three members of the Independent Technical Review Team (Dr. David Dean, a highly respected coastal engineer from the University of Florida) did not completely agree with the findings in the 2008 report.

Also ignored by the Corps is a 2007 U.S. Geological Survey (USGS) report on the historical sand losses experienced by the Mississippi-Alabama barrier island chain, of which Dauphin Island is a member. The USGS report concluded Dauphin Island has been eroding at an accelerated since 1958 and that maintenance dredging of the inlet channel has resulted in the permanent removal of large volumes of beach quality sand from the littoral drift system. The

USGS also considered the effects of storms and sea level rise. Even then, the 2007 report concluded that increased dredging was the only factor that correlated with the island's erosion. Additional data developed by the USGS's Assessment of Shoreline Change Project show that the West End of Dauphin Island has eroded at a rate of 6 to 12 feet/year. In fact, the erosion has been so severe, that at the extreme western end of the developed portion of the island, two rows of lots are now in the surf.

Even while denying that maintenance of the Outer Bar Channel was causing Dauphin Island and the ebb tidal delta bar and islet complex between Sand Island Lighthouse and Dauphin Island to erode, the Corps could not deny that the barrier island system was experiencing significant land loss. To its credit, to counter the severe erosion, the Corps initially constructed a feeder berm and later designated the Sand Island Beneficial Use Area (SIBUA) in the 1980s in an attempt to reintroduce dredged sands back into the littoral drift system. These efforts were pursued under existing Corps authorities and funding, and utilizing hopper dredges traditionally used to maintain the Outer Bar Channel. Even though sands have been increasingly dumped in the SIBUA since 1987, neither the feeder berm nor the SIBUA have been successful in curtailing erosion, as evidenced by the fact that Dauphin Island has continued to erode and no scientific studies have been produced to demonstrate otherwise.

Yet, despite direct observations of the extent of erosion, the USGS's findings, the views of other coastal scientist and engineers, and the scientific literature on navigation channels in coastal inlets, the Corps has steadfastly denied the Mobile Harbor project has any role in Dauphin Island's erosion. I can only conclude the Corps refuses to acknowledge maintenance of the Outer Bar Channel is contributing to Dauphin Island's erosion problem in order to avoid having to mitigate for the erosion which would increase the federal cost to maintain the project that already exceeds an average of almost \$24 million a year for the period 1999-2008 and could result in the Alabama State Port Authority having to pay more as its non-federal share of the maintenance costs.

Mitigation of Shoreline Erosion. The Public Scoping Meeting notice emphasized that the No Action Alternative will be evaluated in the SEIS. A friend of mine who also attended the meeting related to me that a Corps staff member informed him the No Action Alternative would consider the existing condition of the Dauphin Island shoreline at the initiation of the GRR Study as representing the "baseline" condition for the conduct of any shoreline erosion investigations that may be undertaken. In short, that means the Corps does not intend to consider the extensive sand and shoreline erosion losses that Dauphin Island has encountered in the 38 years since the above discussed 1978 Corps report was completed; or the 36 years since the 1980 Corps was completed recommending Mobile Harbor be improved; or the 30 years since Congress authorized the Mobile Harbor project to be considered in the GRR Study. That does not make sense.

As pointed out above, the 1980 report had two major flaws: (1) It did not fulfill the commitment made in the Corps 1978 report to address the Dauphin Island erosion problem; and (2) It did not

conduct the analysis of the Dauphin Island shoreline required by Section 5 of the 1935 Rives and Harbors Act. These two flaws resulted in the Dauphin Island erosion problem not being analyzed in the 1980 Corps report which in turn prevented Congress from considering the erosion issue when it authorized widening and deepening of Mobile Harbor in the Water Resources Development Act of 1986.

The erosion problem clearly acknowledged by the Corps in its 1978 report did not cease to exist merely because the Corps ignored altogether its existence, either by intent or error, in the subsequent 1980 report. The GRR Study cannot be allowed to continue the major error of omission of Dauphin Island's erosion problem that has resulted in the cumulative losses of millions of cubic yards of littoral drift sands since the 1980 report was completed due to that report's complete failure to address the island's erosion problem. To accept the present highly eroded status of Dauphin Island as the baseline condition for the No Action Alternative would indefensibly penalize property owners who have lost land through no fault of their own, not to mention important natural habitats that have eroded away from Alabama's only barrier island. In summary, the No Action Alternative must clearly state that an unmet mitigation need exists to reverse the erosion of Dauphin Island that has been allowed to occur since 1978 when the Corps first acknowledged that maintenance of the Outer Bar Channel contributed to the erosion of Dauphin Island.

A number of federal laws have direct applicability to the conduct of the GRR Study and SEIS and must be considered to evaluate their potential connection to the mitigation of the significant adverse environmental effects of the Mobile Harbor project. Of those, Section 302 of the Water Resources Development Act of 1996 has particular relevance to the authorized Mobile Harbor project that is to be addressed in the GRR. Section 302 amended the 1986 authority to deepen and widen the Mobile Harbor project by allowing the Corps to "...consider alternatives to disposal of such material in the Gulf of Mexico, including environmentally acceptable alternatives for beneficial uses of dredged material and environmental restoration." Mitigation of Dauphin Island's eroded shoreline would certainly meet both of those goals. Accordingly, the GRR Study must formulate at least one alternative, if not more, to dispose of sands dredged from the Outer Bar Channel (during both new work and subsequent maintenance) to mitigate the island's erosion problem in order to comply with this specific amendment to the Mobile Harbor authority.

Disposal of Dredged Material in Mobile Bay. In 2011, the Corps began a Regional Sediment Management (RSM) initiative in Mobile Bay to pursue in-bay disposal of dredged material removed from the Mobile Harbor to reduce the cost of maintenance by avoiding having to transport the dredged sediments to approved offshore sites. If the ship channel is enlarged, the volume of dredged material will increase and there will be greater interest by the Corps and the Port Authority to dispose of the material at in-bay sites to reduce project maintenance costs.

Unfortunately, in pursuing the RSM initiative over the last five years, the Corps has elected to only work with a closed group of selected agencies and organizations referred to as the

Interagency Working Group. Further, the Corps has made no effort to share the results of the RSM effort with the public, or to seek the views of the public as it attempts to surreptitiously reverse existing dredged material practices that have become institutionalized over the years to avoid adverse impacts within Mobile Bay. Development of an acceptable plan to dispose of future dredged material volumes associated with an enlarged channel should be an important component of the GRR Study. Therefore, the current RSM effort should be integrated into the GRR Study with the goal of developing a Master Plan for the disposal of dredged material in Mobile Bay. Such a plan should be transparently prepared, with the public being provided an opportunity to voice its views and concerns.

Federal Standard Should Include Mitigation for Shoreline Erosion as a Component of the Navigation Purpose. The Corps often falls back upon the “Federal Standard” as the reason why it cannot include a specific measure in a selected plan because of cost considerations alone. As you well know, for a navigation project, the “Federal Standard” is defined as the least costly dredged material disposal alternative consistent with sound engineering practices **and meeting applicable federal environmental requirements**. Corps planning guidance allows a plan, other than the National Economic Development plan, to be selected and recommended if there is an important overriding reason for choosing an alternative that would not maximize net economic benefits. As described above, there is ample supporting evidence to demonstrate that inclusion of shoreline mitigation for Dauphin Island should be included in both the No Action Alternative and any deepening and widening alternative that may be developed by the GRR Study. The formulation of the “Federal Standard” will come down to a matter of will by the Corps and the Port Authority to take the correct action to address the significant Mobile Harbor caused erosion of Dauphin Island as determined by the Corps’ in 1978.

Involve Public in GRR Study. News Release 16-003 on the Mobile District’s website concerning the Scoping Meeting states that “...public input will also be solicited when the Draft SEIS and Draft Report results are available”. Those documents will not be available until near the end of the GRR’s four-year study period. Taken at face value, the news release is reasonably interpreted to mean that the Corps **does not** plan to conduct a public information program over the course of the multi-year GRR Study, and only do the minimum required by agency regulations by only allowing the public to comment on the Draft SEIS and Draft GRR when essentially all plan formulation decisions will have been made. The subsequent review of the Final SEIS and GRR is all too often only a perfunctory exercise. The following significant issues cry for a the GRR effort to include a proactive public involve program: (1) the highly controversial nature of the historic Dauphin Island erosion issue; (2) the fact that the Alabama Barrier Island Restoration Study has been purposefully designed to preclude public input; and (3) the likelihood in-bay disposal of dredged material will be included among the GRR’s recommendations.

Scoping Report. No mention was made in Public Notice No. FP15-MH01-10 (dated December 11, 2015) announcing the Public Scoping Meeting as to whether a Notice of Intent (NOI) to prepare the SEIS had been published in the *Federal Register*. I would appreciate being provided

a hardcopy of the NOI that should have been published in advance of the Scoping Meeting, or the electronic link to retrieve the NOI from the internet.

It is a customary practice for a Corps district to prepare a Scoping Report to inform the public how the input received as a result of the Scoping Meeting will be considered in the conduct of a Corps study and the preparation of the SEIS. The meeting notice made no mention to such a report and I saw no information at the meeting stating a Scoping Report would be prepared. In addition to seeing the views, concerns, opinions, and suggestions of the general public, I am particularly interested in examining the comments the Corps receives from the following federal agencies in response to the published NOI: U.S. Fish and Wildlife Service, National Marine Fisheries Service, and the U.S. Environmental Protection Agency. I am also interested in the comments provided by the following state agencies: Alabama Department of Environmental Management, Marine Resources Division, and the State Lands Division's Coastal Section.

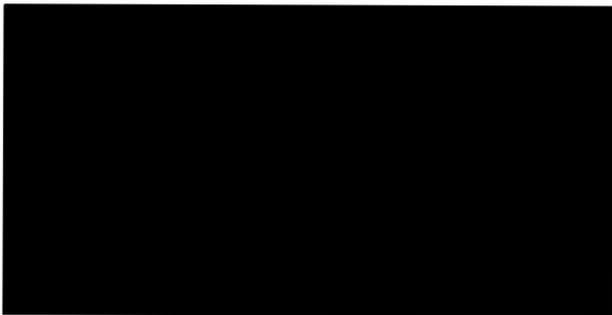
Summary Recommendations:

- The GRR Study must analyze and document the Dauphin Island erosion problem attributable to maintenance of the Outer Bar Channel first acknowledged in the Corps' 1978 report. This analysis must comply with the provision of Section 5 of the Rivers and Harbors Act of 1935. This analysis is required to correct a major omission of the 1980 Corps report that was supposed to have included investigations of the erosion problem according to a July 9, 1975 Corps letter to then Congressman Jack Edwards. The GRR should document the shoreline and sand volume losses that have occurred in the Sand-Pelican and Dauphin Islands complex since the 1978 report was completed. That information should be used to establish the baseline conditions for the "without project" condition for the purpose of developing appropriate mitigation measures to return the island's shoreline to the conditions that existed at least at the time the 1980 Corps report was prepared and later considered by Congress to authorize the enlarged dimensions of Mobile Harbor.
- The GRR Study must formulate at least one alternative, if not more, to dispose of sands dredged from the Outer Bar Channel (removed during both new work and subsequent maintenance) to comply with Section 302 of the Water Resources Development Act of 1996.
- The "Federal Standard" formulated for the GRR Study should include mitigation for shoreline erosion as a component of the navigation purpose and cost-shared accordingly.
- The GRR Study and SEIS must identify a new disposal site to replace the existing Sand Island Beneficial Use Area which is failing to meet its intended purpose. A site closer to the Sand-Pelican and Dauphin Islands complex should be selected in more shallow water (e.g., around 10 to 15 feet deep) to resemble the method of sand placement the Corps has recommended be implemented in its Mississippi Barrier Island Restoration Project.

Since Dauphin Island is a member of the same barrier island chain, it seems only reasonable and consistent to employ the same shoreline restoration and maintenance sand deposition method.

- The GRR Study No Action Alternative should acknowledge the significant historic and ongoing erosion that is affecting Dauphin Island. This should include the recognition that Dauphin Island presently has an unmet mitigation need caused by maintenance of the Outer Bar Channel. Mitigation of even the No Action Alternative is needed to restore the island's eroded shoreline and sand volume losses dating back to the condition identified in the Corps 1978 report when the channel maintenance caused erosion problem was first admitted to by the Corps.
- Development of an acceptable plan to dispose of future dredged material volumes associated with an enlarged channel should be an important component of the GRR Study. Therefore, the current RSM effort should be integrated into the GRR Study with the goal of developing a Master Plan for the disposal of dredged material in Mobile Bay. Such a plan should be transparently prepared, with the public being provided ample opportunity to voice its views and concerns.
- The GRR Study must include a proactive public information and involvement program in the GRR effort to keep the concerned public informed of the progress of the Study. The Corps must recognize that due to the controversy associated with the long-term Dauphin Island erosion issue and concerns over potential increased disposal of dredged material in Mobile Bay, not to inform and/or involve the public over the next four years would be both unwise and unacceptable to the taxpayers who are funding the GRR Study.
- Provide a hardcopy of the *Federal Register* NOI or the electronic link to retrieve the NOI from the internet.
- Please confirm that a Scoping Report will be prepared to document the Scoping Process and state when that document will be available to the public. I assume since I have submitted scoping comments, I will receive a copy.

Thank you for the opportunity to provide input into the Mobile Harbor GRR and EIS effort.



To: Ms. Jennifer Jacobson
Mobile District Planning & Environmental Division
Coastal Environment Team
RE: Public Notice: FP15-MH01-10
P.O. Box 2288
Mobile, AL 36628-0001

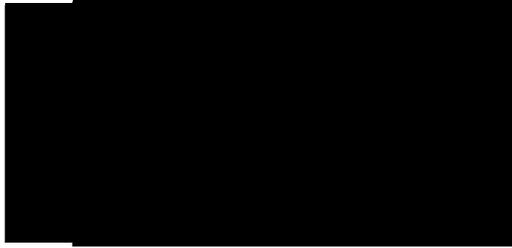
February 20, 2016

Dear Ms. Jacobson

I am addressing this letter to you re: the erosion of Dauphin Island secondary to the further dredging of the ship channel — even deeper and wider. Multiple studies now have confirmed the Corps' involving interest in this erosion. As a physician, of obvious scientific capability, it is just illogical to me that the dredged sand could not be deposited on Dauphin Island — since this same sand would eventually migrate onto Dauphin Island with unimpeded littoral flow.

It is time that the Corps face its responsibility to replace that sand as has been done elsewhere in the US with similar dredging practices. The benefits of replacing this sand are innumerable and have been delineated often — now is the time for real action! The Corps simply must DO THE RIGHT THING!
Thank you for hearing my voice!





February 16, 2016

Ms. Jennifer Jacobson
Mobile District, Planning & Environmental Division
Coastal Environment Team
RE: Public Notice: FP15-MHO1-10
P. O. Box 2288
Mobile, Alabama 36628-0001

Dear Ms. Jacobson:

As a concerned property owner on the west end of Dauphin Island, I have several comments with regard to the Mobile Harbor Channel Widening and Deepening Study. Of utmost concern to my wife and I is the Corps' present and stated position with regard to the historic sand losses and sand deficits that have occurred on Dauphin Island over the past forty to fifty years. It would be greatly appreciated if the Corps would conduct the Channel Widening and Deepening Study objectively, taking into consideration all interests and not limiting same to the interests of the Alabama State Port Authority.

The increased erosion of Dauphin Island over the past few years makes it imperative that the Supplemental Environmental Impact Statement address the changed environmental conditions within the study area that have occurred since the initial EIS. It is my understanding that the original 1980 EIS that was prepared to analyze the effects of deepening and widening the Mobile Outer Bar Channel did not consider the potential of an enlarged ship channel to affect Dauphin Island's erosion problem in existence at that time. This 1980 study did not consider the relationship of the ship channel to the erosion of Dauphin Island, nor did it take into account how the island's erosion could be further affected by enlarging the ship channel.

The SEIS should identify new dredged sand disposal sites that are closer to Dauphin Island. The same shallow water deposition concepts that the Corps recommends being employed to replenish Petit Bois Island's eroded shoreline just west of Dauphin Island should be implemented at Dauphin Island. The Mobile Harbor Channel Widening and Deepening Study should also fully implement the Corps' national Regional Sediment Management (RSM) planning concepts to make beneficial use of the dredged sands to counter erosion. It is my understanding that in the past, the Mobile District has intentionally excluded Dauphin Island from its RSM planning efforts, while pursuing multiple RSM projects along the coast, including within the confines of Mobile Bay.

It would be extremely beneficial if a Citizen Advisory Committee, similar to the Corps' Mobile Bay Interagency Group, could be established. This Committee could meet from two to four times a year with the Corps to assess how the public concerns are being addressed in the study. A public involvement program could also be implemented so that the next time the public hears from the Corps on this issue is not with the release of the Draft EIS at the end of the four year study.

Thank you for your consideration and assistance in this extremely important issue that is critical to the entire Dauphin Island community. I plan to retire to the island in the very near future and make the Island my full-time residence.



February 25, 2016

Ms. Jennifer Jacobson
Mobile District, Planning & Environmental Division
Coastal Environmental Team
P. O. Box 2288
Mobile, AL 36628-0001

Re: Public Notice
FP15-MH01-10

This letter is to express my concern that the loss of sand that migrates to the beaches on Dauphin Island due to the Mobile Harbor Channel dredging that has caused significant erosion to the beach there. This issue is not being adequately considered in the upcoming Mobile Harbor Channel widening and deepening that is proposed.

It is logical that the sand that travels from the east to the west that falls in to the Mobile Ship Channel and is subsequently dredged out should be deposited such that the sand can continue its natural migration to the beaches of Dauphin Island. The fact that this has not been done in the past has caused significant erosion of Dauphin Island.

The original 1980 EIS prepared to analyze the effects of deepening and widening the Mobile Outer Bar Channel failed to consider the potential of an enlarged ship channel and its effect on Dauphin Island's erosion problem that existed at that time.

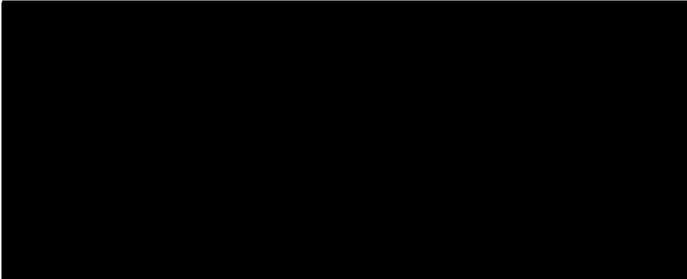
The 1980 EIS was deficient since it failed to consider the relationship of the ship channel to the erosion of Dauphin Island and how the Island's erosion could be further affected by enlarging the channel.

It seems that the erosion of Dauphin Island could be arrested if the sand dredged from the Mobile Harbor Channel was moved to Dauphin Island itself to counter the erosion rather than being dumped in the Gulf of Mexico or on Sand Island.

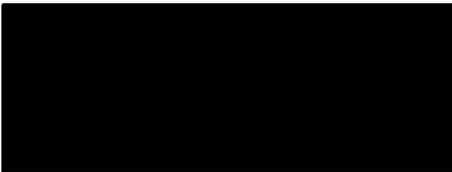
I request that Section 5 of the River and Harbor Act of 1935 that requires every Corp of Engineers report involving an improvement of an inlet (ie. the Mobile Harbor Outer Bar Channel through Mobile Pass) to evaluate shore line erosion for a distance of not less than 10 miles on either side of the ship channel. I believe a proper study will reveal that it is in the State's best interest, as well as those that benefit from a

"healthy shoreline" at Dauphin Island, to see Dauphin Island's erosion be arrested, the beaches be replenished and a system be established to continuously maintain the beaches from the dredged sands from the Mobile Harbor Channel.

Thank you for your attention to this matter.



Comment # 144



February 26, 2016

To: Coastal Environmental Team
RE: Public Notice : FP 15- MH01-10

I have enjoyed a “family” home on Dauphin Island since 1972 and am now the owner of that particular house. I have watched the island east end beaches erode for many years. I have heard that a new study and SEIS is being made on deepening and widening the Mobile Ship Channel. This study needs to assure that all interests are given equal consideration – not just the interests of the Alabama State Port Authority.

Shoreline erosion within 10 miles on either side of the channel needs to be addressed as well as evaluated.

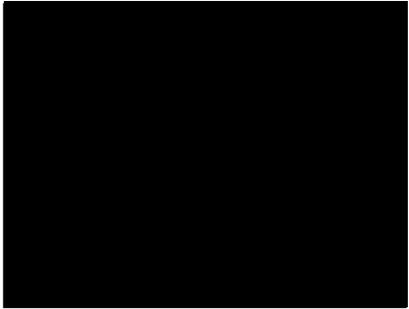
The 1980 EIS study failed to consider the relationship of the ship channel to the erosion of Dauphin Island and how the Island's erosion could be further affected by enlarging the channel.

Why are dredged sands not being placed closer to Dauphin Island to counter erosion? Perhaps if placed closer to the island (instead of in The Sand Island Beneficial Use Area) the erosion would not be so extreme.

Dauphin Island is one of the great barrier islands of Alabama and a good buffer for Mobile during major storms! Let's not compromise our barrier islands and coastline anymore. We do need to make sure larger ships can get into the port of Mobile, but we also need to make sure we preserve as much of these affected coastlines as possible. We need to consider both the future of the port and shipping as well as the future of the leisure, recreation, and maritime opportunities that our coastal areas bring to the Mobile area way of life .

Sincerely,





February 15, 2016

Ms. Jennifer Jacobson
Mobile District, Planning & Environmental Division
Coastal Environment Team
PO Box 2288
Mobile, Alabama 36628-0001

RE: Public Notice: FP15-MH01-10

Dear Ms. Jacobson

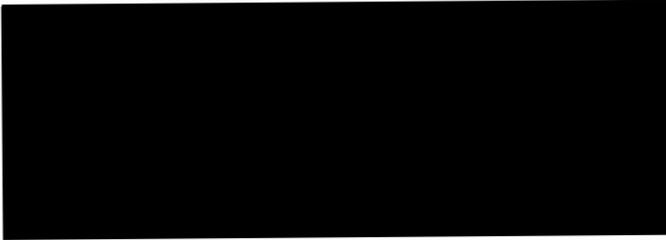
I am a property owner at Sandcastle Condominiums on Dauphin Island. In the last 4 years since I have owned, there has been significant erosion to the beach in front of the complex and extending in both directions. I would estimate there has been well in excess of 50 feet of loss in that time. I understand from talking to others who have owned in Sandcastle much longer, the beach loss has been many times of what I have witnessed. Below are some items that I would request the Corps to take into consideration, prior to conducting any further dredging activities in the Mobile Ship Channel.

1. Comply with Section 5 of the River and Harbor Act of 1935 that requires every Corps report involving an improvement of an inlet (i.e., Mobile Harbor Outer Bar Channel through Mobile Pass) to evaluate shoreline erosion for a distance of not less than ten miles on either side of the inlet channel. The Corps' 1980 report and EIS did not comply with that requirement.
2. Pursuant to 40 CFR 1502.9(c)(1)(ii), the SEIS prepared for this study must address the changed environmental conditions within the study area that have occurred due to the significant erosion of Dauphin Island. The original 1980 EIS prepared to analyze the effects of deepening and widening the Mobile Outer Bar Channel failed to consider at all the potential of an enlarged ship channel to affect the Dauphin Island's erosion problem that existed at that time. The 1980 EIS was deficient since it failed to consider the relationship of the ship channel to the erosion of Dauphin Island and how the island's erosion could be further affected by enlarging the channel. As a result, the SEIS must thoroughly address the cumulative historical sand losses to Dauphin Island dating back to 1958 that correspond with increasing deepening of the Outer Bar Channel according to U.S. Geological Survey's 2007 report. The conclusions of the Corps' 1976 report that concluded SEIS maintenance of the Outer Bar Channel contributes to the erosion of

Page 2

Dauphin Island also cannot be ignored in the New Study and to further deepen and widen the channel.

3. Identify new dredged sand disposal sites nearer Dauphin Island. Apply the same shallow water deposition concepts that the Corps recommends be employed to build back Petit Bois Island's eroded shoreline west of Dauphin Island.



February 18, 2016

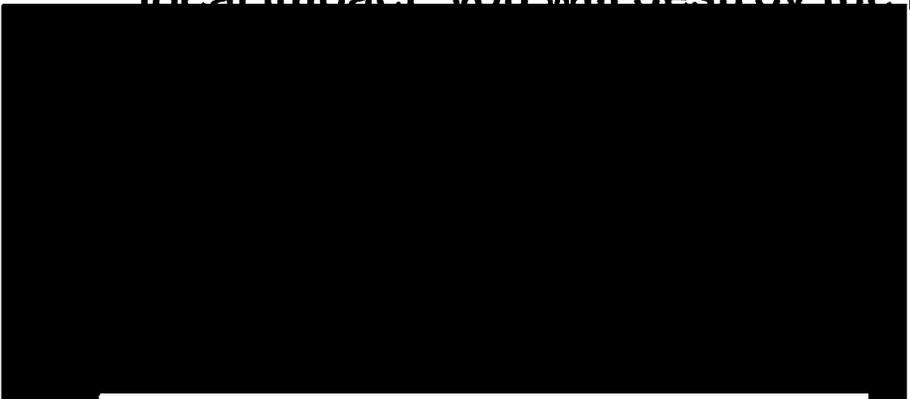
To All this Concerns:

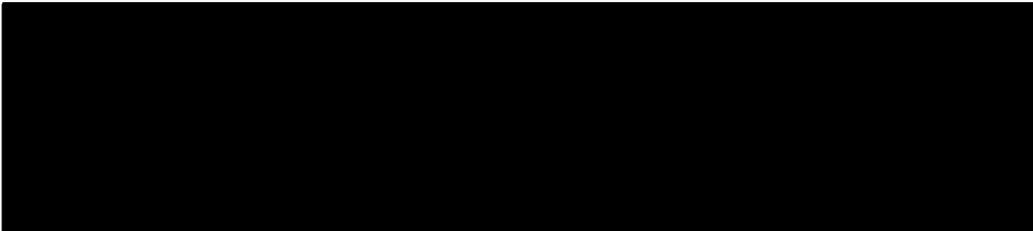
As I am not an engineer, scientist, or other decorated specialist I will explain my concern for the impact on Dauphin Island erosion using the lost art form of common sense.

Make a small indent in the sand, over time Mother Nature will fill it in utilizing surrounding material. Now dig a deep and wide trench taking the material far, far away, Mother Nature will fill it back up with the closest material.

Thus, causing the erosion of Dauphin Island.

If you continue to remove sand without regard for local impact, you will destroy the island.





February 11, 2016

Ms. Jennifer Jacobson
US Army Corps of Engineers
Mobile District, Planning and Environmental Division
Coastal Environment Team
PO Box 2288
Mobile, AL 36628-0001

Re: Mobile Harbor Ship Channel Widening Study

Dear Ms. Jacobson:

I am writing to express concern with the upcoming plans to study and possibly deepen and widen the Mobile ship channel and the potential impacts to the shoreline of Dauphin Island. As a long-time visitor to "DI", I have seen firsthand the dramatic effects of the current practices to maintain the channel. Ten to twenty feet of beach simply disappear every year on many parts of the island. If this pace continues Dauphin Island as it has been known for the last 40 years will cease to exist within a generation. And this is nothing short of a travesty. Thousands of families visit Dauphin Island every year because it is a quaint, slow-paced, and uncrowded alternative to many of the beach communities on the Gulf coast. I visit with my family because the island is the place where we can unplug and spend quality time laughing, connecting, and just being a family. This time spent on the island, and the memories developed, are special for us and the other families that make Dauphin Island their home away from home. I understand the issues around maintaining the channel are complex and there is no simple answer, but put simply Dauphin Island is a rare gem and it is worth saving.

There are a variety of legal and scientific arguments *against* the current dredging practices – from Section 5 of the 1935 River and Harbor Act to the placement of sand in the SIBUA – and there are likely many arguments *for* the current practices. I am not writing to put these in front of you. I am writing as a concerned person who simply wants my children, and their generation, to have a place where they can experience the same peace and joy that I have from the island.

Sincerely,



Comment # 148

Ms. Jennifer Jacobson
US Army Corps of Engineers
Mobile District, Planning & Environmental Division
Coastal Environment Team
PO Box 2288
Mobile, Alabama 36628-0001

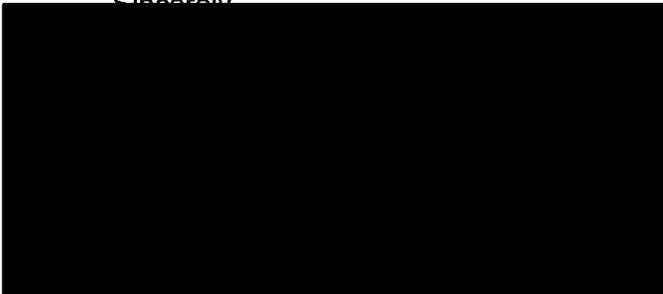
I attended the Public Scoping Meeting concerning the Mobile Harbor General Reevaluation Report. I am distressed to learn that the Corps of Engineers has begun a new study to deepen and widen the Mobile Harbor ship channel. My concern is additional damage to Dauphin Island and the subsequent environmental damage to the Mississippi Sound and the South Mobile County coast.

Dauphin Island is already suffering erosion issues from the lack of the littoral sand drift due to existing Corps practices. The Corps has dumped dredged sands in the Sand Island Beneficial Use Area (SIBUA) south of the lighthouse for years with the position being that these sands are moved by currents to Dauphin Island to counter erosion. However, the observed evidence indicates most of the sands are not moved, but accumulate at that location, while Sand Island has almost disappeared and Dauphin Island continues to erode.

How can the Corps ignore the effects of their current maintenance practices on erosion issues on Dauphin Island? How can the Corps ignore the vast amounts of scientific literature documenting the negative effect to beaches downdrift of dredged navigation channels? What confidence can the public have that the current project will thoroughly and objectively evaluate the effects of widening and deepening the channel when the existing SIBUA fails to meet its purpose? What will assure the public that this current Corps project will establish maintenance practices that mitigate the loss of littoral drift sands? Who will insure that the Corps complies with Section 5 of the River and Harbor Act of 1935 that required an evaluation of shoreline erosion which the Corps' 1980 report and EIS ignored.

Based on the above questions, I believe that the General Reevaluation Report should incorporate the wording of Section 5 of the River and Harbor Act of 1935 so that any reader of the report is aware of the Corps' legal responsibilities in the work of widening and deepening the channel inlet. Additionally, the report should be reviewed by an independent, unbiased scientific entity selected by a Citizen's Advisory Committee whose findings are made available to the public prior to report finalization. This may place an additional economic burden on the Corps and non-federal sponsor. But what is the economic burden and environmental loss that has already been placed on the citizens of Dauphin Island, the citizens of South Mobile County and U.S. taxpayers for the Corps' previous neglect?

Sincerely,





Feb. 5, 2016

Ms. Jennifer Jacobson

US Army Corps of Engineers Mobile District

P.O. Box 2288

Mobile, Al. 36628-0001

Dear. Ms. Jacobson:

I understand that your agency conducted a Public Scoping Meeting about the General Reevaluation Study and Environmental Impact Statement for widening the Mobile Harbor Ship Channel on January 12, 2016. Unfortunately, I was unable to attend but some of my acquaintances did. I was told, that you had prepared quite a few displays about the project, but contrary to the announcement for the meeting there was very little opportunity for the public to comment, and the meeting was insufficiently publicized. That is disgraceful.

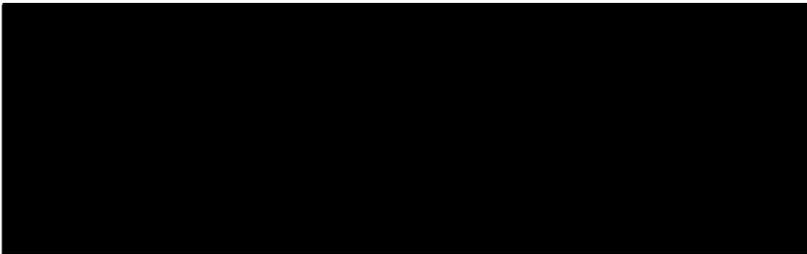
As a scientist, I have collaborated with the Army Corps of Engineers on projects that were funded by the US Department of Energy and found the staff to be competent and fair. With this in mind I expect and request that you give equal consideration to the public interest and not just the views of the Alabama Port Authority.

I am not opposed to widening of the shipping channel but ongoing maintenance dredging of the Outer Bar Channel has clearly aggravated and is contributing to the continued erosion of Dauphin Island because dredging is interrupting and diverting the littoral flow of sand from Fort Morgan to Dauphin Island. It has been estimated that between the years of 1974 and 2000, over twenty million cubic yards of sand were removed and deposited in the deep waters of the open Gulf. That has to stop. In fact, the sand deficit must be addressed in the Environmental Impact Statement that should go back to the original Study. The Corps must prepare a Dredged Material Disposal Master Plan and make it part of the Environmental Impact Study in order to mitigate for the erosion of Dauphin Island.

It is also critical that the resulting General Reevaluation Study report comply with Section 5 of the Rivers and Harbors Act of 1935 that requires every Corps report involving an improvement of an inlet to evaluate shoreline erosion for a distance of not less than 10 miles on either side of the inlet channel. I have information indicating that the 1980 Corps report that resulted in the present Congressional authorization to deepen and widen the Mobil Harbor ship channel failed to satisfy the 1935 federal statute. The General Reevaluation Study must not repeat that failure.

In recent years the Corps has placed dredged sand in the Sand Island Beneficial Use Area on the assumption that this would mitigate the erosion of Sand Island and Dauphin Island. It has not. I see with my own eyes that the gap between the lighthouse and the east end of sand island is steadily growing and the east end of Dauphin Island continues to erode. The General Reevaluation Study must identify a new disposal site in shallow waters closer to Dauphin Island to assure that the majority of the beach quality sands are reincorporated into the littoral drift system instead of being lost to the deeper Gulf waters which has been the case for the last half century. Dauphin Island cannot afford for the cumulative loss of sands to be allowed to continue

I trust that the Corps will be mindful of keeping its reputation as a competent and fair agency intact and act in the common interest.



February 4, 2016

Ms. Jennifer Jacobson
US Army Corps of Engineers
Mobile District, Planning & Environmental Division
Coastal Environment Team
PO Box 2288
Mobile, Alabama 36628-0001

Ms. Jacobson,

I am writing to make known my concern regarding the impact of the widening and deepening of the Mobile navigation channel. It is my understanding that to maintain a deeper and wider channel, larger volumes of sands will likely be dredged from the Outer Bar Channel east of Dauphin Island. I respectfully request that when studying the impact of the widening and deepening of the Mobile navigation channel that equal consideration be given to the long term future of all parties concerned and not just the views of the Alabama State Port Authority. In the interest of fairness and transparency any plans for the disposal of dredged material both removed during initial deepening and widening of the ship channel and future maintenance should follow a Master Plan for Mobile Bay and make it part of the Study and Engineering Impact Statement (EIS).

In order to include all of the people that would be affected, the Master Plan should include input and involvement of the public. It is vitally important that this effort be incorporated into the General Reevaluation Study and EIS. The information should be made public in the early planning stages and not at the end of the process when all decisions have essentially been decided.

A big concern to me is that Dauphin Island is going to be excluded from the decisions that will be made regarding the disposal of dredged material both removed during initial deepening and widening of the ship channel and future maintenance. Please include Dauphin Island in the Master Plan. I have watched the sands on and around Dauphin Island move around for many years and it is quite clear to me that the island's erosion is affected by maintenance of the Outer Bar Channel. It is very important that careful attention be given to the beneficial use of dredged sands to counter erosion on Dauphin Island.

I will admit that I am not an expert in this matter, but it seems that there are some requirements in the River and Harbor Act that state that an improvement to an inlet include an evaluation of shoreline erosion. The improvement being proposed to the Mobile Harbor Outer Bar Channel through Mobile Pass seems to meet the ten mile on either side of the inlet channel requirement.

Some of the earliest documented references to Dauphin Island date back to the 13th & 14th centuries. This demonstrates the longevity of Dauphin Island. The house on Dauphin Island that I purchased was built in the 1950s. When I bought it in 2004, the

owners described to me how far the sand once extended. They told me that they started noticing the erosion after the deepening of the Outer Bar Channel had begun and that the ongoing maintenance practices had definitely taken a toll. The analysis being requested is needed to establish the historical and baseline island conditions and to project future conditions of any actions taken. Given a fair and impartial study it would be hard to ignore the losses in sand due to the Outer Bar Channel maintenance that have occurred over time.

To further support the need for a fair and impartial study please also consider the 1978 draft report and the position by Corps of Engineers on Dauphin Island's beach erosion. It concluded that maintenance of the Outer Bar Channel is contributing to at least 40% of Dauphin Island's erosion problem. If it is determined now that the 1978 conclusion is not valid it seems fair to explain why the findings and conclusions of that report are no longer valid. The reason I am being so persistent in my request is because there is so much scientific evidence out there with examples of where navigation channels dredged through coastal inlets have stopped the flow of nearshore sands along the beach, thus causing beaches downdrift of the inlets to erode. This appears to be common along the entire US Gulf Coast and many places around the world.

I have personally witnessed the effect of the dumped dredged sands in the Sand Island Beneficial Use Area (SIBUA) south of the lighthouse. The thought was that these sands are moved by currents to Dauphin Island to counter erosion. However, most of the sands do not move. Instead, they accumulate at that location and Sand Island has almost disappeared. In addition, Dauphin Island continues to erode. The General Reevaluation Study and EIS should thoroughly evaluate the dumping practice in the SIBUA. My suggestion would be that the Corps adopt the same shallow water (<10 to 15 feet) deposition methods the Mobile District has recently recommended be used to build back Petit Bois Island's eroded Gulf shoreline west of Dauphin Island.

I understand and fully support progress. However, progress should not be made at the expense of Dauphin Island and the protection it provides. It is my firm belief that any progress achieved should be used to support and even improve the conditions of a very important barrier Island such as Dauphin Island. Please consider establishing a Citizen Advisory Committee that will meet every 3-4 months with the Corps to assess how public concerns are being addressed in the General Reevaluation Study and EIS. Thank you for considering my input.

Sincerely,



Comment # 151

Ms. Jennifer Jacobson
US Army Corps of Engineers
Mobile District, Planning & Environmental Division
Coastal Environment Team
PO Box 2288
Mobile, Alabama 36628-0001

Ms. Jacobson:

I am writing as a concerned citizen and as a Dauphin Island, Mon Louis Island, and Coden waterfront property owner. I believe that the Army Corps of Engineers' practice of dumping material dredged from the Mobile ship channel too far out in the Gulf of Mexico for it to benefit Dauphin Island has caused substantial erosion of that barrier island and endangers the entire South Mobile County shoreline. As you may be aware, many properties on Dauphin Island that were waterfront homes only a very few years ago are now totally underwater in the Gulf of Mexico. This erosion has occurred during a period of relatively minor storm activity, and must be attributed primarily to the Mobile Bay ship channel and the Corps' dredging/dumping practices.

Given the east to west shoreline currents in this area of the Gulf, it should be obvious that (prior to the digging of the Mobile Bay ship channel) sand flowed naturally along the northern Gulf coast from the east to Dauphin Island and beyond. It should also be obvious that sand coming toward Dauphin Island from the east now drops into the Mobile Bay ship channel and is trapped there. Naturally westward flowing sand would eventually fill the Mobile Bay ship channel, and it would once again flow onto the Dauphin Island shoreline if the Corps' did not regularly dredge the channel to keep it open. The Corps' practice of depositing this dredged material out in deep water instead of closer to Dauphin Island has further interrupted the natural flow of sand and resulted in substantial erosion of the Dauphin Island shoreline.

This off shore dumping practice may save money by avoiding the use of shallow draft barges and/or the pumping of dredged material into shallower water, however it will, no doubt, prove to be much more expensive when the time finally comes to rectify the substantial damage the Corps is causing to the barrier island shoreline in this area of the Gulf.

It is my understanding that the Army Corps now plans to deepen and widen the Mobile Bay ship channel which can only speed up the erosion of Dauphin Island unless the Corps changes its dredging/dumping practice so that future dredged material is deposited in a location which will benefit Dauphin Island. The widening and deepening of the channel could actually begin to offset some of the damage the Corps has already caused to the barrier islands given that a lot of dredged material will now become available.

While the quality of some Mobile Bay dredged material has been questioned, silt already flows out of every river on the northern Gulf coast, and it seems to float away leaving the higher quality sand. A little care may be given to assure that the better material is deposited closest to the shoreline, but at this point, any material is better than no material – just ask the people whose properties are fifty feet out in the Gulf.



Comment # 152

Dear Ms. Jacobson, and folks at the U. S. Army Corps of Engineers,

Dauphin Island is more than just the beloved home of our residents and abundant wildlife, it is also a significant economic engine for South Mobile County and the Gulf Coast. PLEASE take our plight seriously and act accordingly in the best interests of Dauphin Island regarding dredging practices.

First I'd like to thank you for holding the scoping meeting in January. I attended and found it to be a friendly and very informative experience. This was a great step in the direction of being more transparent and involving the public in the planning process. As the owner of a business based on Dauphin Island, I speak with many people each day and unfortunately many of them were not able to attend. I am sending this letter to capture and convey the issues they have shared with me.

The Alabama Port Authority certainly has their priorities with regard to expediency and cost but these are not necessarily in the best interest of all. Please don't forget about the impacts to our island home.

You will receive input calling for a "Dredged Material Disposal Master Plan for Mobile Bay" and I cannot emphasize enough how important this is to continue in the positive direction of public transparency and inclusion in the EIS.

It is my understanding that Dauphin Island is not included in the Regional Sediment Management Strategy for Mobile Bay. Can the Corps please update and include us in the existing RMS?

I am sure you are aware that the River and Harbor Act requires Corps reports involving an improvement to evaluate shoreline erosion for a distance of not less than ten miles on either side of the inlet channel. For whatever reason, the Corps' 1980 report and EIS did not do this so can this be corrected?

There is also uncertainty and disagreement regarding losses of littoral drift sands due to maintenance practices, so analysis is needed to establish the true historical baseline and projected future conditions in order to properly represent the "no action alternative" versus the proposal.

A 1978 draft report on Dauphin Island's beach erosion concluded maintenance of the Outer Bar Channel is contributing something like 40% of Dauphin Island's erosion problem. The reversal of the Corps position on this critical issue can seriously undermine the credibility of the Corps, so please provide a satisfactory explanation in the documentation process.

The Sand Island Beneficial Use Area simply does not seem to be aiding in the movement of sand by currents to Dauphin Island to counter erosion as expected. The General Reevaluation Study and EIS should to address this as well, but more importantly, the Corps really needs to use shallow water deposition. Understandably, this may be less convenient to execute, but it is critical to Dauphin Island.

Finally, I Applaud the efforts by the Corps thus far to keep the public informed and included and I implore you to continue to do so regularly throughout this project. I have heard suggestions of forming "a citizen committee" to facilitate this and it seems like an excellent idea - and a way to delegate some of the communications effort away from Corps resources.

Thank You,



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February 9, 2016

Ms. Jennifer Jacobson
US Army Corps of Engineers
Mobile District, Planning & Environmental Division
Coastal Environment Team
PO Box 2288
Mobile, Alabama 36628-0001

RE: Public Notice: FP15-MH01-10

Dear Ms. Jacobson:

Comments about the Mobile Harbor General Reevaluation Meeting 1/12/16

The Corps intentionally left out all environmental impacts to Dauphin Island in the 1980 Environmental Impacts Statement (EIS) for the Mobile Harbor and Channels and the Corps' Mobile District has concealed that fact and the consequences thereof, for the past 37 years.

The Corps cannot proceed with the new SEIS until they do the following:

1. The Corps will first have to go back to all studies completed before the original 1980 EIS and disclose all environmental impacts to Dauphin Island caused by the Corps dredging of the Mobile Ship Channel until time the 1980 EIS was produced, up to the depth of 42 feet.
2. The Corps will have to disclose all environmental impacts caused by their dredging from 1980 to 2016 to Dauphin Island.
3. The Corps will have to identify all future environmental impacts to Dauphin Island, including future dredging of the Mobile Harbor and all channels.

The Corps has already misled the property owners of Dauphin Island and the public by producing the 1980 EIS that contained almost 1000 pages, and where the Corps conveniently left out all impacts to Dauphin Island in the document. The 1980 EIS has to be obtained by a FIOA request.

The Corps has already tried to trick and deceive Dauphin Island in the 2009 lawsuit settlement agreement with the difference between the words, **current and authorized**, to describe the depths of the channel.

Now, we find that the Corps is trying to extend their deceitful tricks to even a greater degree for the new SEIS, by making their terms for the investigation obscure and trying to make the analysis so complicated that the public would not be able to understand the documentation about Dauphin Island in it.

Now, the Corps wants to try to trick us again with the wording in **the Planning Process**, which reveals the Corps only wants to study from the current environmental conditions to compare with the environmental effects of any proposed action and its alternatives. In essence, the Corps only wants to conduct studies on the impact associated with the change from 47 ft. deep X 600 ft. wide to 57 ft. deep X 700 ft. wide. The new SEIS investigation will be restricted to only the impacts between those depths and widths.

Corps Trick 1: The Corps would only investigate the dredging impacts of the Bar Channel from the current depth of 47 feet, up to the depth 57 feet for the erosion on Dauphin Island. This means:

- The Corps wants to hide and ignore all of their previous impacts to Dauphin Island from expansion of the Bar Channel from 42 feet deep to 57 feet deep.
- The Corps would not be investigating the all of their dredging impacts to Dauphin Island between the depths of 42 feet starting 1975, to the depth of 47 feet this year, 2016.

What a sneaky and underhanded trick.

We know and so does the Corps' that the Corps' 1978 Dauphin Island study stated that the Corps was causing the erosion on Dauphin Island from their dredging of the Bar Channel. The Corps is trying to use this new trick to cover up the Corps' erosion on the island from 1978 until now.

By doing the limited investigation, the Corps will cover-up all of their past exploitations of Dauphin Island and this will leave Dauphin Island in its present eroded condition that has a historic sand deficit of over 47 million cubic yards of sand.

This trick shows the Mobile District Corps will go to any extent to cover up their past deception and their need to advance their own agenda at virtually any cost or harm to others.

Corps Trick 2. To cover-up the Corps past corruption, the Corps wants to use their lawsuit study, the **2008 Final Report**, and the "so-called" updates to the study to justify the Corps past deception to Dauphin Island.

- Before proceeding with the SEIS, the Corps needs to disclose all errors and inaccuracies in the **2008 Final Report**, which deems the study useless.

Corps Trick 3: The Corps is now managing **three studies** about Dauphin Island, which will be incorporated into the SEIS for the massive expansion of the Mobile Harbor. With the Corps' past practices of deceiving Dauphin Island, how can they be trusted to do studies without selectively choosing facts to justify their agenda and suppress all other facts about Dauphin Island?

- The Corps will not answer any FOIA request for information about the three studies about Dauphin Island, they will be managing. We know the results of the studies will be included in the SEIS.
- How can the Corps' Mobile District be trusted to go forward with these studies and the SEIS when they have not disclosed all past Corps studies between 2005 to 2016 that **used incorrect and flawed data** as indicated in a Corps' December 2011 memorandum, which stated:

"USACE surveys that were provided for the sediment budget analysis were incorrect".

- **No studies or updated studies that used any incorrect and flawed data** should be incorporated into the SEIS documentation. This includes all of the Corps studies from 2005 to 2015 that were updated because of the incorrect sand sediment surveys and the other corrupted data, all of which, has not been disclosed to the public.

Corps Trick 4: The Corps Mobile District use of the phrase, “Not based on Science”, to discredit all other studies that contradicts the Corps’ agenda is inexcusable. The Corps use of the phrase, “Based on Science,” is an excuse to do new studies that justify their agenda.

- The Corps’ use of the term “Not based on Science” is just another way to discredit all other studies that that contradict their scheme and to lie, deceive, mislead, and manipulate the public for the massive expansion for the Mobile Harbor.
- The Corps’ use of the term that the studies have to be “Based on Science” is the Corps scheme trying to discredit all other studies that verify the Corps is causing the erosion on Dauphin Island. By making this type of disparaging remarks, the State and the Town question all other studies, than the Corps, which gives the Corps the prerogative to choose facts selectively for the massive expansion to the Mobile Harbor, and the Corps suppressing all factual information from other scientist.
- For a the Mobile District Corps to deliberately try to ruin the reputation and good name of some of the most respected scientist in the country because they produce studies that contradicts the Corps practices: threatens democracy and the whole American system.

For the employees in a government agency to try to instigate doubt or suspicion about the validity or accuracy of a study that is contrary to the Corps agenda because the Mobile District is trying to keep from being caught about of their deletion of the impacts to the Island, is an outrageous abuse of power, that should not be tolerated.

- I feel the Mobile District Corps should apologize to the US Geological Survey, the National Park Service and to all others local coastal engineers that the Corps has been trying to degrade over the past 37 years, this also includes the Corps employees who are now degrading their own past engineers like General Drake Wilson, who was in charge of the Mobile District during the time the Corps produced a 1978 study on Dauphin Island, which stated that the Corps’ dredging was causing the erosion on Island.
- This is an insidious act by the Mobile District, which should not be tolerated anymore.

Corps 1-12-16 meeting for the Massive expansion to the Mobile Harbor.

At the Public Scoping Meeting, there was no information about the 1969 NEPA law or how the public could use the Law for public comments.

The National Environmental Policy Act of 1969 (NEPA) established a national policy to protect the environment by requiring Environmental Impact Statements for major federal actions having a significant effect on the environment. The massive expansion to the Mobile Harbor and channels is a major Federal action.

Corps needs to explain the following:

1. How in 2016, can the Corps produce a Supplemental Environmental Impact Statement SEIS for the Mobile Harbor project, when the original 1980 Environment Impacts Statement EIS did not follow the Federal Law?

How can you supplement a corrupted EIS document?

2. Why did the Corps fail to disclose at the Public Scoping meeting that the Corps left out all environmental impacts to Dauphin Island in the original 1980 EIS?

3. Why has the Corps failed to address the environmental impacts to Dauphin Island from the Corps' dredging of Mobile Harbor and Channel, a Federal Navigation project for the last 35 years in the EIS?
4. The Mobile District's Coastal Environment Section of Planning Division duties are to ensure the environmental compliance of all federally authorized projects.
5. Did any of the employees in the Coastal Environment Section, disclose to the Federal Judge during the 2009 lawsuit about the erosion on Dauphin Island that the Corps left out environmental impact to Dauphin Island in the 1980 EIS, and that the Mobile District has not complied with the environmental laws since that time? Did the employees in the Coastal Environment Section fully disclose to all other federal agencies that the Mobile District is not complying with federal laws?

The Corps expert witness testified:

- She is on the Coastal Environment Section of Planning Division which duties of that section are to ensure the environmental compliance of all of the federally authorized projects
- Has years of experience with the National Environmental Policy Act compliance
- The Mobile Harbor Project was one of the projects that she was responsible

Why wasn't the Judge informed that the Corps left out the environmental impacts of the Corps dredging causing erosion on Dauphin Island in the 1980 EIS? If the expert's duties were to ensure the environmental compliance of all federally authorized projects and the person had years of experience with the National Environmental Policy Act, didn't they have an affirmative duty to disclose these facts to the judge?

6. The Corps intentional deletion of any impacts to Dauphin Island in the 1980 EIS shows that the defects in the agency's analysis of Dauphin Island is so perverse that it invalidates all other Corps documentation about the Island's erosion.
 - The Corps concealment of the impacts is so obvious; it questions the Corps reliability to oversee any investigations concerning Dauphin Island.
 - Involves immense lying and corruption within the Mobile District for the passed 37 years.
 - There is a need for the Federal Government and all other agencies involved in the protection of the environment to take away all Corps responsibility over Dauphin Island and any other studies including taking over the Corps handling of the SEIS for the Mobile Harbor.

Since the Corps did not disclose the intentional deletion of the dredging impacts to the island in the 1980 EIS, how can we trust the Corps studies to protect Dauphin Island, 37 years later? How can the Corps, ever again, be trusted and that they won't try to cover up the erosion caused by their dredging of the Mobile Ship Channel in the New SEIS?

Lawsuit Testimony:

How can the Corps even consider deepening and widening the Bar Channel when Corps' expert, Susan Rees and Director Lyons' expert testimony stated that the Corps did not need to expand the Bar Channel for the new Post-Panamax containerships?

Both experts had their own agency documentation starting, at least, in 2008 that 55 feet to 60 feet was the projected depth needed for the Mobile Harbor for the opening of the Panama Canal in 2015. The Port Authority's 2008 documentation shows a timeline for the expansion of the Harbor for deep draft dredging that would start in in 2014 to 2019. Under the Federal Code the term "deep-draft harbor" means a harbor, which is authorized to be constructed **to a depth of more than 45 feet**

Before the Federal Judge, both experts testified the Mobile Harbor did not need to be increased to a depth up to 55 feet for the Post-Panamax ships.

The Federal Judge knew the Corps and the Port, as the expert's witnesses, would not lie under oath. The Federal Judge believed them when they testified that there were no plans to expand the channel to 55ft as shown on document present to the court. Also, the Judge knew that the experts would not failed to disclose their past knowledge of the channel being deepened or not failed to disclose their knowledge about any future plans about the deepening of the Bar Channel.

The Federal Judge delayed the settlement of the case and required extra briefs. The Federal Judge totally relied on the Corps' and the Port's expert witness testimony, in the Judges' final opinion, using the words "extreme unlikelihood".

"The court does recognize that plaintiffs have raised valid concerns regarding the settlement. It is true that the Channel at issue could be dredged to a greater size. The objectors, however, put too much weight in this concern. **Dr. Rees and James Lyons both emphasized the extreme unlikelihood of such a project ever being undertaken.**"

Both expert witnesses testified about a Corps 2008 document presented to the Judge about the 55 feet depth of the Bar Channel that would not be needed for the new Panama Canal, which was not opening until 2015-2016. The Corps' 2008 documentation states that the Ports would have to follow the depth of 60 feet for the Post-Panamax ships. Rees testified she was responsible for the Mobile Harbor Project and she stated that it was not the deepening of the channel that was needed, they just needed the turn basin.

DOJ- "Objectors have also suggested that expansion of the MOBC is necessary to permit larger ships traversing the Panama Canal to use the channel and enter the Port of Mobile. See id. at 107:21-109:2 (C. Graves). Dr. Rees testified, however, **that very large ships already call at the Port of Mobile, and that the main restriction on those ships' usage is the location of the turning basin, not the depth of the channel.** (MOBC Mobile Outer Bar Channel)

Based upon Dr. Rees testimony, there is no need for the Corps dredge the Bar channel deeper and the depth of the channel was not needed in the future for the Post-Panamax ships.

In addition, when the DOJ asked Rees if she could "comment on that testimony", "that very large ships were going to be using the channel and that that would require it to be deepened". Rees stated, "whether those ships would actually utilize Mobile or not are business decisions that, you know, private industry makes".

At the lawsuit settlement hearing on 9/15/09, a Corps 2008 document was presented that the Corps was going to deepen and widen the Mobile Harbor including the Bar Channel for the new Panama Canal for the Post-Panamax ships.

DOJ statement to judge: (MOBC Mobile Outer Bar Channel)

- "The testimony of Dr. Susan Rees, who, in her position with the Coastal Environment Section of the Planning Division of the Corps, had responsibility for the Mobile Harbor Project, and Mr. James Lyons, Chief Executive Officer for the Alabaman State Port Authority, establishes that class members' assertions related to future development of the MOBC are inaccurate. Not only is the expansion of the MOBC not imminent, it is not even on the distant horizon."
- "Mr. Lyons testified that there is no way economically that the State could assume these increased costs. Tr. at 160:19-161:12. Nor does the State sees any economic benefit associated with deepening the MOBC, because **the current depth accommodates the maximum ship size needed to be served.** Tr. at 163:6-164:21.
- **"Objectors have also suggested that expansion of the MOBC is necessary to permit larger ships traversing the Panama Canal to use the channel and enter the Port of Mobile. See id. at 107:21-**

109:2 (C. Graves). Dr. Rees testified, however, **that very large ships already call at the Port of Mobile**, and that the main restriction on those ships' usage is the location of the turning basin, **not the depth of the channel**. Tr. at 150:25-151:6.

Costs to increase the Bar Channel:

How is the Corps going to justify the cost to increase the Bar Channel, when Director Lyons testified enlarging just the Bar Channel would cost between \$400 million to \$2.7 Billion dollars, and that amount would bankrupt the Port Authority? If this amount is just for the expansion of the Bar Channel how much more will the Port Authority and the Corps have to pay for all other parts of the Harbor massive expansions?

Port Director Lyons:

- He was told the day of the hearing that an expansion of the Bar Channel to its authorized limits would cost "\$2.7 billion"
- That the amount for the bar channel was \$200 million and "could be well over double that" today.
- He equated the amount for the expansion of the bar channel "a million-and-a-half cubic yards per mile" and stated that the cost to "move two-and-a-half-million-cubic yards" "is \$75 million".
- the Port could not take on an extra \$100 million in debt to expand the bar channel and also the payment of the 50 percent of the dredging maintenance costs.
"It would bankrupt us. We couldn't do it. I mean, there's no way we could do it."
- "As far as deep draft, we do have a lot of petroleum here, but it's all north of the tunnel, so it'll never be any deeper than 40 feet. But I talked to a couple of my coal customers, I said: Is there anything benefit of bringing anything more than 45 feet, and the answer was no, and that was pretty much the end of it."
- "we ended up taking a position on that based on what we felt like was going to be the maximum ship size to ever come in here and none of those have ever indicated **a need for anything more than 45 feet.**"
- "Yeah, there might be a few ships, but I don't think there would be enough business to justify it. **I don't think I would even ask the Corps or try to even spend any money on trying to study it.**"

Corps 1-12-16 public meeting --the Corps' experts to give the public information:

Only the Corps could turn a \$48,000 dollar meeting, for experts answering questions, to a meeting that experts talk without actually saying anything.

When you try to address an issue with the experts, they either lied or they told you to go to the court reporter to make your comments. I personally feel the Mobile Districts Corps' lying has turned in an art form.

The prime objective of Corps' public meeting was control and the strategy of distraction, consisting of diverting the public attention from the important issues and the hidden alterations in the studies.

The Corps failed to reveal the laws governing the National Environmental Policy Act of 1969(NEPA) at the NEPA/scoping meeting.

The Corps did not inform the public what the NEPA process was and all laws governing the process that the Corps has to follow when doing an Environmental Impacts Statement (EIS).

The Corps failed to reveal the laws that governed the protection of Dauphin Island and the environment impacts from the Corps dredging of the Mobile Outer Bar Channel.

The Corps used biased one-sided documentation, in support of Port deepening and widening of the Bar Channel, instead of identifying all environmental issues and alternatives.

Out of the 13 posters of the Corps presented, only two posters related to the environment.

Of those two posters titled **Environmental Considerations**, the Corps only listed phrases without any background on what the Corps was planning on doing about the options.

For example, the Corps put **Potential Impacts to Dauphin Island** under **Other Consideration**. This makes no sense. The Corps has known since a 1978 Dauphin Island Study that there were real and existing environmental impacts to Dauphin Island from the Corps dredging of the Bar Channel, why wouldn't the Corps disclose that fact at the meeting?

Under the Disposal Options:

Potential Beneficial use opportunities for Shoreline protection/restoration .

- Why didn't the Mobile District disclose that they have not followed all federal laws governing the prevention or mitigation of erosion attributable to Federal Navigation works on adjacent shorelines of Dauphin Island?
- Why didn't the Mobile District disclose that they would not produce evidence under a FOIA request that shows proof that the SIBUA underwater berm transports sand to Dauphin Island?
- Why didn't the Corps acknowledge that it is putting the sand in SIBUA further south and west of Dauphin Island, which will do Dauphin Island no good at all?
- Why did the Mobile District acknowledge that the Corps left Dauphin Island out of the "Regional Sediment Management Plan" in 2000, even though Rees testified in Federal Court in 2009 that the Corps has a National policy for both beneficial use and Regional Sediment Management that stresses that we identify areas that we can keep the sediment into the system as much as possible. Rees was over the Mobile Harbor, the Corps environmental compliance section, and she was over the Regional Sediment Management Plan?

Mobile District has not followed Federal Laws for erosion damages attributable to Federal Navigation works since 1935:

33 U.S. Code § 2211 – Harbors (b) Operation and maintenance

(c) Erosion or shoaling attributable to Federal navigation works

Costs of constructing projects or measures **for the prevention or mitigation of erosion or shoaling damages attributable to Federal navigation works** shall be shared in the same proportion as the cost sharing provisions applicable to the project causing such erosion or shoaling. The non-Federal interests for the project causing the erosion or shoaling shall agree to operate and maintain such measures.

33 U.S. Code § 2241 – Definitions

For purposes of this subchapter—

(1) Deep-draft harbor

The term "deep-draft harbor" means a harbor which is authorized to be constructed to a depth of more than 45 feet

(2) Eligible operations and maintenance

(B), the term "eligible operations and maintenance" means all Federal operations, maintenance, repair, and rehabilitation, including

(iv) mitigating for impacts resulting from Federal navigation operation and maintenance activities

Why didn't the Mobile District disclose at the NEPA/scoping meeting the following:

- That the Corps will not answer a FOIA request about the "incremental costs" for the Corps to put sand closer to the western side of Dauphin Island even though there have been Federal Laws since 1992 for the percentage split of the "incremental costs" for beneficial use of dredged material for environmental restoration?
- The 1996 law specially states **Mobile Harbor**, and alternatives disposal of the dredged material for environmental restoration, which the Corps could consider for the sand from Bar Channel for Dauphin Island.
- Either the Mobile District intentionally let Dauphin Island erode away by not following the Federal Laws or the Mobile District does not understand the Federal Laws governing the Mobile Harbor.
- Why won't the Mobile District follow the laws that govern erosion attributable to Federal Navigation works?

Is the past cover-up about Dauphin Island keeping the Mobile District from following any Federal Laws for environment impact to Dauphin Island now?

What is the Mobile District Concealing?

1992 Water Resources Development Act of 1992 (P.L. 102-580), as amended-Beneficial Uses of Dredged Material

Section 204..... Project costs consist of the incremental costs of the beneficial use as compared to the disposal plan that would have otherwise been used. A nonfederal sponsor is responsible for paying 25 percent of these costs, including LERRD.The total federal costs associated with a beneficial use of sediments project shall not exceed \$5 million. This cost limit refers to the incremental cost over the Base Plan. There is authorized to be appropriated not to exceed \$15 million annually to carry out this section. Such sums remain available until expended.

1996 Water Resources Development Act of 1996 (P.L. 104-303),

Sec. 207 which provides for the placement of dredged sediment via methods that are not the least-cost option when the Corps determines incremental costs are reasonable in relation to environmental benefits.

Sec. 302 Mobile Harbor, Alabama. "In disposing of dredged material from such project, the Secretary... may consider alternatives to disposal of such material in the Gulf of Mexico, including environmentally acceptable alternatives for beneficial uses of dredged material and environmental restoration."

What is the Mobile District concealing by not disclosing all Federal laws and the Corps manuals and the Corps' compliance to those laws?

Why didn't the Mobile District disclose at the Public Scoping meeting, the actual environmental impacts to Dauphin Island caused by erosion attributable to a Federal navigation works and not following any of the laws stated below:

1935 Section 5 of Public Law 409, 74th Congress, approved August 30, 1935.

Section 5 of this law required that all reports dealing with improvements at a river mouth or inlet contain "**information concerning the configuration of the shoreline and the probable effect thereon**" that might result if the improvements under consideration were built. *Particular reference was to be given to erosion and accretion "for a distance of not less than ten miles on either side of the said entrance."* Because of its *concern with erosion problems....associated with the Corps of Engineers' harbor activities*, 33 U.S. Code § 546a - Information as to configuration of shoreline

1984 SHORE PROTECTION MANUAL VOLUME I, Coastal Engineering Research Center
Waterways Experiment Station, Corps of Engineers

Man-induced erosion occurs when human endeavors impact on the natural system. Much of the man-induced erosion is caused by a lack, of understanding and can be successfully alleviated by good coastal zone management. However, in some cases coastal erosion can be due to construction projects that are of economic importance to man. **When the need for such projects is compelling, the coastal engineer must understand the effects that the work will have on the natural system and then strive to greatly reduce or eliminate these effects through designs which work in harmony with nature.**

2. Man - Induced Causes:

b. **Interruption of Material in Transport.** This factor is probably the most important cause of man-induced erosion. Improvement of inlets by both channel dredging and channel control and by harbor structures impounds littoral material ... Often, the material is permanently lost from the down coast beach regime either by the deposition of dredged material outside of the active littoral zone... **This can be mitigated by sand-bypassing systems.** Realignment of the shoreline by the use of such structures as groins also interrupts the transport of littoral material. These structures may not only reduce the rate of a longshore transport but also may reduce littoral material reaching down coast beaches by entrapment.

c. **Reduction of Sediment Supply to the Littoral Zone .** In some areas the transport of sediment to the coast by rivers form the major source of material to the littoral zone. Dams constructed on these rivers not only form sediment traps but also reduce peak flood flows, thereby reducing the sediment supply to the coast which results in coastal erosion.

5. Effect of Inlets on Barrier Beaches:

Inlets may have significant effects on adjacent shores by interrupting the longshore transport and trapping onshore-offshore moving sand.

1985 The Corps designated the Mobile Harbor to become a **Deep-Draft "Superport" in 1985**

1987 **Environmental Engineering for Deep-Draft Navigation** Projects Manual No. 1110-2-1202

Chapter 6 Mitigation Decision Analysis:

6-1. Policy... **Damage from Federal navigation work along the shorelines of the United States must be prevented or mitigated**

6-3. Justification for Mitigation:

a. ... **Endangered and threatened species and critical habitats** will be given special consideration, with specific requirements for these resources covered in the Endangered Species Act of 1973

b. **Impacts resulting from dredged material disposal** and hydraulic changes are largely on bay bottoms, shorelines, wetlands, vegetated shallows, and riparian zones.

1990 **Water Resources Development Act of 1990 §2316. Environmental protection mission**

(a) General rule The Secretary **shall include environmental protection as one of the primary missions of the Corps of Engineers** in planning, designing, constructing, operating, and maintaining **water resources projects.**

1995 Engineering and Design EM 1110-2-1810, USACE, 31 January 1995

COASTAL GEOLOGY

(4) **Interruption of sediment transport at engineered inlets.**

(a) At most sites, the designers of a project **must ensure that the structures do not block the littoral drift; otherwise, severe downdrift erosion can occur**

....Unfortunately, this concept suggests that **maintenance of a permanent channel deep enough for safe navigation is usually inconsistent with sediment transport around the entrance by natural processes.**

Sand bypassing using pumps or dredges can mitigate many of the negative effects of inlet jetties and navigation channels (EM 1110-2-1616) Knowles 1988)

1996 Shoreline Protection and Beach Erosion Control Study:

Final Report: **An Analysis of The U.S. Army Corps Of Engineers Shore Protection Program 1996**

<http://www.iwr.usace.army.mil/Portals/70/docs/iwrreports/96-PS-1.pdf>

In 1976, PL 94-587 **authorized the placement of sand from dredging of navigational projects on adjacent beaches if requested by the interested state government** and in the public interest, with the increased cost paid for by the non-Federal interests.

The Corps complies with all environmental laws and Executive Orders. The Corps carefully considers and seeks to balance the environmental and development needs of the Nation in full compliance with the National Environmental Policy Act of 1969 (NEPA) and other authorities provided by Congress and the Executive Branch. Alternative means of meeting competing demands generated by human water resources needs are identified and their environmental values examined fully, along with the economic, engineering and social factors.

1996 Water Resources Development Act- Corps planning document:

<http://planning.usace.army.mil/toolbox/library/PL/WRDA1996.pdf>

Sec. 204. Restoration Of Environmental Quality.

“(C) Restoration Of Environmental Quality. —If the Secretary determines that **construction of a water resources project** by the Secretary or operation of a water resources project constructed by the Secretary has **contributed to the degradation of the quality of the environment**, the Secretary may undertake measures for **restoration of environmental quality** and measures for enhancement of environmental quality that are associated with the restoration, through modifications either at the project site or at other locations that have been affected by the construction or operation of the project, if such measures do not conflict with the authorized project purposes. 33 USC 2215

1998 Transmittal of the National Dredging Team Guidance

Close coordination and planning at all governmental levels, and with all aspects of the private sector, are **essential to developing and maintaining the Nation's ports and harbors** in a manner that will increase economic growth and protect, conserve, and restore coastal resources.

Dredged material is a resource, and environmentally sound **beneficial use of dredged material** for such projects as wetland creation, **beach nourishment**, and development projects must be encouraged

1998 "USACOE Coastal Engineering Research Committee Meeting on Dauphin Island, recommended the creation of a Regional Sediment Management plan to replace the ad hoc individual site approaches." (Town of Dauphin Island Erosion Task Force Report)

1999 Regional Sediment Management Plan (RSMP) adopted by Mobile Office covering the Coast from St Marks to Miss off shore Islands.

2 miles east of Fort Morgan Pt. to the west end of Dauphin Island

"The demonstration initiatives identified within the Sub-Regions are:

1. **Mobile Bay/Dauphin Island**

1999 The Corps left Dauphin Island out of the Regional Settlement Management:

2000 The State of Alabama gave \$100 million dollars to the Port Authority for the massive expansion of the Mobile Harbor and Channels, without any requirement to protect the adjacent beaches of Dauphin Island.

The \$100 million dollars came from the Gas/oil money from the gas/oil rigs all around Dauphin Island and **pipelines going under Dauphin Island.**

Dauphin Island is literally **being eroding away using the gas/oil money** from pipelines going under the island. The Port Authority has not spent one penny of that money to protect Dauphin Island.

2010 ENVIRONMENTAL COMPLIANCE POLICIES ER 200-2-3 29 Oct 10
 Environmental Compliance for Civil Works Operations

d. Environmental compliance requirements are an inherent part of the mission of each business line in Civil Works Operations. **The scope and magnitude of environmental compliance requirements of each mission is a function of the potential environmental impacts of the mission**, and the associated controls defined by applicable laws, regulations, Executive Orders and USACE policies. Therefore, each business line is responsible, in coordination with their supporting Environmental Compliance Coordinator (ECC), to plan, program, budget, and **execute their mission, including its environmental compliance requirements**, in a manner that is fully compliant. Each business line **must control the direct environmental impacts of its mission**,

2010 Corps of Engineers Civil Works Direct Program Development Guidance Fiscal Year 2012

d. Renourishment to restore sand lost to shorelines from Federal navigation operation and maintenance (navigation mitigation): This activity would be carried out pursuant to specific authorizations for shore protection projects that involve navigation mitigation, and pursuant to the Section 111 Continuing Authority Program. Funding for navigation mitigation will be derived from the Harbor Maintenance Trust Fund.

2011 Assessing the Impact of Federal Navigation Projects on Adjacent Beaches

INTRODUCTION:

Section 111 of the 1968 Rivers and Harbors Act, Public Law 90-483, as amended, gives the Federal government the authority to study, plan, and **prevent or mitigate damages to shores caused by navigation projects:**

The Secretary of the Army is authorized to investigate, study, plan, and implement structural and nonstructural measures **for the prevention or mitigation of shore damages attributable to Federal navigation works ..**Since the 1970s, there have been numerous Section 111 **studies that have estimated the erosion caused by navigation channels, jetties, and dredging and placement activities over the lifetime of an individual navigation project.** The goal of a Section 111 study is to evaluate data and conduct analyses such that a determination can be made **for the percentage of damages caused by the Federal navigation project.**

The Corps Mobile District needs to disclose the following information before continuing with the New SEIS:

- The Corps needs to identify all past and future adverse environmental impacts to Dauphin Island that are of sufficient magnitude that the proposed action must not precede as proposed.
- The potential violation of or inconsistency with a national environmental standard that is substantive and/or will occur on a long-term basis to Dauphin Island.
- The severity, duration, or geographical scope of the past deletions of impacts to Dauphin Island associated with the proposed action warrant special attention.
- The environmental impacts resulting from the proposed action are of National importance because of the threat to national environmental resources or to environmental policies.
- The original 1980 EIS does not contain any information of past impacts to Dauphin Island to fully assess future environmental impacts, which should be avoided in order to fully protect the environment.
- Any additional information, data, analyses, or discussion should be fully disclosed about impacts to the Island and they should be documented and included in the final EIS.
- The Corps refusal to identify all past significant environmental impacts to Dauphin Island in the 1980 EIS, therefore all environmental impacts to Dauphin Island should be analyzed in detail to reduce the significant future environmental impacts to the island.

- The Corps needs to identify all information, data, analyses, or discussions about the impacts to Dauphin Island since the 1970's and they should have full public review of those impacts before being included in the SEIS for the Mobile Harbor expansion.
- The Corps needs to identify all past and future impacts to Dauphin Island including ecological (such as the effects on natural resources and on the components, structures, and functioning of affected ecosystems), aesthetic, historic, cultural, economic, social, or health, whether direct, indirect, or cumulative.
- The Corps must now show evidence that all Corps statements about SIBUA underwater berm beneficial effects of adding sand directly to the beaches including the western side of Dauphin Island.

The Corps should disclose all past mitigation for the erosion of the adjacent beaches of Dauphin Island caused by their dredging of the Outer Bar Channel including:

- Any action or parts of an action taken by the Corps to avoid the impact to Dauphin Island.
- Any action or parts of an action taken by the Corps to minimizing impacts by limiting the degree or magnitude of the action and its implementation.
- Any action or parts of an action taken by the Corps to rectify the impact by repairing, rehabilitating, or restoring the affected environment to Dauphin Island.
- Any action or parts of an action taken by the Corps to reducing or eliminating the impact to Dauphin Island over time by preservation and maintenance operations during the life of the action.
- Any action or parts of an action taken by the Corps to compensate Dauphin Island for the impact by replacing or providing substitute resources or environments.
- The degree to which the impacts to Dauphin Island have on the human environment.
- The degree to which the Corps past actions establish a precedent for no actions to protect Dauphin Island from any significant effects caused by the Corps dredging of the Mobile Bar Channel.
- The degree to which the Corps past actions of Dredging of the Bar Channel, adversely affect an endangered or threatened species or its habitat that has been determined to be critical under the Endangered Species Act of 1973.
- Whether the Corps' past actions has violated Federal, State, or local law or requirements imposed for the protection of the environment and protection of erosion to the adjacent beach from a federal project.

By its past actions, the Mobile District shows it has a well-established pattern of suppression and distortion of facts and laws about the environmental impacts to Dauphin Island by high-ranking Corps employees. Their actions have devastating consequences on Dauphin Island for human health, public safety, and community well-being.

- There is strong documentation of efforts to manipulate the scientific findings to prevent any study that might run counter to the Corps agenda.
- There is evidence that the Corps often imposes restrictions on what scientists and the employees can say or write about the dredging impacts on Dauphin Island.

- There is significant evidence that the scope and level of the manipulation, the suppression of evidence, and misrepresentation of the impacts to Dauphin are unprecedented.

This is not just a few incidences but a widespread practice of abuse, ranging from deleting material in reports to undermining the quality and integrity of studies about the environmental impacts to Dauphin Island.

All Corps' employees for the last 37 years that have participate in the cover-up of the deletion of environment impacts to Dauphin Island in the original 1980 EIS and thereafter, should be fired.

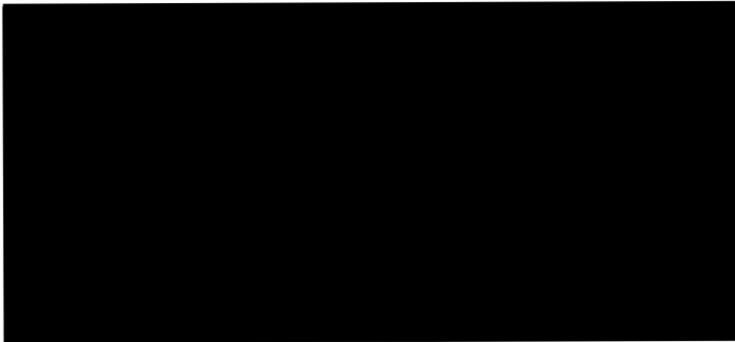
All employees that have not complied with the Federal Environmental Laws to protect Dauphin Island should be fired.

All employees that have been involved with producing false studies and making false statements about Dauphin Island should be fired.

All employees that ordered the employees under them to produce studies or reports with false or misleading information in them should be fired.

The Corps Mobile District abuse of power by a Federal agency to destroy Alabama's only barrier island show their complete lack of morals, principles, ethics, and honesty.

I will be sending copies of this letter all other government agencies, so that they can be inform of the Corps Mobile Districts practices.





The Mobile Bay Audubon Society

Chester McConnell
Vice-President and Conservation Chairman
8803 Pine Run
Spanish Fort, AL 36527
Tel. no. 251-626-7804
wmicmc@bellsouth.net

February 8, 2016

Ms. Jennifer Jacobson
US Army Corps of Engineers
Mobile District, Planning & Environmental Division
Coastal Environment Team
PO Box 2288
Mobile, Alabama 36628-0001

Dear Ms. Jacobson:

Mobile Bay Audubon Society is writing to express our views concerning the U.S. Army Corps of Engineers plans to deepen and widen the Mobile Harbor Ship Channel. Our views are in response to the Corps' January 12 Public Scoping Meeting. This letter identifies some of the issues that should be address in its General Reevaluation Study and Environmental Impact Statement (EIS) to deepen and widen the Mobile Harbor Ship Channel.

We urge the Corps to assure that the views of all interests are objectively considered.

How does the Corps plan to dispose of dredged material in Mobile Bay? Will the material be spread out in a thin layer near the channel and/or be used to create an island(s)? We contend that the Corps should prepare a Dredged Material Disposal Master Plan for Mobile Bay and make it part of the Study and EIS

We urge the Corps to include Dauphin Island in its "Regional Sediment Management Strategy (RMS)" for Mobile Bay. Audubon believes Dauphin Island's erosion is affected by maintenance of the Outer Bar Channel and major attention should be devoted to evaluate and apply the facts to make beneficial use of dredged sands to counter erosion.

We urge strict compliance with Section 5 of the River and Harbor Act of 1935 that requires every Corps report involving an "improvement" to an inlet (i.e., Mobile Harbor Outer Bar Channel through Mobile Pass) to evaluate shoreline erosion for a distance of not less than ten miles on either side of the inlet channel. The Corps' 1980 report and EIS failed to comply with that law. Please comply with all applicable laws and regulations.

Mobile Bay Audubon believes that a comprehensive EIS on this matter should address the cumulative historical sand losses to Dauphin Island dating back to at least 1958 that correspond with increasing deepening of the Outer Bar Channel according to U.S.

Geological Survey's 2007 report. The historical, baseline and projected future conditions are necessary to describe the EIS No Action Alternative against which the deepening and widening alternatives will be compared. The loss of millions of cubic feet of littoral drift sands due to its maintenance practices and the erosion of Dauphin Island that occurred over time cannot be ignored in any responsible study.

Numerous scientific studies describe examples where navigation channels dredged through coastal inlets have interrupted the littoral drift of nearshore sands along the beach, causing beaches down drift of the inlets to erode. The General Evaluation Study and EIS must devote considerable attention to this issue and provide convincing information to support any conclusion the Corps develops.

We urge the Corps to establish a Citizen Review Committee that will meet every three months with the Corps to evaluate how public concerns are being addressed in the General Reevaluation Study and EIS.

Thank you for considering our views.

Sincerely,

A handwritten signature in cursive script that reads "Chester McConnell".

Chester McConnell

Ms. Jennifer Jacobson
US Army Corps of Engineers
Mobile District, Planning & Environmental Division
Coastal Environment Team
PO Box 2288
Mobile, Alabama 36628-0001

RE: Public Notice: FP15-MH01-10

Dear Ms. Jacobson:

I am writing this letter regarding the General Reevaluation Study and Environmental Impact Statement (EIS) to deepen and widen the Mobile Harbor Ship Channel and provide comments that I hope you will consider when you assess the environmental impact of the Mobile Channel widening project.

We all know and support the need to maintain and develop the mobile channel that provides an economic lifeline to the Lower Alabama Region but we MUST also do this while respecting and protecting the vulnerable barrier island, Dauphin Island.

Everyone was supportive and understood the primary importance of Dauphin Island as the front line of protection for Mobile recently highlighted in the fight against the ingress of oil into the mobile channel area in the BP horizon disaster, but now that disaster has passed, so too has the support to protect this vital barrier island

Dauphin Island is Alabama's only barrier island and unlike its neighboring states' barrier island has never received a comprehensive plan for re-nourishment.

It is severely depressing that a country like China is actively building islands whereas the US Corp of Engineers and therefore the US government is actively involved in the demise of Alabama's only barrier island

Don't allow the destruction of this beautiful, geologically important and historic barrier island be a reality for future generations. This is a mistake of historic proportions that cannot be rectified once gone.

The scientific evidence and the ever receding Dauphin Island coastline shows this island is being destroyed with every dredge of sand that is not place back in the acknowledged sand littoral drift cycle.

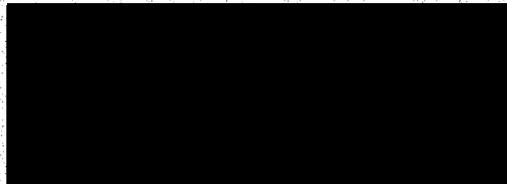
I passionately implore you to support and enforce all necessary means to get any and all sand dredged from the Mobile Channel to be deposited adjacent to the barrier island from where the sand is currently stolen from.

Everyone is judged on the decisions we make, please don't make the demise of an amazing historic and geographically important Dauphin Island be your legacy.

Eventually with the current dredging practice being implemented by the US Corp of Engineers the island will be GONE, the sea life and the industries that rely on this sea life will be GONE, any protection provided by the Island to the mainland will be GONE.

Surely we all must look at the consequences of dredging without using that dredge sand for re-nourishment not just accept the wishes of the Alabama State Port Authority. We can have both the economic prosperity that widening the Mobile Channel brings and survival of Alabama's only barrier island but this mean ensuring the correct placement of that dredged sand.





Feb. 8, 2016

Ms Jennifer Jacobson
US Corp of Engineers
Mobile Planning Division
PO Box 2288
Mobile, Al 36628-0001

Re: Proposed widening of Mobile ship channel

Dear sirs:

As a resident of Dauphin Island with a home on the Gulf, I am writing about my concerns about beach erosion and appeal to the Corps of Engineers for a solution to the problem.

The cost of placing the dredged sand in locations to restore our coastline, I believe, would be less than that of what has, and will be spent, on pumping sand back after storms and the continued losses to erosion.

I recall a very learned scientist state that had Mobile Bay been dredged for the past 100,000 years, as is it is currently done, there would be no Dauphin Island.

Yours truly,



Ms. Jennifer Jacobson
US Army Corps of Engineers
Mobile District, Planning & Environmental Division
Coastal Environment Team

Ms. Jacobson,

I am writing in concern of the proposed dredging project in the Mobile Bay and its imminent impacts on the barrier island, Dauphin Island.

As the past has shown, the balance of sand in the barrier islands is extremely delicate and the slightest rearrangements by man or nature can shift the balance with devastating effect. This is especially true for Dauphin Island—being located at the mouth of the Mobile Bay where there is comparatively much more water moving through a tight bottleneck between the Gulf and the bay. Dauphin Island is a very long and skinny island, which increases both the speed and severity of erosion. The dredging of the shipping channel to the east of the island would cause uniform erosion from the north and south sides of the island, pulling sand down the stretch of the island and off into the channel. With minimal foundation beneath the sand already, any further loss of sand would be economically and environmentally devastating.

I have grown up on Dauphin Island and watched the sand move for nearly 30 years. What we are seeing now, even without a dredging project going on, is the worst erosion I have ever witnessed. After hurricanes Ivan and Katrina, there was a mass of wreckage that became buried beneath nearly five feet of new sand from offshore. At first it was actually very pretty. Brand new white sand from offshore had blanketed the island, and once the surface wreckage was cleaned up, we had several years of big white beaches to enjoy. But as the years wore on, the top sand eroded and began to show the trash underneath. Each year now as I watch the island, there is much less sand and much more trash. We are losing top sand by the foot each year and the amount of wreckage buried underneath is more than anyone could possibly attempt to clean up. This year, it became nearly impossible to walk on the west end, due to debris and the lack of sand. A massive dredging project would increase these issues dramatically and leave the island an emaciated sandbar full of trash.

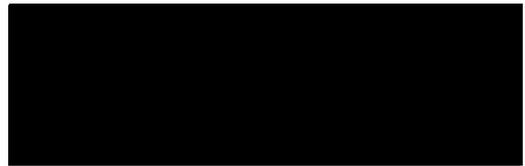
As an employee of the Corp of Engineers, I know I do not need to explain to you the necessity for healthy barrier islands. I am writing you to explain that Dauphin Island is already very unhealthy, and this dredging project would have destructive effects on the already fragile sandbar.

I hope the Corp of Engineers will open their eyes and realize that Dauphin Island is not an expendable sand mine to be exploited for economic gain.

Regards



9 Feb 2016



Subject: Proposed Widening and Deeping of the Mobile Ship Channel

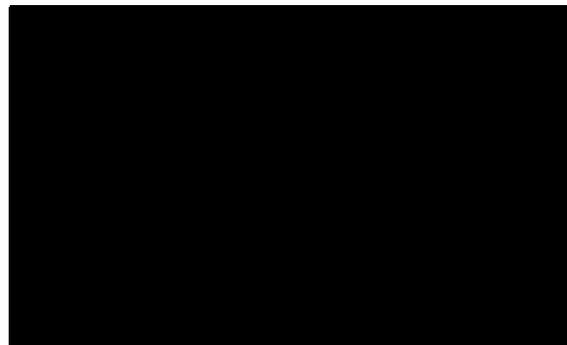
Dear Ms Jacobson:

As a retired Corps of Engineers Project Manager and Dauphin Island property owner I am concerned with the erosion of the Island's beaches that has resulted from off shore disposal of dredged sands from the Mobile ship channel. It seems that the proposed widening and deepening of the channel will only accelerate the problem if that sand is not disposed of in a way to re nourish the Dauphin Island shore line.

I am concerned that the interests of the Alabama Port Authority are given priority over other groups in this study and Dauphin Island is being excluded from sediment management studies.

Please assure that all that the proposed ship channel project and dredging will be done in such a way to restore damage that has occurred in the past and that re nourishment will continue.

Sincerely,



February 5, 2016

Ms. Jennifer Jacobson
US Army Corps of Engineers
Mobile District, Planning & Environmental Division
Coastal Environment Team
PO Box 2288
Mobile, Alabama 36628-0001

Ms. Jacobson,

I am writing to request your assistance. My ask is that when decisions are made regarding the impact study pertaining to the widening and deepening of the Mobile navigation channel that consideration be given to the long term future of all parties concerned. Due to the importance of this endeavor there should be a Master Plan for Mobile Bay incorporated into the Study and also include an Engineering Impact Statement (EIS). Please also consider establishing a Citizen Advisory Committee that will meet several times per year with the Corps to assess how public concerns are being addressed in the General Reevaluation Study and EIS.

The Master Plan should include input and involvement of the public during the entire process and be incorporated into the General Reevaluation Study and EIS. As you can tell, I am deeply concerned that Dauphin Island is going to be excluded from the decisions that will be made regarding this issue.

I did some research and documented references to Dauphin Island can be found way back in the late 1400's and early 1500's. This tells me that Dauphin Island has been naturally sustained for a long time. I have heard stories of how far the sand on the Gulf side of Dauphin Island used to extend in the 1950's. The study I am requesting is needed to confirm the historical and baseline island conditions. From there future conditions can be projected and the best decisions can be made for everyone involved.

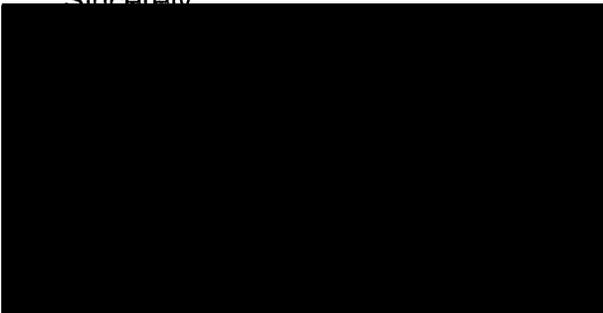
When conducting the study please consider other studies and supporting information that is available. For example, the 1978 draft report and the position by Corps of Engineers on Dauphin Island's beach erosion that concluded that maintenance of the Outer Bar Channel contributed to at least 40% of Dauphin Island's erosion problem. There are numerous other examples of where navigation channels dredged through coastal inlets have affected the accumulation of sands along beaches, which resulted in inlets erosion. Please also consider the River and Harbor Act which requires that an improvement to an inlet include an evaluation of shoreline erosion. The improvement being proposed to the Mobile Harbor Outer Bar Channel through Mobile Pass appears to fall under this description.

It's amazing to me to see over the years the changes to Sand Island, the movement and ultimately its disappearance. I attribute this to the effect of the dumped dredged sands in the Sand Island Beneficial Use Area (SIBUA) south of the lighthouse. I understand

that the idea was that these sands would be moved by currents to Dauphin Island to counter erosion. However, that did not occur and it appears that most of the sands do not move and instead just accumulate there. The General Reevaluation Study and EIS should thoroughly evaluate the dumping practice in the SIBUA. I was told that the Mobile District adopted a shallow water, less than 15 feet, sand placement method to build back Petit Bois Island's eroded Gulf shoreline west of Dauphin Island. It would seem to make sense that the same policy be adopted for Dauphin Island.

Thank you for reading my letter.

Sincerely,



Dauphin Island



PROPERTY OWNERS ASSOCIATION

P.O. Box 39
Dauphin Island, AL 36528

251-861-2433
office@dipoa.org

March 31, 2014

Commander Col. Jon Chytka
U.S. Army Corps of Engineers, Mobile District
109 Saint Joseph St.
Mobile, AL 36602-3630

Dear Col. Chytka,

My name is Laura Martin and I am the President of the Board of Directors for the Dauphin Island Property Owners Association (DIPOA). Our Board represents the owners of the approximately 3,000 separate property parcels on the island.

I am writing you to convey the very serious concerns of our organization over the manner in which the Mobile District of the Corps is complying with the National Environmental Policy Act (NEPA) in the preparation of the Limited Re-evaluation Report (LRR) for widening of the Mobile Harbor Ship Channel. Our concerns are associated with the longstanding view held by many interests that maintenance of the Mobile Harbor bar channel is contributing to the significant shoreline erosion problems that have plagued Dauphin Island for the last several decades. To help you understand why we are concerned about the channel widening proposal, you should be aware that our organization filed a lawsuit against the United States and the State of Alabama in 2000 over the Dauphin Island erosion issue. This suit was eventually certified as a Class Action and was settled in 2009.

To explain the specifics of our present concern, on November 25, 2013, Mr. Jimmy Lyons, the Director and Chief Executive Officer of the Alabama State Port Authority (ASPA), arranged a meeting with representatives from various area groups, the Town of Dauphin Island, and the DIPOA Board to inform the attendees of the ASPA's proposal to construct a passing lane in the lower portion of the ship channel where it crosses the Mobile Pass bar. The proposed channel widening would be undertaken as partial implementation of the Mobile Harbor channel improvements work authorized by the Water Resources Development Act (WRDA) of 1986. Dr. Susan Rees, David Newell, and Wynne Fuller of your staff participated in that meeting. At that meeting, we were informed of the Mobile District's plans to prepare an Environmental Assessment (EA) for the LRR to evaluate the impacts of widening the channel.

Subsequent to the November 25, 2013 meeting, we obtained a copy of your South Atlantic Division's (SAD) December 14, 2012 approval of the Review Plan for the "Mobile Harbor Widening, Alabama LRR". Our careful review of the Review Plan revealed a number of Corps conclusions used to justify the "EA approach" to comply with NEPA that are not correct and which erroneously depict the facts as we know them to be, as well as being in direct contradiction to prior Court testimony made by Dr. Rees. Also of major concern to us

is that, based on the date of the SAD letter, the Corps apparently began work on the LRR well over a year before the November 25, 2013 meeting was held, with many of the conclusions contained in the Review Plan being developed before any contact was made with the DIPOA and without any effort being made to either seek the views of our organization on the channel widening proposal or the public in general. That situation is of great concern to the DIPOA and should be to all entities interested in the physical well-being of Dauphin Island. The remainder of this letter elaborates on the specific nature of our concerns and the remedies that we believe are both appropriate and necessary.

The original Environmental Impact Statement (EIS) upon which the WRDA of 1986 authorization for widening and deepening Mobile Harbor was based was prepared in 1978. Over 35 years have passed since that original EIS was prepared. During that period a number of major changes/issues involving the area within the vicinity of the mouth of Mobile Bay were either unknown at the time the 1978 EIS was prepared or have changed significantly since its preparation. For example:

- Erosion of Dauphin Island has greatly intensified, while Sand Island has almost ceased to exist.
- The foundation of the 141-year old Sand Island Lighthouse immediately adjacent to the ship channel is in great danger of being undermined. That structure is listed on the National Register of Historic Places which is one of the criteria for determining “significant” environmental impacts according to the Council on Environmental Quality’s (CEQ) regulations for complying with NEPA.
- The Corps’ 2009 Mississippi Coastal Improvements Study acknowledged that maintenance of the ship channels passing between the barrier islands forming Mississippi Sound contribute to the erosion of those islands. That conclusion is similar to the one contained in the Corps’ 1978 “Mobile County (Including Dauphin Island) Feasibility Report for Beach Erosion Control and Hurricane Protection” which clearly stated the Mobile Harbor ship channel contributes to the erosion of Dauphin Island.
- Various studies performed by the US Geological Survey following hurricanes over the last couple of decades have periodically pointed out that the Mobile Harbor ship channel is contributing to the erosion of Dauphin Island.
- A considerable body of literature has developed over the last few decades, both within the United States and around the world, documenting that navigation channels crossing inlet passes can and do act as the cause of erosion to downdrift shorelines by interrupting the natural sand littoral drift transport system. This is exactly what is happening to Dauphin Island.
- In the late 1990s, the Corps used dredged material to construct an underwater berm as a Demonstration Project to encourage that material to remain within the littoral drift system to benefit Dauphin Island’s shoreline. Various Corps sources touted that effort to be a success. However, the Corps ceased placing dredged material at the underwater berm site for some unknown reason. More recently, the Corps began placing dredged material in the Sand Island Beneficial Use Area located south of the lighthouse. Since much of that sand placed at this location appears to be accumulating within the limits of the originally designated disposal site instead of being incorporated into the littoral drift system and moved by natural processes to the west, the Corps has already expanded the

disposal site southward once to develop additional disposal capacity. Despite those efforts, Sand Island and Dauphin Island have continued to erode. We are unaware of any formal study or data which indicate either of the two disposal approaches have materially returned sand to the littoral drift system upon which Sand Island, Dauphin Island, and the downdrift Mississippi barrier islands depend for their long-term existence.

- A study performed in connection with the above mentioned Class Action lawsuit stated that there was no conclusive evidence that maintenance of the Mobile Harbor ship channel was responsible for causing Dauphin Island's erosion problems. It should be pointed out that one of the report's three authors, a highly respected coastal engineer, did not completely agree with the findings contained in that report.
- The fact that the above mentioned lawsuit was conducted between 2000 and 2009 clearly demonstrates that "controversy" exists over the influence of maintenance of the ship channel on the erosion of Dauphin Island. According to the CEQ's NEPA regulations, "controversy" is one of the factors that indicate the potential impacts of a proposed action could be significant, thus indicating preparation of an EIS is warranted to analyze the impacts.

After considering the above information, on behalf of the DIPOA and our 3,000+ property owners, this is to convey our position that an EA is not the appropriate NEPA document to adequately analyze the potential effects of the proposed Mobile Harbor channel widening proposal. Instead, it is our firm belief that a Supplement to the original 1978 EIS should be prepared to adequately comply with the CEQ's NEPA guidance based on the "significance" of the potential issues, resources, and impacts involved.

Our position is also supported by the testimony given by Dr. Rees at the September 15, 2009 Fairness Hearing which was held in connection with the DIPOA lawsuit. The most cogent portion of Dr. Rees' testimony stating the need for a Supplement to the 1978 EIS is provided in the following ver-batim excerpts from the Court transcript:

Excerpt Testimony of Dr. Susan Ivester Rees: September 15, 2009 Fairness Hearing, Mobile, Alabama; Questioned by Wells D. Burgess, US Department of Justice

Question: Thank you, Dr. Rees. I'm going to ask you now to basically – there's been some suggestion here that the Corps already has the funds to do this and it can just go out and basically start digging. And I need you to take the Court and also the class members here through the process that you believe needs to happen or that you know needs to happen based on your knowledge of the regulations and your experience and your current position before this additional dredging could occur.

Answer: Engineering regulation 1105-2-100, Chapter 4, dictates that for post-authorization projects – and in this case if we were to try to deepen Mobile Harbor that would be considered post-authorization – that we have to do a re-evaluation report utilizing current planning criteria and current policy and regulations.

There are two types of reports that you can do. And basically the period of time that has elapsed since the original report was done and a consideration of whether conditions have changed since that original report was done, those two factors drive the level of reporting that is required. For the case

of Mobile Harbor, we would have to do what is called a general re-evaluation report. That basically brings all of the economics up to current condition. It looks at whether the project is still justified or not.

If you take Mobile Harbor specifically, it was originally authorized based on the coal trade and the use of the McDuffie Coal Terminal. Today, the through-port and the port is vastly different from what it was in the late '80s, so there's different economics obviously, the cost of dredging and the placement of dredge material has changed significantly and the environment has changed. And so we would have to take into consideration all of those aspects in preparing that general re-evaluation report.

And as far as the environmental compliance goes, because of the age of the original EIS we would have to do a supplement to that EIS. [Emphasis added].

Question: And I had asked you before, did I not, obviously you have years of experience with the National Environmental Policy Act compliance, is that correct?

Answer: Yes, I do

Question: You mentioned that an environmental impact statement would be issued if there was any expansion over the current – currently maintained dredging depths and width. Would that environmental impact statement examine the impact on Dauphin Island of any expansion?

Answer: *It would definitely examine the impacts to the coastal processes of the entire region, not just Dauphin Island. [Emphasis added]*

Question: But including Dauphin Island?

Answer: Definitely.

As you can clearly see, our present position on the appropriateness of a Supplement to the 1978 EIS being prepared to address the channel widening proposal is completely consistent with the testimony given by Dr. Rees less than five years ago. As the Corps expert witness who testified at the Fairness Hearing, her testimony was given great weight by the Court in reaching its decision to accept the settlement of the lawsuit. We are aware of no information being provided by the Corps in the intervening period that would negate the important position she testified to in Court based upon her professional and technical experience and expertise. To be completely candid, we are both confused and concerned over the Corps' reversal of position in less than five years on this very important matter in the absence of unqualified supporting data and coordination with the public.

Furthermore, I would like to bring your attention to an inaccurate statement on page 14 of the LRR Review Plan. In response to the evaluation factor contained in Item (5) entitled "Significant public dispute as to size, nature or effects of the project", the following response is provided: "There is no significant public dispute as to the size, nature or effects of the channel widening". We do not understand how the Corps could make such a statement given the historic controversy that has existed over the potential contribution of the ship channel to the erosion of Dauphin Island. Until the ASPA and the Corps met with us on November 25, 2013 we had no knowledge at all of the proposal to widen the channel and we continue to remain unaware of any public involvement efforts conducted by the Corps by which the public's views on the widening proposal

have been sought and provided. As such, the present statement is an outright misrepresentation of the facts as we know them to be and no information is provided to support the Corps position. I think you would agree that it is not possible for the public to challenge or dispute a project proposal if the public is not made aware of the proposal or given a legitimate and honest opportunity to convey its views on the proposal. Since the LRR Review Plan was dated December 14, 2012, we now have to question exactly how far along the Corps is in preparing the LRR and exactly what was the purpose for the ASPA to request the November 25, 2013 meeting with us.

We would also like to address another important concern we have with the LRR Review Plan. We take issue with the narratives provided for a number of the "Factors Affecting the Scope and Level of Review" contained on pages 8 and 9. For example, we object to the following statements:

- (1) "There are no socially challenging aspects to the project." This demonstrates a complete insensitivity to the potential for Dauphin Island property owners to lose land and for the Dauphin Island community to be harmed by continued shoreline erosion.
- (2) "There is no controversy with the project." This proposal ignores completely the past history of controversy associated with the Mobile Harbor project and Dauphin Island's erosion problem that continues today which is best illustrated in the 2000 to 2009 lawsuit.
- (3) "Project risks". The Review Plan fails to acknowledge that risk and uncertainty exists for a widened bar channel to accelerate erosion of the downdrift Dauphin Island shoreline.
- (4) "There would be no significant impacts". This statement is presented as a foregone conclusion and is made without providing corroborating facts or study results. In fact, the contribution of the ship channel maintenance practices to Dauphin Island's erosion problems and the role of the channel project, particularly a widened or deepened channel, in the erosion issue has never been resolved.

To summarize, it is the position of the DIPOA that a Supplement to the 1978 EIS is the appropriate NEPA document that should be prepared in order to adequately analyze the effects of the Mobile Harbor channel widening proposal on the human environment. It is also our position that the Corps should immediately initiate a full and open scoping process as required by the CEQ and Corps regulations to provide the agencies, organizations, and general public the opportunity to express their views on the project proposal and to identify the issues of concern to them so as to appropriately influence the eventual content of the Supplement to the EIS. In our view, if the Corps fails to undertake these actions and maintain its present "EA approach" this will result in the preparation of an inadequate NEPA document that fails to comply with the CEQ and Corps regulations and which could result in potential future challenges. In this connection, I believe it is important that you be aware that although the DIPOA settled the prior suit the problems persist, and the settlement does not preclude any further action arising from the failure of the Corps to comply with NEPA over clearly established procedural issues and/or the failure to include adequate mitigation measures to offset significant adverse impacts associated with a project proposal.

I want you to know that it is not our wish to hinder efforts to improve the Mobile Harbor project so that it continues to maintain its regional competitive edge. After all, many of Dauphin Island's property owners are also residents within the Mobile metropolitan area and understand the importance of the harbor to our local economy. But at the same time, the DIPOA also must represent the interests of our membership, many of which have been and continue to be adversely affected by shoreline erosion. Sufficient information exists to indicate maintenance of the existing Mobile Harbor project is contributing to Dauphin Island's significant

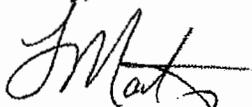
erosion problems. We are aware of no analyses that have been performed to predict what effect widening of the channel would have on erosion of Dauphin Island. To date, no entity on either the State or Federal level has been willing to pursue meaningful solutions to address the island's erosion problem. Now we are faced with a new proposal to widen the ship channel with no evidence being provided that an adequate analysis of the potential effects of that proposal on the significant erosion issue will be performed. We simply cannot accept that situation.

We call on the Corps and the ASPA to begin working with the DIPOA and other interests to assure the Mobile Harbor project can reach its full economic potential as a complete asset for the region without Dauphin Island having to continue to bear the adverse consequences resulting from further harbor improvements. We understand the present widening proposal has an estimated 4 to 1 benefit to cost ratio. Surely, the possibility exists to direct a portion of the excess benefits to include as an official project component appropriate mitigation measures to satisfactorily ameliorate the island's significant erosion problem. The DIPOA is prepared and willing to work with the Corps and the ASPA to that end.

Given the serious nature of this issue and our concerns, we are sending copies of this letter to the ASPA, the Corps SAD office, the Corps Chief of Engineers in Washington, DC, our Congressional delegation, and our local State legislators.

The Board of Directors look forward to receiving a meaningful response from you. Should you wish to arrange an interim meeting with us, please contact me at 251-861-1367 or LM@dauphinisland.us.com and I will coordinate with the entire Board of Directors for any future arrangements.

Sincerely,



Laura Martin
President, Dauphin Island Property Owners Association

Cc: Brigadier General Donald E Jackson, U.S. Army Corps of Engineers, Atlanta, Georgia
Lieutenant General Thomas P. Bostick, U.S. Army Corps of Engineers, Washington, DC
Mr. Jimmy Lyons, Chief Executive Officer of Alabama Port Authority
Senator Richard Shelby
Senator Jeff Sessions
Congressman Bradley Byrne
State Representative David Sessions
State Senator Bill Hightower;
Sandy Stimpson, Mayor, City of Mobile
Jeff Collier, Mayor, Town of Dauphin Island
Brett Dungan, Mayor, City of Bayou La Batre
Heinz Mueller, Chief, NEPA Program Office
Mr. William Cox, Chief, Wetlands, Coastal, and Ocean Branch, EPA
Jerry Carl, Commissioner, Mobile County Commission



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Dept of the Army
US Army Engineers, Mobile
P.O. Box 2228
Mobile, AL 36628-0001



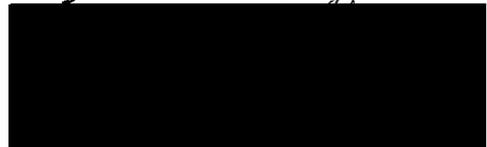
US Army Engineers office
Mobile, AL

April 3, 2018

Dear Sirs:

My Question to you today is about
Mobil Bay and the Land we are losing!
It is evident that Hurricanes, storms
and dredging are the problem!
How can you help keep the load on the
shore? We are losing 125' wide x 40' deep
every couple of years! This is not the way it
used to be - Keep us -

Sincerely,





Grand Capital of Alabama

March 28, 2018

Colonel Jon DeLapp
Commander Mobile District
United States Army Corps of Engineers
109 Saint Joseph Street
Mobile, AL 36602-3630

Dear Colonel DeLapp:

On behalf of the Town Council, I write in reference to the Mobile Harbor General Reevaluation Report (GRR) Study to potentially widen and deepen the Mobile Ship Channel. As these proposed improvements are contemplated, I want to once again state the vital importance of incorporating an improved permanent dredge disposal practice that is "truly" beneficial to the barrier island community of Dauphin Island. For decades, the littoral system west of the channel has been starved of critical amounts of sand that would naturally feed down drift bottomlands and shorelines to enhance overall stability and resiliency. The existing Sand Island Beneficial Use Area (SIBUA) is not serving such purpose.

As a barrier island, Dauphin Island provides much needed protection to mainland communities and sensitive environmental habitats throughout Mississippi Sound. These areas offer safe haven for juvenile shrimp, fish, crab and oysters which supports the regional seafood industry. Unfortunately, in its weakened and declining physical state, the island's ability to defend these critical resources is being compromised at an alarming rate. Time is not on our side. Therefore, it is incumbent on all of us to make sure we take full advantage of this opportunity to implement practices and procedures that will benefit coastal Alabama for future generations.

If I can be of any assistance to the Corps in accomplishing this goal, please don't hesitate to contact me. Thank you in advance for your favorable consideration.

Respectfully,

Jeff Collier
Mayor

- cc: Brigadier General Diana M. Holland, Commander, South Atlantic Division, United State Corps of Engineers
- Lieutenant General Todd T. Semonite, Commanding General and Chief of Engineers, US Corps of Engineers
- The Honorable Richard Shelby, United States Senator
- The Honorable Doug Jones, United State Senator
- The Honorable Bradley Byrne, United States Congressman
- The Honorable Kay Ivey, Governor, State of Alabama
- The Honorable David Sessions, Alabama State Representative
- The Honorable Bill Hightower, Alabama State Senator
- The Honorable Sandy Stimpson, Mayor, City of Mobile
- The Honorable Terry Downey, Mayor, City of Bayou La Batre
- The Honorable Jerry Carl, Commissioner, Mobile County

GREER, RUSSELL, DENT & LEATHERS, PLLC

ATTORNEYS AT LAW

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WRITER'S E-MAIL ADDRESS:

mgreer@greerlawfirm.com

*(1944-2017)

March 20, 2018

RD-A

U.S. Army Corps of Engineers
Mobile District
109 Saint Joseph Street
Mobile, AL 36602

Re: Erosion on Dauphin Island, AL

Dear Sir or Madam:

The Corps admitted during the February 22, 2018 public meeting, 50% of the Outer Bar Channel dredged sands placed in the so-called Sand Island Beneficial Use Area (SIBUA) are accumulating and not being reincorporated into the natural littoral drift system. Since 1999, when the SIBUA began to be used, this has robbed Dauphin Island of at least 7 million cubic yards of beach quality sands, causing significant erosion of the island. This impact will be made worse each time the Outer Bar Channel is dredged in the future. The Corps should cease referring to the SIBUA as a "beneficial use" disposal site because neither Sand nor Dauphin Island benefit from its use. More importantly, the Corps must identify an alternative disposal site to **place dredged sands in shallow water less than 20 feet deep** to assure dredged beach quality sands are effectively bypassed across the Outer Bar Channel to be reincorporated into the natural littoral drift system. The Corps can accomplish this under the authority provided by Section 302 of the Water Resources Development Act of 1996, with the Mobile Harbor Federal Standard being adjusted accordingly as already directed by Corps higher authority in its May 30, 1997 directive to the Mobile District.

Federal law, the Council on Environmental Quality's National Environmental Policy Act regulations, and the Corps' own agency policy and regulations require significant adverse project impacts be **MITIGATED**. Based on the Corps' admission that use of the so-called SIBUA is actually contributing to the erosion of Dauphin Island, the Corps must include in the June Mobile Harbor Draft Report an appropriate **MITIGATION PLAN** to compensate for at least 7 million cubic yards of beach quality sands that have been removed from the nearshore littoral drift system since 1999, creating an indirect adverse project impact that has significantly contributed to the erosion of both Sand and Dauphin Islands. Further, the Corps' recent admission also gives strong credence to the Corps' 1978 report that first concluded maintenance of the Outer Bar Channel

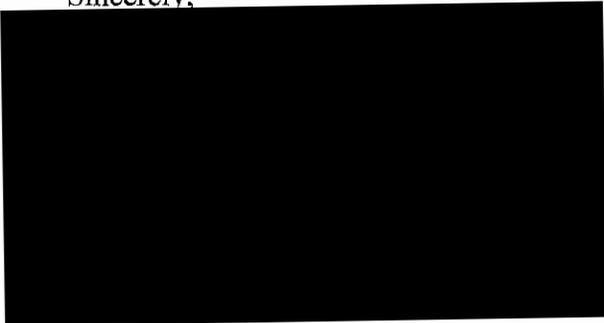
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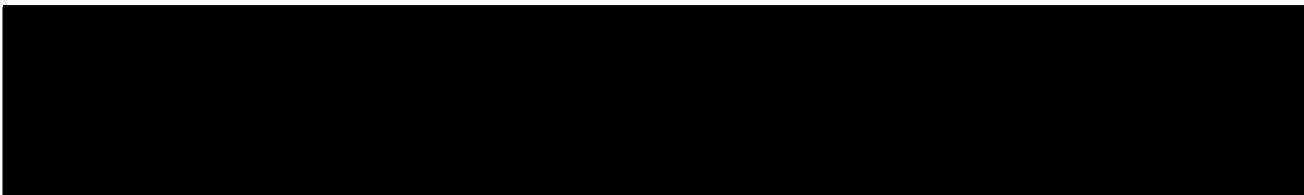
Army Corps of Engineers
Mobile District
Page 2
March 20, 2018

contributed to Dauphin Island's erosion. The Corps has consistently refused to address in the ongoing Mobile Harbor Study the erosion effects resulting from the cumulative removal of around 30 million cubic yards of sand from the littoral drift system since 1980 associated with the maintenance of the Outer Bar Channel. In view of its February 22 admission, the Corps has no credible reason to continue advocating its present position and should begin immediately to investigate **MITIGATION REMEDIES** in the ongoing Mobile Harbor Study to appropriately respond to this now acknowledged significant "changed condition and adverse project impact" in the Study Area. The existing Mobile Harbor Study provides the Corps with sufficient authority to move forward in **MITIGATING** the significant adverse erosion impact created by the Mobile Harbor project that the Corps has long refused to acknowledge was occurring.

Please take whatever steps necessary to move forward with mitigating the adverse erosion impact on Dauphin Island.

Sincerely,





March 20, 2018

RTD A

U.S. Army Corps of Engineers
Mobile District
109 Saint Joseph Street
Mobile, AL 36602

RE: February 22, 2018 Public Meeting

Dear Sir or Madam:

This letter follows-up on the public meeting on February 22, 2018.

During the February 22, 2018 public meeting, the Corps admitted that 50% of the Outer Bar Channel dredged sands placed in the so-called Sand Island Beneficial Use Area (SIBUA) are accumulating and are not being reincorporated into the natural littoral drift system. Since 1999, when the SIBUA began to be used, this has displaced from Dauphin Island at least 7 million cubic yards of beach quality sands, causing significant erosion of the Island. This impact will be made worse each time the Outer Bar Channel is dredged in the future. The Corps should cease referring to the SIBUA as a "beneficial use" disposal site because neither Sand Island nor Dauphin Island benefit from its use. More importantly, the Corps must identify an alternative disposal site to place dredged sands in shallow water less than 20 feet deep to assure dredged beach quality sands are effectively bypassed across the Outer Bar Channel to be reincorporated into the natural littoral drift system for Dauphin Island. The Corps can accomplish this under the authority provided by Section 302 of the Water Resources Development Act of 1996, with the Mobile Harbor Federal Standard being adjusted accordingly as already directed by Corps higher authority in its May 30, 1997 directive to the Mobile District.

Federal law, the Council on Environmental Quality's National Environmental Policy Act regulations, and the Corps' own agency policy and regulations require significant adverse project impacts be MITIGATED. Based on the Corps' admission that use of the so-called SIBUA is actually contributing to the erosion of Dauphin Island, the Corps must include in the June Mobile Harbor Draft Report an appropriate MITIGATION PLAN to compensate for at least 7 million cubic yards of beach quality sands that have been removed from the nearshore littoral drift system since 1999, creating an indirect adverse project impact that has significantly contributed to the erosion of both Sand and Dauphin Islands. Further, the Corps' recent admission also gives strong credence to the Corps' 1978 report that first concluded maintenance of the Outer Bar Channel contributed to Dauphin Island's erosion. The Corps has consistently refused to address in the ongoing Mobile Harbor Study the erosion effects resulting from the cumulative removal of around 30 million cubic yards of sand from the littoral drift system since 1980 associated with the

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March 20, 2018

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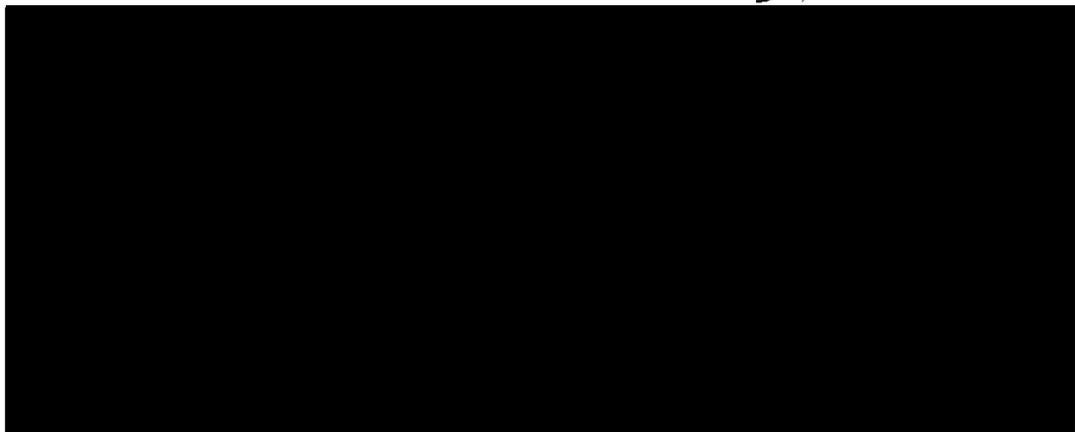
maintenance of the Outer Bar Channel. In view of its February 22 admission, the Corps has no credible reason to continue advocating its present position and should begin immediately to investigate MITIGATION REMEDIES in the ongoing Mobile Harbor Study to appropriately respond to this now acknowledged significant "changed condition and adverse project impact" in the Study Area. The existing Mobile Harbor Study provides the Corps with sufficient authority to move forward in MITIGATING the significant adverse erosion impact created by the Mobile Harbor project that the Corps has long refused to acknowledge was occurring.

Please feel free to contact me if you have any questions or need additional information.

Sincerely yours



LAH:kdd (2267723)



U.S. Army Corps of Engineers
Mobile District
109 St. Joseph Street
Mobile, Alabama 36602

h 3/30/18

Re: Mobile Harbor Project – Dauphin Island Erosion

Gentlemen:

I write to express my concerns regarding the Mobile Harbor Project currently under consideration by the Corps and the erosion of Dauphin Island. I have a home on Dauphin Island which makes this issue all the more pertinent and consequential to me. At the public meeting held by the Corps last Thursday, the Corps admitted that fifty percent of the sand dredged from the Outer Channel and placed in the Sand Island Beneficial Use Area (SIBUA) remains at that site although all of the deposits were intended to be moved by currents to Dauphin Island. This and other aspects of the Mobile Harbor Project are of substantial concern to me and I call on the Corps to address these items, which are as follows:

1. **The Corps' acknowledgment that fifty percent of the dredged sands deposited in the SIBUA are not making it to the Dauphin Island beaches, as intended, means that 7 million cubic yards of beach quality sand has not made it to Dauphin Island.** This obviously contributes to the severe erosion occurring on Dauphin Island. This should be remedied by depositing dredged sand in shallower waters (no more than 20 feet deep). The Corps can accomplish this under Section 302 of the Water Resources Development Act, and I call on the Corps to do so.

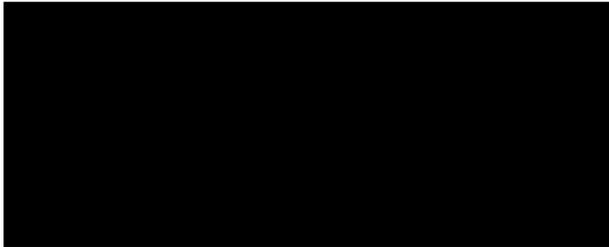
2. **The Corps must include a plan in the Mobile Harbor GRR to address the inadequacy of the SIBUA as a disposal site, and provide for a different site in shallower water.** Given the Corp's acknowledgment that fifty percent of the dredged sands deposited in the SIBUA remain at the SIBUA site, it is clear that the Corp is required to include a mitigation plan in the Mobile Harbor GRR to compensate for the 7 million cubic yards of sand lost to Dauphin Island since 1999. This loss is a significant contributor to the erosion problems of both Sand and Dauphin Islands. I call on the Corp to present such a plan.

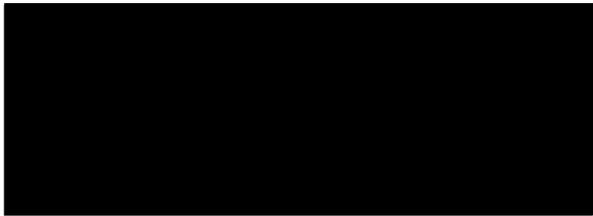
3. **The Corps should use computer modeling to evaluate the Dauphin Island erosion issue.** Although the Corp is using such modeling in other aspects of the GRR Study, it is not doing so in connection with its consideration of the historical erosion of Dauphin Island. To fail to do so renders the Corp's investigation incomplete and fails to verify the accuracy of the computer model being used. Moreover, if the Corp cannot demonstrate that the computer model it is using in other aspects of the GRR Study accurately locates the historical erosion of Dauphin Island since 1999, the credibility of the model being used by the Corp will appropriately be called into question.

4. **The effects of the Mobile Harbor Project on fishermen and oystermen should be further studied and addressed.** The increased quantity of dredged material from the proposed enlarged channel should be disposed of in a manner that will not adversely affect grass beds and other areas critical to commercial and recreational fishing. Also, before proceeding the Corps also should ensure that any open water discharge of dredged materials in Mobile Bay will not increase the siltation of oyster reefs, which would, in turn, lead to a decline in oyster production.

One final note: an article in the Mobile Press Register following the last public meeting held by the Corps on the Mobile Harbor Project noted that a coastal engineer specializing in coastal erosion commented that dredged materials were being placed in an area that was too deep for the current to pick it up and transport it to the shores of Dauphin Island. This obviously has now been found to be true. It was also mentioned that the Corps did an experiment in 1987 wherein it figured out where to put the sand so that it would get into the littoral drift system and be moved rapidly toward Dauphin Island within a matter of months. I can't imagine why the Corp has continued to use the SIBUA as its dumpsite since 1987. This is all the more egregious in light of the fact that, as reported in the same article, hundreds of houses on the island have fallen into the ocean, the beach beneath them having disappeared. I urge the Corps to fix this problem.

WCR/caj





November 10, 2016

COL James A. DeLapp, District Commander
US Army Corps of Engineers, Mobile District
P.O. Box 2288
Mobile, AL 36628-0001

Dear COL DeLapp:

You have recently assumed command of the Corps' Mobile District. I am writing to convey my complete dissatisfaction with the manner in which your District is conducting the Mobile Harbor Deepening and Widening General Reevaluation Report (GRR) Study.

The GRR Study was formally kicked off with a Public Scoping Meeting on January 12, 2016. In response to that meeting, the public identified numerous significant environmental concerns/issues associated with the disposal of dredged material within Mobile Bay and the potential for an enlarged channel to exacerbate the ongoing erosion of Dauphin Island. The public's extensive comments are documented in the Public Scoping Report that was not made available to the public until July 28, 2016.

Almost 10 months have now passed since the Public Scoping Meeting was held and the Mobile District has still not provided any feedback to the public as to how the various comments/issues received will be addressed in the GRR Study. Although the Mobile District agreed in an August 9th meeting to provide additional opportunities for the public to participate in the Study, no actions have been taken to date to develop and implement a genuine public involvement program as part of the Study. As a result, not only does the public not have a voice in the conduct of the Study, no information on the progress of work is being provided to the public. The total failure of the Mobile District to include an active public involvement program in the Mobile Harbor GRR Study appears to be a calculated strategy to prohibit the public from being able to influence both the conduct of and the outcome of the Study.

The cost to construct the 1986 authorized Mobile Harbor project could approach \$1 billion, while adversely affecting extensive natural resources in coastal Alabama. In view of the potential investment in public tax dollars and the significant adverse environmental impacts that could be involved, I find the Mobile District's intentional efforts to shut the public out of the planning process to represent major violations in the spirit and intent of both the Corps' planning guidance and the Council on Environmental Quality's NEPA regulations.

This letter requests the Mobile District to cease all work on the Mobile Harbor GRR Study until such time that a genuine public involvement program is created to provide the public with a voice equal to that of the Alabama State Port Authority. The public involvement program should also include reestablishment of the Mobile Harbor Advisory Committee that the Mobile District originally formed in the late 1970s to assist in preparation of the 1980 Survey Report that the GRR Study is now reevaluating. Should the Mobile District refuse to take these reasonable actions that are customarily pursued with large projects having the potential for extensive construction costs, significant environmental impacts and serious public controversy, such refusal will reinforce the view now held by an increasing segment of the public that the Corps has little regard for the public's concerns in all matters related to the Mobile Harbor project.

As indicated below, I am sending copies of this letter to specific Congressional representatives; your bosses in the Corps' South Atlantic Division and Washington Headquarters; and to the US Environmental Protection Agency which I understand is serving as a cooperating agency in the preparation of the GRR Study's Supplement to the Environmental Impact Statement.

I regret having had to send you this letter, but the refusal of the Mobile District to seriously consider the issues/concerns expressed by the public in the Mobile Harbor GRR Study have forced me to take this action.

Sincerely,

CC:

Brigadier General C. David Turner
U.S. Army Corps of Engineers, South Atlantic Division,

Lieutenant General Thomas P. Bostick
U.S. Army Corps of Engineers, Office of the Chief of Engineers,

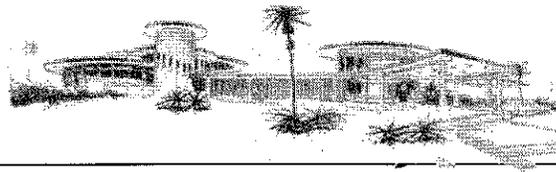
Senator Richard Shelby
United States Senate

Senator Jeff Sessions
United States Senate

Congressman Bradley Byrne
House of Representatives

Mr. Christopher Militscher, Region 4 NEPA Div. Director
US Environmental Protection Agency

Dauphin Island



PROPERTY OWNERS ASSOCIATION

dipoa.org

isledauphine.com

P.O. Box 39

251-861-2433

Dauphin Island, AL 36528

March 21, 2018

office@dipoa.org

Colonel Jon DeLapp
Commander Mobile District
United States Army Corps of Engineers
109 Saint Joseph Street
Mobile, AL 36602-3630

VIA UNITED STATES MAIL

Re: Disposal site for dredge material from the Mobile Outer Bar Ship Channel

Dear Colonel DeLapp:

I write to you as President of the 3,300 member Dauphin Island Property Owners Association regarding the disposal of sand dredged from the outer bar of the Mobile Ship Channel. The Board of Directors has requested that I inform the United States Corps of Engineers of the Association's position in light of recent data disclosed by the Corps of Engineers to the public in a February 22, 2018 meeting at the Corps of Engineers offices in Mobile, Alabama.

The Association is highly concerned that the placement of beach quality sand dredged from the outer bar of the Mobile Ship Channel be in an area where it will return to the littoral drift and limit the significant erosion that has been occurring on Dauphin Island over the past several decades. As you are aware the dredge material is currently being deposited in the Sand Island Beneficial Use Area (SIBUA) at a water depth of approximately twenty-seven feet. At the February 22, 2018 Corps meeting, Corps representatives indicated the sand is leaving that area at about one-half the deposited rate. Consequently, the sand that the Corps of Engineers has been depositing in the SIBUA since 1999 is accumulating there, and only half the material dredged has left the SIBUA, leaving half the material at the disposal site. It is my understanding that approximately seven million cubic yards of sand remains in the SIBUA, and that area is nearing capacity.

These circumstances illustrate two concerns: 1) the sand is not returning to the littoral drift and having an opportunity to make its way to the beaches of Dauphin Island and 2) there now needs to be a different area for which the sand must be deposited as the SIBUA is nearing capacity. There have been discussions of extending the SIBUA area north and west, but still having the material deposited at a twenty-seven foot depth. The current problem of the sand not returning back into the littoral drift will not be solved or affected by simply continuing to place the sand at such water depths. It is our understanding that coastal engineering science indicates an effective water depth that will return the vast majority of this sand to the littoral drift should be in twenty foot of water or less, possibly as shallow as ten to fifteen foot of water. The Association appreciates the fact that disposal in shallower waters may require additional costs because of the draft of the vessels currently being used to deposit the sand, and there may be a necessity to pump or otherwise deliver the sand to a water depth of less than twenty feet. Notwithstanding the costs, it is imperative the sand be deposited in an area of less than twenty feet in order to begin returning the entire volume of the newly dredged sand to the littoral drift. This concern is exacerbated by the fact that the Corps is proposing to widen and deepen the Mobile Ship Channel, and that event will cause an additional five to twenty percent of the sand in the littoral drift to be captured in the outer bar of the Mobile Ship Channel. That additional sand will also be dredged and should be returned to the drift.

Moving the sand disposal site to an area of less than twenty feet will only begin to repair the extensive damage that has been done to Dauphin Island by the amount of sand that has been removed from the littoral drift and remains in the SIBUA. Hopefully the remaining sand in the SIBUA will after decades return to the littoral drift, but a continued practice of depositing dredged sand material in water depths above twenty foot would only contribute to the further demise of the beaches of Dauphin Island.

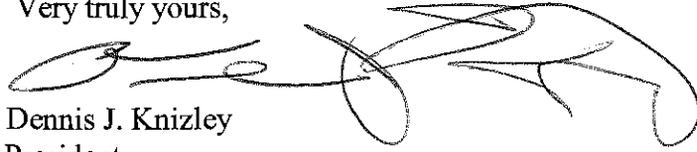
The Corps has been made aware of the value of Dauphin Island not only as a contributor to the regional economy, but also as a critical barrier island protecting the mainland from storm surges and damages as a result of hurricanes, tropical storms, and other natural calamities. It is important to the public that the geological integrity of the island remain intact to afford this protection.

As the Corps of Engineers has now publicly stated there is scientific data that the depositing of dredge material at the twenty seven foot depth has only allowed one-half of the sand over the last twenty years to have even the opportunity to return to the drift, it is imperative that changes be made in the dredge material disposal site. The only site that is acceptable to return this dredged material to the littoral drift is to deposit the sand would be in an area of less than a twenty feet depth.

On behalf of the Dauphin Island Property Owners Association, I urge the Corps of Engineers to change the practices of the depositing of dredge material to the shallower areas so that they may benefit the public at large, the regional economy, the fisheries, the environment, and the safety of the citizens that live on Dauphin Island and the mainland of Mobile County.

Serious consideration of these concerns by the Corps of Engineers will be deeply appreciated.

Very truly yours,



Dennis J. Knizley
President

Dauphin Island Property Owners Association, Inc.

DJK/cmK

cc:

Brigadier General Diana M. Holland, Commander, South Atlantic Division,
United States Corps of Engineers

Lieutenant General Todd T. Semonite, Commanding General and Chief of
Engineers, United States Corps of Engineers

The Honorable Richard Shelby, United States Senator

The Honorable Doug Jones, United States Senator

The Honorable Bradley Byrne, United States Congressman

The Honorable David Sessions, Alabama State Representative

The Honorable Bill Hightower, Alabama State Senator

The Honorable Sandy Stimpson, Mayor, City of Mobile

The Honorable Jeff Collier, Mayor, Town of Dauphin Island

The Honorable Terry Downey, Mayor, City of Bayou La Batre

The Honorable Jerry Carl, Commissioner, Mobile County

The Honorable Kay Ivey, Governor, State of Alabama

March 1, 2018

Colonel James A. Delapp
Corp of Engineers
P.O. Box 2288
Mobile, Al. 36628

As an involved citizen of Mobile and a respected environmentalist of coastal Alabama for many years I hereby submit these comments for the **Corps of Engineers (COE) Record for the Public Hearing (PH) and Re: Alabama State Port Authority's (ASPA) Proposed Widening and Deepening of the Mobile Ship Channel** held February 22, 2018 in Mobile, Alabama. I attended the previous Corps Public Hearing in Bayou La Batre and couldn't stomach another dog and pony farce.!

A proper Public Hearing (PH) has not been held by the Corps of Engineers (COE) in coastal Alabama for many years. There may be reasons for believing the COE and ASPA have joined forces and are violating the laws of the land, specifically the **Public Trust Doctrine (PTD)** and the **National Environmental Policy Act (NEPA)**.

I am being told by individuals attending the PH that the District Engineer of COE made it a point to take up a great deal of time at the beginning of the PH February 22 discussing at length Puerto Rico's situation-WHY?? **Did he due it intentionally** to shorten the public's time significantly in voicing their concerns and sharing their views for the Record?? People in the audience thought it very obvious and many now feel this **federal agency** may be **overstepping their boundaries** in supporting ASPA's bloated economics as well as this project over the public needs. A similar situation was discovered several years ago right after **BP's blowout**. The Department of Interior and Minerals Management Services ignored their responsibility and violated federal laws, even bending over backwards supporting the oil and gas industry every way they could. It became a national farce as MMS help cause the catastrophic blowout. The **acting inspector general** for the DOI quietly **recommended** the agency **adopt a scientific integrity policy**. They didn't.

If this project is somehow allowed to pass, then the container, maritime and automobile industries should be required to **assume all of the expenses and consequences** for their project? They should be required to request this permit in their names and for their needs and not make the taxpayer assume their debts.

The Public Trust Doctrine (PTD) protects and provides for the rights of the American public and Alabamians to enjoy public access and use of all of coastal Alabama's natural resources, in this case all that Mobile Bay offers. ASPA's proposed widening and deepening project poses significant threats to Mobile Bay's integrity, water quality, bottomlands/detritus, micro/macro marine life, underground water bodies (aquifers) and all of its other natural resources. The '**public interests**' or users of this body of water are commercial 'live li hood' families depending on fisheries/ recreational fishermen, shrimpers, oystermen, boaters and sailors, swimmers, tourists, families and bay side property owners.

As one who has focused half of her life and 'lain across barb wire to save' Mobile Bay from assaults, are AGAIN having to focus on another badly planned proposed project

which threatens this invaluable estuary almost out of existence—for special interests over the public interests! Why chance making our bay deeper and wider, and discover the containerships, marine traffic and ‘projected cars’ aren’t coming; ASPA’s economics are bloated and flawed, or just plain GREEDY in their wants! **A similar but possibly worst widening and deepening proposal by COE and ASD’s was denied in 1985!**

The PTD should not be ignored as no-one should be so ignorant as to believe they can ignore the laws and people’s NEEDS and VALUES! If they believe **Jimmy Lyons**, who is **not a biologist**, say ‘**open spraying**’ is the safest and best option in spreading millions of gallons of dredge material into the air and over the bay’s waters containing **unidentified toxic and hazardous chemicals** which may be threatening human lives then they are not smart enough to realize that ‘others are losing their shirts.’ (Oh by the way- Lyons also believes that coal dust is not harmful to humans?)

No-one truly knows **what the impacts have been** from this ‘scatter brained idea’ and it **should be a top priority** to identify the unknowns before this estuary is completely destroyed. Ralph Atkins, owner of **Southern Fish and Oyster** said “There are no oysters in Alabama right now. None. All the dredging you’ve been doing and have done for at least three years has covered up everything in the bay. If you stopped today, it’d take 10 years to get the pH factor back in the bay to produce local oysters.”

The million cubic yards of sprayed sediment and heavy turbidity loads may be **filling the gills** of fish, shrimp and oyster with ‘silt’ making them have trouble breathing the vital dissolved oxygen needed from the water column? **Coastal Alabamians have similar problems** breathing as the local air contains unidentified toxic/hazardous pollution loads released from the heavily congested transportation corridors, McDuffie’s coal handling facility, emissions from the numerous storage tanks and various chemical, cement and energy companies in Mobile/Baldwin Counties.

National Environmental Policy Act (NEPA) requires and supports citizen input and participation especially when a proposed project poses ‘**significant adverse affects** on the **environment** and **jeopardizes human life.**’ These words trigger the need for an overall EIS. This story needs to be told. A retired COE speaker at a Sierra Club meeting in coastal Alabama alerted the attendees as to how Director Jimmy Lyons of the ASPA was ‘illegally’ meeting behind closed doors with other state and federal agencies discussing his proposed channel and dredging project for Mobile Bay. He planned on filling the northern portion of the bay with disposal islands which are presently public lands. A little history...the Fish & Wildlife Service estimated that in the early days the Alabama State Docks (ASD), now the ASPA, had historically “taken, diked and filled” over 5,000 acres of public lands in the Mobile Harbor now ‘fast lands’ being used by the Port. They are McDuffie, Blakeley, Pinto Island and Gaillard Island. Following the meeting individuals and groups became involved and required the current overall EIS being put together for the project, instead of the proposed EA the ASPA planned on doing. You may enjoy reading my book--”Chronicle of An Eco-Warrior Relating South Alabama’s Environmental Issues”,,,it covers the 70’s until 2017.

These are few historical moments that someone in power may consider being useful::

****Other ports in the Nation have deeper channels and **presently accommodate** and easily handle these huge ships and automobiles-so why try something that **isn't going to work in our very shallow** Mobile Bay? The bay is so shallow it requires frequent costly maintenance and the COE adds to these costs as they forget their responsibility and never seem able to do something right the first time in an environmental friendly manner. They believe in using the least costly methods such as capturing and dumping the loads in deep Gulf of Mexico waters or spraying it over bay's waters. 'Out of sight out of mind process.

**** The Waterways Experiment Station in Vicksburg warehouses contained estuary models such as Mobile Bay and the COE scientific board announced that dredged material was considered a "**natural resource**" and should be used as such. **This was news** but it seemed to challenge the Mobile District as they were dredging the **new "Theodore Industrial Channel** for the Industrial Park." The ASPS and Chamber of Commerce wanted an island in the bay and refused to consider placing millions of cu. yds. of dredge material onshore that could be used in construction and roads. **Common sense was ruled out**-Greed came into play! Mobile Bay ended up with the badly planned, extremely costly **Gaillard Island** which destroyed over 5 square miles of bay bottoms and surface area in the beginning and has become a sinkhole for millions of taxpayers' dollars annually.

****A similar situation occurred in the 70's with **Radcliff Dredging**. During their 24 hour dredging operations in Mobile Bay it was finally discovered the **heavy turbidity** and **huge sediment loads** were destroying water quality, killing marine life and destroying wetlands and grass beds through out the bay. The **operation was stopped**.

***** Dredge material was used in a pilot program in recovering a superfund site. The COE/ASD used Alcoa's area for 35 years '**freely**' dumping 15 million cubic yards of dredged material from the harbor into the six mud- lakes. According to the **Alcoa/ Ala's legal agreement** after that period **600 acres** would be turned into a **birding paradise** and re- turned to the people and state of Alabama as '**mitigation.**' This was beautifully done in the 600 acre area and contained lot of trees, shrubs and freshwater ponds caring for a variety of birds, butterflies and possibly wildlife, as it is close to the Mobile-Tensaw Delta. But the Director of the ASPA /COE violated this legal document and the birding paradise has been **destroyed completely**

***** There doesn't appear to be any kind of federal or biological oversight regarding the COE/ASPA operations in Mobile Bay as the deep holes or 'dead zones' throughout areas in the bay have been filled that once provided marine life a haven; the invaluable submerged and emergent grass beds and bay bottoms that were once lush in Arlington Point have been smothered; as have the Alabama's oyster beds and reefs.

*****The ASPA plans to dredge a deep holding area as anchorage for the huge container vessels in the Bay north of Fort Morgan Peninsula, but these ships need to stay in the Gulf. What happens when the Peninsula starts to disappear and slough off into the

dredged holding basin as Mother Nature's natural holding stability would have been disturbed and removed... what will the state do? In 1985 the ASD's planned a huge coal handling terminal in this same area, but thank heavens it was stopped-one has to watch out for land grabs such as these.

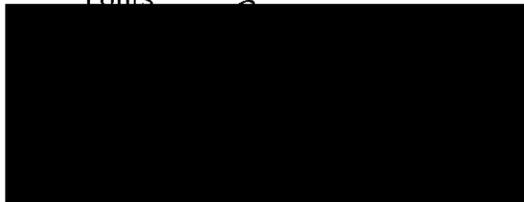
**** Jeff Childs, a noted biologist with MMS warned "bringing in these huge foreign ships are likely to introduce **invasive exotic species** that may well yield much greater **significant adverse affects** than expected." This happened before in Mobile Bay and ended being an economic horror and presented nightmares! Jimmy Lyons, put this in your **economic** statement!

****During the COE's Tenn.Tom/Black Warrior '**boondoggle**' a few years back... people discovered there was no water coming from their wells in their backyards as the aquifers had suddenly dried up. It was finally discovered the **new deep cuts** for the canal had destroyed and dried up the underground springs close to the farms and homes. No-one assumed responsibility for their losses. The PTD now requires that underground water supplies be fully protected in the Nation. The point that needs to be made is the COE and ASD's have again requested a **deeper draft and channel** in the bay and these **should be denied forever**. Water supplies are too vital and must be preserved for the rights of present and future generations. These underground rivers or aquifers provide diverse benefits as they also **refurbish and replenish surface rivers and streams**, which provide for recreational trout fishing and other needs. There are numerous rivers that need protecting on both sides of Mobile Bay such as Fish, Fowl and Dog Rivers and fishermen need to be alerted and involved...

*****Costly and **catastrophic erosional processes** will occur within Mobile Bay with wider and deeper channels as more **ship waves** will threaten marshes, wetlands, the high banks on eastern shore and beaches of Mobile Bay will disappear and erode. This is probably why the **beach areas** on the **west side of Mobile Bay** are covered with rip rap? Alabama taxpayers will pay for the COE/ASPA short sightedness-AGAIN if this EIS is approved in near future! Will the Alabama taxpayer ever tire of footing the COE/ASPA bills for their badly planned 'special interests' projects?

The **Alabama Attorney General** needs to stay on top of this project and consider taking appropriate actions when necessary as the EIS hasn't been released yet. The citizens should be allowed a proper Public Hearing and have time to make comments on this questionable document. Citizen lawsuits need to be filed if this permit is granted and the AG hasn't done anything.

Yours



Copies to everyone

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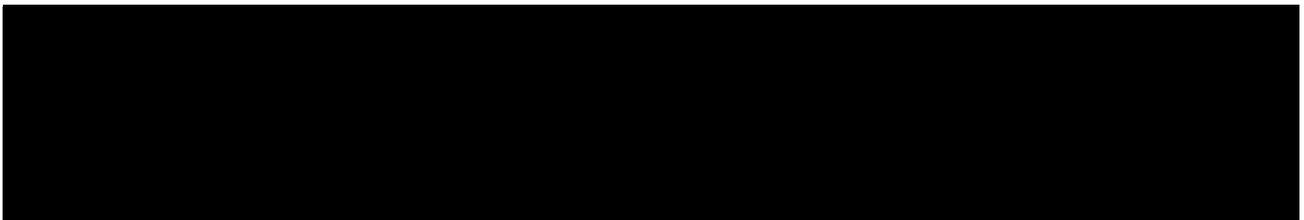
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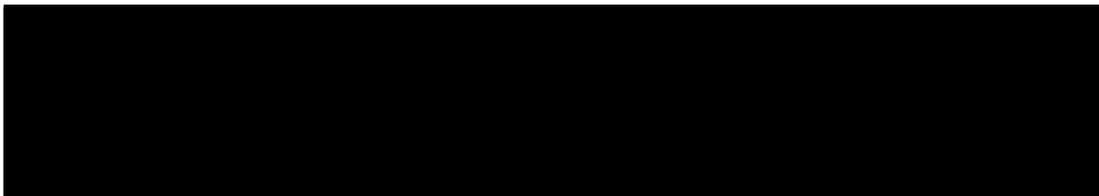
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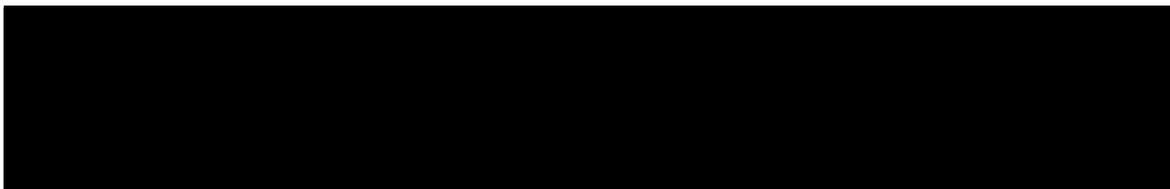
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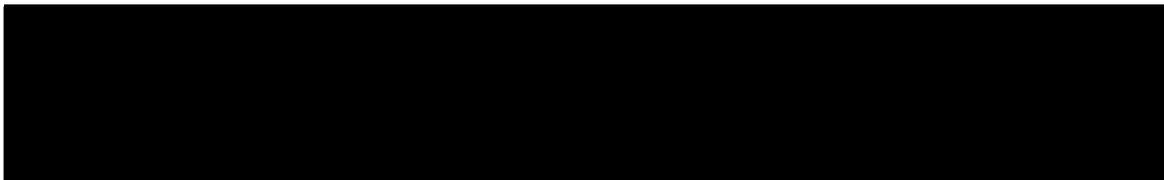
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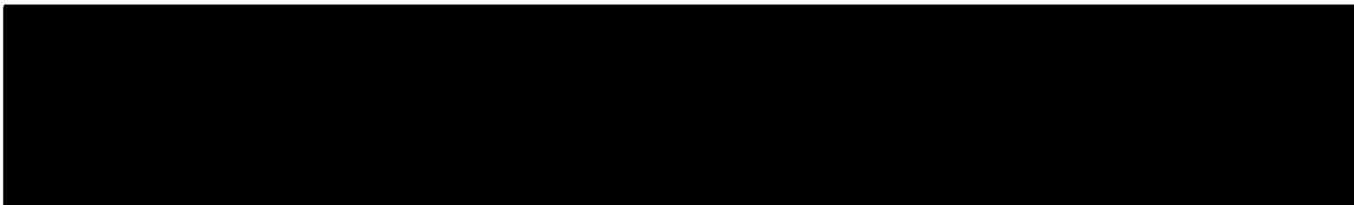
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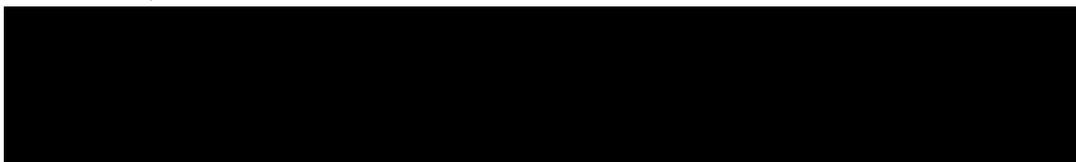
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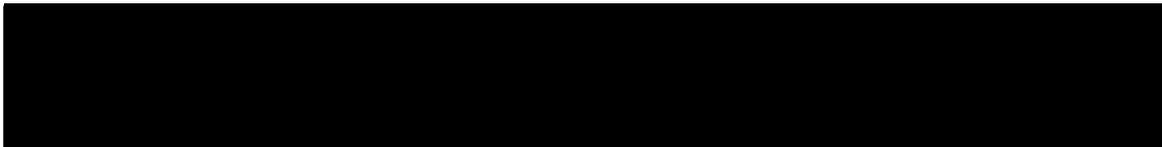
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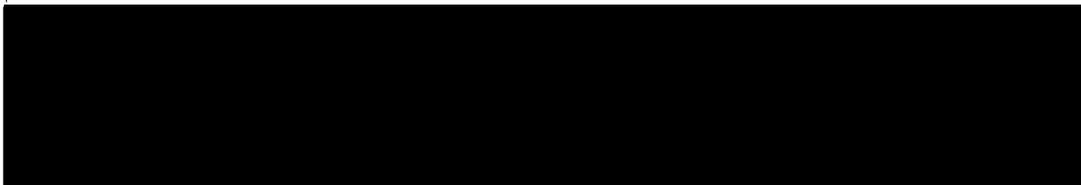
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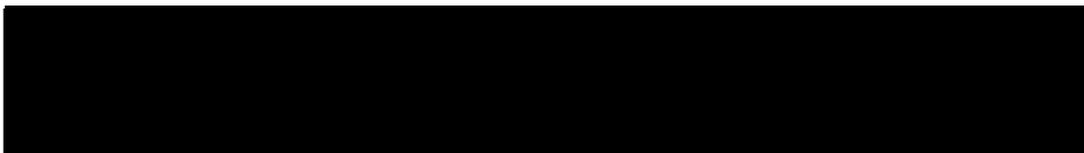
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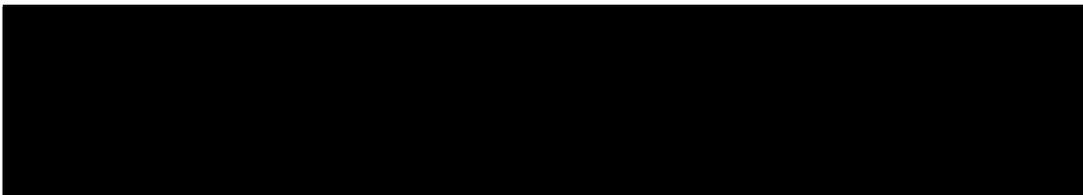
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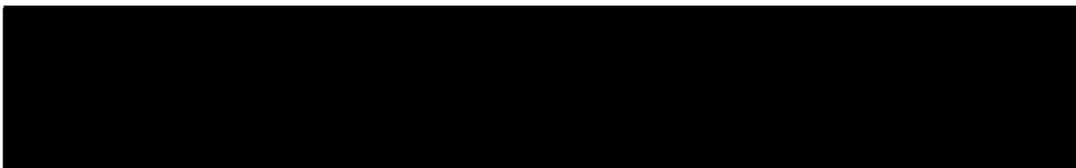
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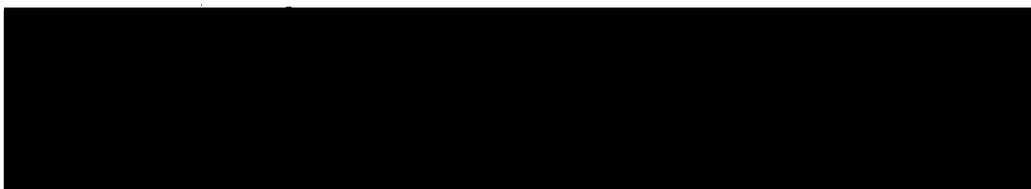
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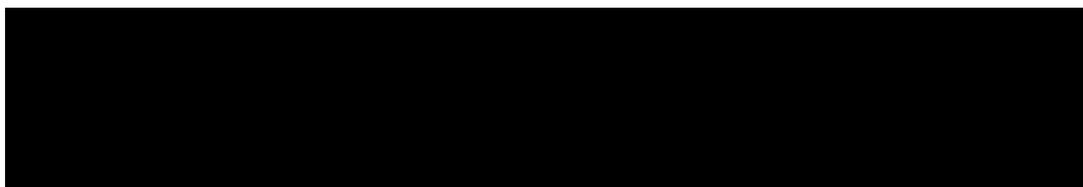
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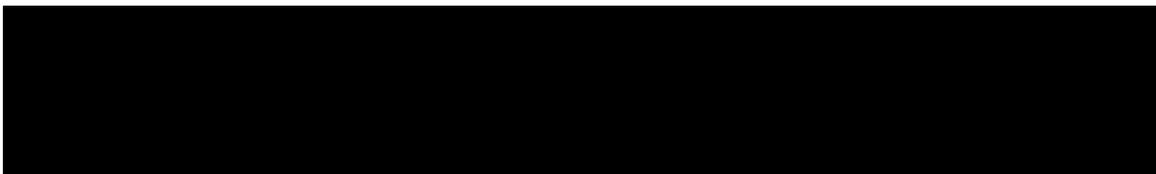
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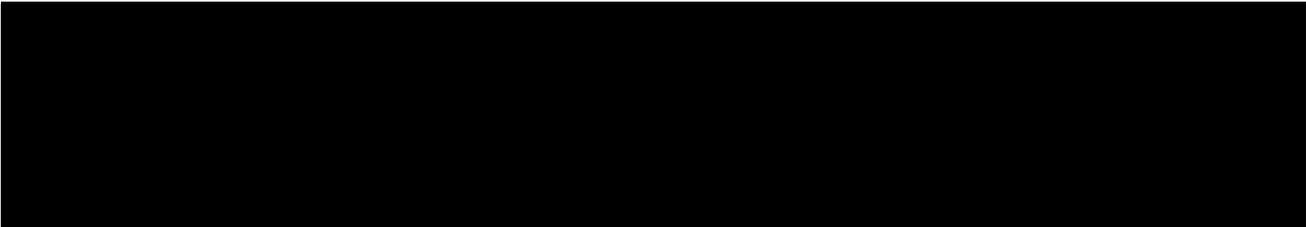
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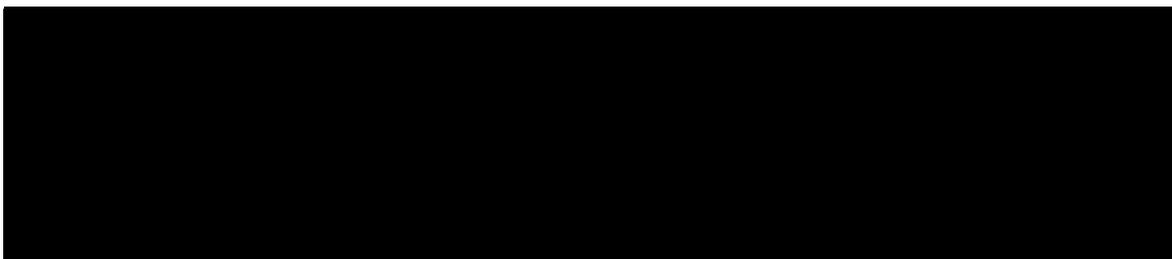
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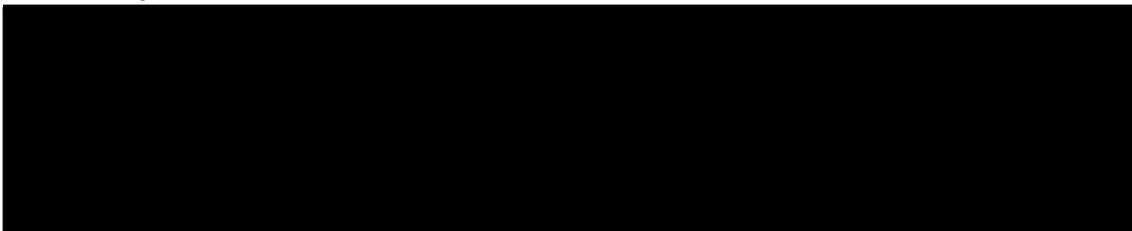
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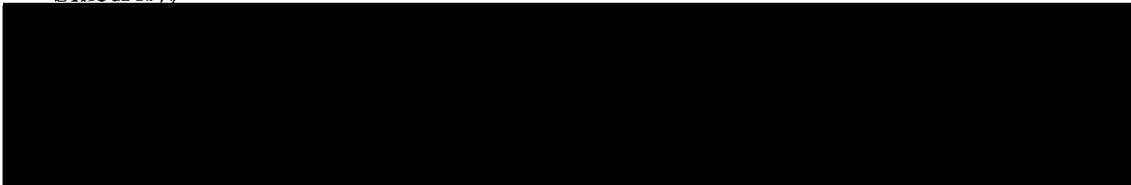
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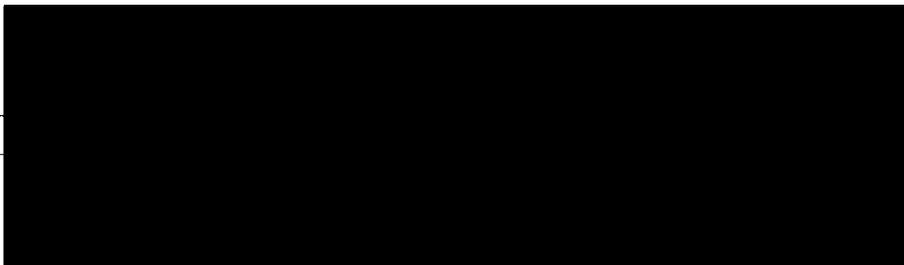
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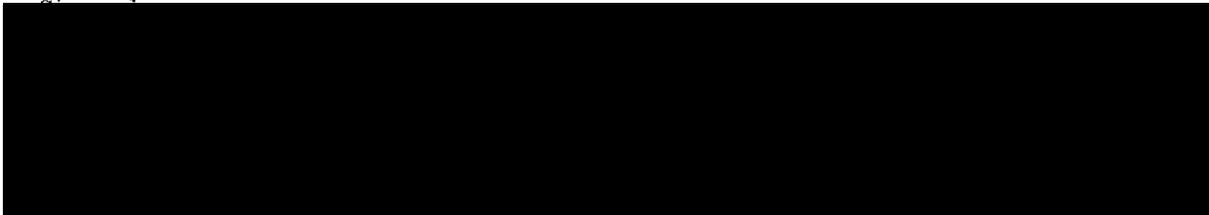
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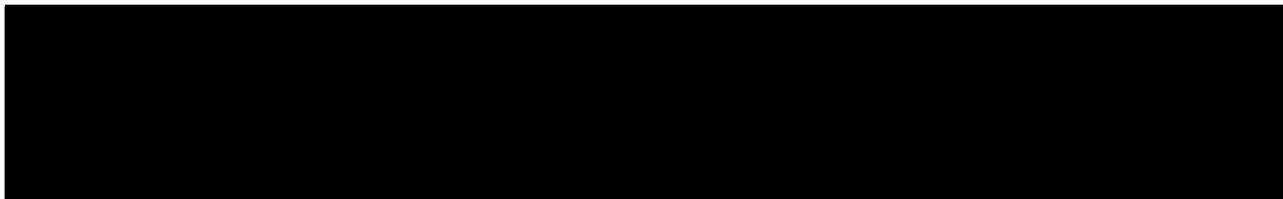
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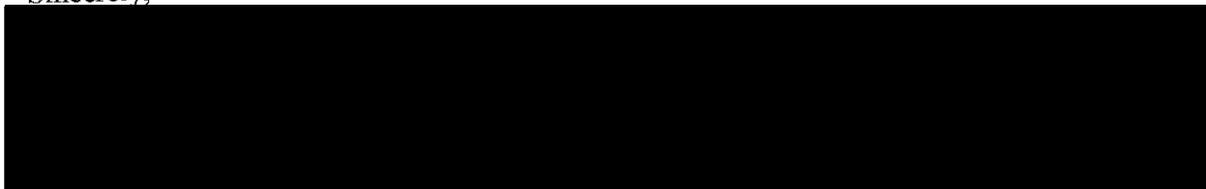
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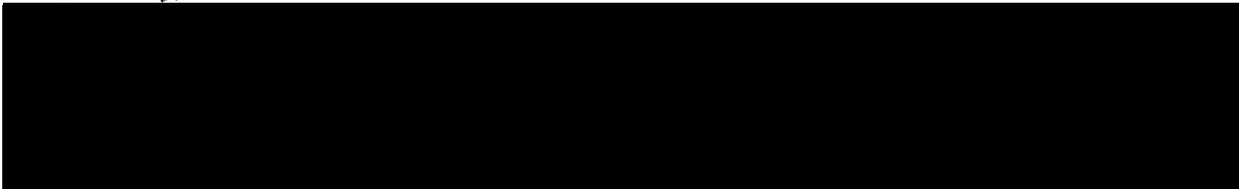
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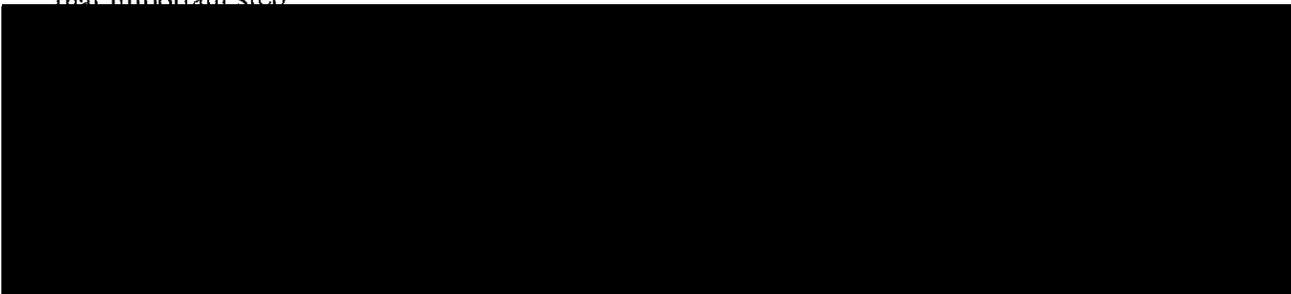
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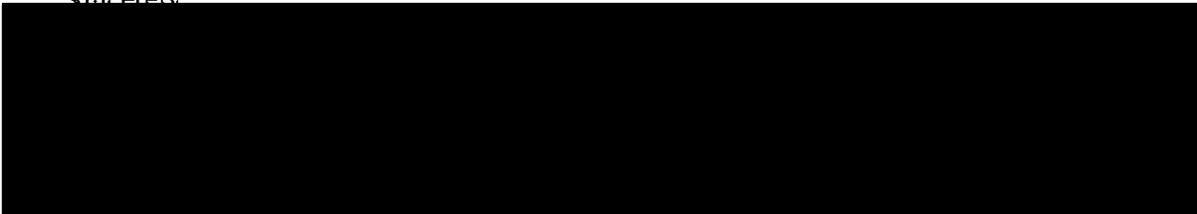
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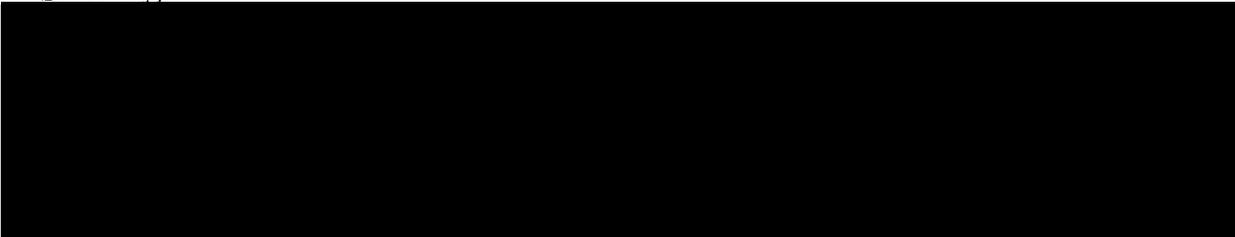
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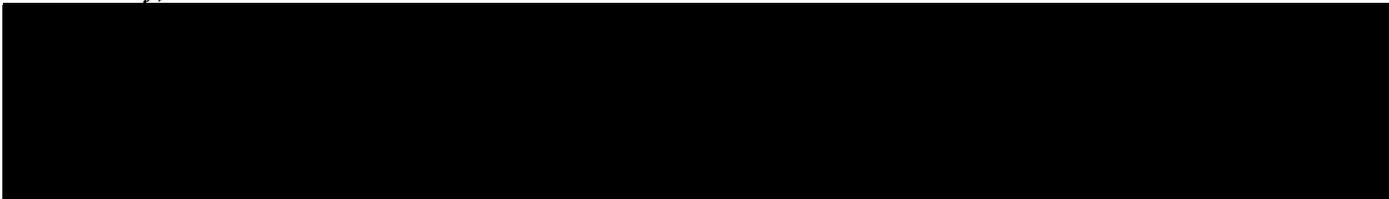
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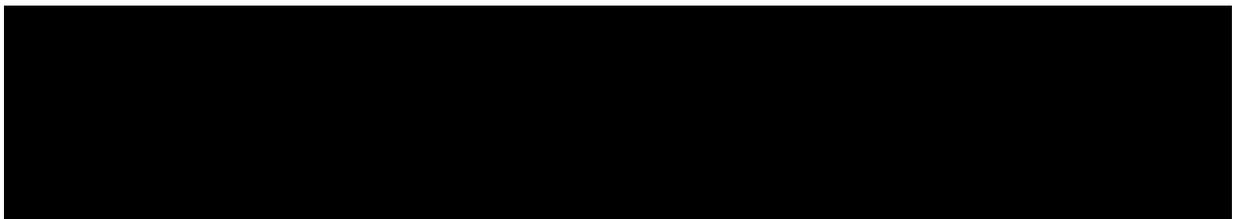
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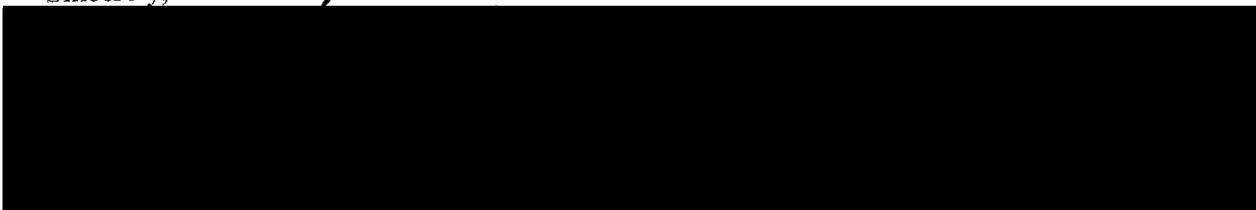
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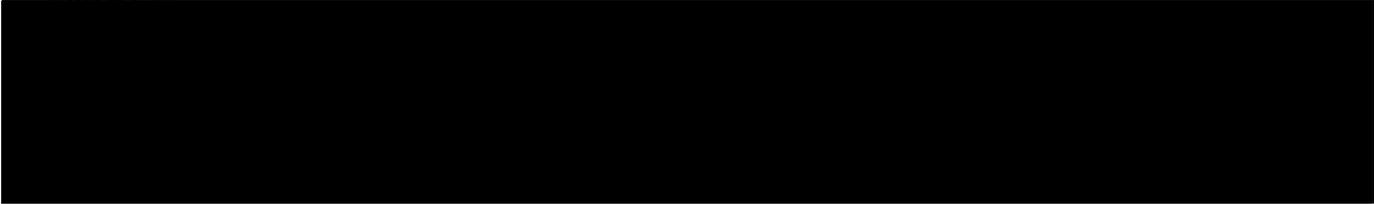
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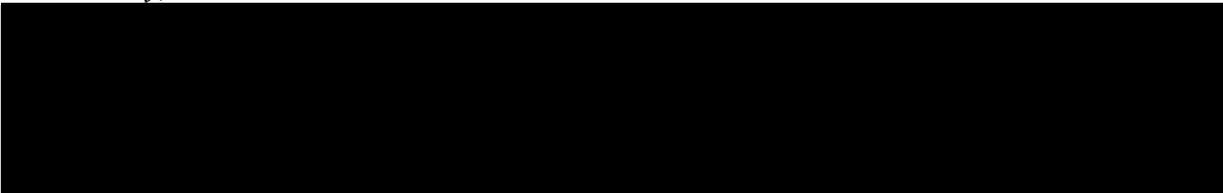
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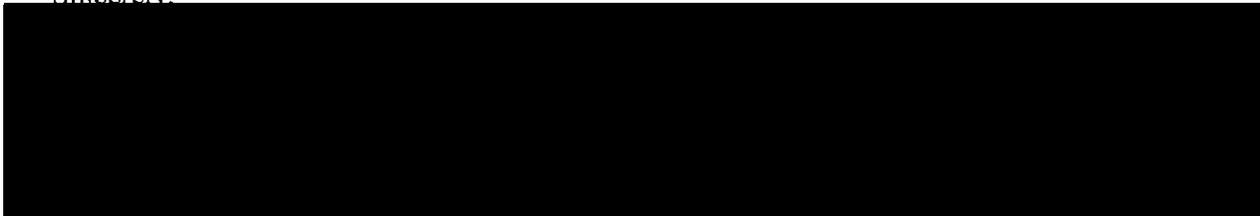
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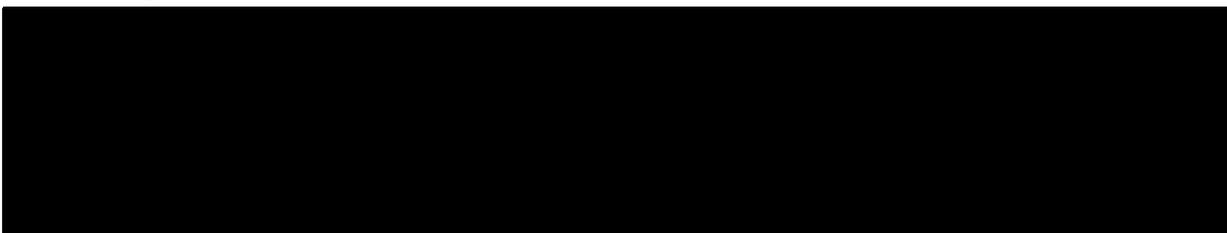
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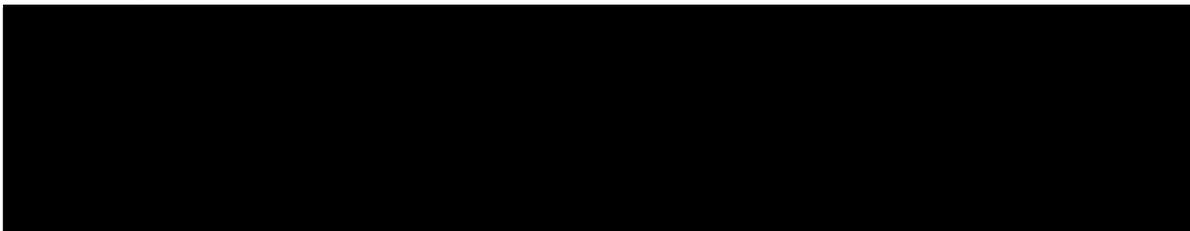
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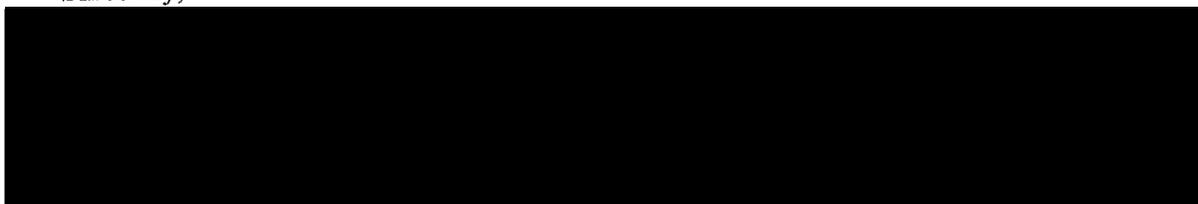
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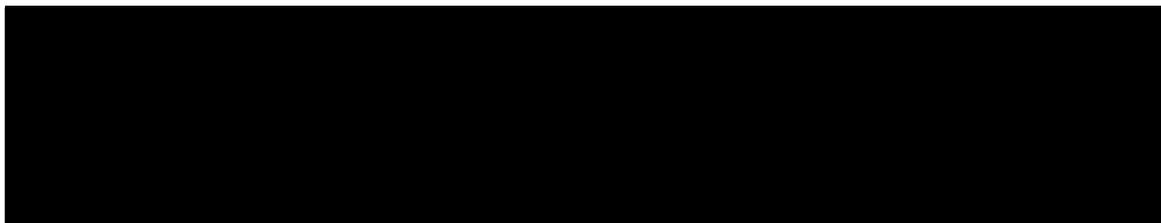
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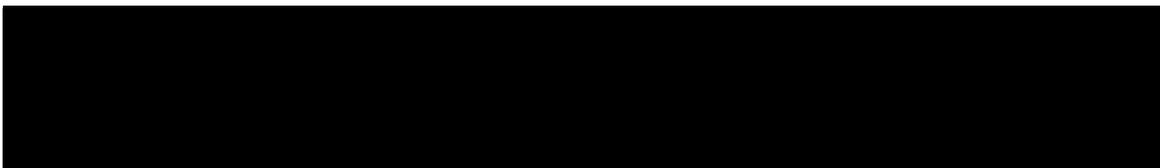
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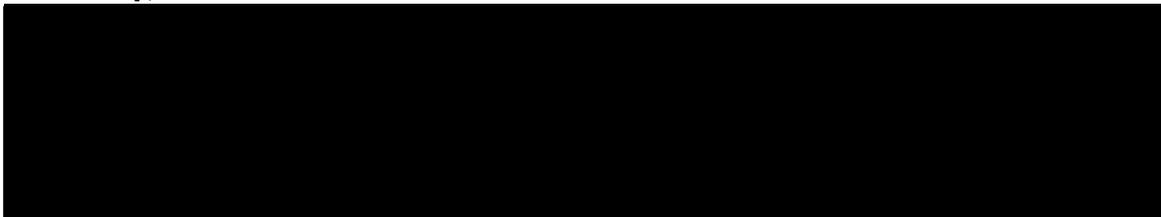
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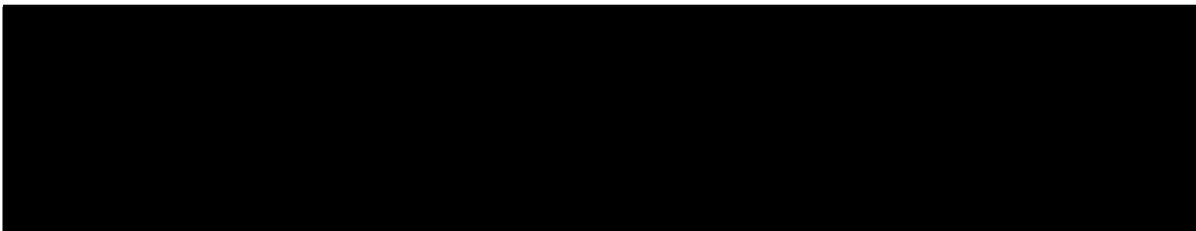
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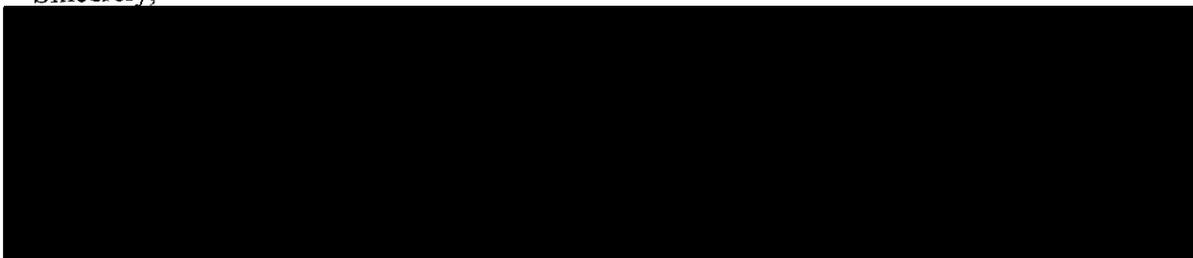
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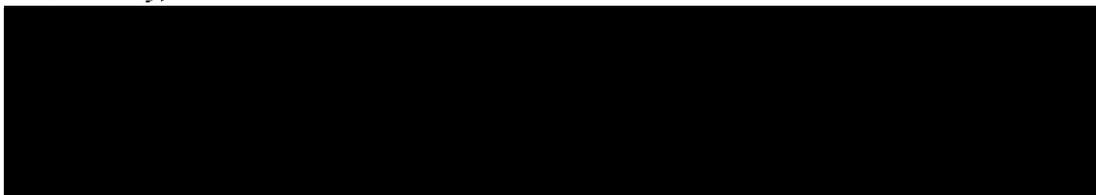
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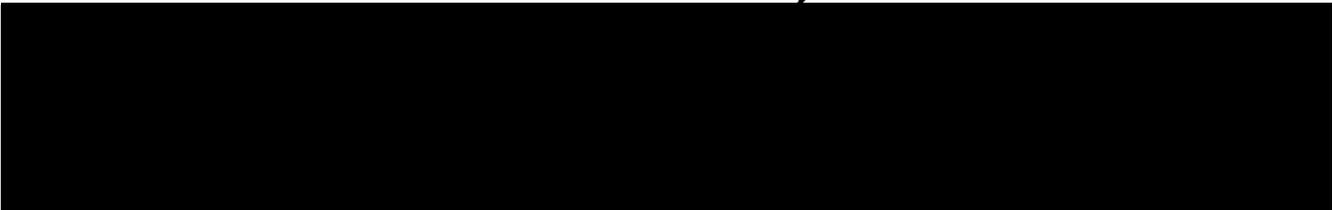
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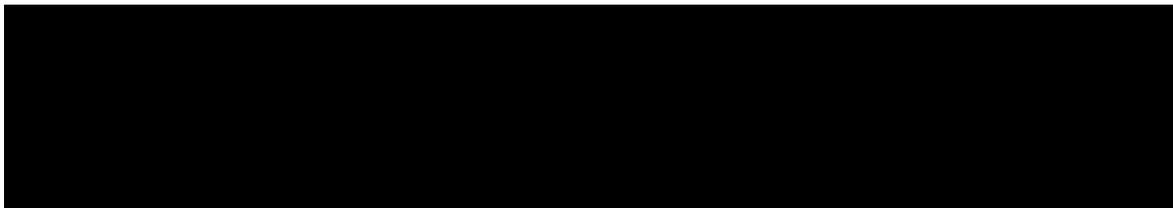
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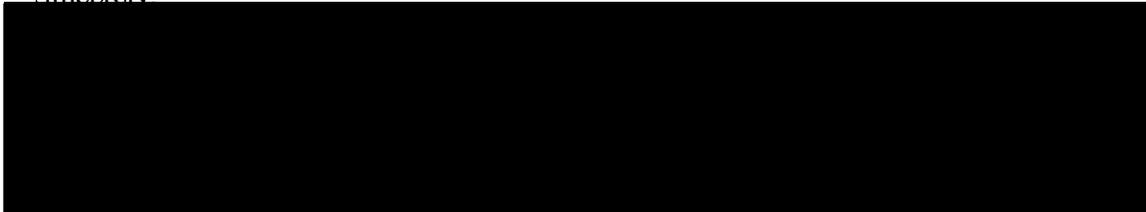
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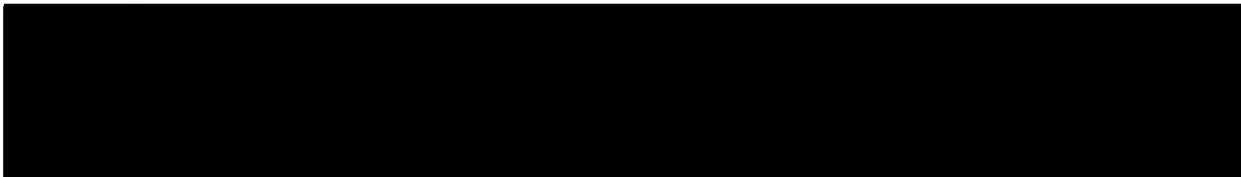
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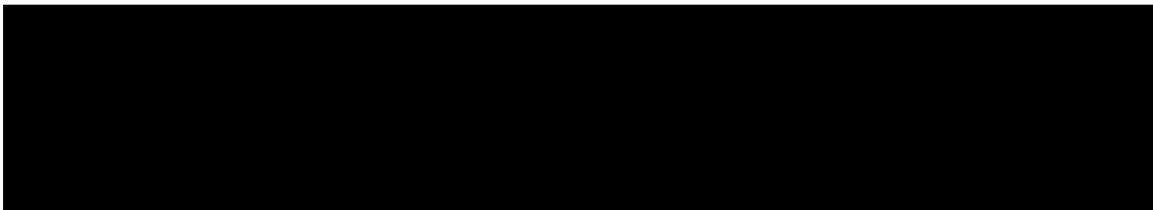
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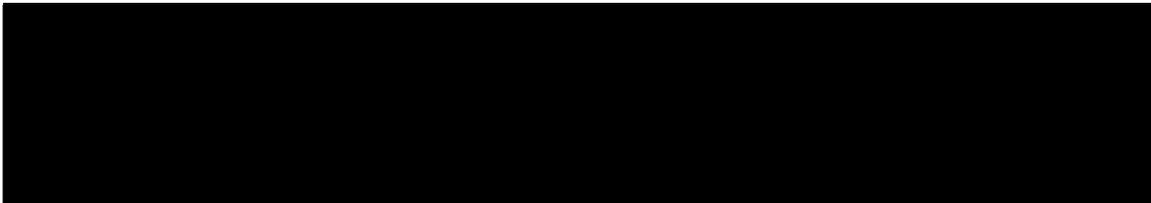
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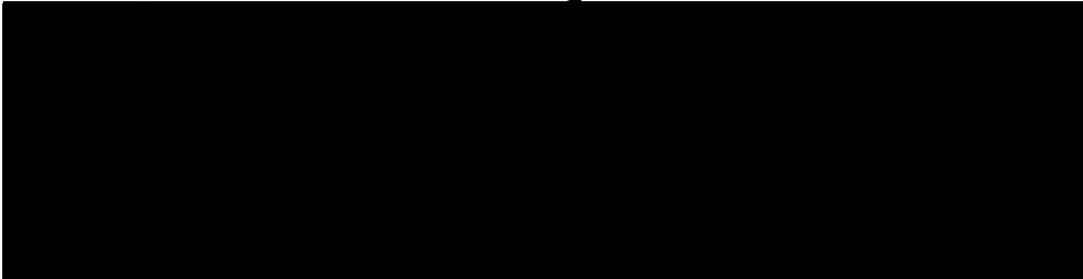
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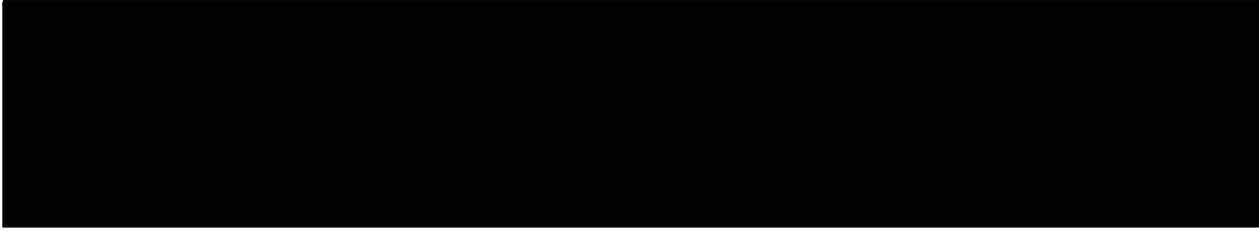
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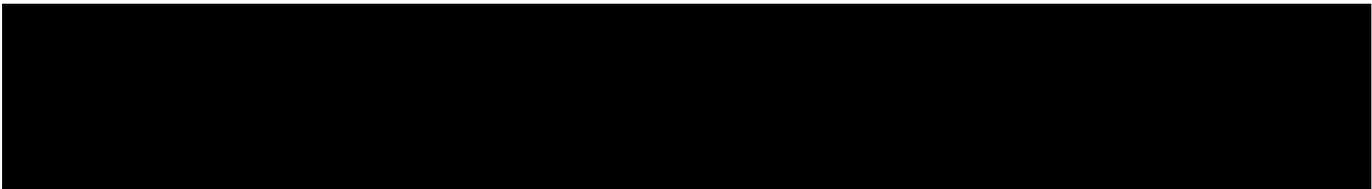
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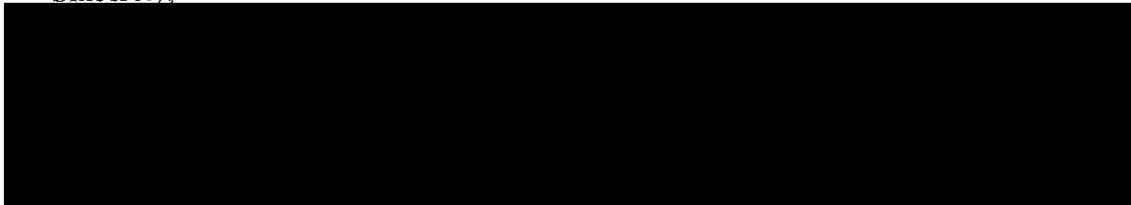
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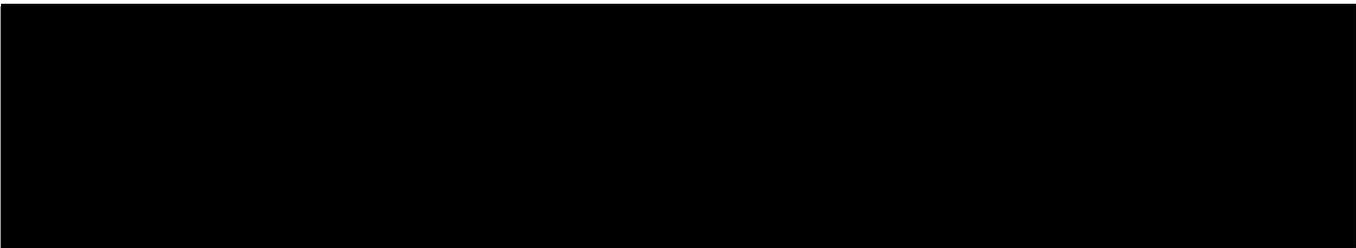
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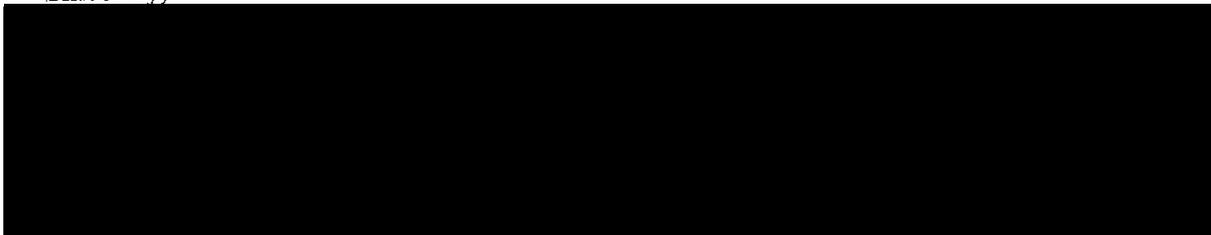
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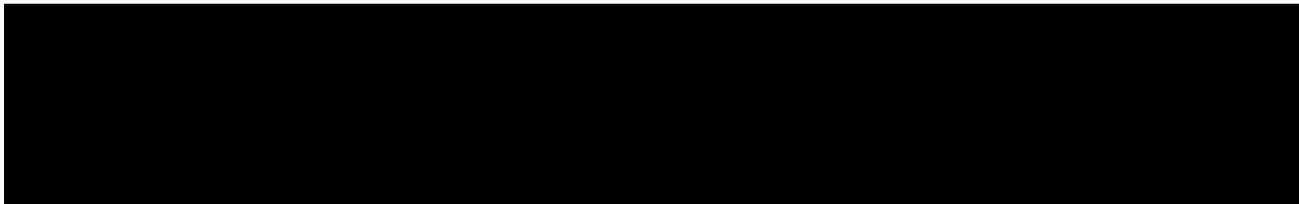
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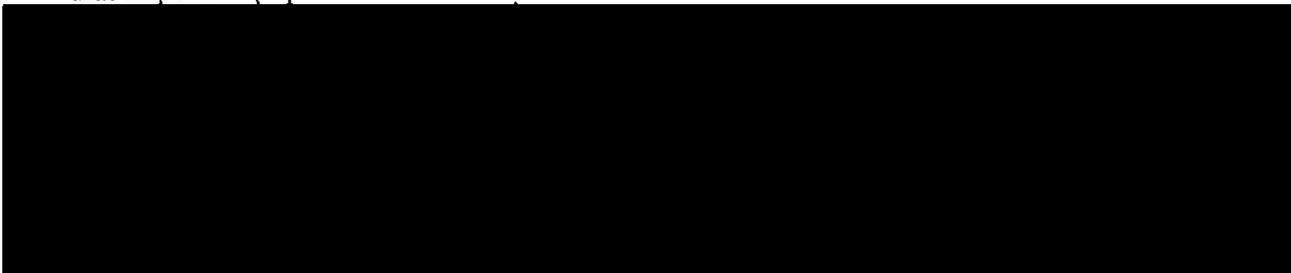
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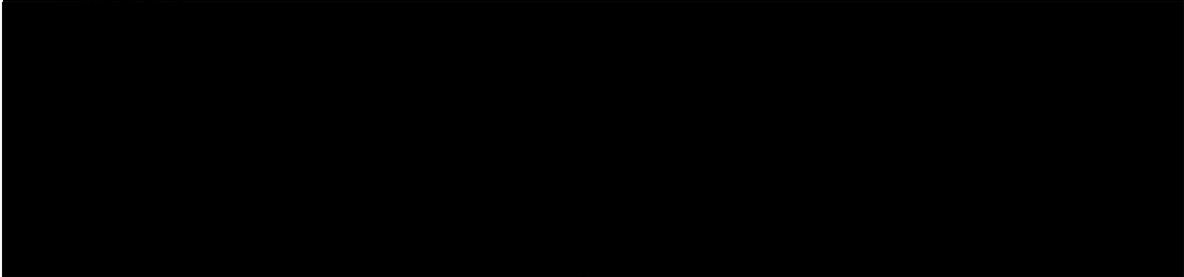
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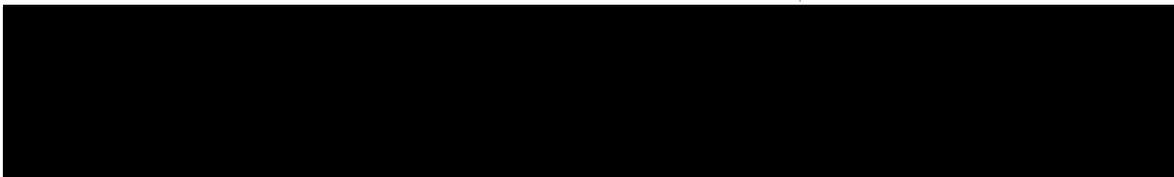
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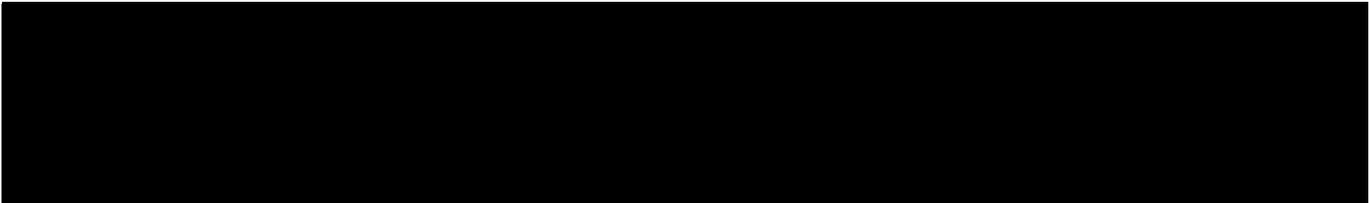
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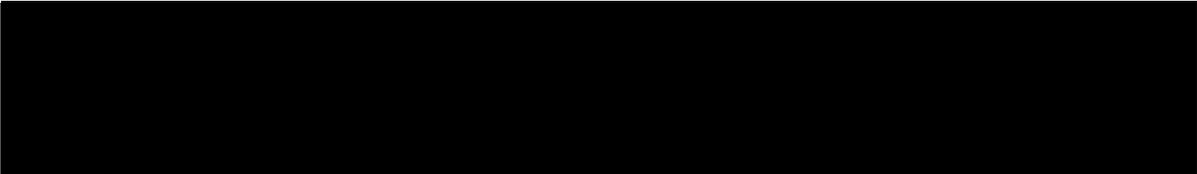
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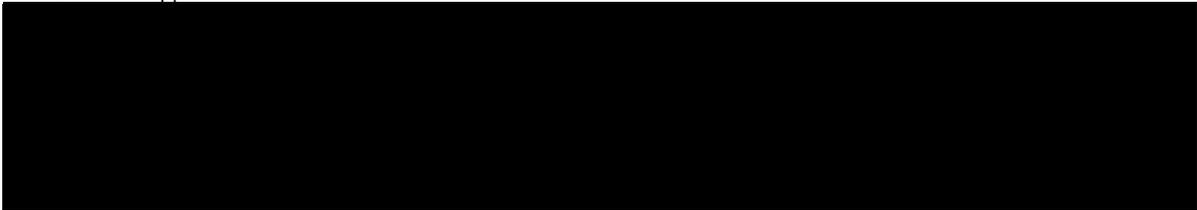
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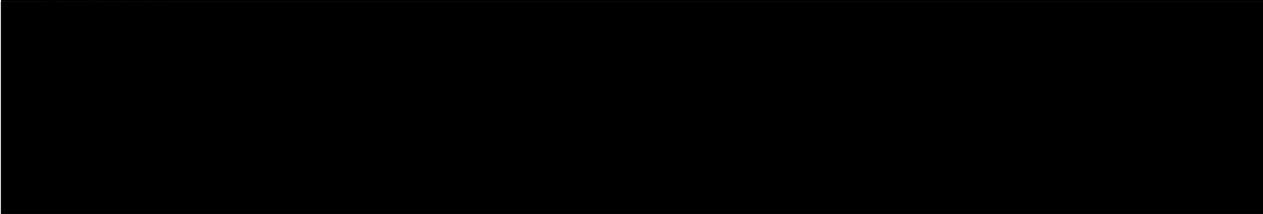
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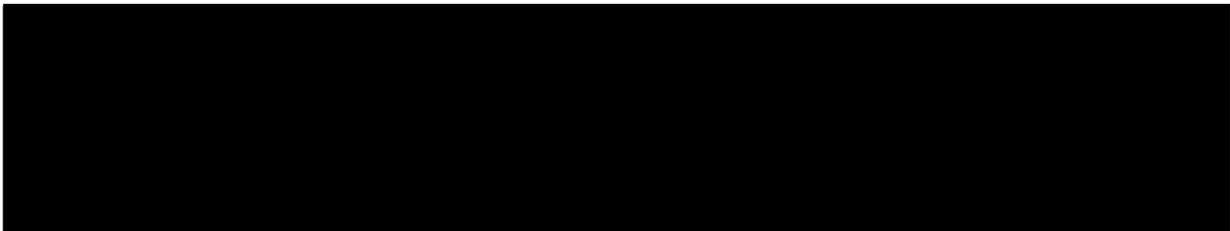
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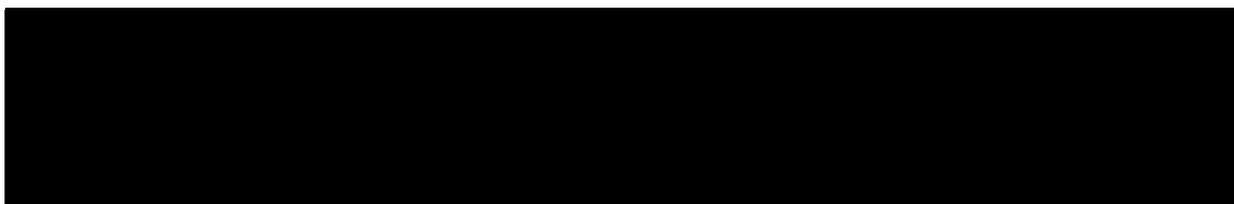
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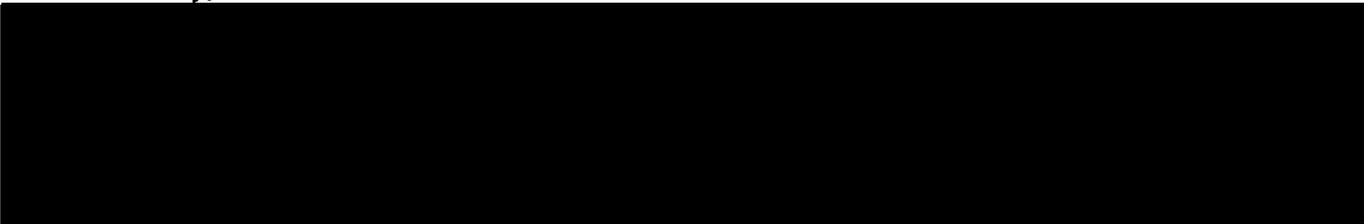
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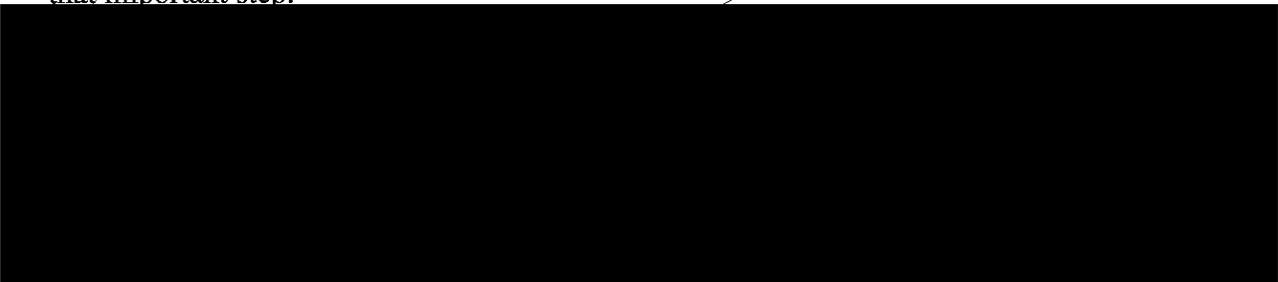
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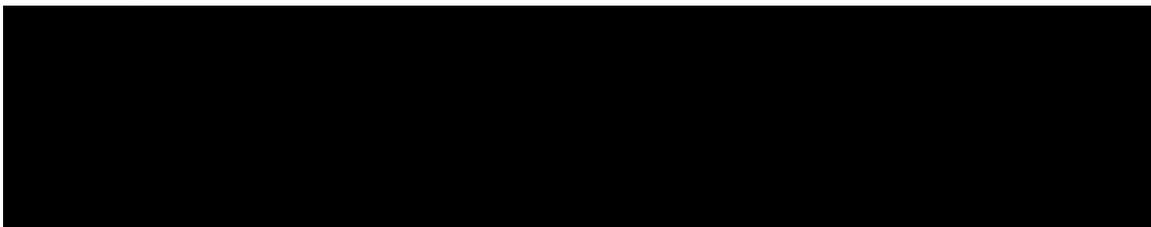
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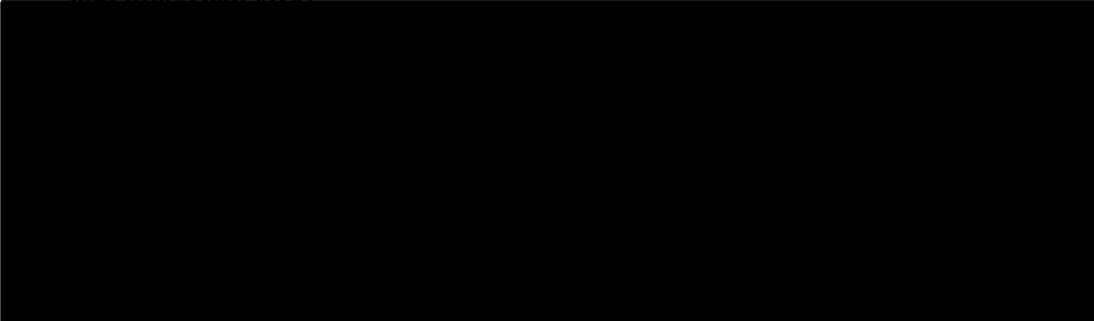
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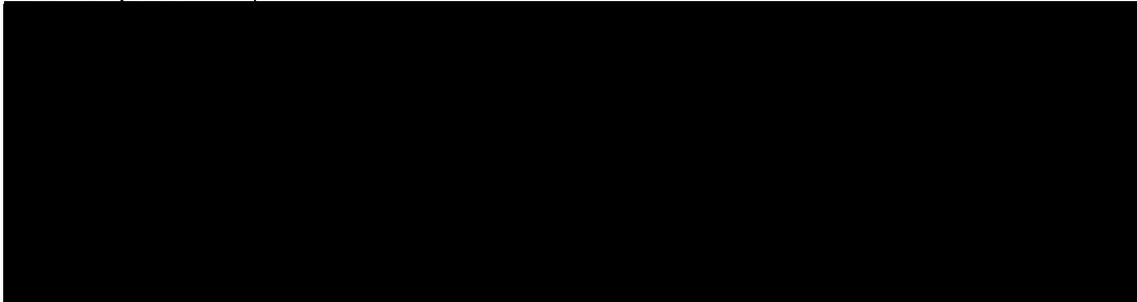
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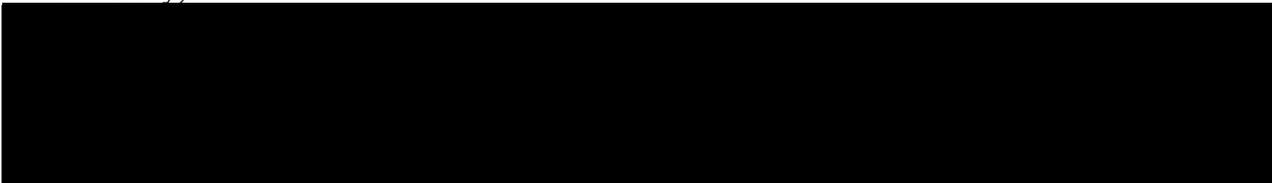
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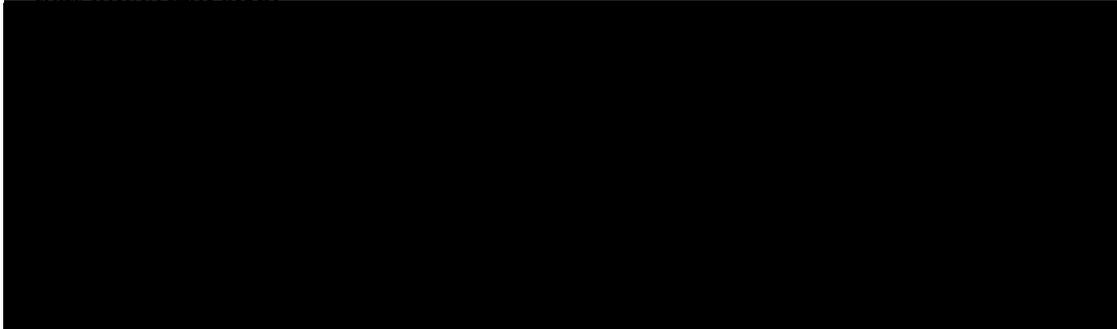
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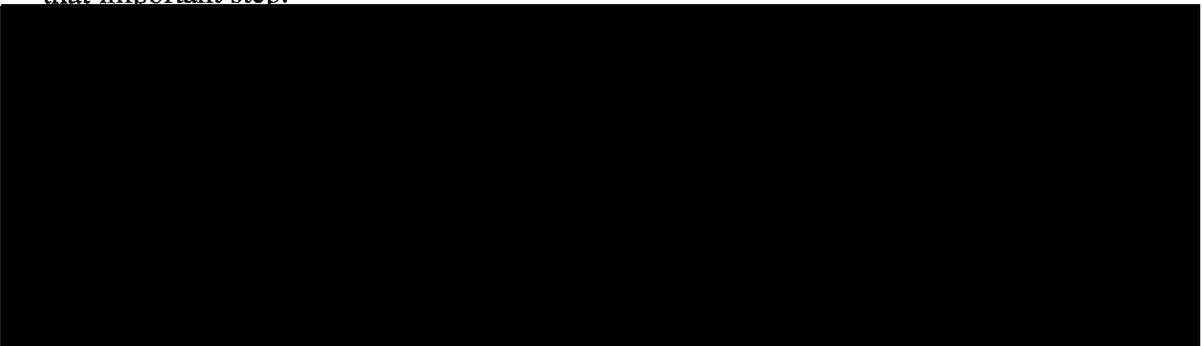
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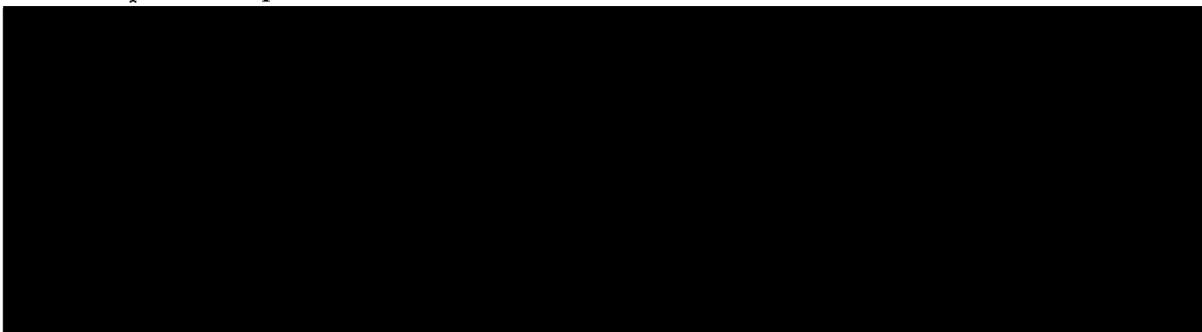
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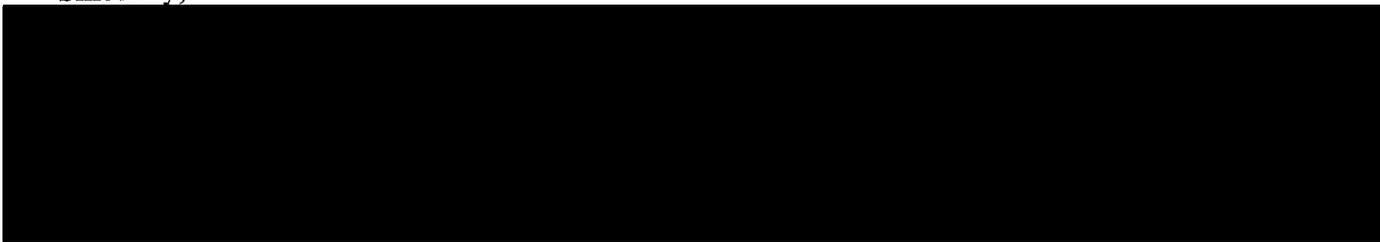
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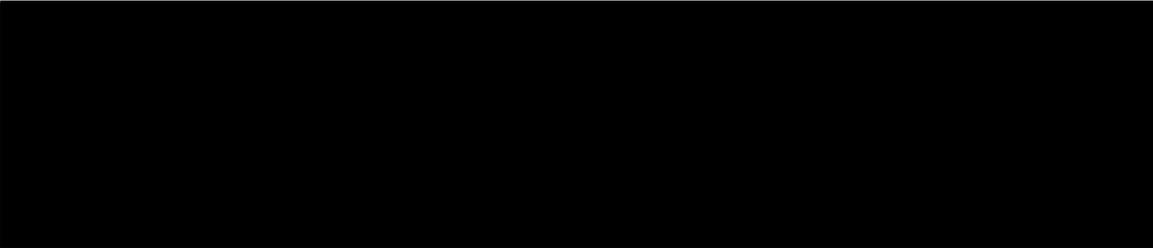
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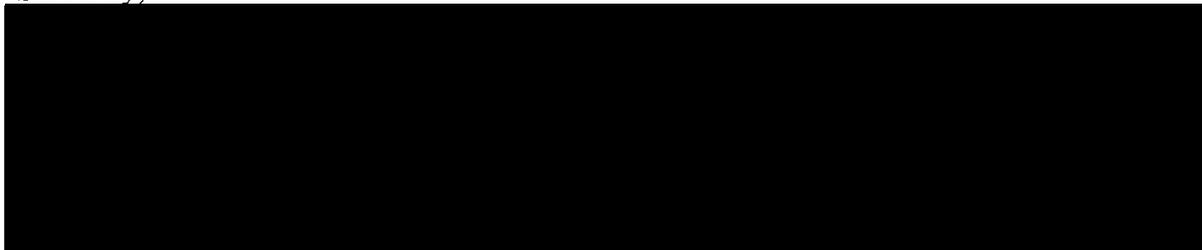
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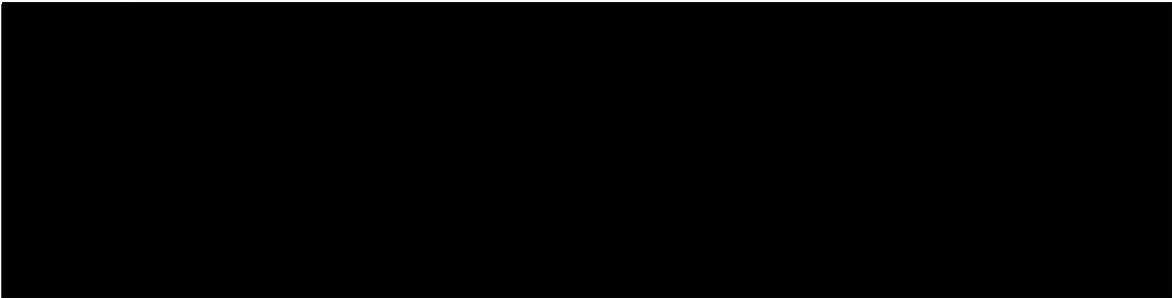
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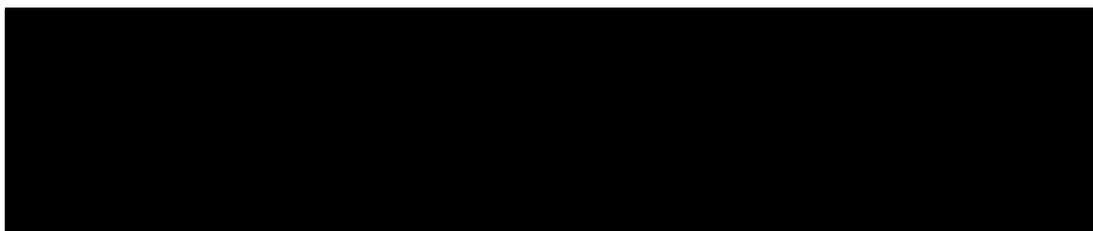
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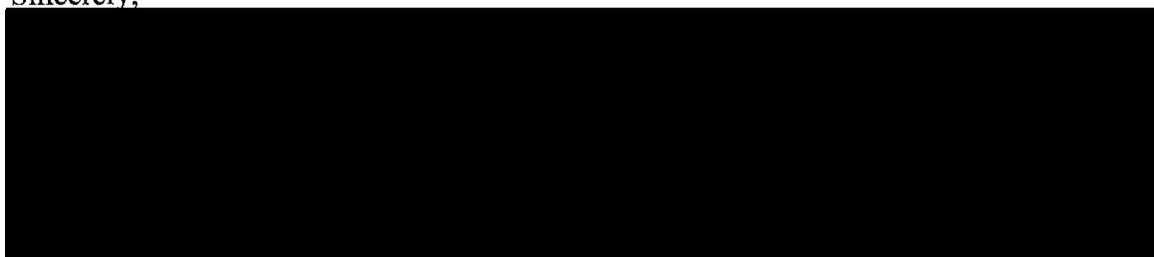
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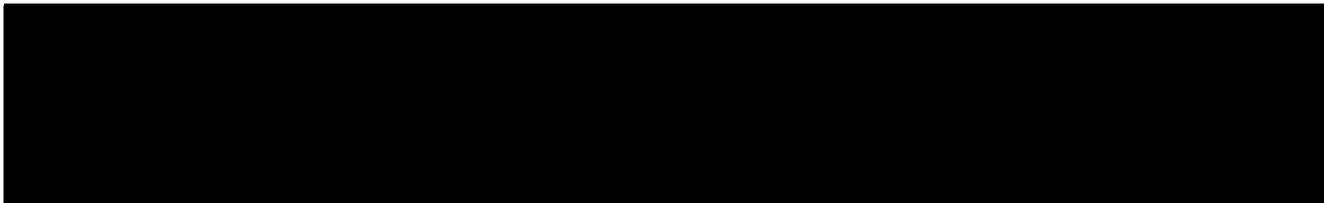
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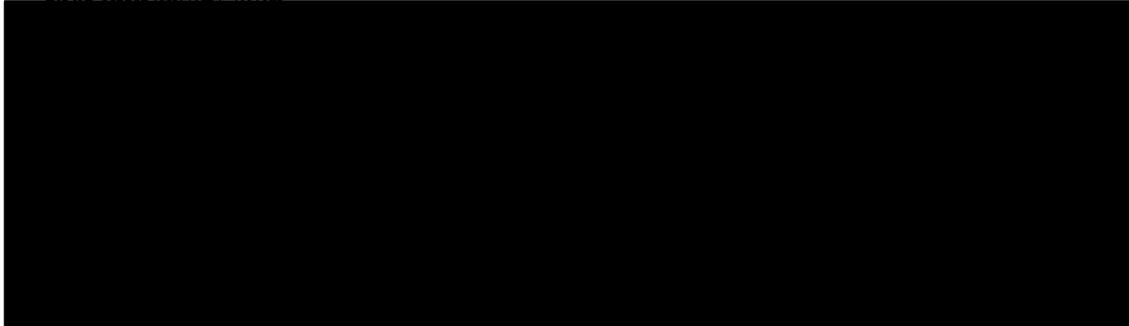
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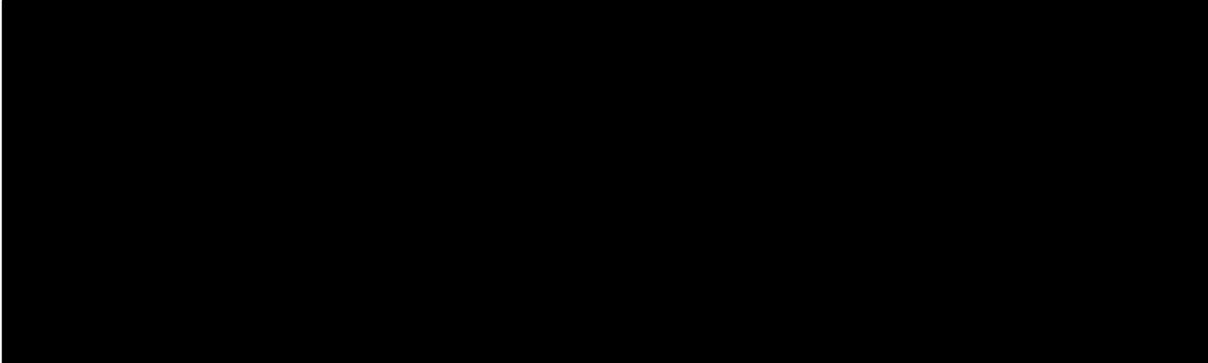
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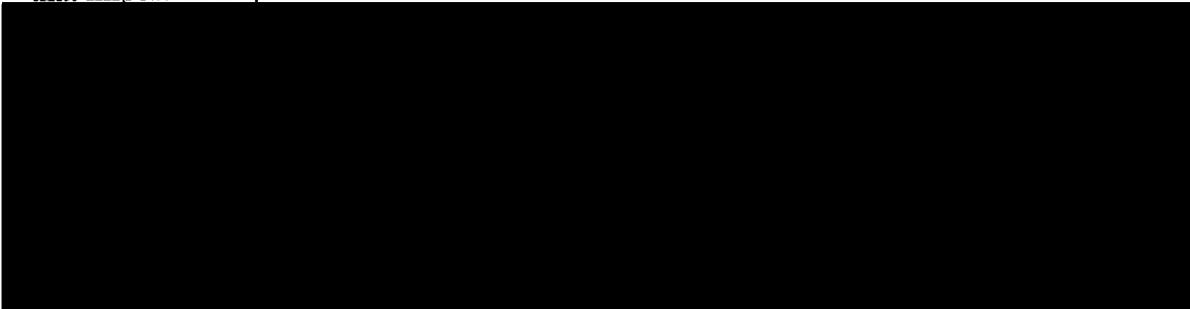
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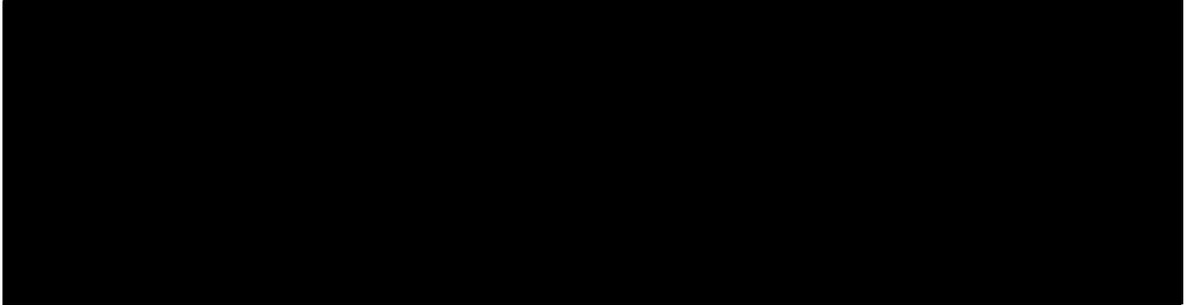
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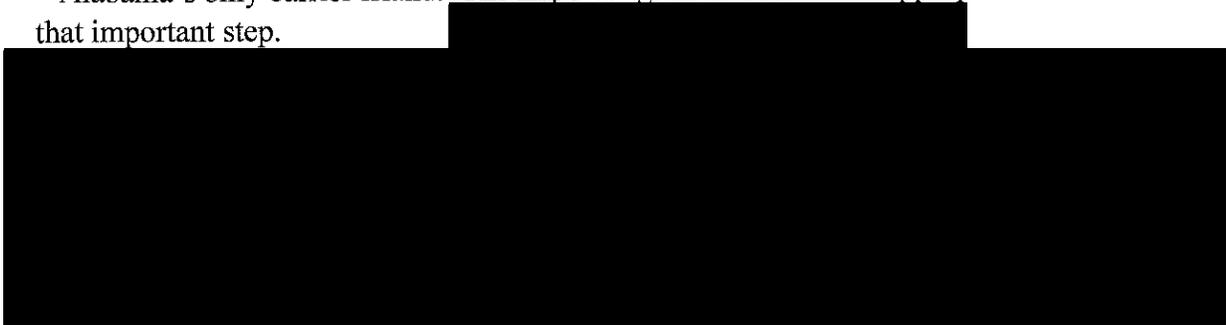
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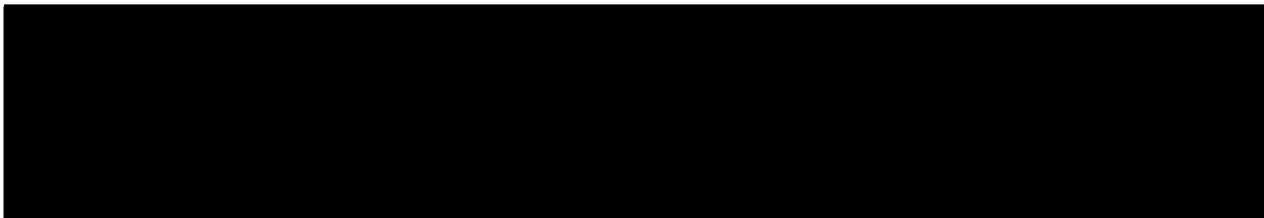
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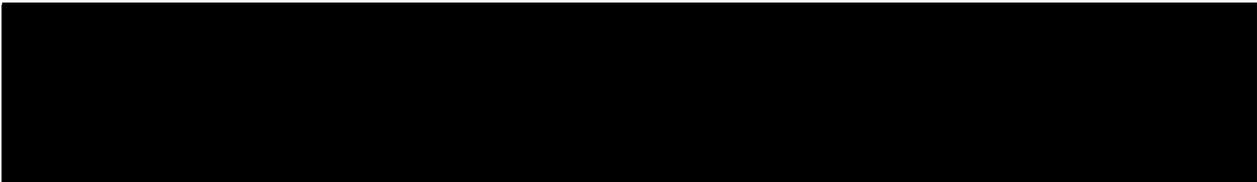
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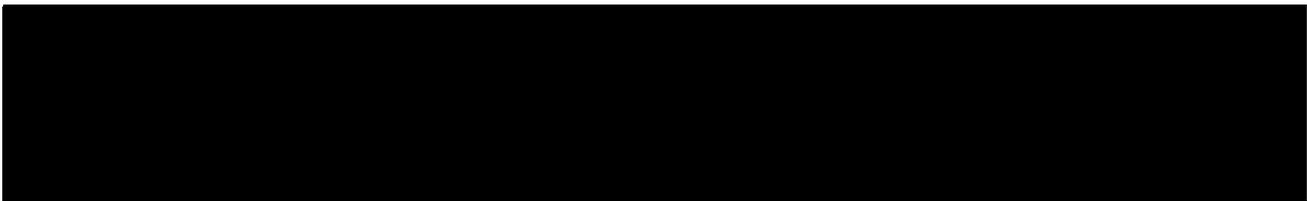
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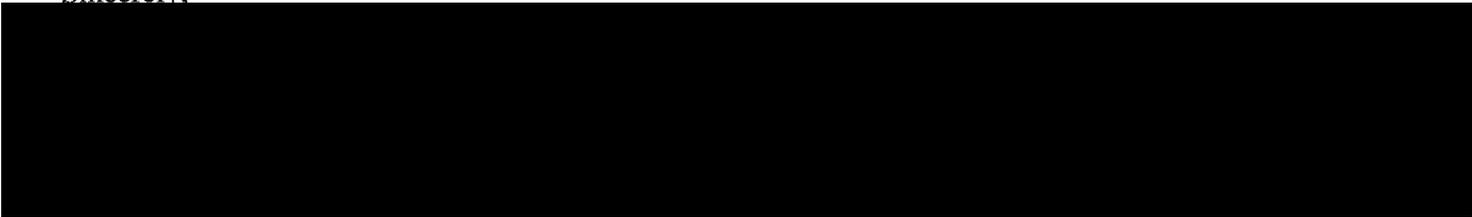
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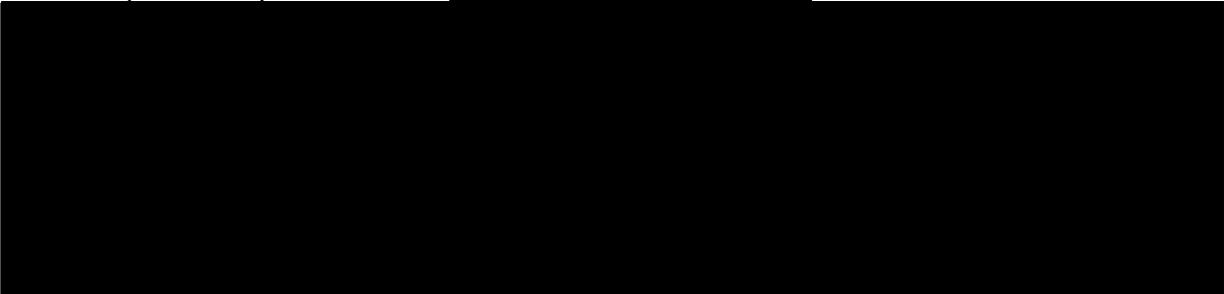
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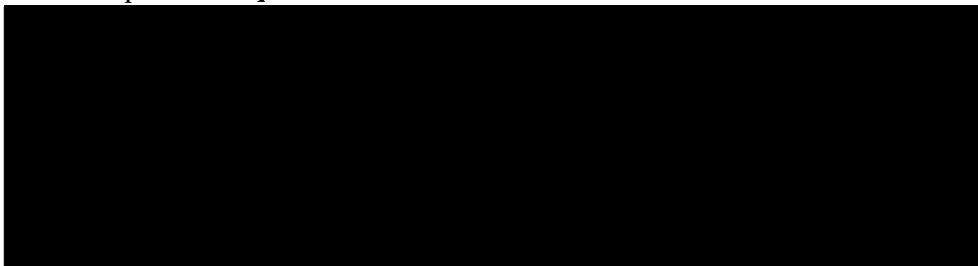
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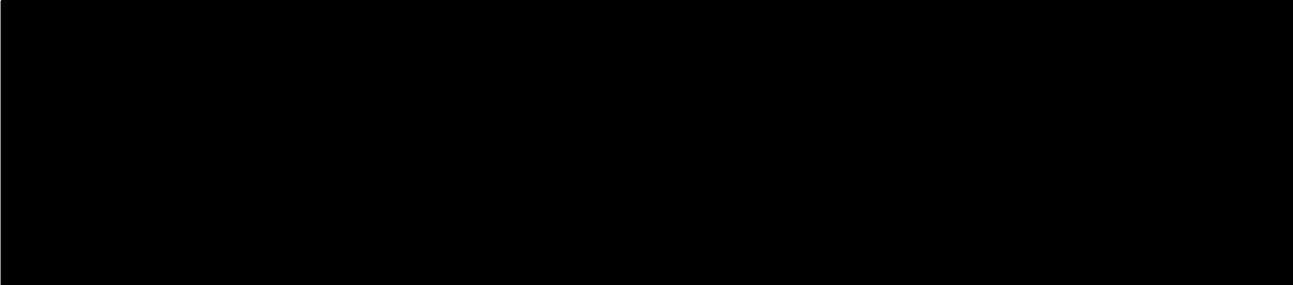
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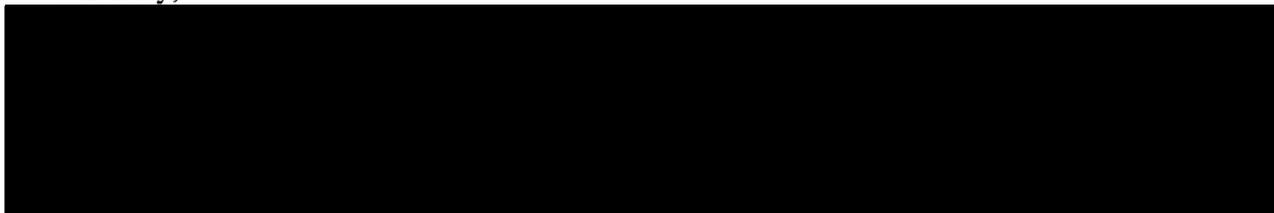
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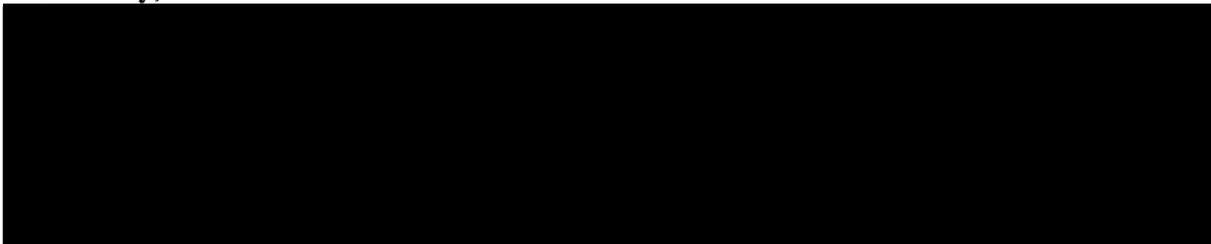
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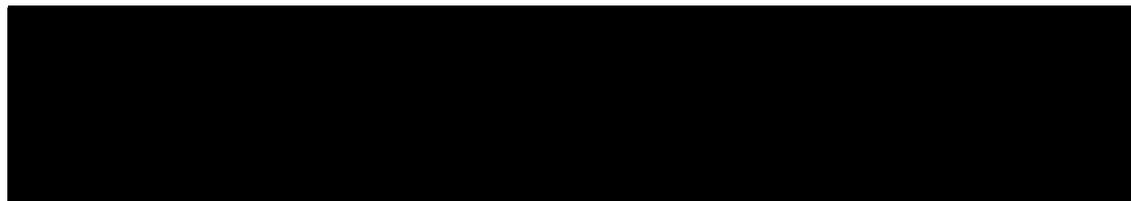
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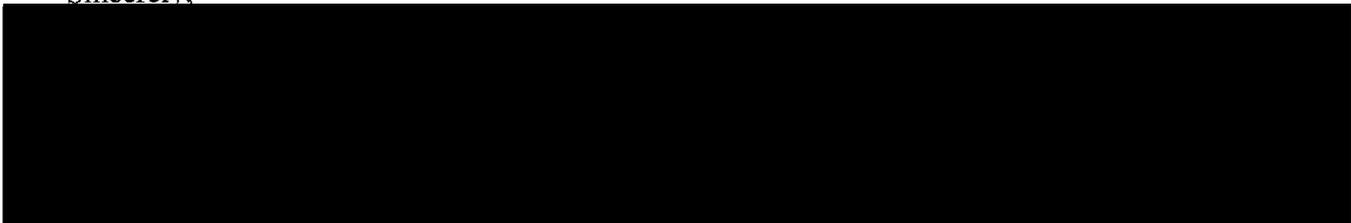
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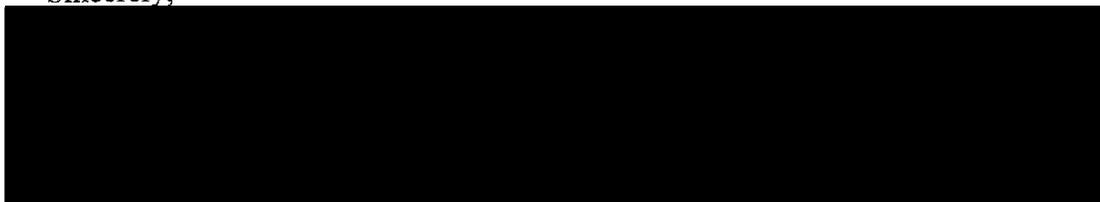
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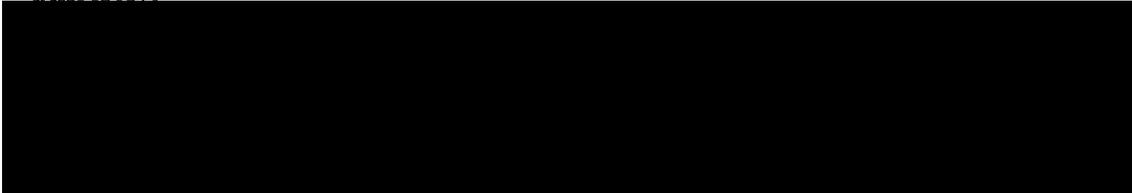
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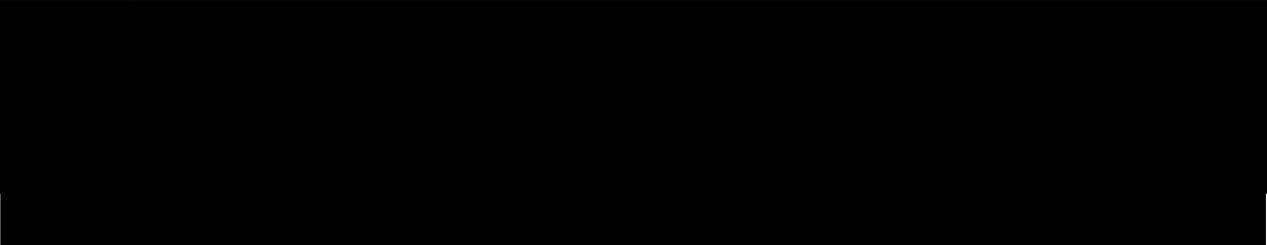
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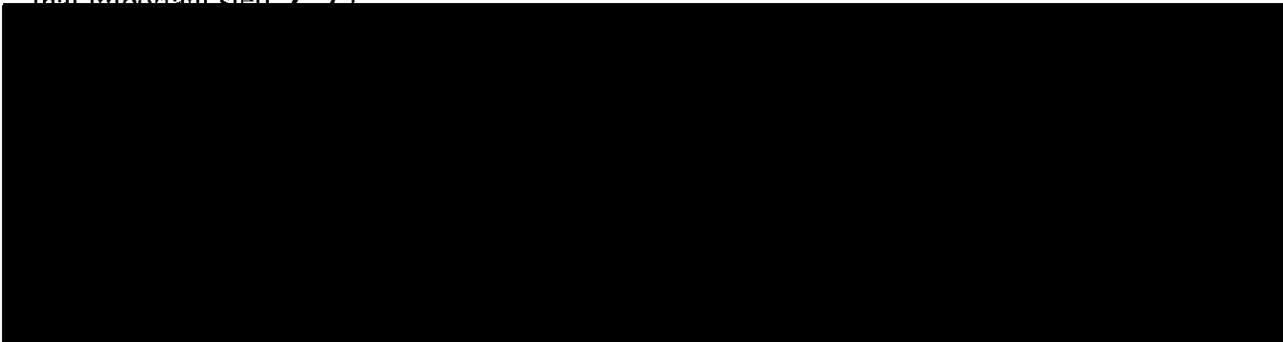
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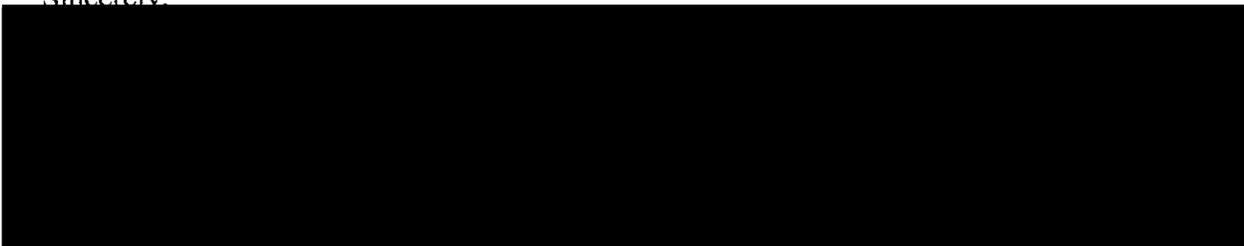
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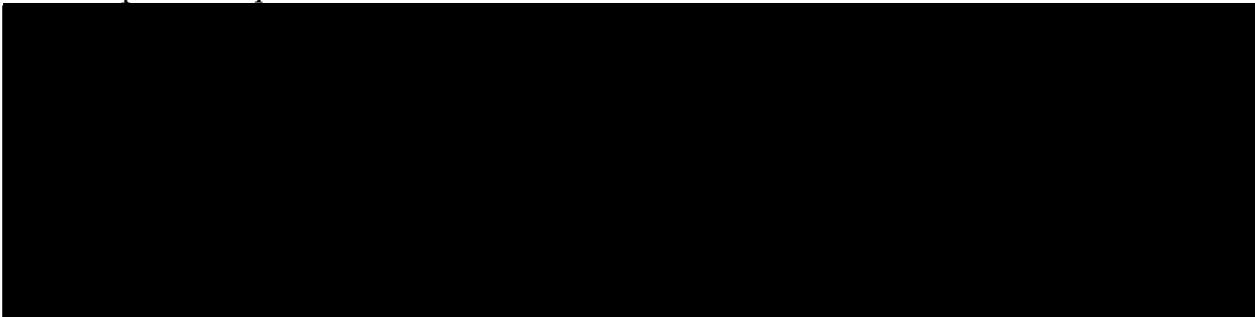
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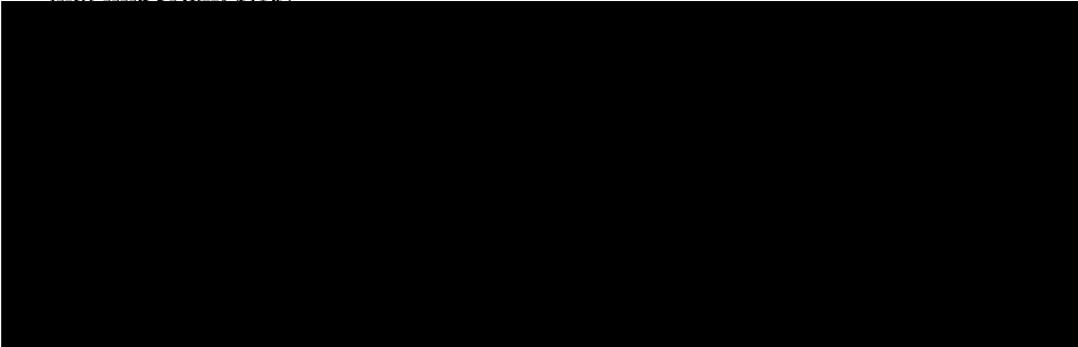
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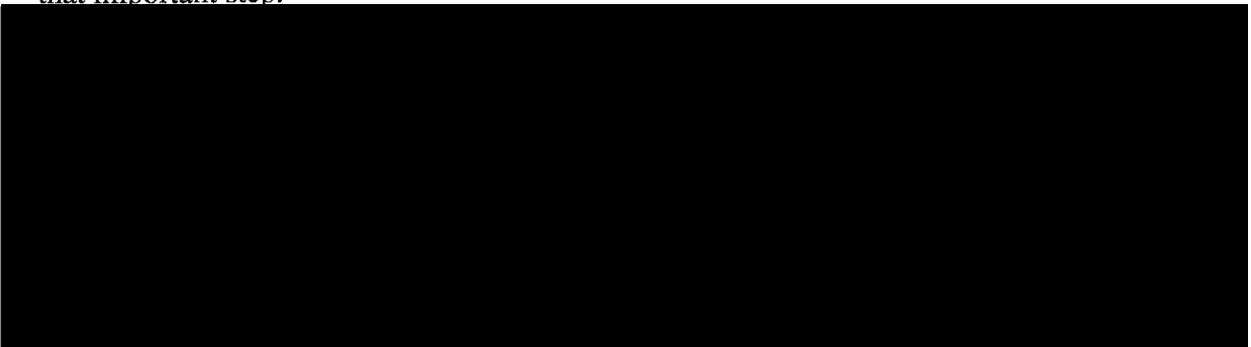
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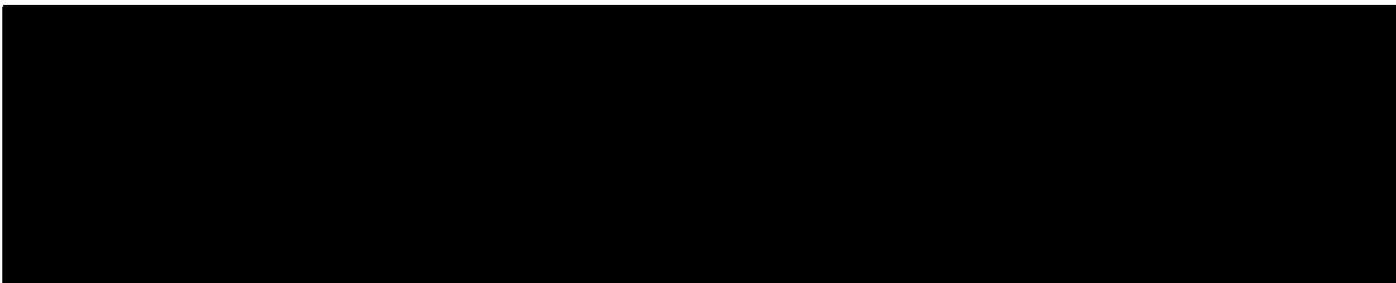
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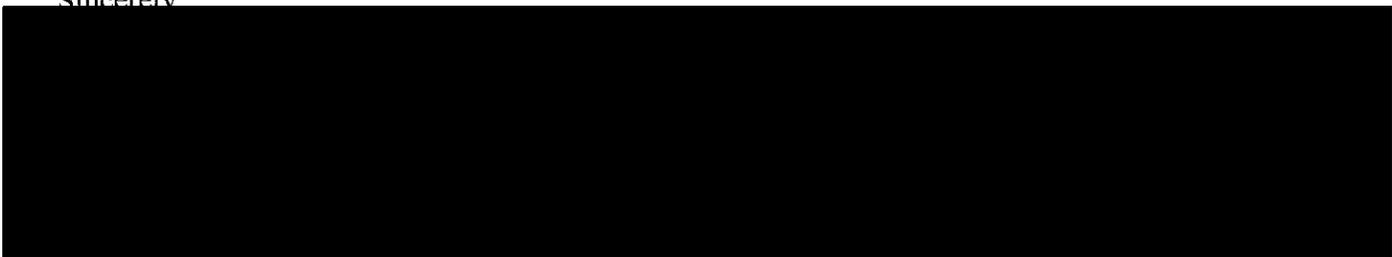
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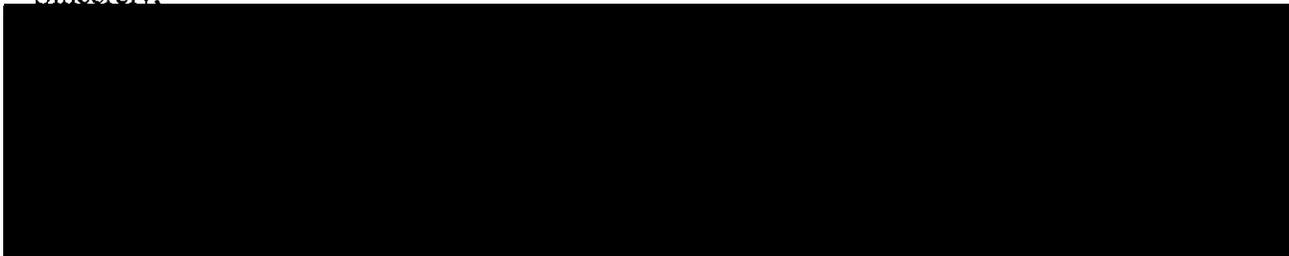
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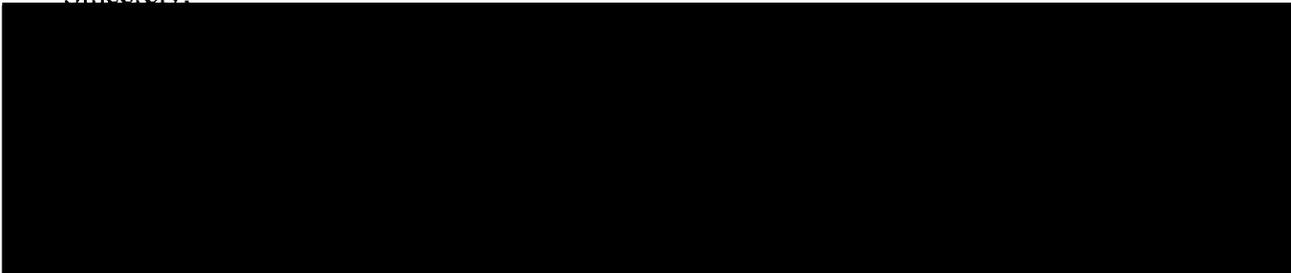
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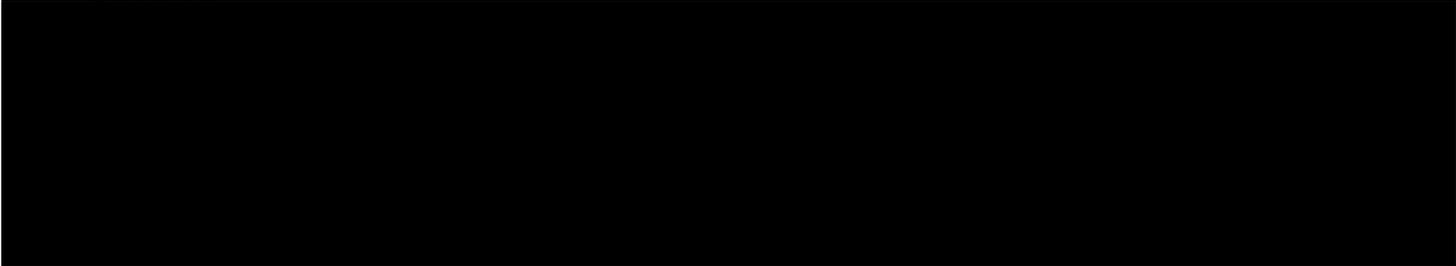
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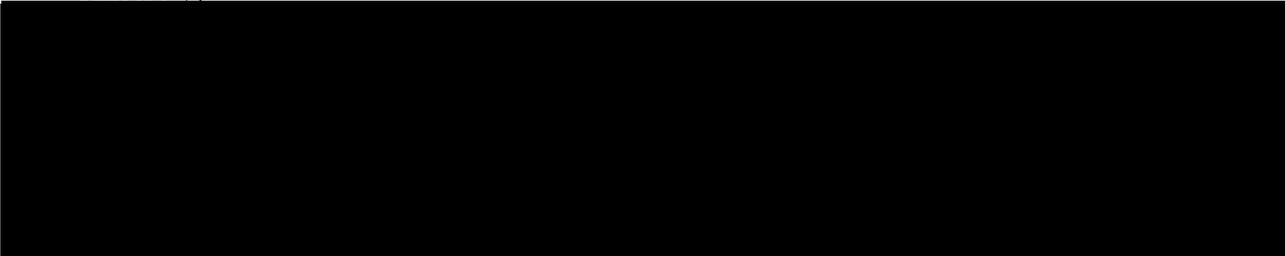
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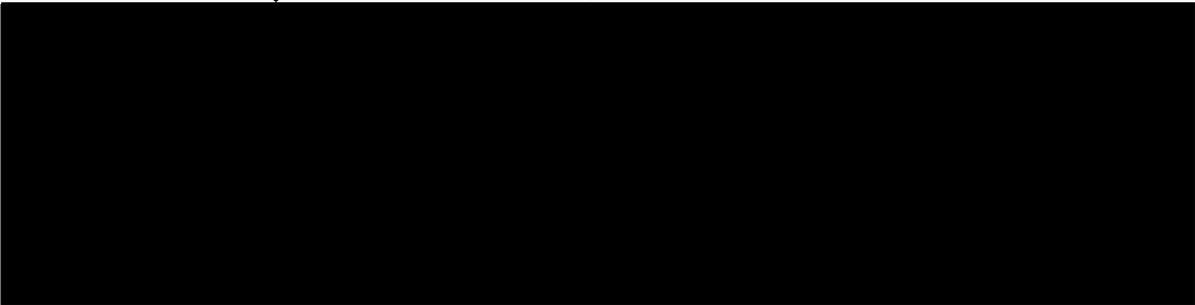
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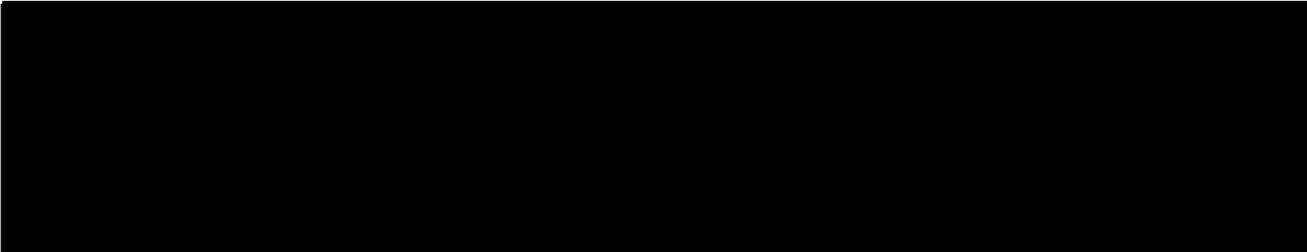
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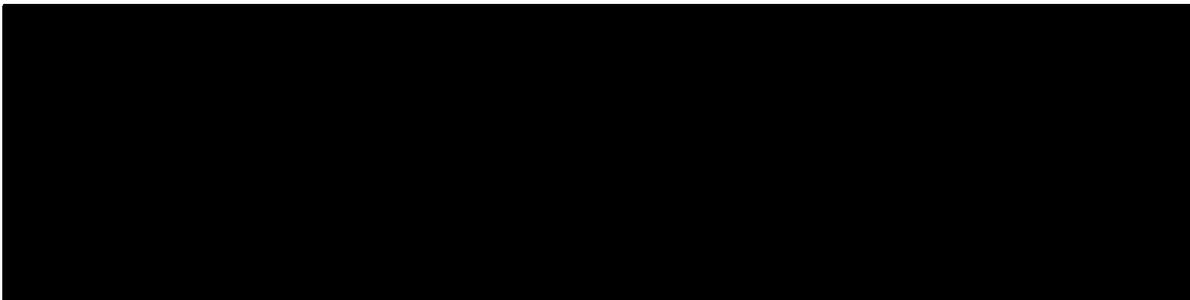
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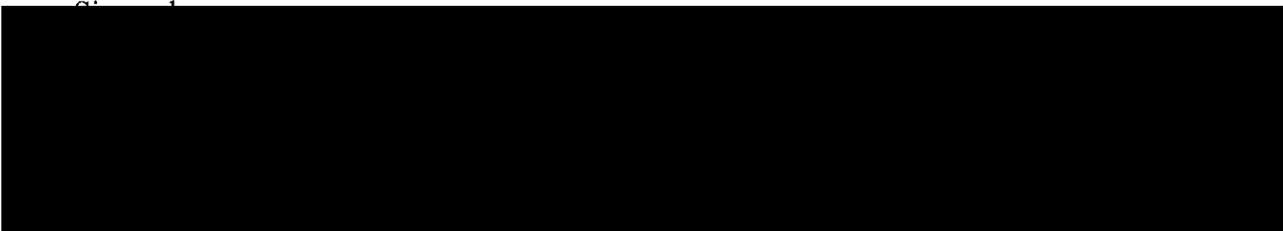
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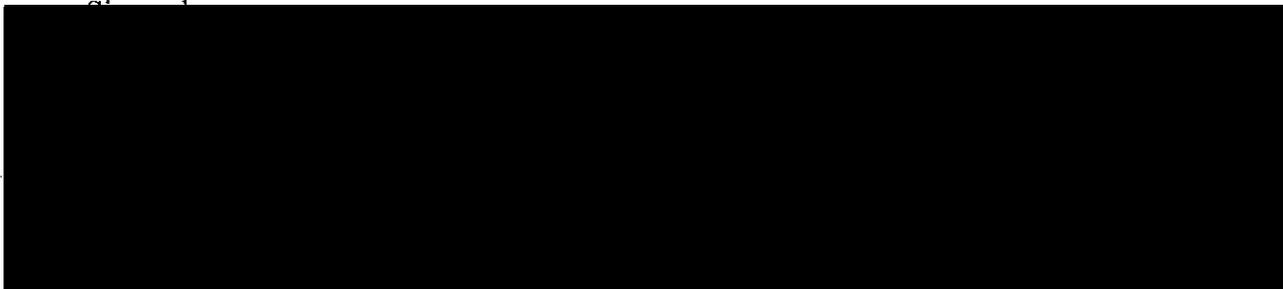
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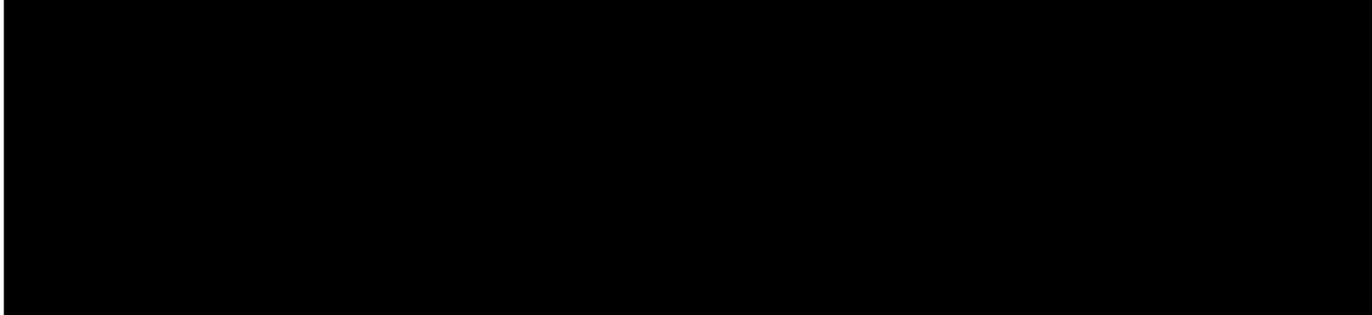
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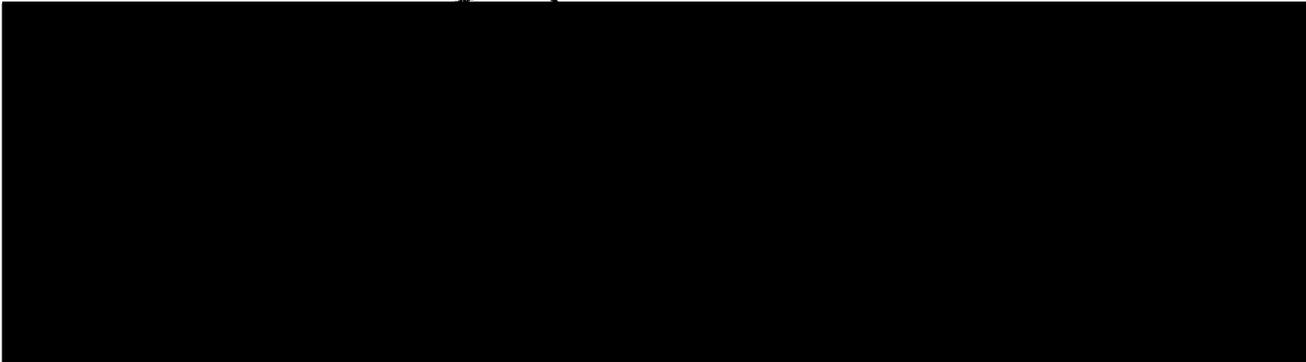
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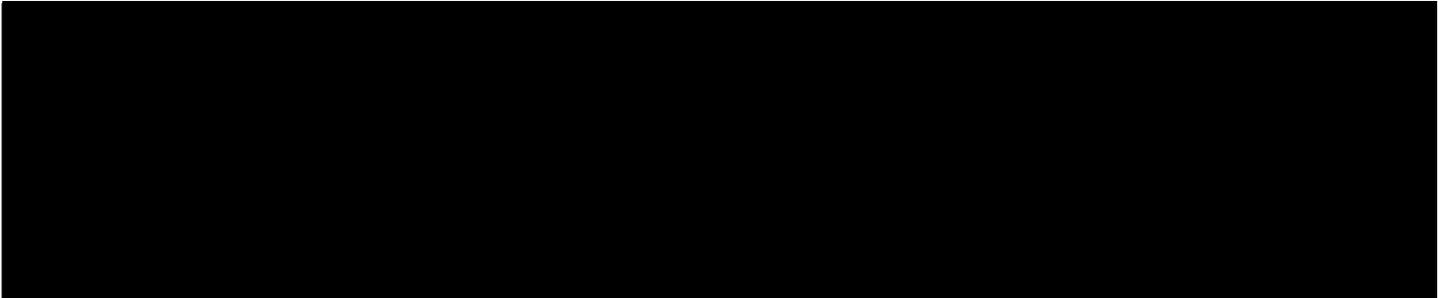
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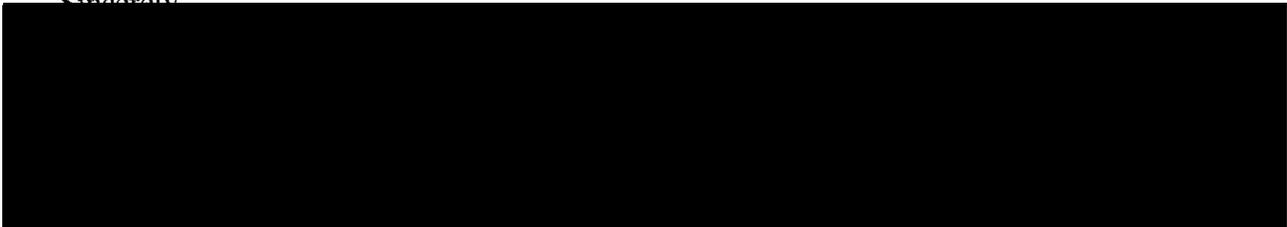
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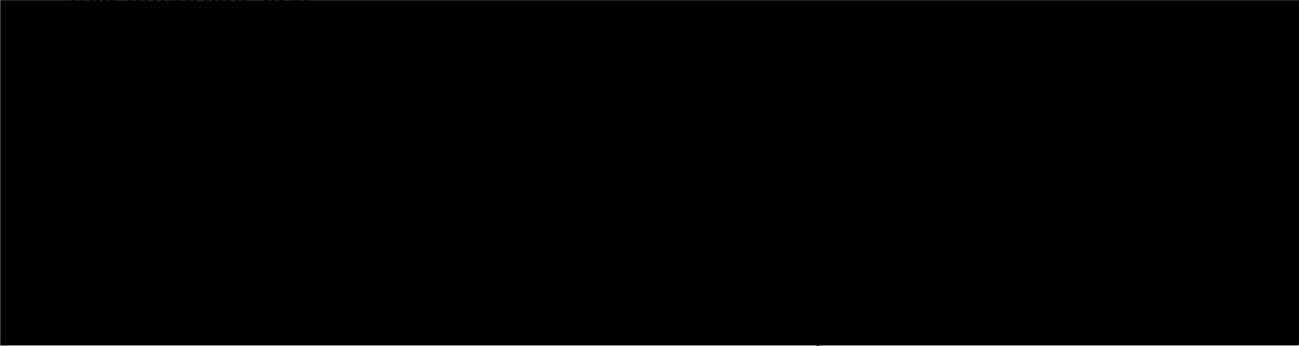
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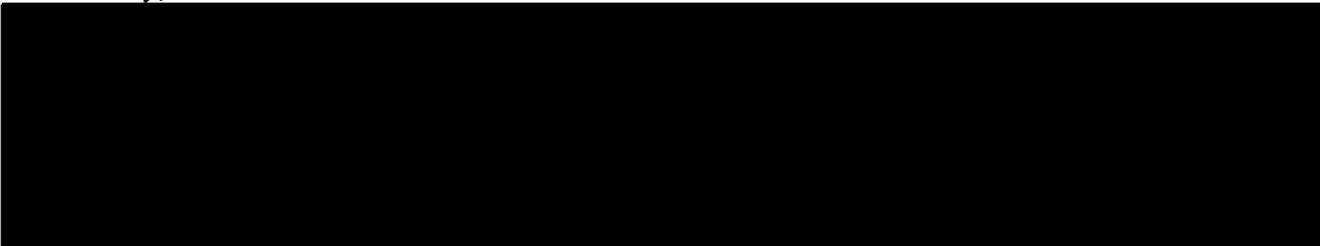
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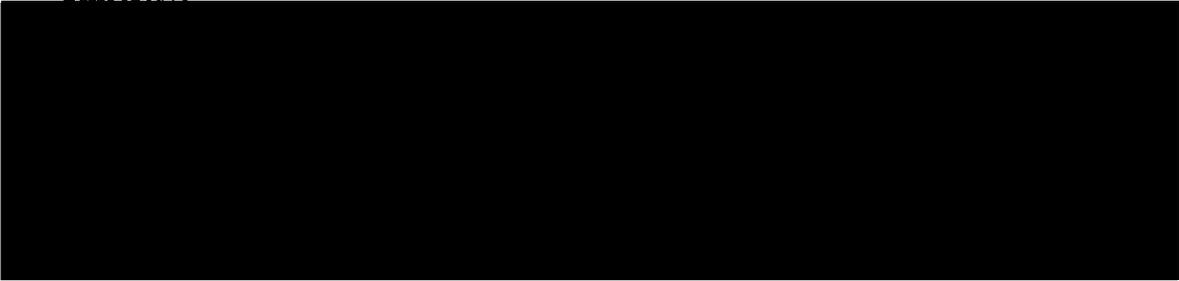
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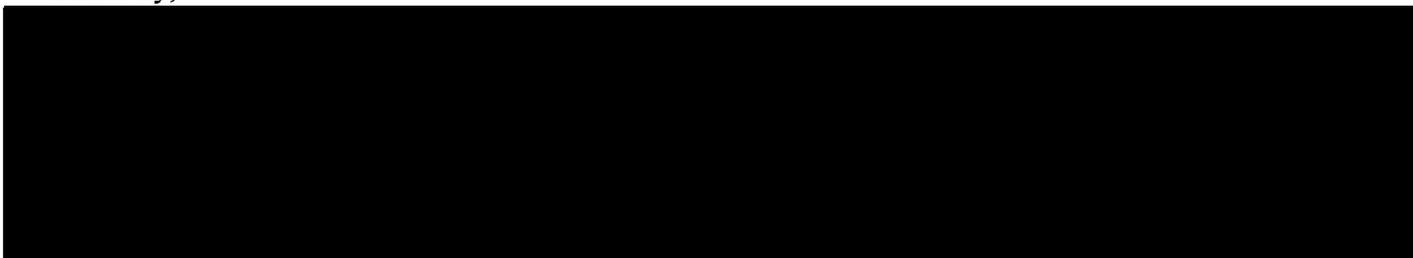
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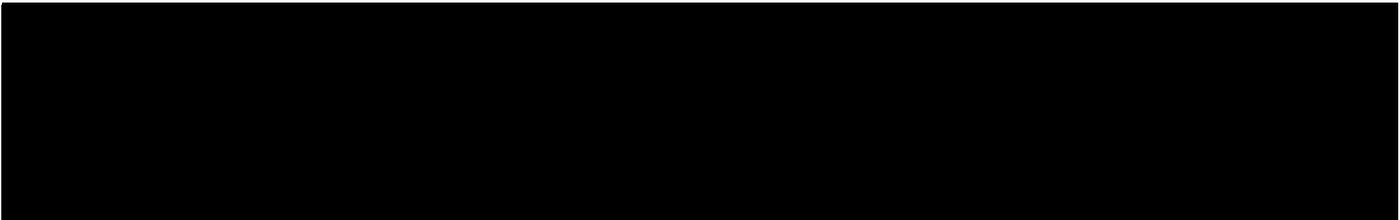
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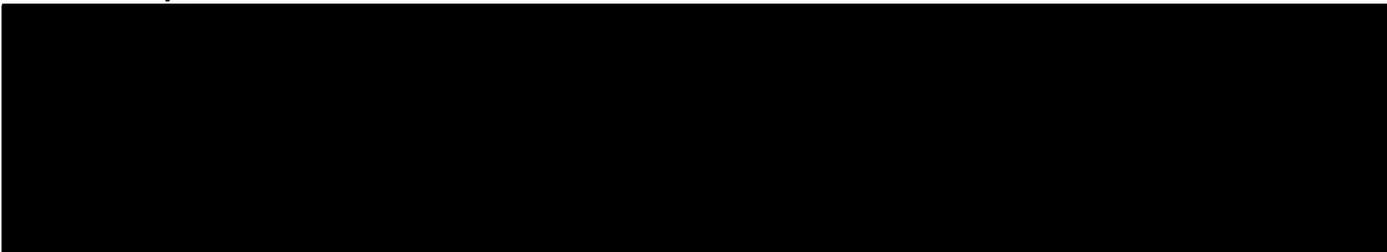
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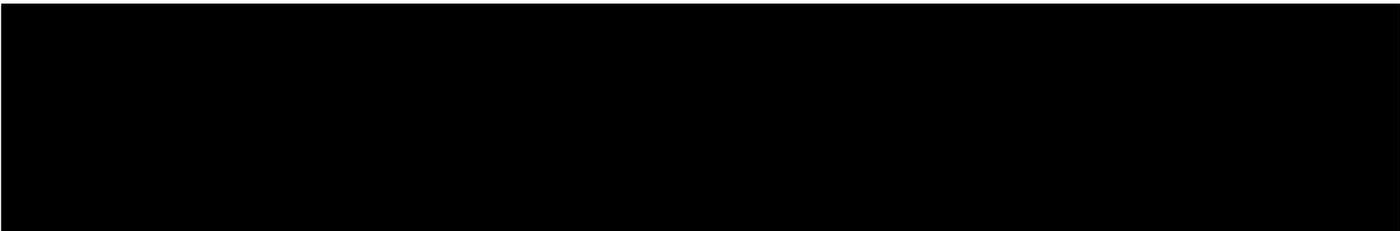
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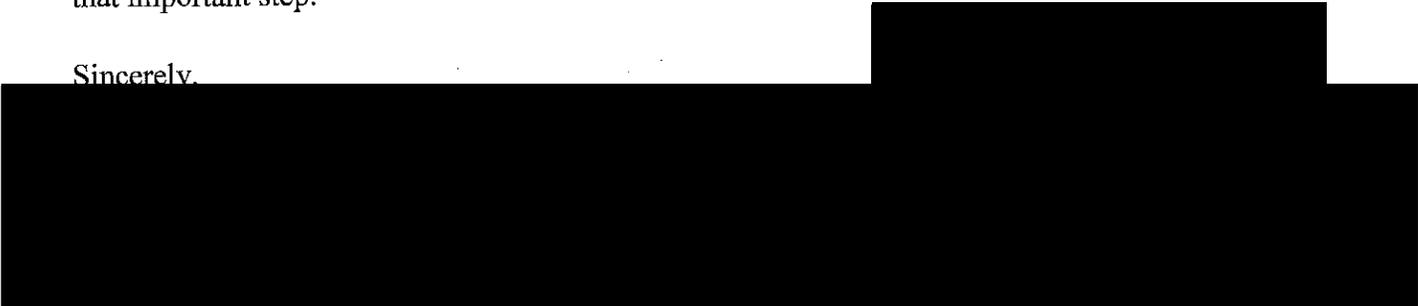
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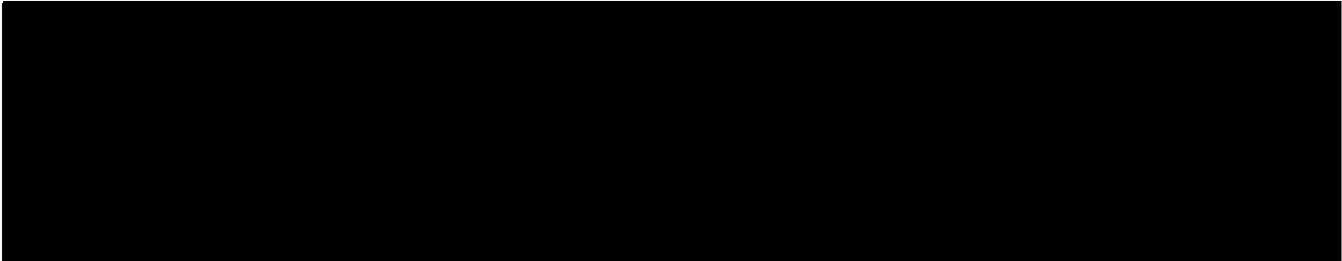
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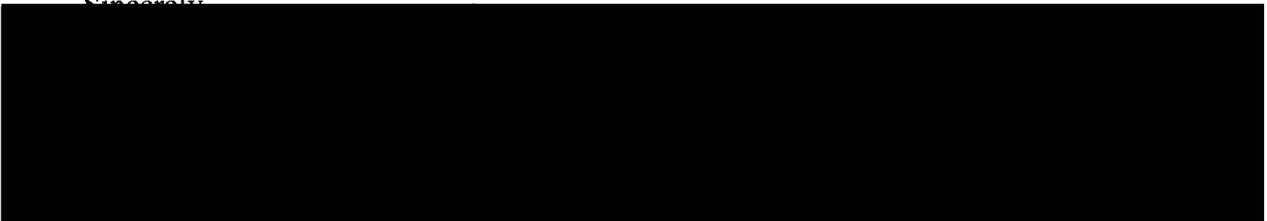
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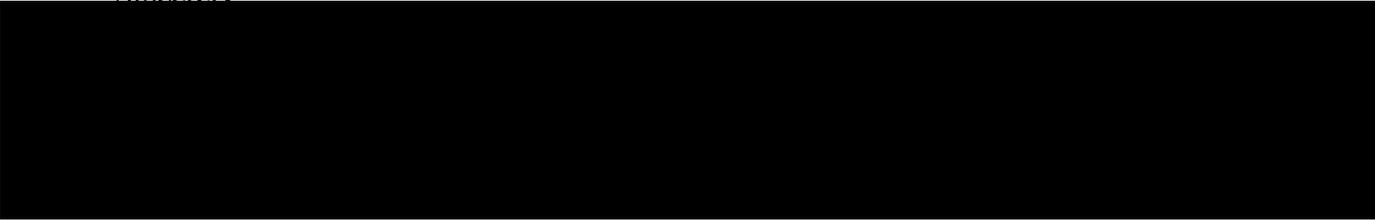
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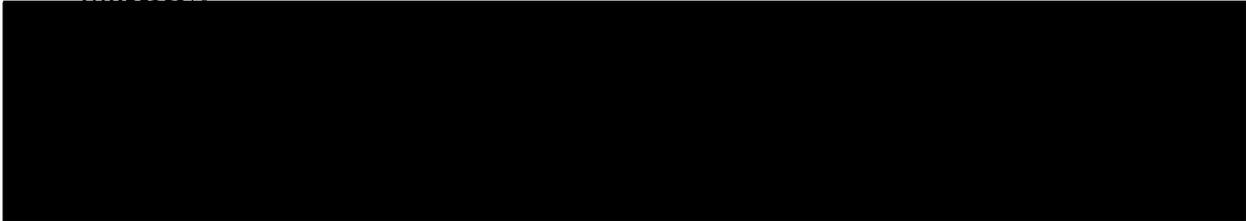
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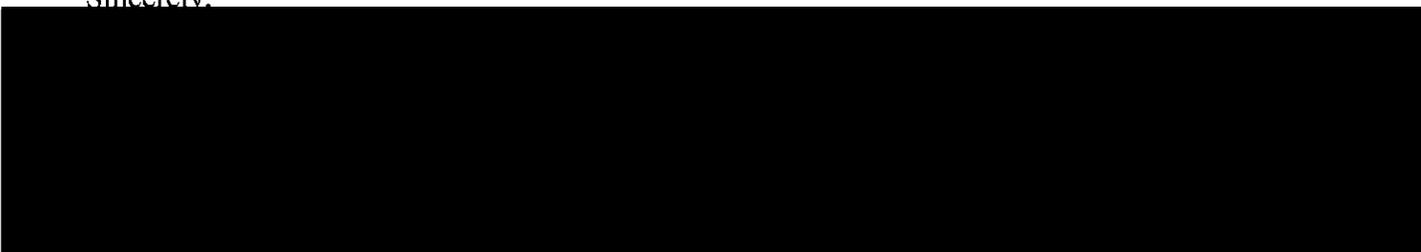
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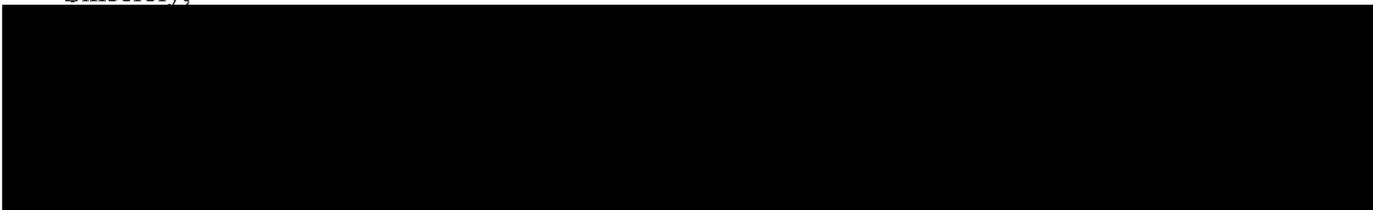
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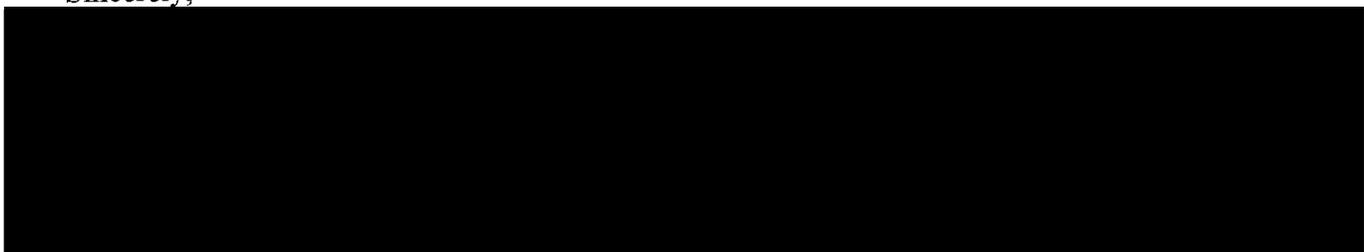
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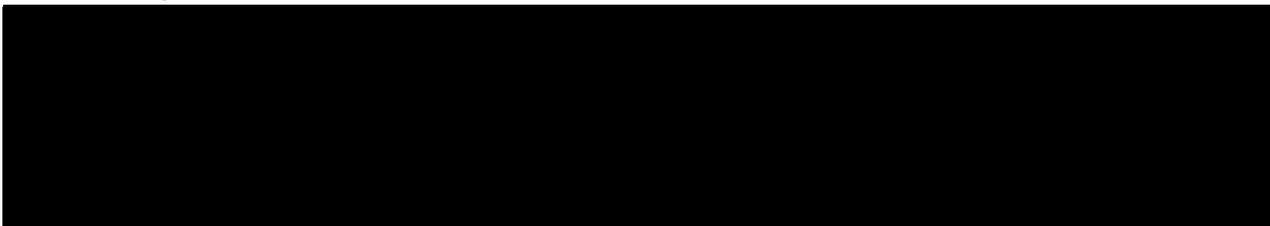
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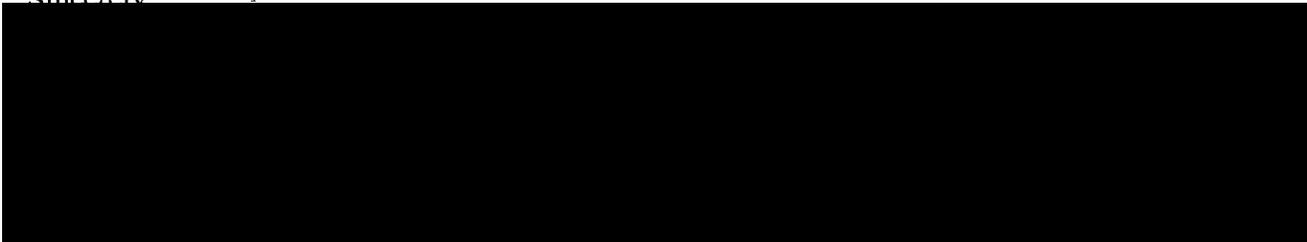
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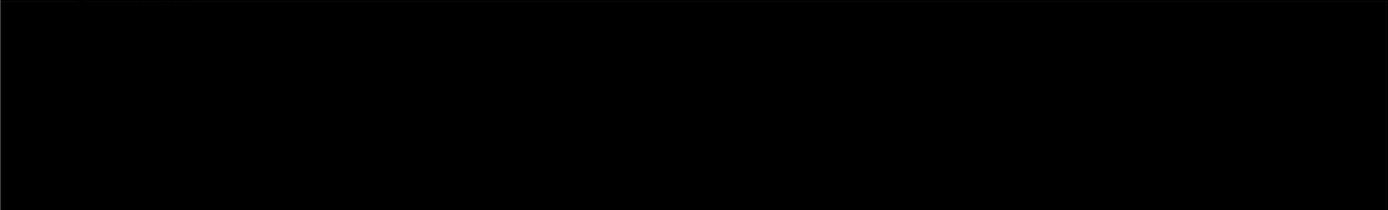
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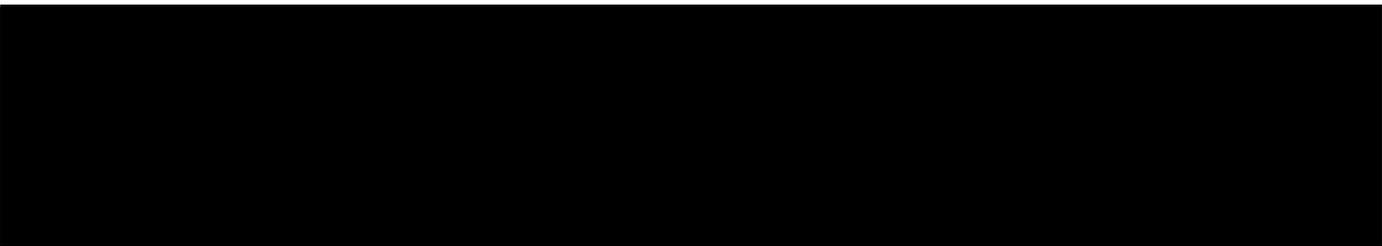
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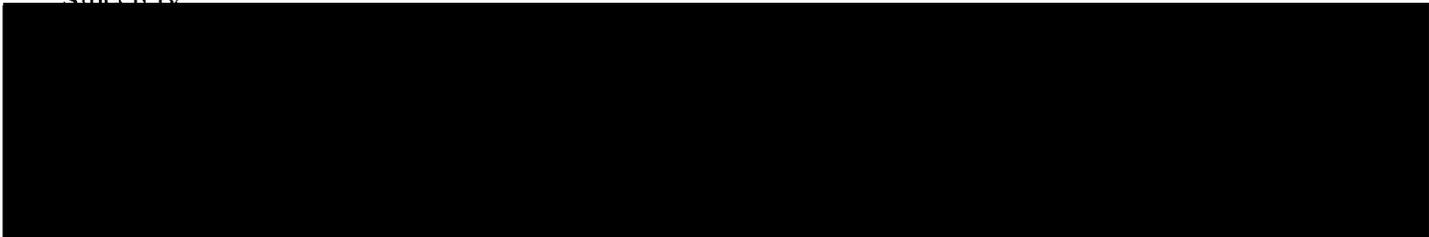
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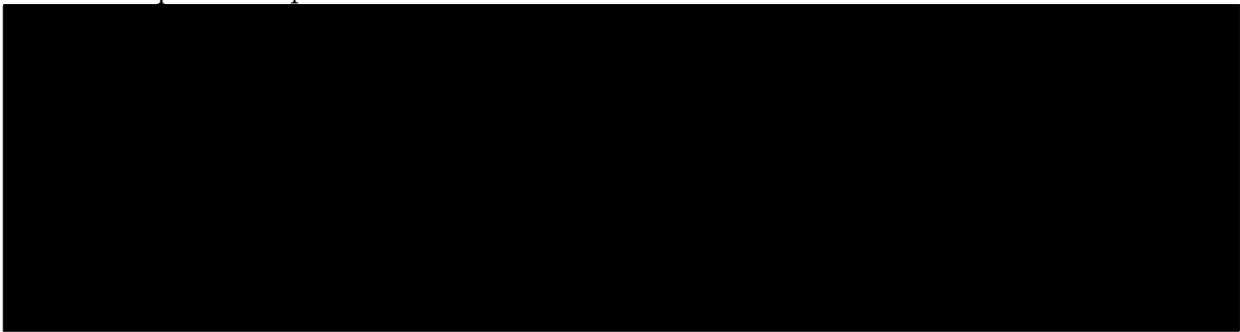
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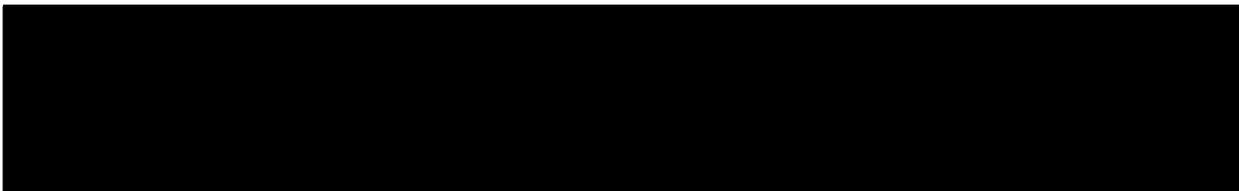
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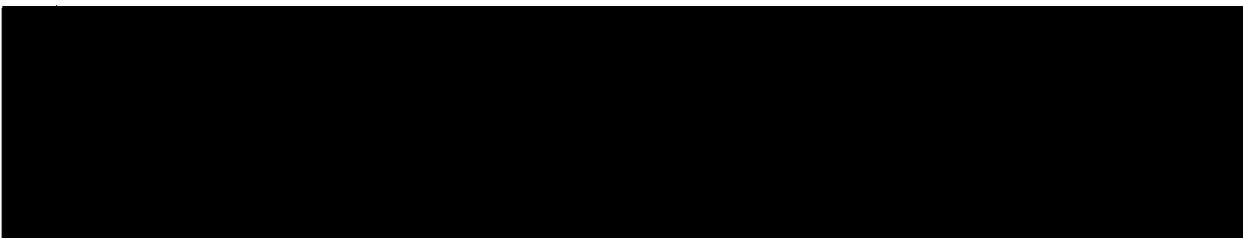
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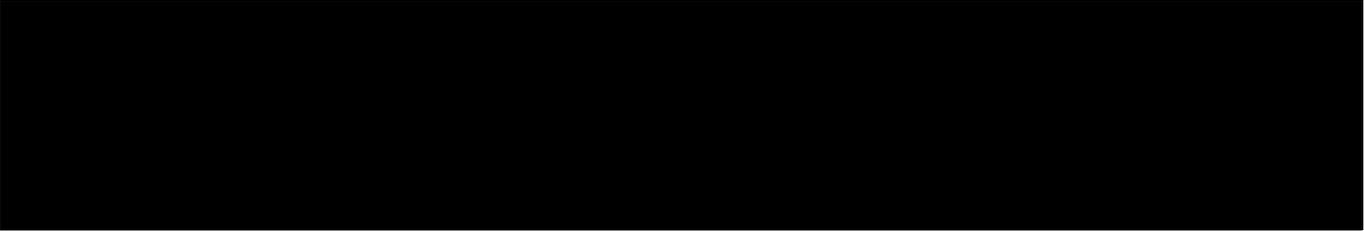
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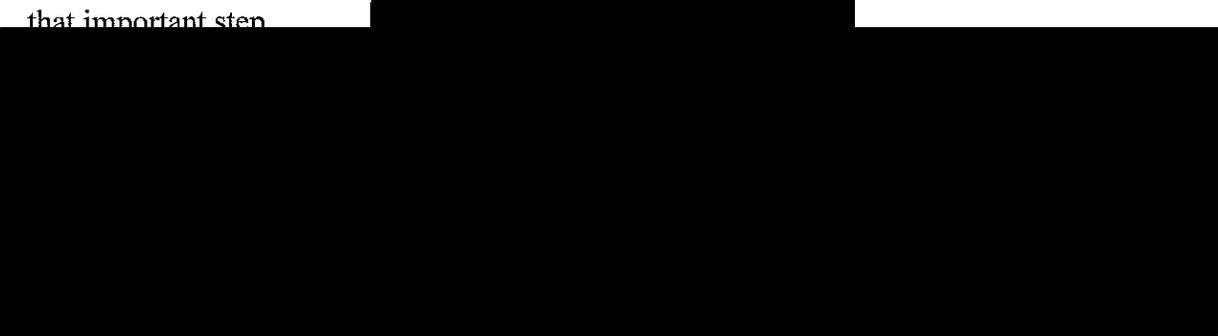
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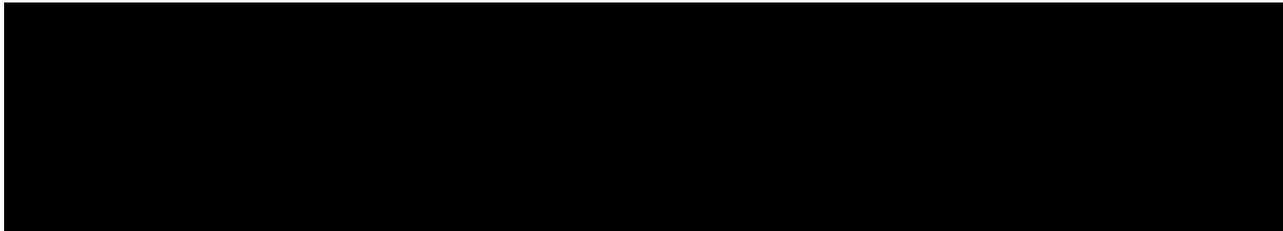
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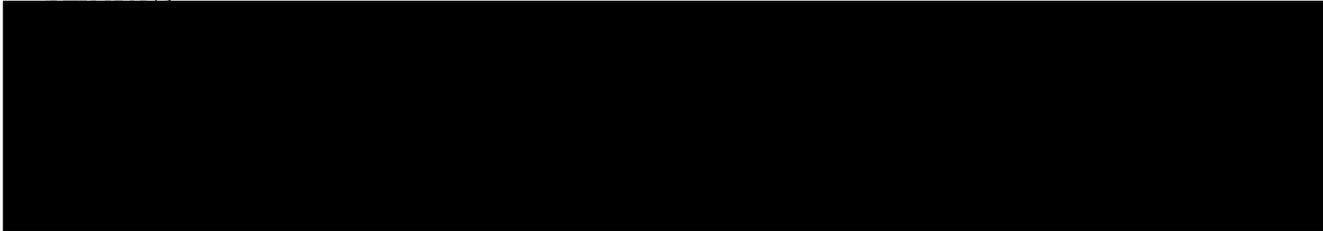
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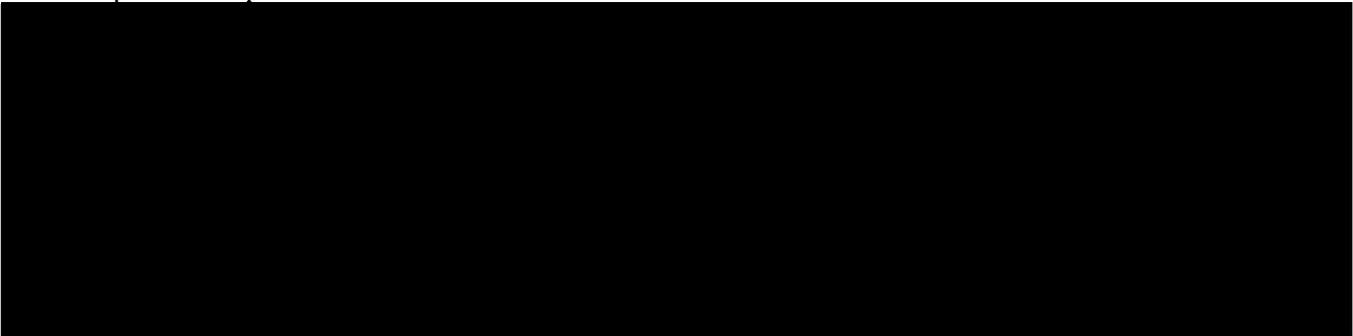
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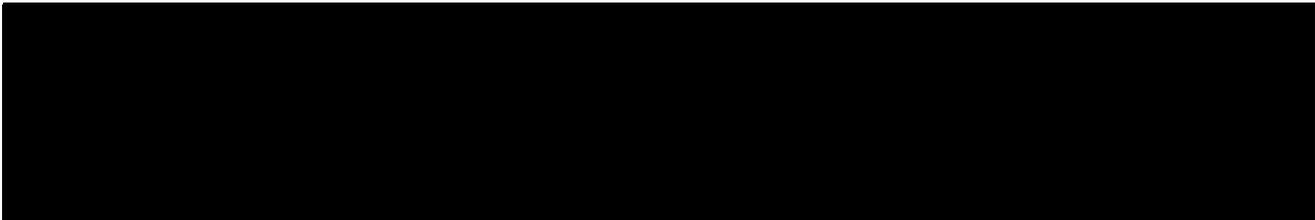
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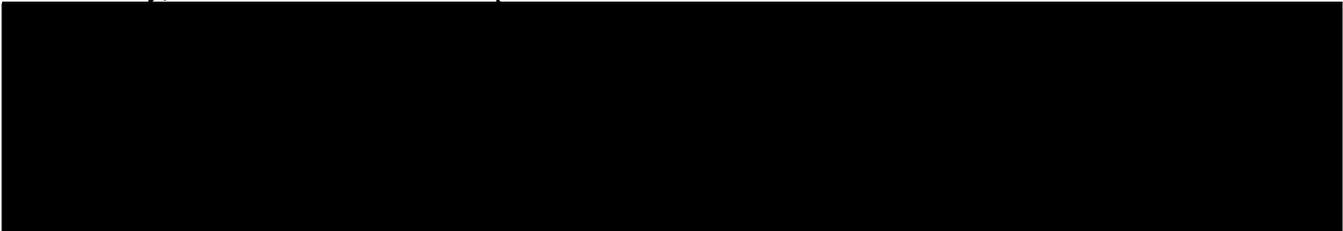
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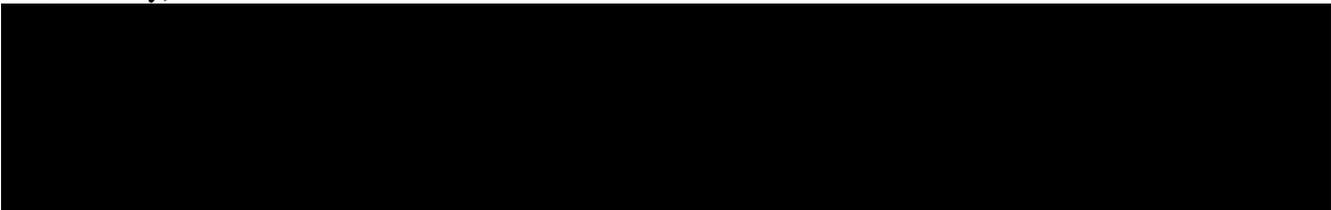
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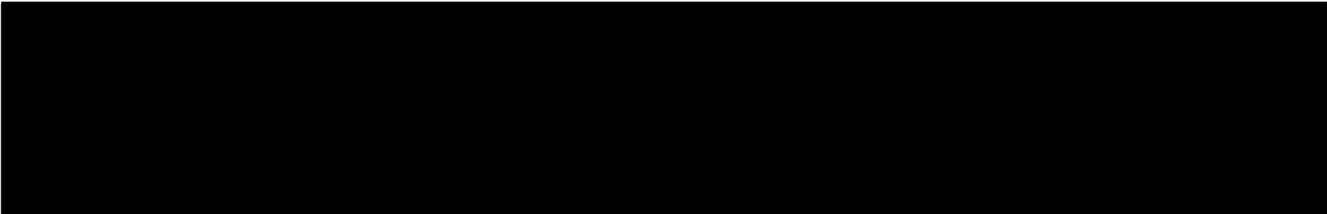
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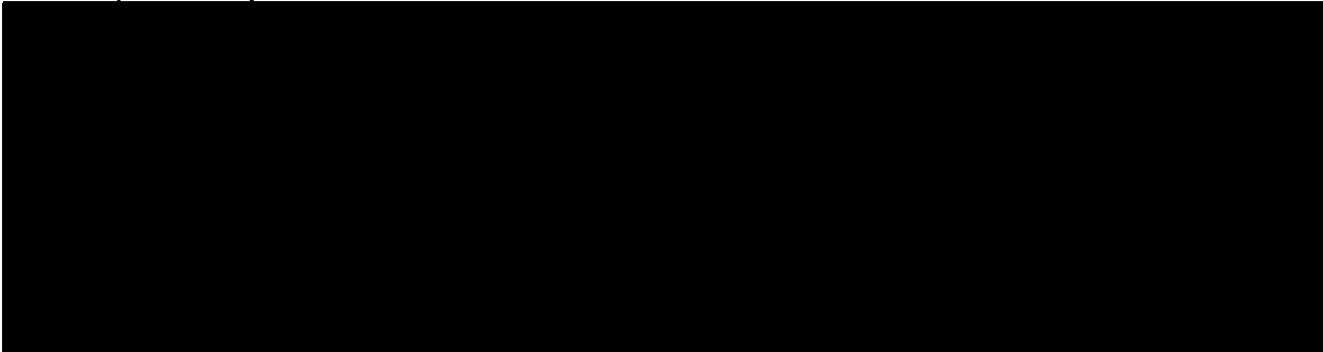
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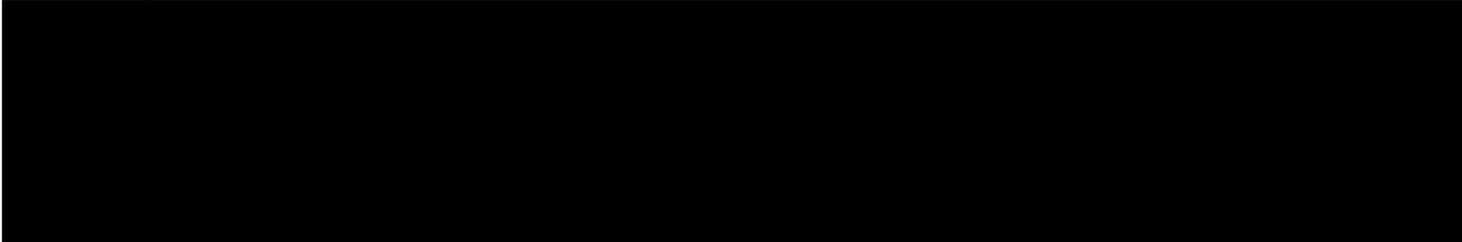
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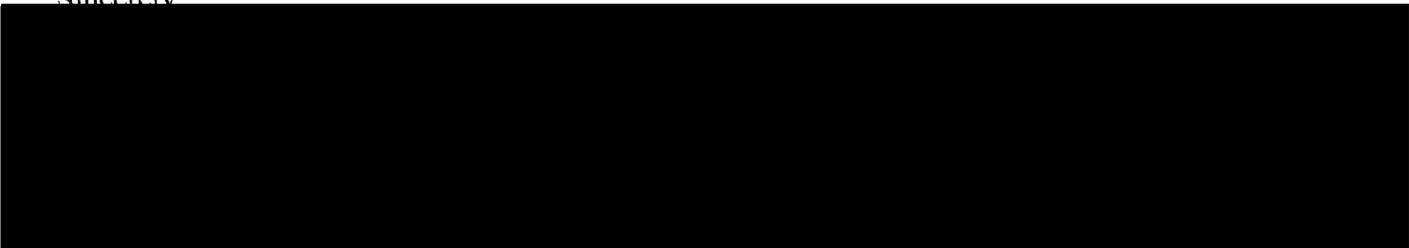
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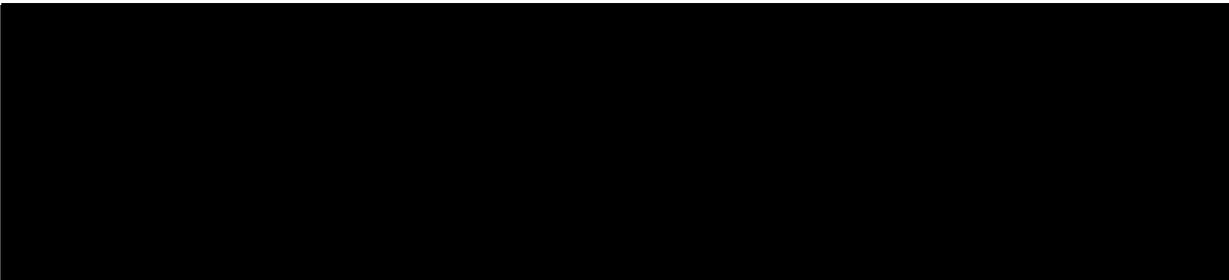
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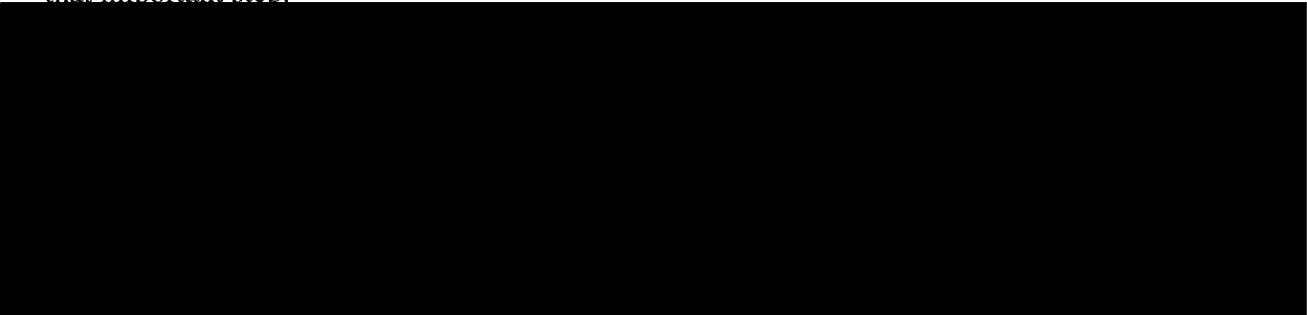
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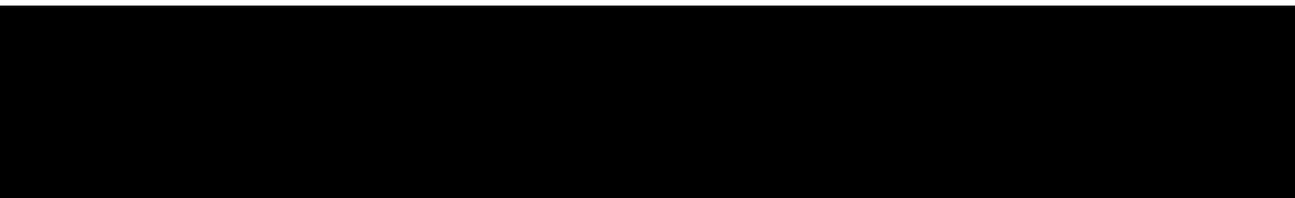
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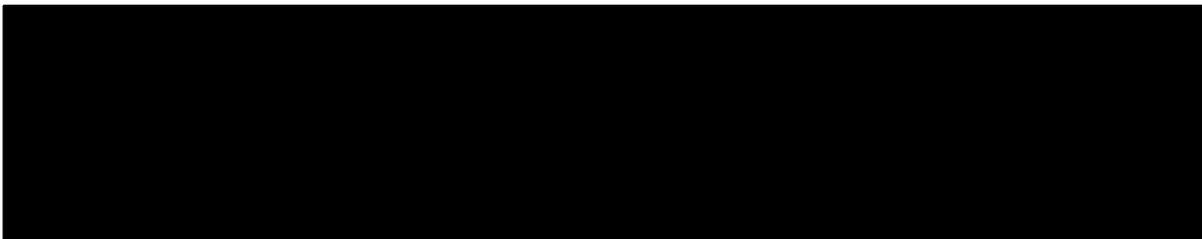
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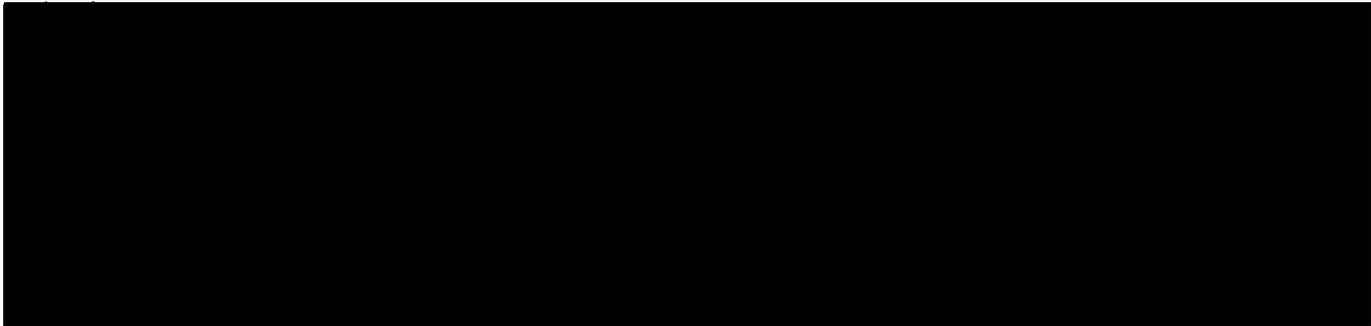
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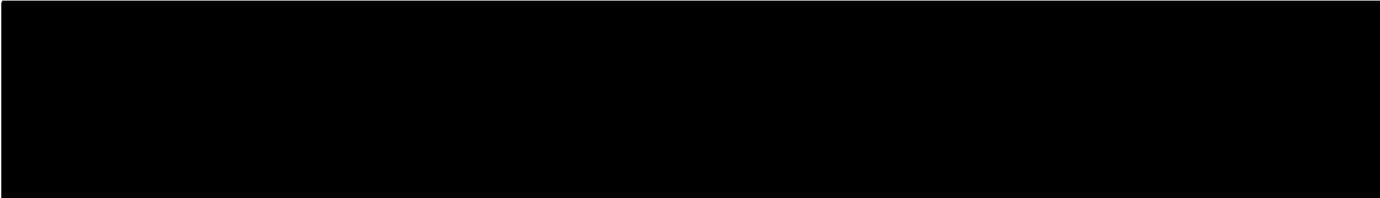
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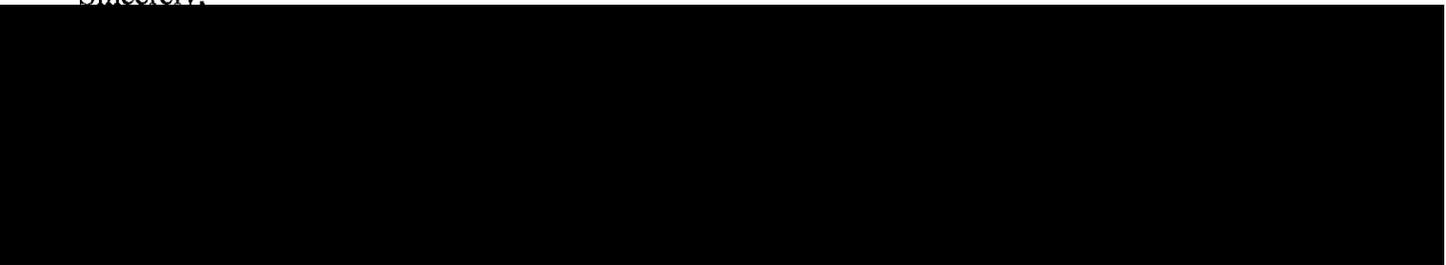
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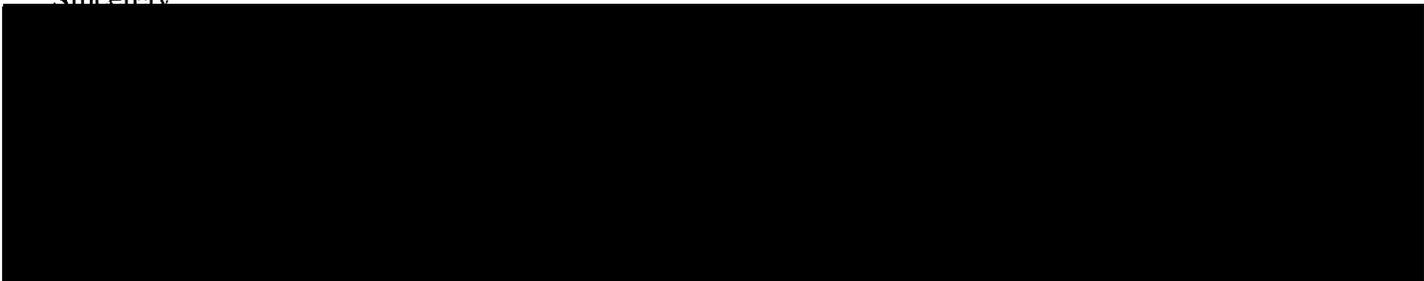
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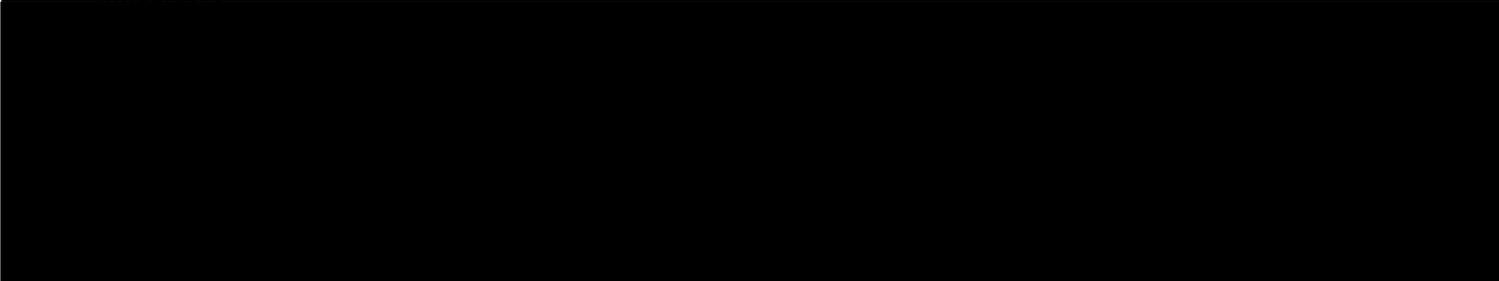
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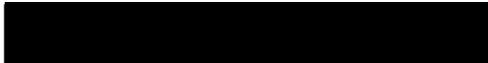
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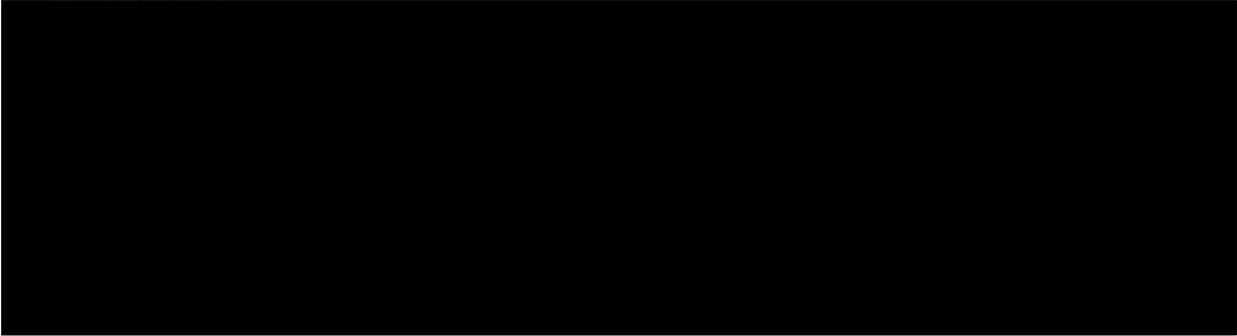
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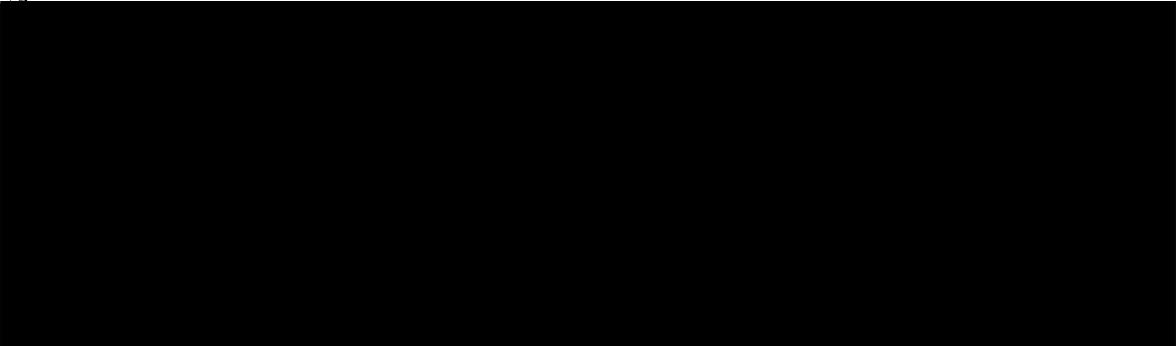
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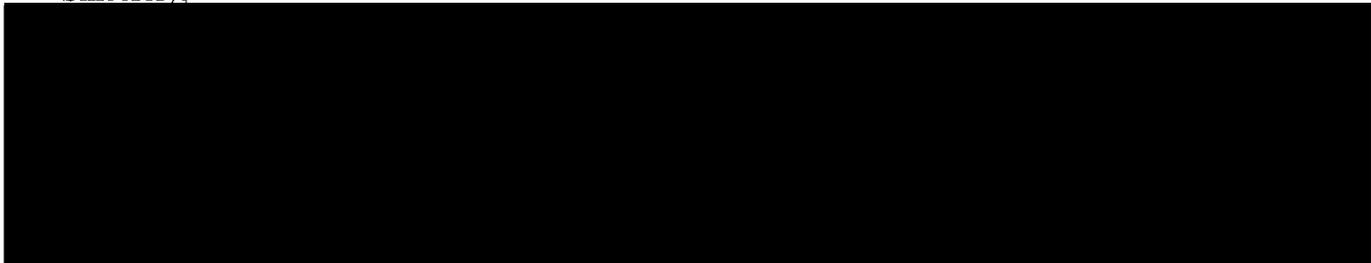
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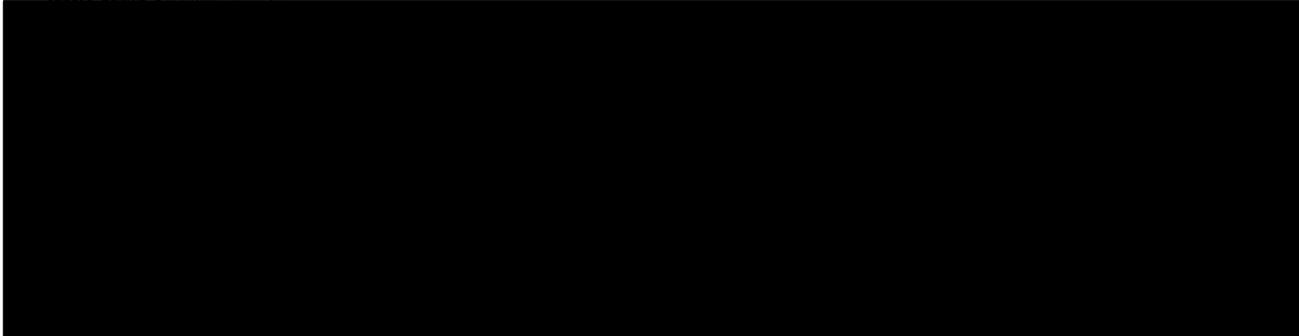
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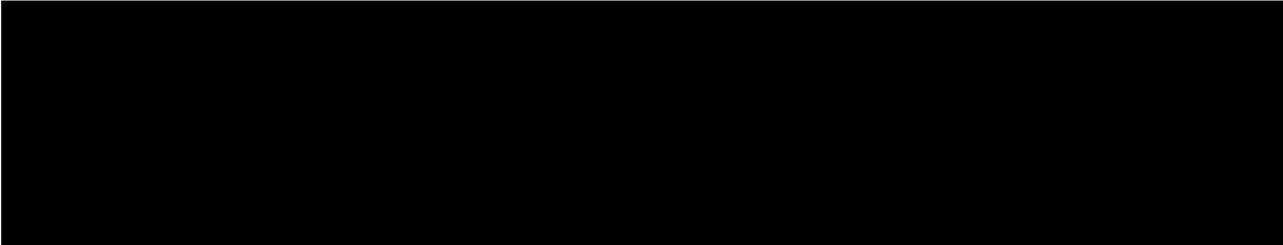
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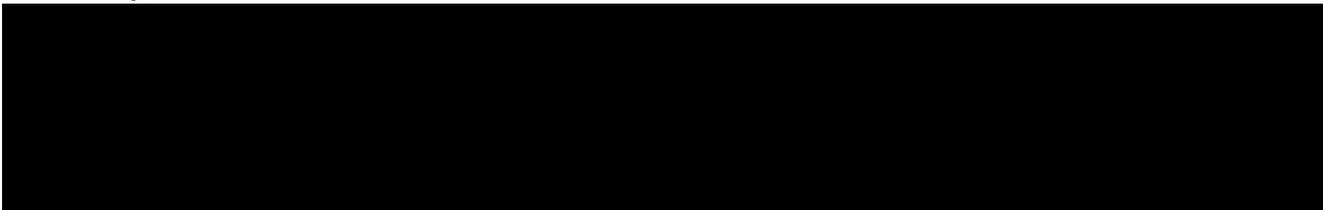
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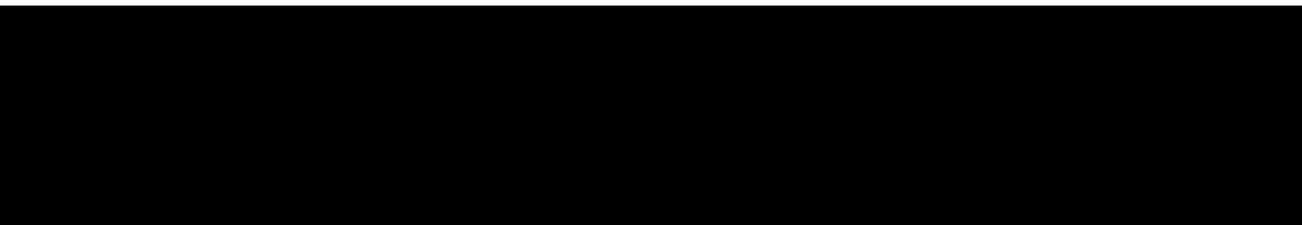
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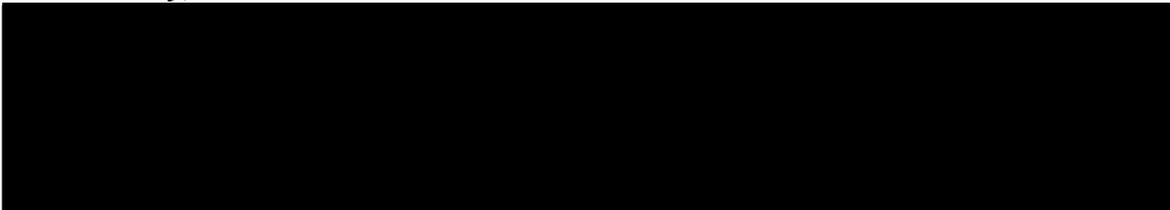
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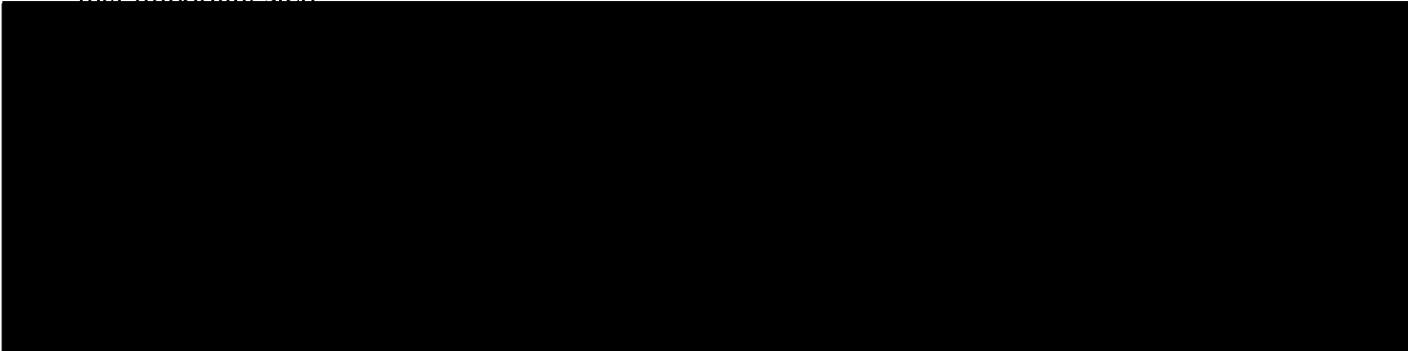
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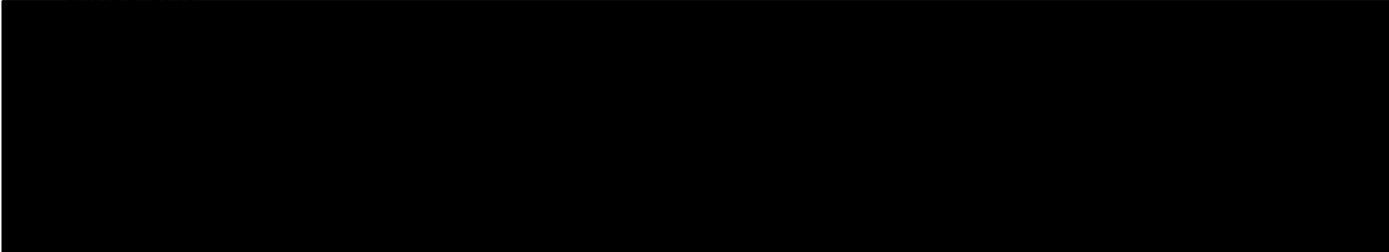
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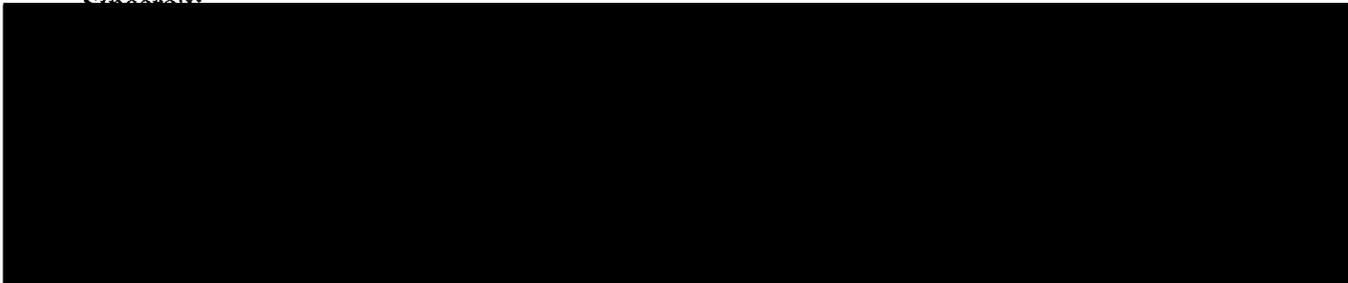
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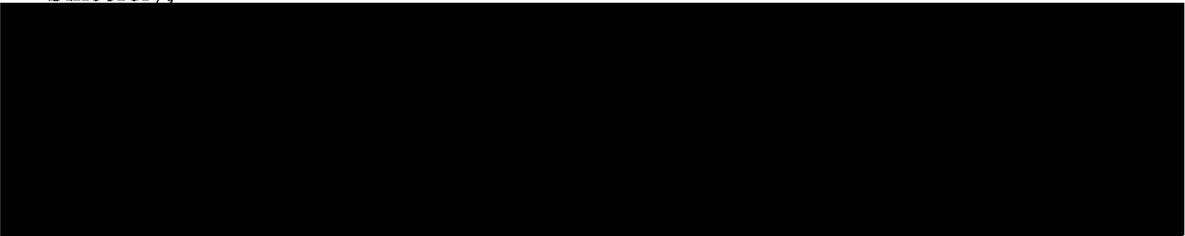
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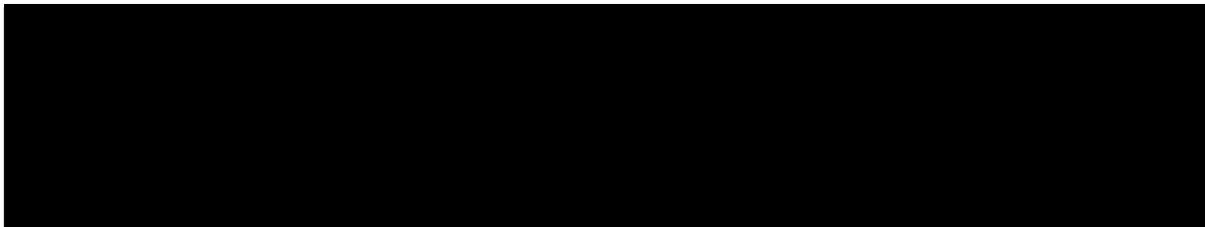
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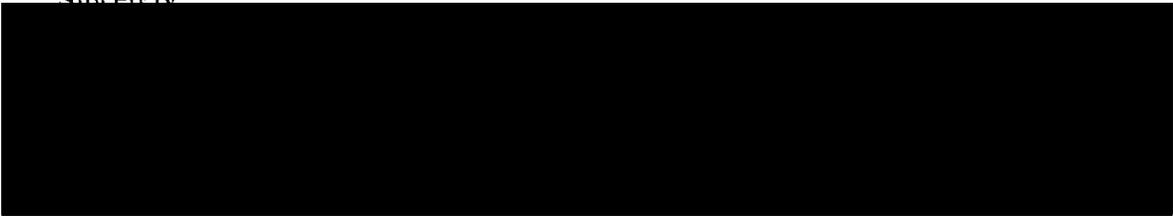
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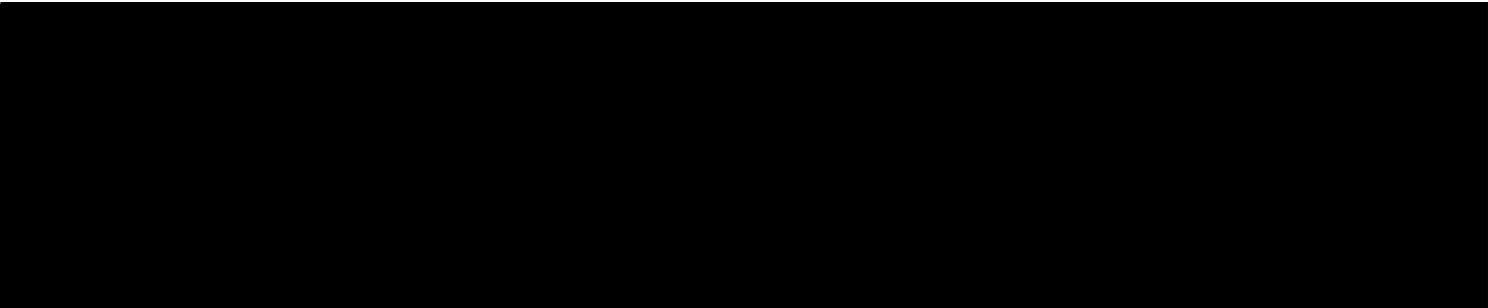
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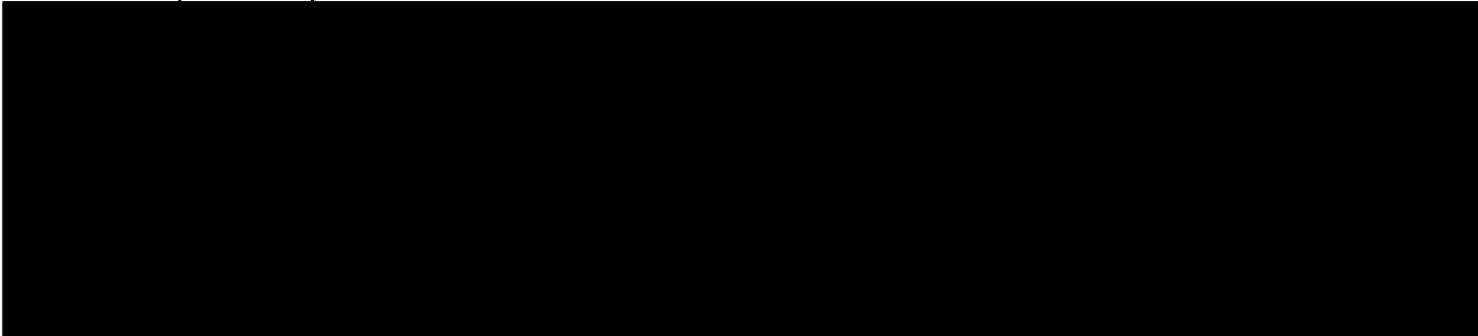
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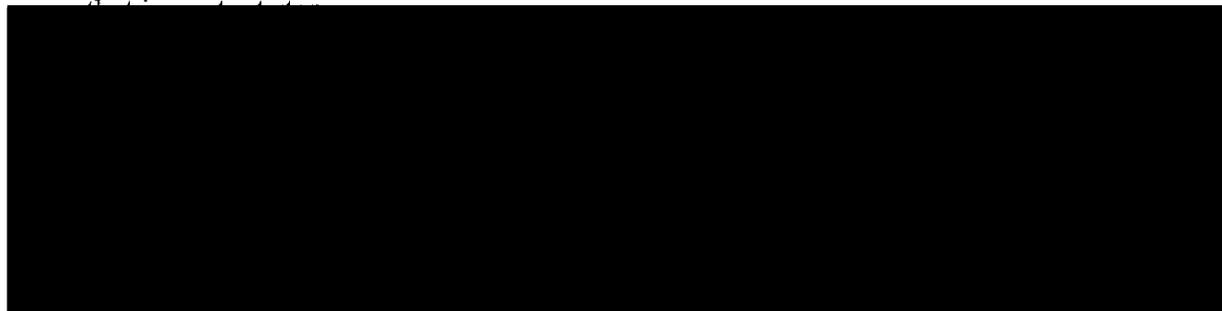
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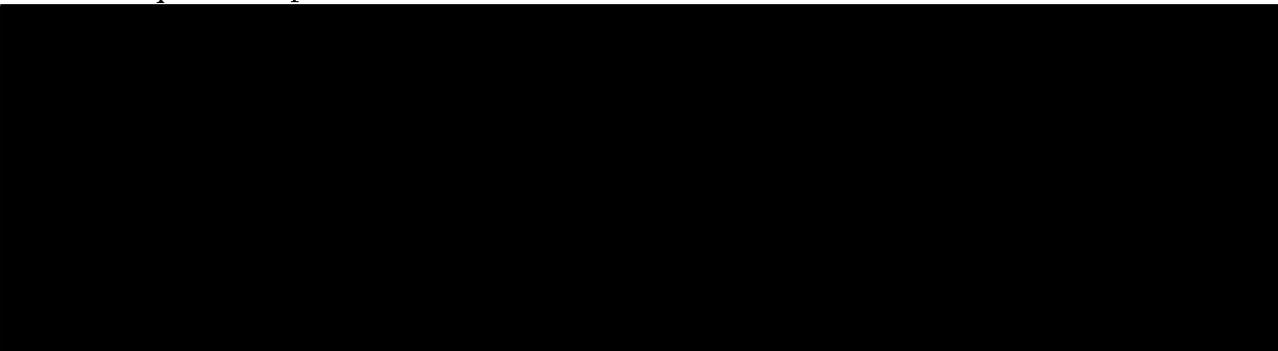
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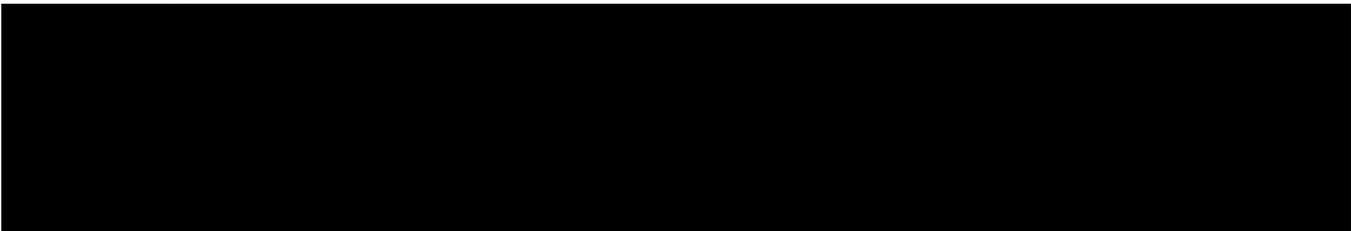
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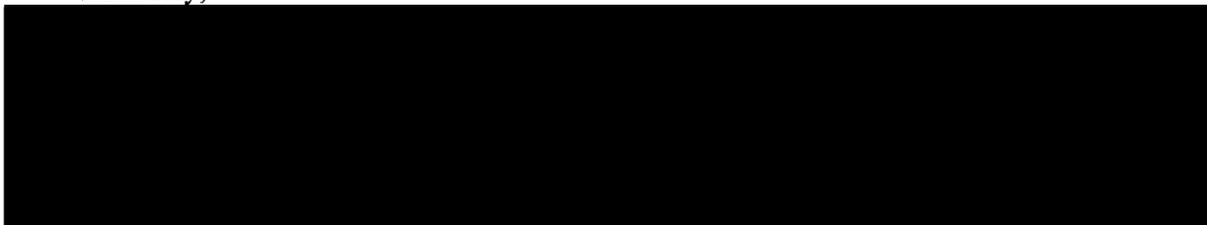
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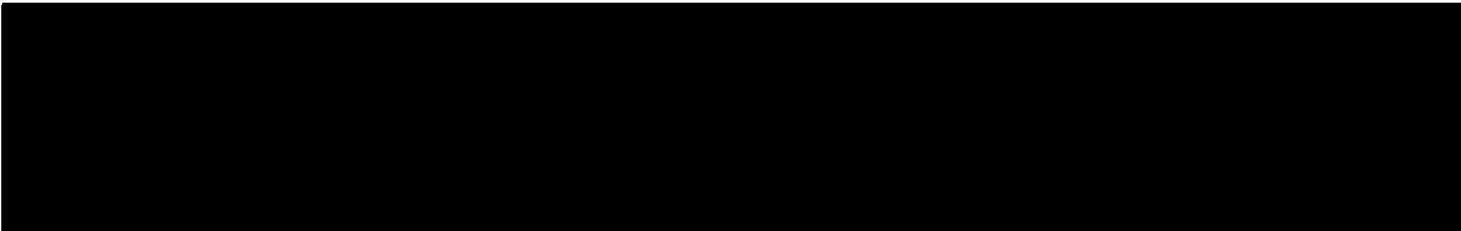
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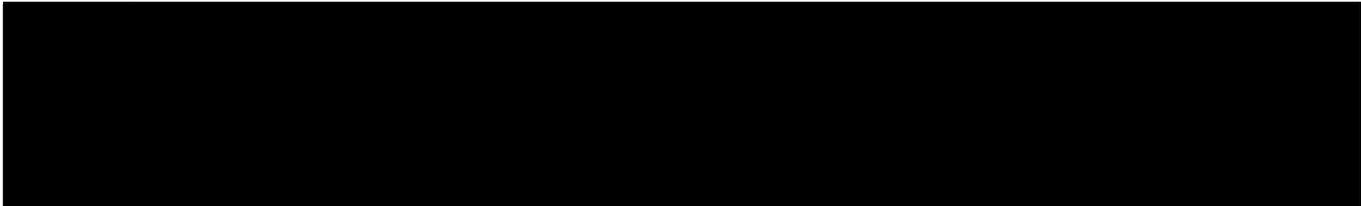
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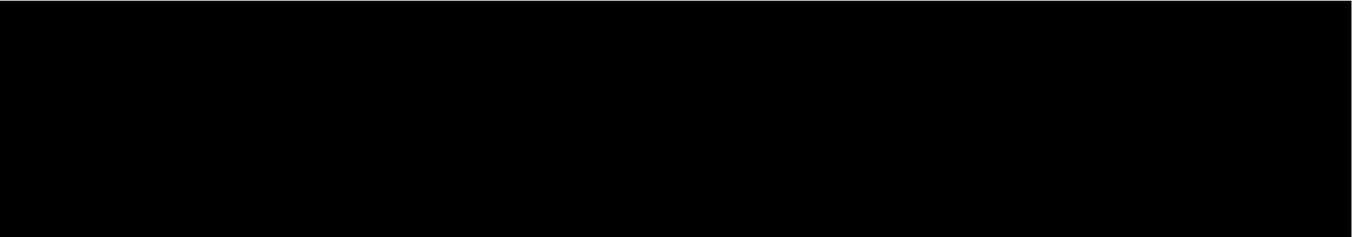
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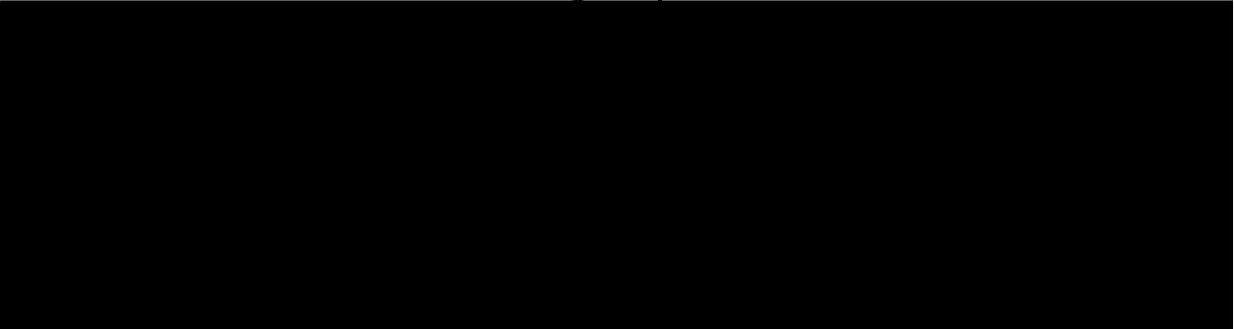
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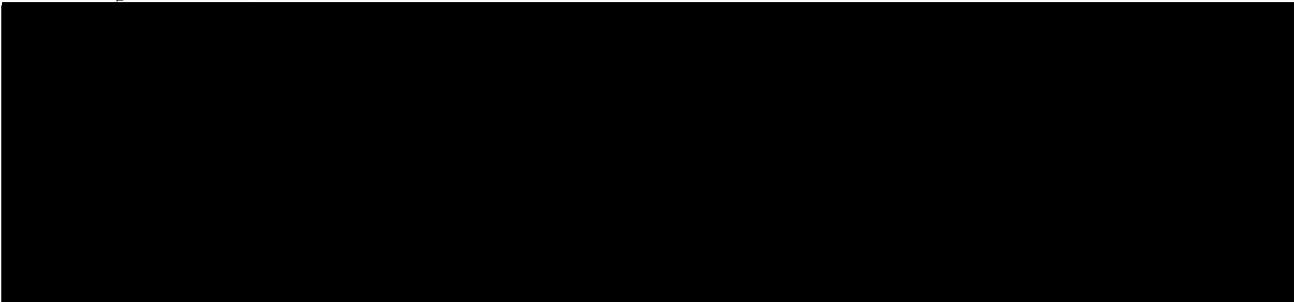
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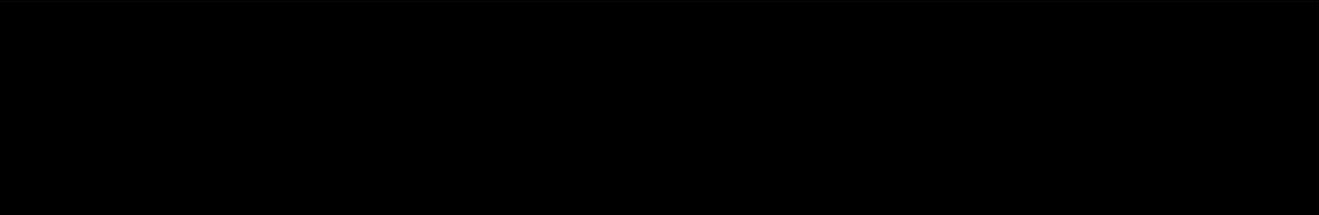
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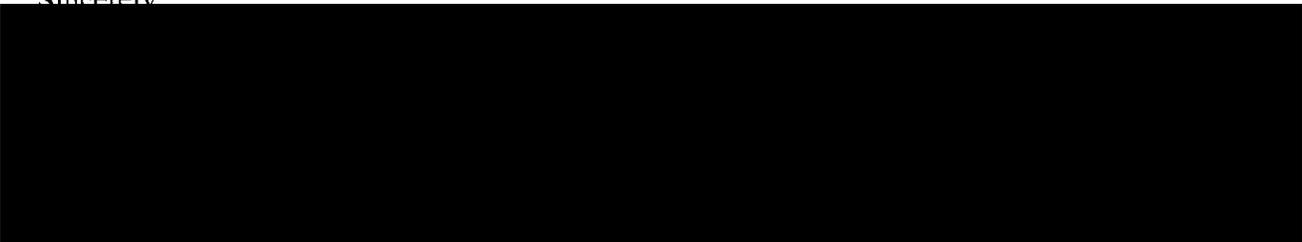
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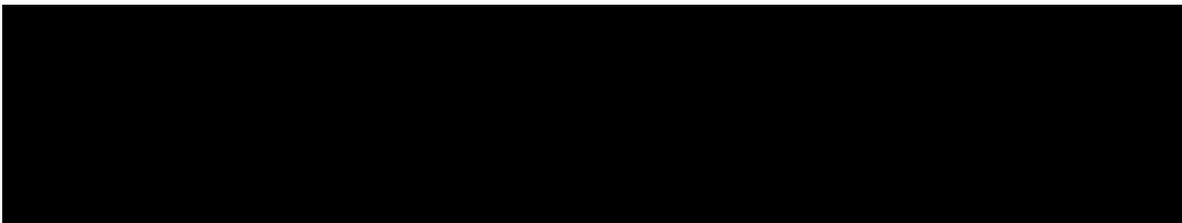
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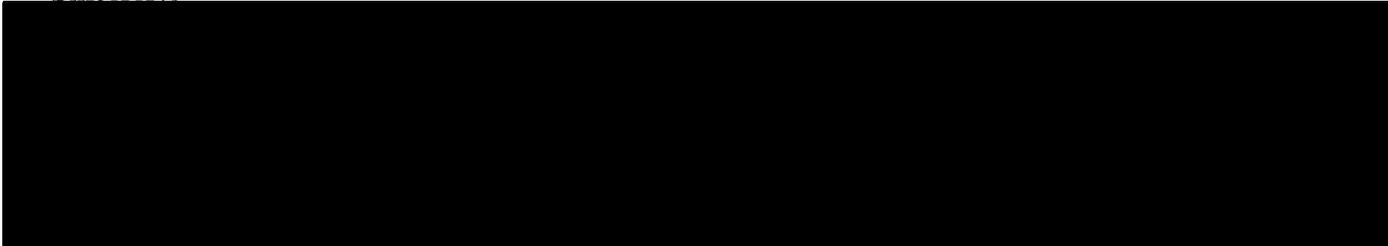
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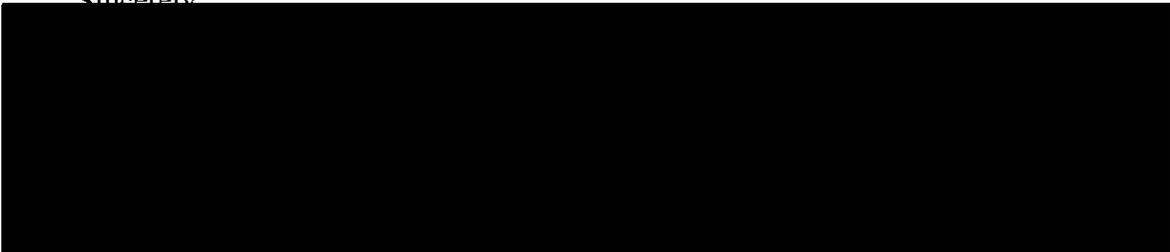
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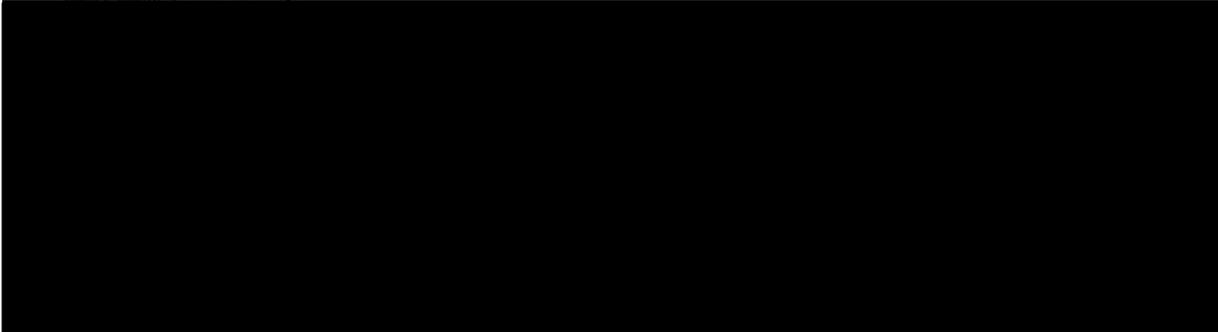
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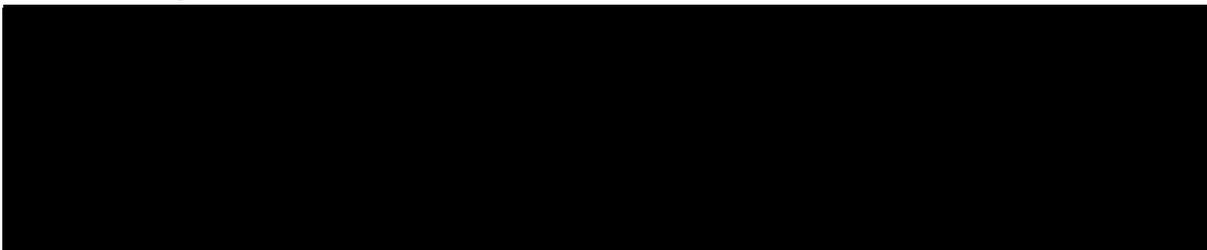
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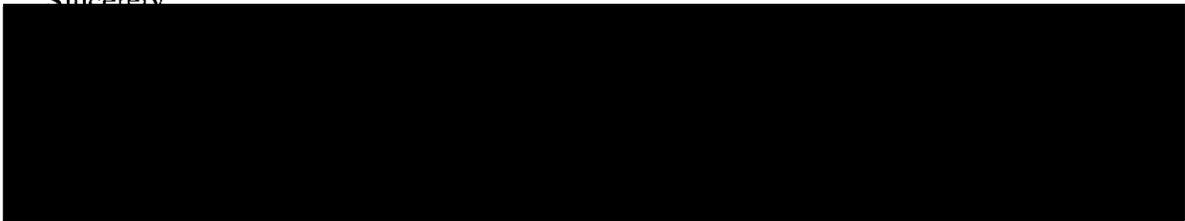
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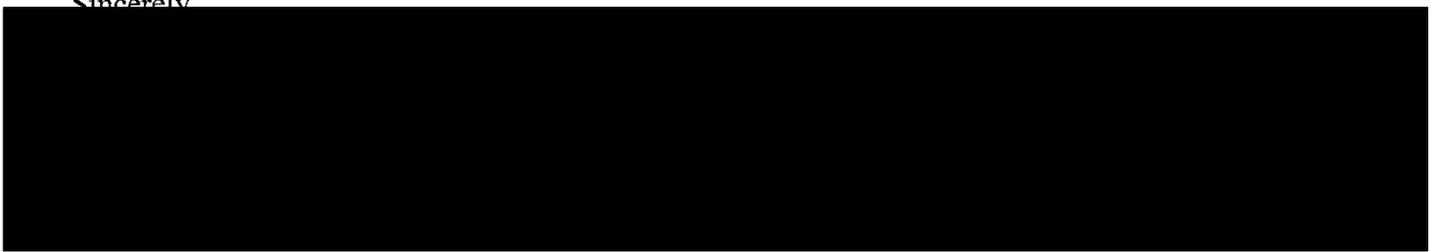
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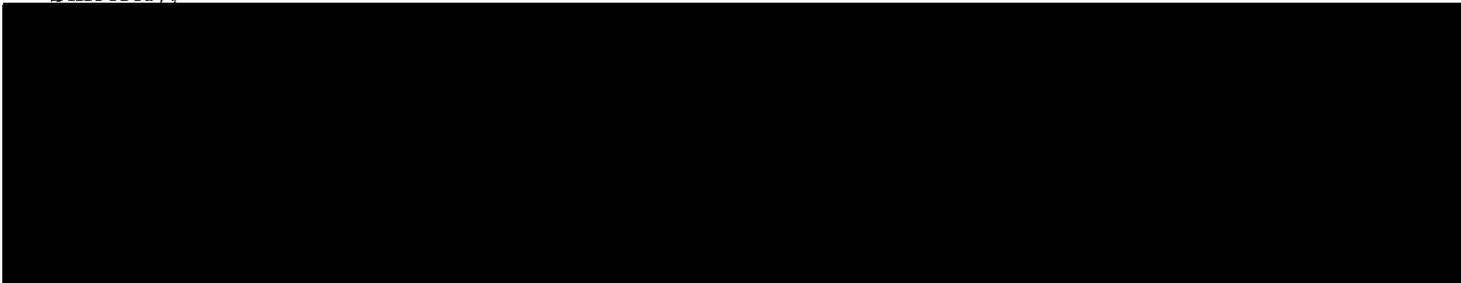
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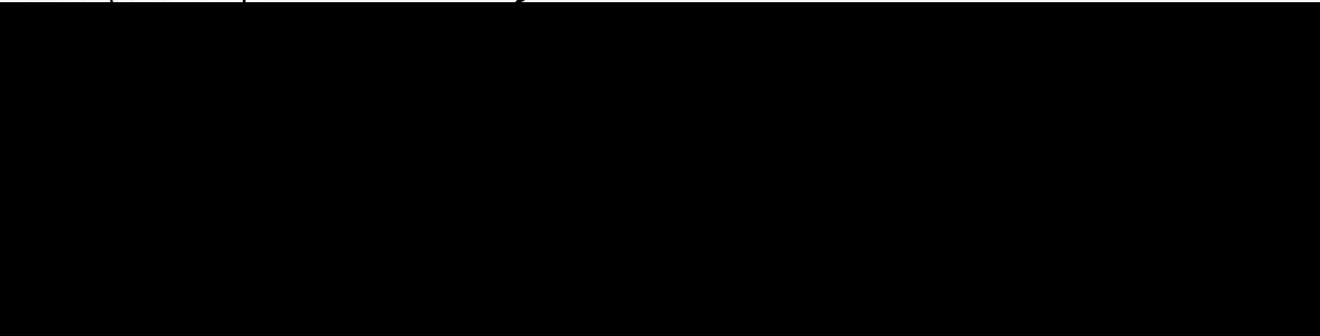
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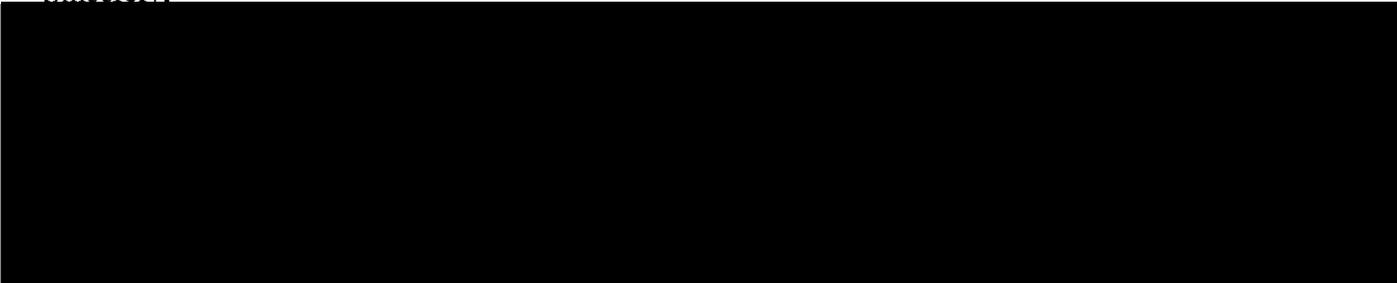
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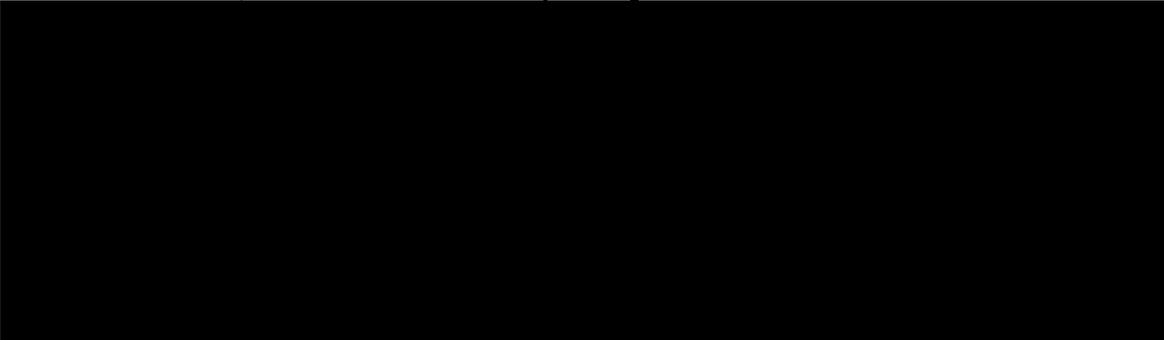
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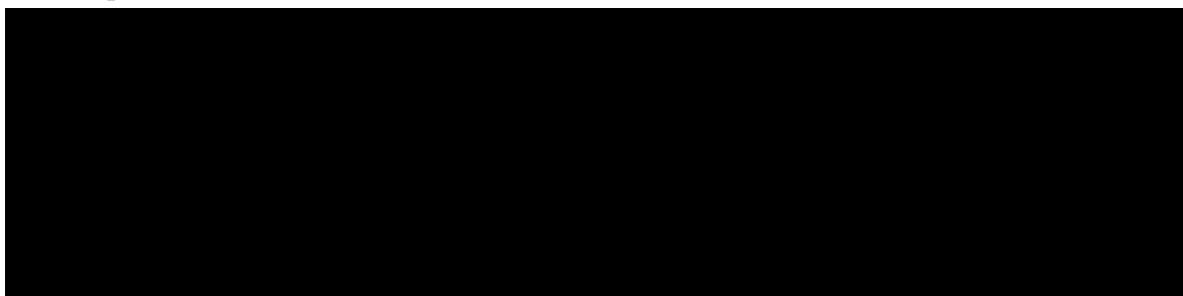
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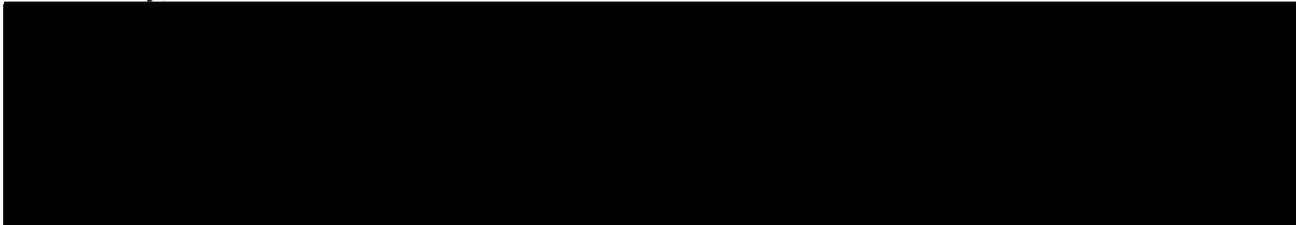
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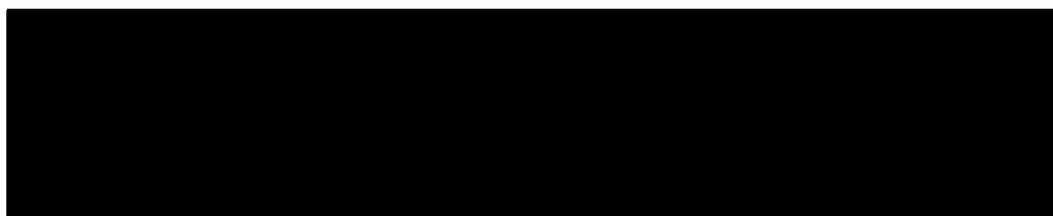
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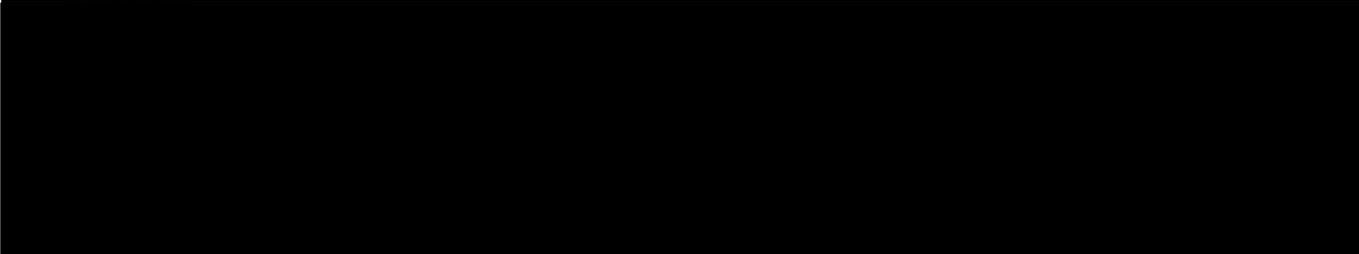
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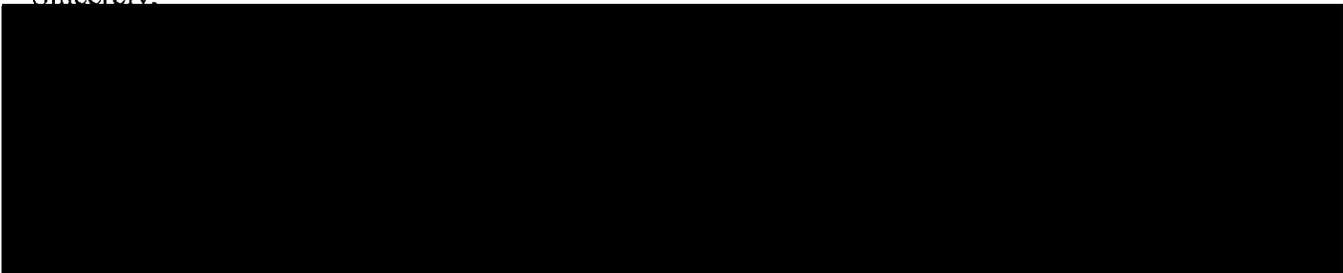
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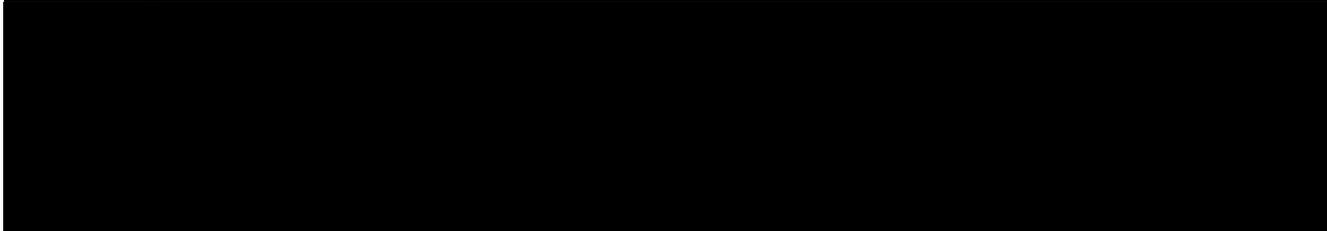
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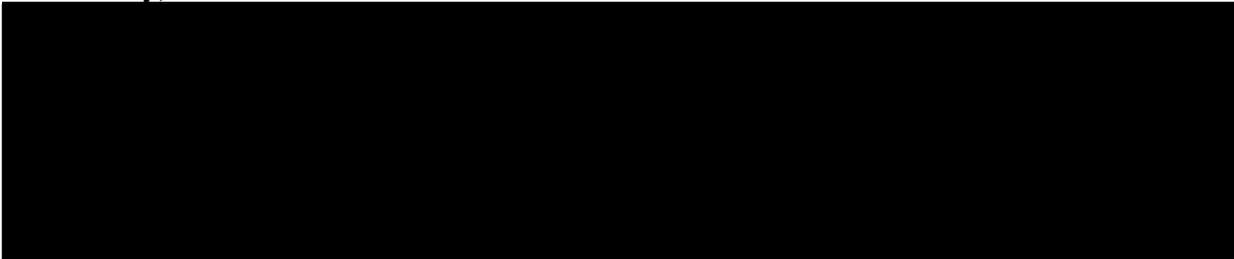
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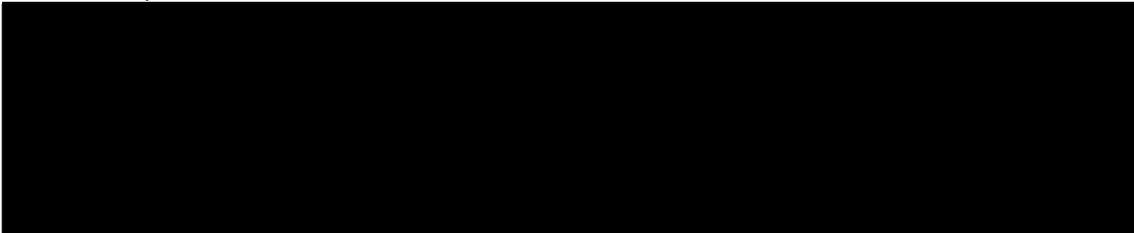
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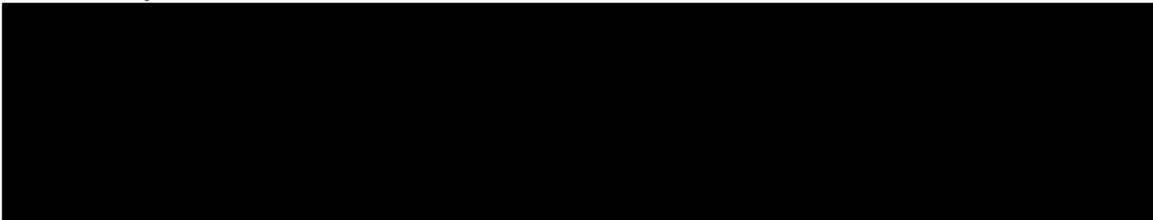
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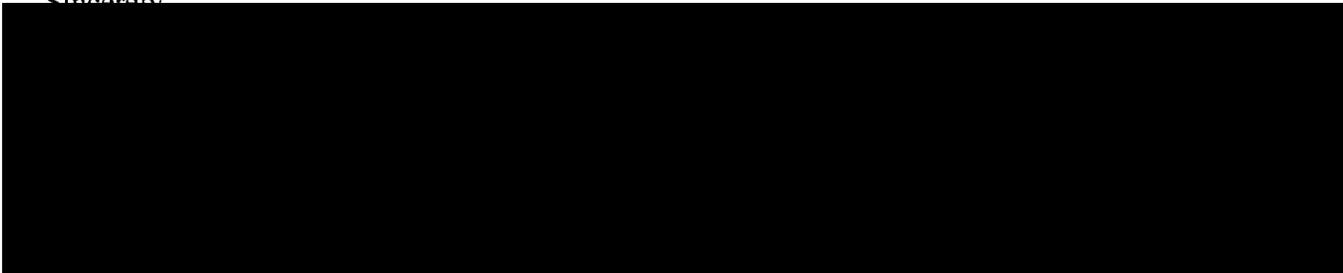
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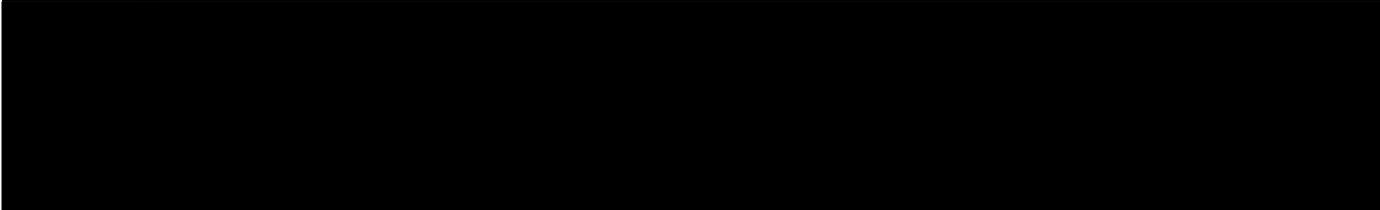
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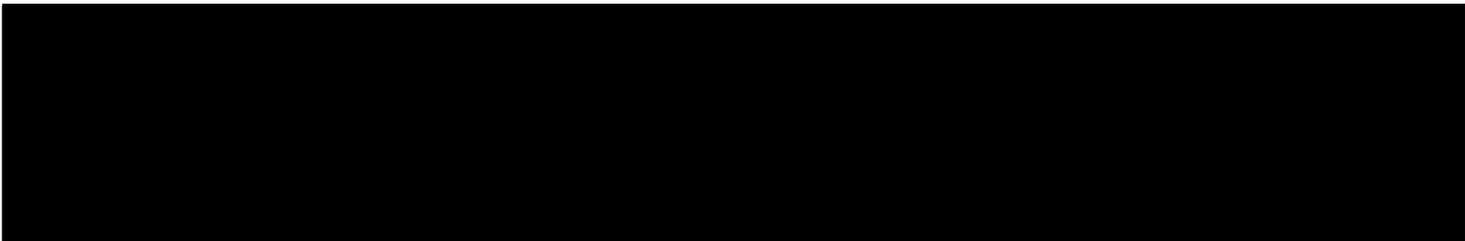
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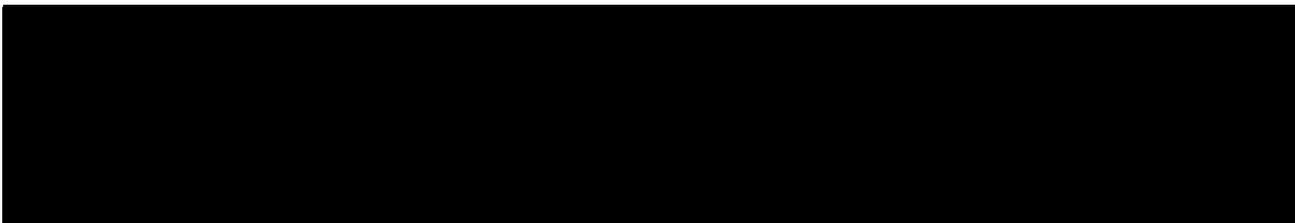
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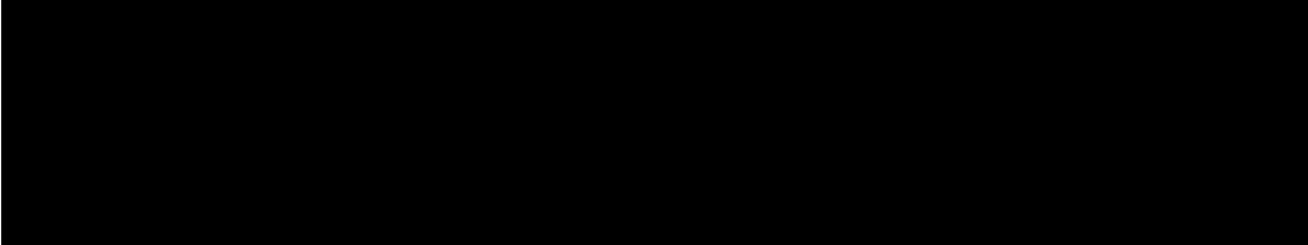
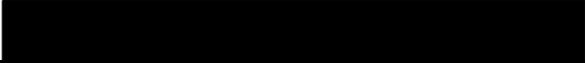
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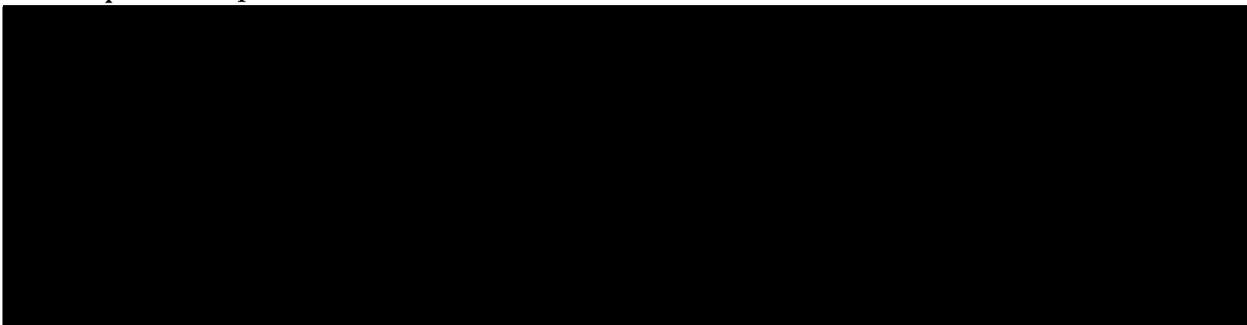
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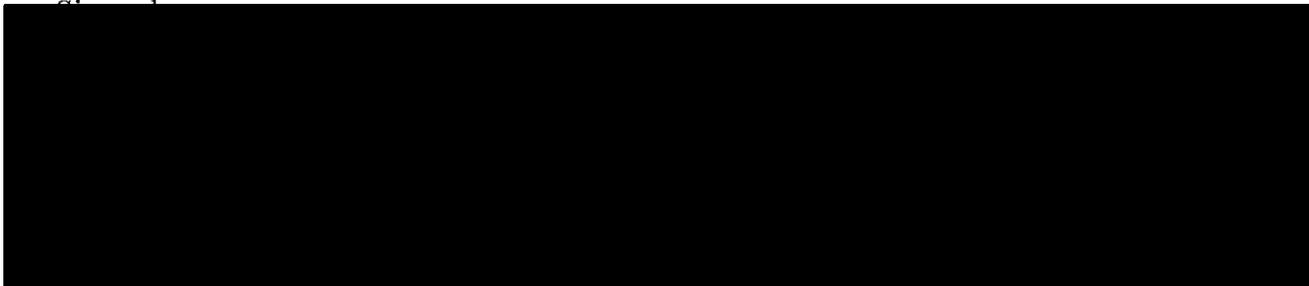
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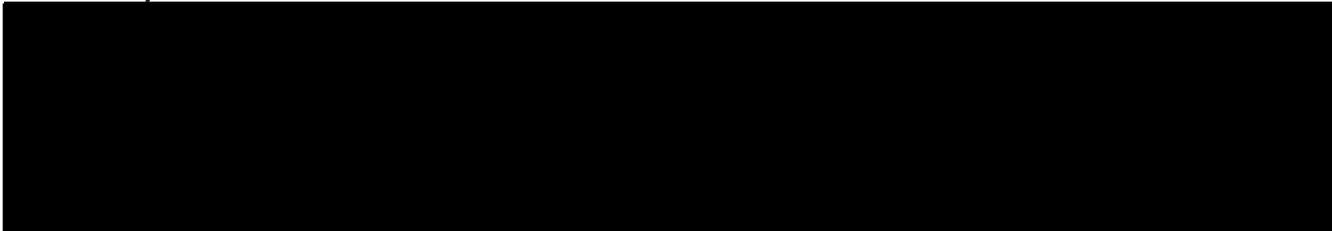
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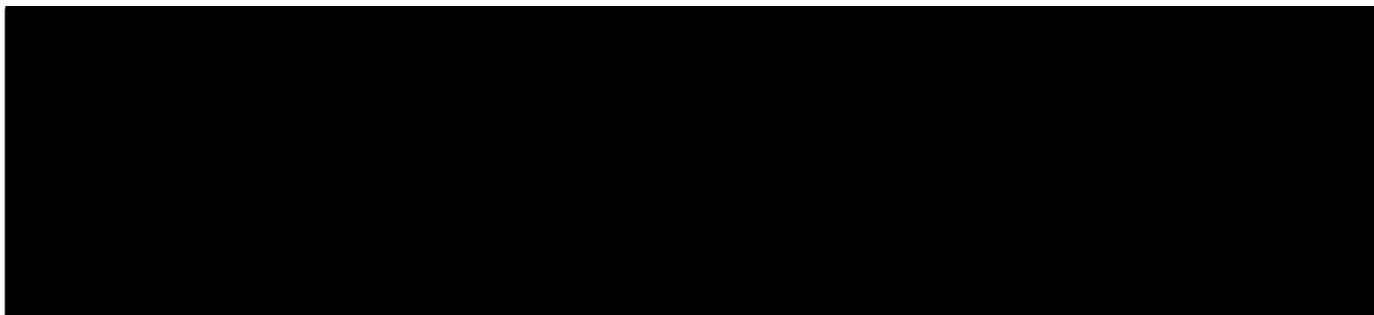
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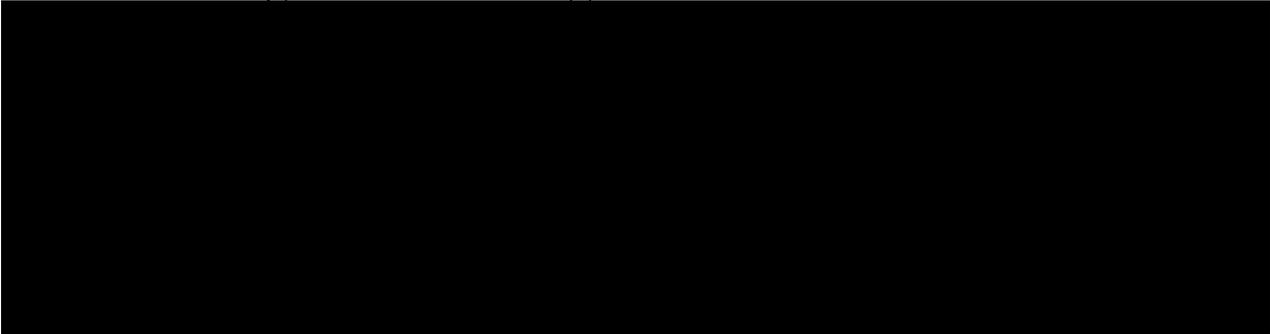
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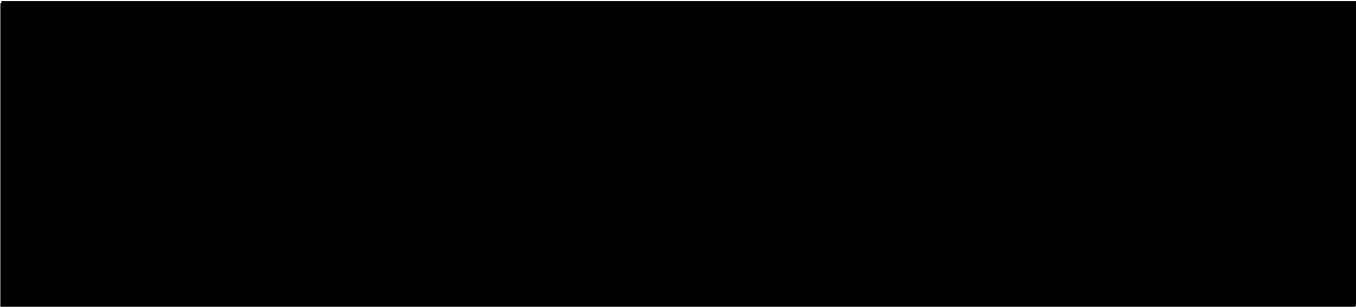
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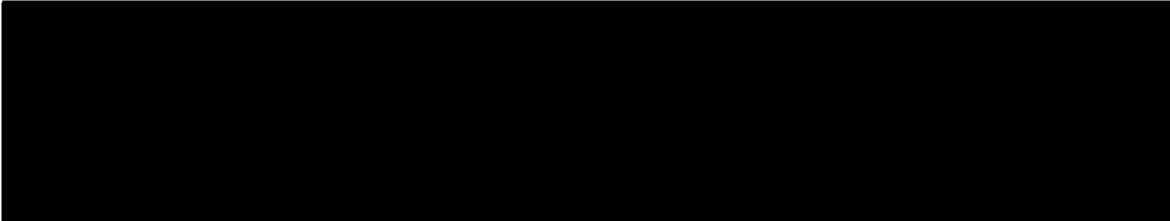
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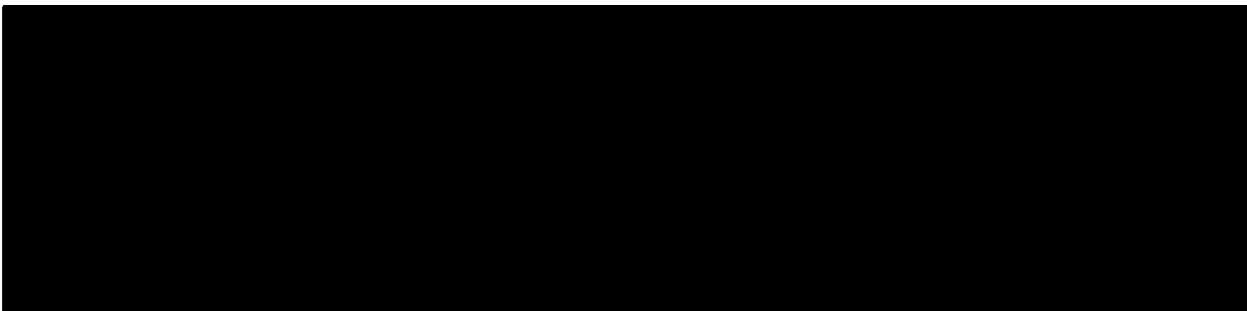
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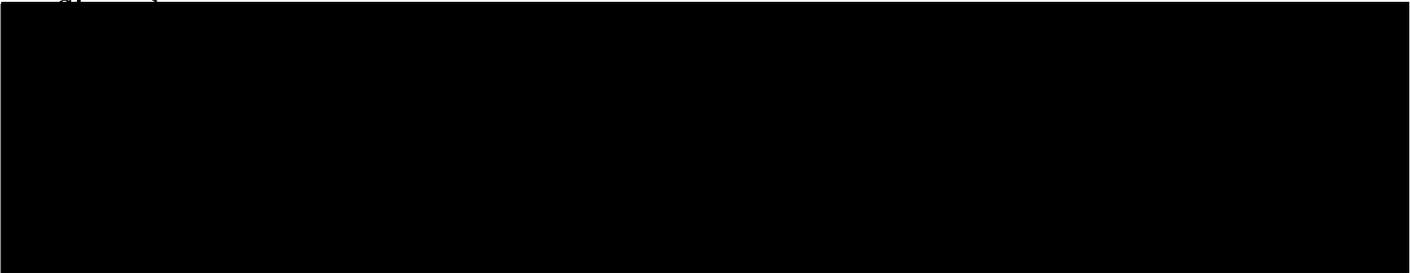
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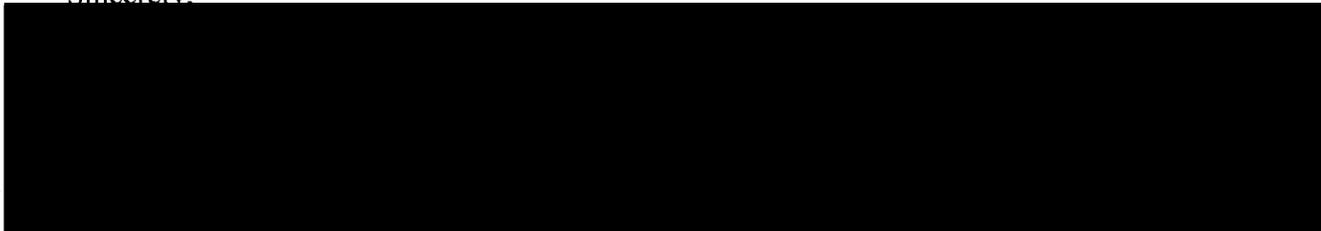
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In Section 302 of the Water Resources Development Act of 1996, Congress provided the Corps the specific authority to use Mobile Harbor dredged material to accomplish environmental restoration. It is time the Corps finally did the right thing and tell the Alabama State Port Authority that together they must develop and implement an acceptable Mitigation Plan to correct the adverse effects the Mobile Harbor project is having on the erosion of Dauphin Island – Alabama's only barrier island. The impending Draft GRR is the appropriate vehicle to take that important step.

Sincerely,



March 31, 2018

COL James A. DeLapp
U.S. Army Corps of Engineers, Mobile District
109 Saint Joseph Street
Mobile, AL 36602

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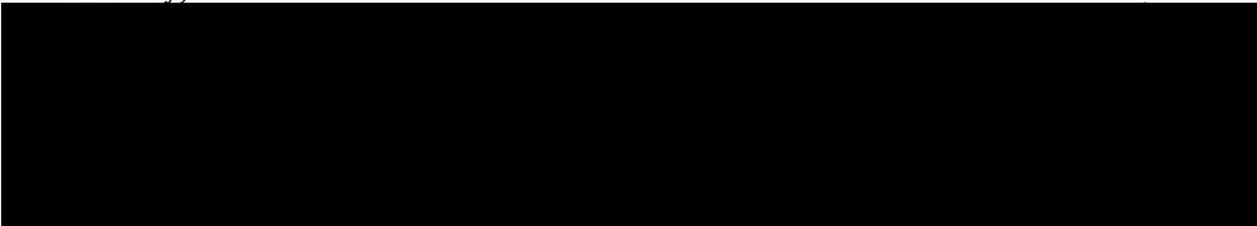
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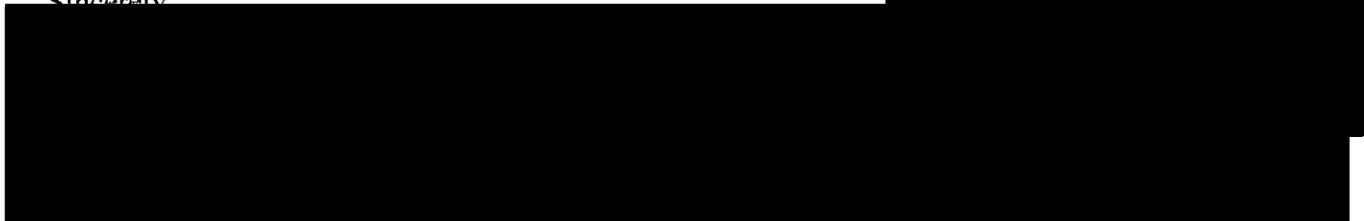
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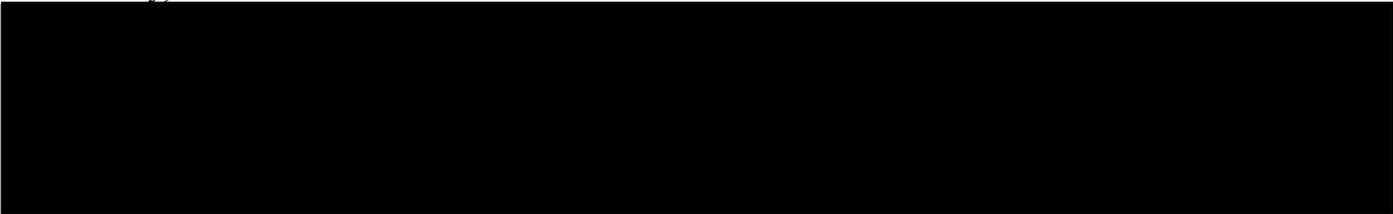
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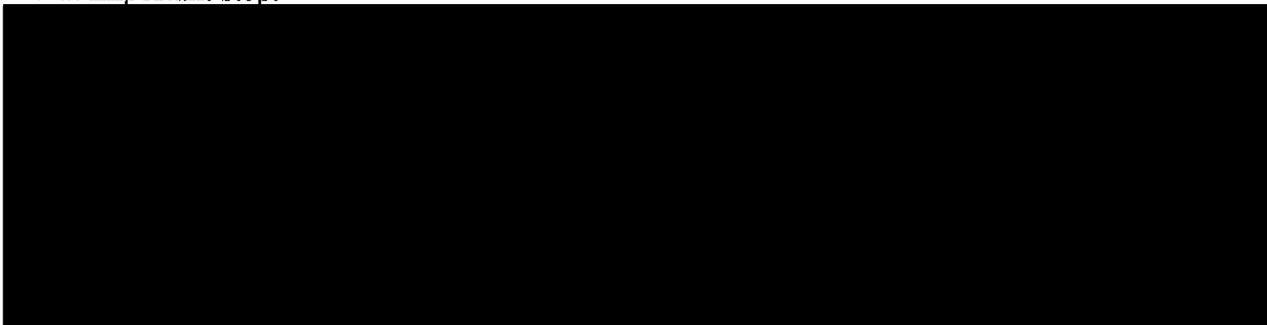
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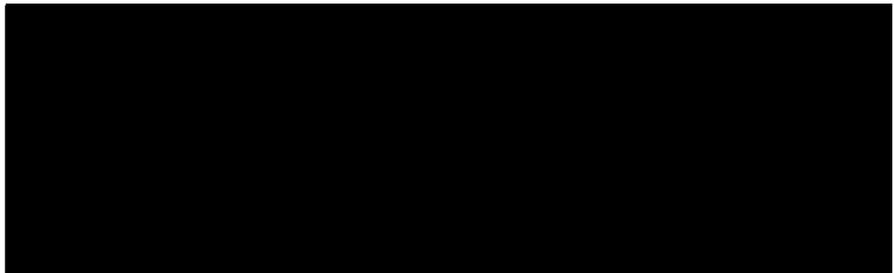
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March 27, 2018

U.S. Army Corps of Engineers,
Mobile District,
ATT: PD-F
P.O. Box 2288
Mobile, AL 36628

RE: Mobile Harbor GRR/EIS

I received a March 2, 2018 letter from C. Patrick Hogeboom IV, Colonel and Acting Commander South Atlanta Division in reply to my letter to Curtis Flakes and a copy of my to Brigadier General Diana Holland. In his letter, Col Hogeboom stated "Our Mobile District Commander, Colonel James DeLapp, assures me and I am advised has previously assured you that the Mobile District will fully evaluate effects of the proposed channel improvements and options for placement of dredged material within the study area, including Dauphin Island. The next point in the Corps decision process is formal consideration of Mobile District's recommended Tentatively Selected Plan (TSP), currently scheduled for March 28, 2018. If a TSP is approved, Mobile District will be directed to prepare a draft integrated GRR/EIS to be released for formal public comment, currently expected to be July 2018." My letter from Col Hogeboom is attached for reference.

Col Hogeboom's statement "will fully evaluate effects of the proposed channel improvements and options for placement of dredge material in the study area" is incorrect, since Corps employee Justin McDonald stated in a December 12, 2017 meeting I attended that the GRR will only evaluate the effects of the disposal alternatives considered on the Dauphin Island shoreline as it exists today. In other words whatever condition the Dauphin Island shoreline is now will continue to exist. And the Island is in a weakened state due to the continued erosion of the years of maintenance dredging. Please explain how the Mobile District will fully evaluate the effects of the Corps planned widening and deepening of the Mobile Navigation Channel. This should also address the historic sand loss going back to the 1980 Environmental Impact Statement.

At the February 22, 2018, Corps of Engineers Update on the Mobile Harbor General Reevaluation Report, the Mobile District stated that 50% of the Outer Bar Channel dredged sands placed in the so-called Sand Island Beneficial Use Area (SIBUA) are accumulating and not being reincorporated into the natural littoral drift system. Since 1999, when the SIBUA began to be used, Dauphin Island has been deprived of at least 7 million cubic yards of beach quality sands, causing significant erosion of the Island's shoreline. This impact will be made worse each time the Outer Bar Channel is dredged in the future.

It is apparent that the Corps must identify an alternative disposal site to **place dredged sands in shallow water less than 20 feet deep** to assure that dredged beach quality sands are effectively bypassed across the Outer Bar Channel to be reincorporated into the natural littoral drift system. The Corps can accomplish this under the authority provided by Section 302 of the Water Resources Development Act of 1996, with the Mobile Harbor Federal Standard being adjusted accordingly as already directed by Corps higher authority in its May 30, 1997 directive to the Mobile District. This memorandum is attached for your reference.

Federal law, the Council on Environmental Quality's National Environmental Policy Act regulations, and the Corps' own agency policy and regulations require significant adverse project impacts be **MITIGATED**. Based on the Corps' admission that use of the SIBUA is actually contributing to the erosion of Dauphin Island, the Corps must in its "Tentatively Selected Plan" (TSP) include a two-part mitigation plan: (1) Increase the percentage of deposited dredged sands placed in the future disposal site recommended to replace the failed SIBUA from the current 50% to 100% that is carried to Sand and Dauphin Islands; and (2) **Mitigate for the historic loss of dredged sands** that have remained in the SIBUA instead of being carried to these two islands dating back to at least 1999 when the SIBUA first began to be used. Both of these steps should be part of the same study and not separate.

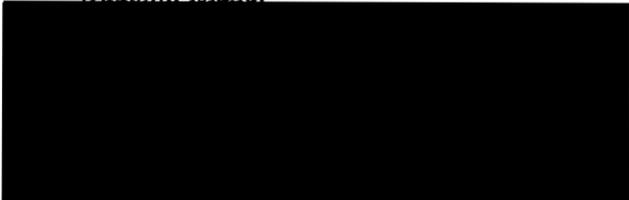
In view of the Corps February 22 admission, the Corps has no credible reason to continue advocating its present position and should begin immediately to investigate **MITIGATION REMEDIES** in the ongoing Mobile Harbor Study and respond to this now acknowledged significant "changed condition and adverse project impact" in the Study Area. The existing Mobile Harbor Study provides the Corps with the authority to move forward in **MITIGATING** the significant adverse erosion impact created by the Mobile Harbor project that the Corps has long refused to acknowledge was occurring.

Furthermore, the new proposed deposit area that the Mobile District is recommending should be abandoned to a more appropriate from the nearshore littoral drift system since 1999, creating an indirect adverse project impact that has significantly contributed to the erosion of both Sand and Dauphin Islands. Further, the Corps' recent admission gives strong credence to the Corps' 1978 report that first concluded maintenance of the Outer Bar Channel contributed to Dauphin Island's erosion. The Corps has consistently refused to address in the ongoing Mobile Harbor Study the erosion effects resulting from the cumulative removal of around 30 million cubic yards of sand from the littoral drift system since 1980 associated with the maintenance of the Outer Bar Channel.

And as I have stated in previous communications with Col DeLapp, the Mobile in the 1980 EIS failed to even study the erosion impact their maintenance dredging of the Mobile Navigation Channel. It gets quite onerous to continue stating this fact and failed to follow NEPA guidelines. Mr. Curtis Flakes in his reply to me (February 6, 2018) stated that the 1980 report was approved within the U.S. Army Corps of Engineers and Congress accepted the results. That may be well be true, but the fact is that the Mobile District did not follow Section 5 of the 1935 Rivers and Harbors Act to evaluate the effect (erosion) of widening and deepening the channel on the shorelines occurring for a distance of at least 10 miles on both sides of the Mobile Pass. In essence, the Mobile District filed with Congress a deficient report that was without complete information for Congress to make a knowledgeable decision and approve the further widening and deepening of the ship channel to its current authorized depth and width in the 1986 Water Resources Development Act.

In July 2018, the draft GRR/ Environmental Impact Statement will be released for public review and comment. It must include a TSP mitigation plan to compensate for the 7 million cubic yards of beach quality sands that have been removed from the nearshore littoral drift system since 1999 that has created an indirect adverse project impact that has significantly contributed to the erosion of both Sand and Dauphin Islands. Further, the Corps' recent admission also gives strong credence to the Corps' 1978 report that first concluded maintenance of the Outer Bar Channel contributed to Dauphin Island's erosion. The Corps has consistently refused to address in the ongoing Mobile Harbor Study the erosion effects resulting from the cumulative removal of around 30 million cubic yards of sand from the littoral drift system since 1980 that is associated with the maintenance of the Outer Bar Channel. Both of the issues of the sand deficiencies caused by the maintenance dredging of the Mobile ship channel **MUST** be part of a mitigation plan to resolve the impact of maintenance dredging.

One important environmental issue that must also be addressed because it is also a direct result of the maintenance dredging and the erosion of the shoreline of Dauphin Island and that is the Sea Turtle. For the past several years, I have witnessed sea turtles nest on Dauphin Island's shoreline. The last sea turtle nest occurred this past summer (2017) and was washed away due to Hurricane Nate. There is no protection for the sea turtles. The mitigation plan must address this important environmental issue. As the attached article indicates, the female sea turtle returns to the proximity of where they were born to lay their eggs. Since the Corps project plan, for widening and deepening the Mobile ship channel, will only evaluate the effects of the disposal alternatives considered for Dauphin Island shoreline as it exists today, an eroded shoreline, we can only expect the same results for the sea turtles; no place to truly and safely return to their nesting area. This critical issue MUST also be addressed in the Mitigation Plan for Dauphin Island.



Cc: Honorable Bradley Byrne, Congressman
Honorable Doug Jones, Senator
Col. C. Patrick Hogeboom, IV Acting Commander, SAD
Eric Bush, Chief of Planning and Policy
Col. James A. DeLapp, Commander, Mobile District ✓
Mr. Curtis M. Flakes, Chief Planning & Environmental Division
Honorable Jeff Collier, Mayor Town of Dauphin Island

Enclosures:

- March 2, 2018 letter, Col. C. Patrick Hogeboom, IV
- May 30, 1997 Memorandum for Commander, SAD
- December 27, 2017 Letter, Brigadier General Diana M. Holland
- December 27, 2017 Letter, Col James A. DeLapp
- December 26, 2017 Letter, Curtis M. Flakes & attachments
- February 6, 2016 Letter Curtis M. Flakes



DEPARTMENT OF THE ARMY
U.S. ARMY CORPS OF ENGINEERS, SOUTH ATLANTIC DIVISION
60 FORSYTH STREET SW, ROOM 10M15
ATLANTA, GA 30303-8801

REPLY TO
ATTENTION OF

March 2, 2018



Dear Mr. Graves:

Thank you for your December 27, 2017 letter regarding the ongoing Mobile Harbor Deepening Study. As you note in your letter, the Mobile District is preparing an integrated General Re-evaluation Report (GRR) and Environmental Impact Statement (EIS) evaluating costs, benefits, and potential impacts of dredging (deepening and widening) the Congressionally-authorized Mobile Harbor navigation project. The draft GRR/EIS is expected to be published for public and agency review in July of this year.

You request I direct Mobile District to "fully comply with the requirements of: (1) Section 5 of the 1935 Rivers and Harbor Act and all applicable Corps agency policy and guidance regulations and design manuals pertaining to that relevant federal statute; and (2) Paragraph 4.1b(1) on page 4-2 of the Corps' ER [Engineer Regulation] 1105-2-100 [Planning Guidance Notebook]", in developing the draft GRR/EIS. You also stated a 1980 Report and EIS prepared by the Mobile District upon which the 1986 authorization of the Mobile Harbor project relied contained a "significant pertinent failure" regarding littoral drift of sediments and effects of maintenance dredging on Dauphin Island.

I want to reassure you that the U.S. Army Corps of Engineers and our Mobile District take very seriously the requirements of all relevant authorizations (including the 1935 Act), regulations, policies, and guidance in the development of Civil Works studies and are performing all analyses required by law and policy to inform decision makers. In particular, we are aware of your concerns about effects of previous dredging of the Outer Bar Channel on the ebb shoal and Dauphin Island and are considering all relevant information, to include analyses conducted by our Engineer Research and Development Center (ERDC) since the 1980 report.

Our Mobile District Commander, Colonel James DeLapp, assures me and I am advised has previously assured you that the Mobile District will fully evaluate effects of the proposed channel improvements and options for placement of dredged material within the study area, including Dauphin Island. The next point in the Corps' decision process is formal consideration of Mobile District's recommended Tentatively Selected Plan (TSP), currently scheduled for March 28, 2018. If a TSP is approved, Mobile District will be directed to prepare a draft integrated GRR/EIS to be released for formal public comment, currently expected to be in July 2018.

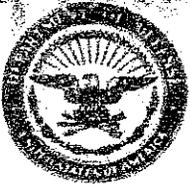
We welcome your continued interest in this project. If you have additional questions or concerns, please direct those to our Chief of Planning and Policy, Mr. Eric Bush, e-mail eric.l.bush@usace.army.mil, telephone 404-562-5220.

Sincerely,

HOGEBOOM.CHARLES.PATRICK.IV.1
047421752

Digitaly signed by
HOGEBOOM.CHARLES.PATRICK.IV.1047421752
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C. PATRICK HOGEBOOM IV
Colonel, U.S. Army
Acting Commander



DEPARTMENT OF THE ARMY

U.S. Army Corps of Engineers
WASHINGTON, D.C. 20314-1000

REPLY TO
ATTENTION OF:

CECW-P/O

30 MAY 1987

MEMORANDUM FOR Commander, South Atlantic Division

SUBJECT: Implementation of Section 302 of the Water Resources Development Act of 1996 (WRDA 96) - Mobile Harbor, Alabama

1. Section 302 of WRDA 96 amends Section 201(a) of WRDA 86 on dredged material disposal from Mobile Harbor, Alabama project. The new legislation authorizes that the Secretary, after compliance with applicable laws and after opportunity for public review and comment, may consider alternatives to disposal of dredged material from Mobile Harbor in the Gulf of Mexico, including environmentally acceptable alternatives for beneficial uses of dredged material and environmental restoration. The intent of section 302 is to allow alternatives to deep water disposal in the Gulf of Mexico that would be environmentally and economically beneficial.

2. Maintenance dredging should be accomplished in the most cost effective, efficient, and environmentally sound manner. However, the Mobile District should evaluate alternative disposal options for placement of dredged material from Mobile Harbor. Any examination of other alternatives to Gulf disposal should involve a multi-agency coordination team including Federal, State, and local resource agencies. Mobile District should make efforts to use District Engineer authority to make adjustment to the Federal standard to accommodate section 302 directives as well as, authorities under Section 204 of WRDA 92, and Section 207 of WRDA 96.

FOR THE COMMANDER:

CHARLES M. HESS
Chief, Operations, Construction
and Readiness Division
Directorate of Civil Works

G. EDWARD DICKEY
Chief, Planning Division
Directorate of Civil Works

Author: Dennis W Barnett SAD at X400
Date: 7/3/97 2:23 PM
Priority: Normal
Receipt Requested
TO: Roger A Burke at sampd_po
Subject: Mobile Harbor, Section 302

----- Message Contents -----

Roger,

I have attached our endorsement to the HQ memorandum on the subject issue as an advance copy. We had given you a copy of the HQ memo when you were recently up here. I think you will find that our endorsement encourages you to look for opportunities to change the O&M plan without putting too many constraints or conditions on you.

Please share with others, especially Operations, as appropriate.

Dennis Barnett

CESAD-ET-P\C (CECW-P\O\30 May 97) (1105-2-10b) 1st End
Mr. Barnett\bjg\404-331-4580\Mr. Deveaux\404-331-6742
SUBJECT: Implementation of Section 302 of the Water Resources
Development Act of 1956 (WRDA 96) - Mobile Harbor, Alabama

Commander, South Atlantic Division, U.S. Army Corps of Engineers,
Room 322, 77 Forsyth Street, S.W., Atlanta, Georgia 30303-3490

FOR COMMANDER, MOBILE DISTRICT

1. Section 302 of WRDA 96 affords an excellent opportunity to revisit the authorized plan for maintenance of Mobile Harbor in the interest of environmental protection and restoration and economic efficiency. Coupled with the high cost of maintaining the project as currently authorized and changing attitudes among environmental interests regarding the value of dredged material as a resource, Section 302 may allow you to develop a "master plan" for maintenance of lower Mobile Harbor that incorporates many positive environmental features and saves O&M funds.
2. As O&M funds for the Mobile Harbor project will permit, you should investigate opportunities to modify the authorized maintenance plan in accordance with Section 302. Any investigations you undertake in this regard should address appropriate adjustments to the "Federal standard" (or Base Plan) for channel maintenance along with any opportunities for use of Section 1135 and 204 authorities to implement pertinent features of the modified maintenance plan.
3. It is paramount that any efforts to modify the authorized maintenance plan for Mobile Harbor be developed in close partnership with the project sponsor, Federal and state resource agencies, environmental groups, and all other stakeholders. In the interest of efficiency and to avoid duplication of effort, we strongly recommend that you use any existing interagency forums, like the Mobile Bay National Estuary Program, as a means to engage stakeholders in the development and evaluation of alternative dredged material management strategies.

FOR THE COMMANDER:

CARL R. POSTLEWATE
Director of Engineering and
Technical Services

December 27, 2017

Brigadier General Diana M. Holland, Commander
U.S. Army Corps of Engineers,
South Atlantic Division, Room 10M15
60 Forsyth St. S.W.
Atlanta, GA 30303-8801

Dear Brigadier General Holland,

Enclosed is a letter and attachments that were mailed to Curtis Flakes, Chief of the Corps of Engineers' Mobile District Planning & Environmental Division. This letter follows-up a December 12 meeting in which I participated to seek answers to questions asked of the Corps. After reviewing the meeting discussions, I came away with 2 specific concerns that are detailed in my letter.

I am sending you a copy of the letter, because your help is needed to reverse the Mobile District's intentional plans to completely ignore a significant flaw in the original 1980 EIS that failed to comply with Section 5 of the 1935 Rivers and Harbor Act which required the Corps to evaluate the effects of deepening and widening the channel on the shorelines occurring for a distance of at least 10 miles on both sides of Mobile Pass. If the Corps had complied with the 1935 law, the 1980 report would have included an investigation of the effects of enlarging the channel on Dauphin Island's shoreline, instead of ignoring the island as the report did.

The Mobile District also plans to ignore the provisions of paragraph 4.1b (1) on page 4-2 of the Corps' ER 1105-2-100 that specifically requires a GRR study to evaluate "changed conditions" in the study area that have occurred since the 1980 report was completed. In doing so, the Mobile District intends to only evaluate the effects of the disposal alternatives considered in the GRR on the Dauphin Island shoreline as it exists today. A consequence of that significant plan formulation decision is the GRR will completely ignore the "changed conditions" that have occurred in Dauphin Island's shoreline that have occurred during the 38 years since the 1980 report was completed as required by Corps agency regulations. It is obvious that the Corps' planned approach is clearly intended to ignore completely the extensive erosion of the Mobile Pass ebb-tidal delta and Dauphin Island that has occurred over the 38-year timeframe because of maintenance of the Outer Bar Channel that regularly intercepted and robbed the littoral drift system of over 29 million cubic yards of beach quality sands that were wastefully disposed in deep Gulf waters or placed in the non-effective euphemistically named Sand Island Beneficial Use Area.

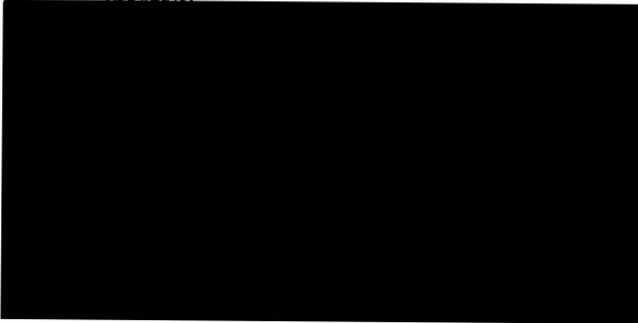
Timing is of the utmost importance, because the Corps schedule is moving forward to produce a draft GRR/SEIS for release and public review in June 2018. It is this reason that I am writing this urgent request that you intervene on behalf of all interests having a concern over the continued well-being of Dauphin Island and the important contribution the island makes to sustaining the important ecological processes and benefits to Alabama's entire western coastline. Specifically, this is to request that you direct the Corps to assure the Mobile Harbor GRR Study fully comply with the requirements of:

(1) Section 5 of the 1935 Rivers and Harbor Act and all applicable Corps agency policy and guidance regulations and design manuals pertaining to that relevant federal statute; and

(2) Paragraph 4.1b (1) on page 4-2 of the Corps' ER 1105-2-100 regarding a full and honest investigation and disclosure of the "changed conditions" in the Gulf shoreline of Dauphin Island that have occurred during the 38 years since the original 1980 Mobile Harbor Survey Report was completed.

The two above specific evaluations not only are required by statute and Corps guidance, respectively, they are mandatory to ensure the GRR Study corrects a significant pertinent failure in the Corps' original 1980 report by addressing the historic loss of over 29,000,000 cubic yards of beach quality sands from the nearshore littoral drift sand transport system due to maintenance dredging that has contributed to present sand-starved condition of Dauphin Island and the significant erosion the island has experienced during the last almost four decades. Your urgent action would be greatly appreciated. I and others await your response on this critical matter before the Corps issues the Draft GRR and Supplement to the 1980 Environmental Impact Statement in the summer of 2018 as currently scheduled.

Sincerely,



December 26, 2017

Mr. Curtis M. Flakes,
Chief, Planning & Environmental Division
U.S. Army Corps of Engineers
Mobile District
P.O. Box 2288
Mobile, Alabama 36628

Dear Mr. Flakes,

I want to thank you for arranging the December 11 meeting to discuss the Mobile Harbor GRR Study. This was an important meeting for us to obtain answers to questions we have had for some time.

This letter addresses specific concerns I have. One important issue deals with how data from the Alabama Barrier Island Restoration Assessment (ABIRA) will be used in the GRR Study. Though David Newell provided some information, I am still concerned how this can happen since the ABIRA Comprehensive Report is scheduled for completion in March 2019, while the Draft GRR and SEIS is scheduled to be released in June of 2018 for a public review. Since these two separate report products have incompatible completion schedules, I would appreciate you elaborating in detail how data from the ABIRA will be used to produce the Draft GRR.

My greatest concern is associated with statements made by Justin MacDonald about the Mobile Harbor GRR Study. I strongly disagree with the Mobile District's position that the GRR will only evaluate the effects of the disposal alternatives considered on the Dauphin Island shoreline as it exists today. Such a position represents a travesty, completely disregarding paragraph 4.1b (1) on page 4-2 of the Corps' ER 1105-2-100 that requires a GRR study evaluate changed conditions in the study area that have occurred since the previous report was completed. It is obvious to the public that the Corps is taking the position that Justin stated in order to avoid having to admit the 1980 Survey Report was flawed because it failed to comply with Section 5 of the 1935 Rivers and Harbor Act. It is also obvious the Corps position is based upon your agency's clear intent to ignore completely the extensive erosion of the Mobile Pass ebb-tidal delta and Dauphin Island that occurred in the intervening 38 years as maintenance of the Outer Bar Channel continued to intercept and rob the littoral drift system of over 29 million cubic yards of beach quality sands that were wastefully disposed in deep Gulf waters and the non-effective Sand Beneficial Use Area (SIBUA). See attached USACE Mobile Harbor Outer Bar Channel Dredging History.

That institutionally accepted wasting of critically needed sands has left Dauphin Island in an extremely weakened condition is a fact. Now, minor storms regularly overwash the island, causing unnatural flooding of areas that once had higher elevations and were buffered by sand dunes. As a recent example, Hurricane Nate (barely a Category 1) caused extensive flooding, depositing sand on Bienville Blvd up to 6 feet deep that had to be removed at an estimated cost of over \$8 million. A document provided by the Town of Dauphin Island states:

"...contractors will have screened and deposited more than 50,000 cubic yards of sand along the island's south shoreline on the west end. As much as several hundred thousand yards of beach quality sand remains piled and scattered within town rights-of-way which could take another 45-60 days to remove. However, sand removal is only one part of the Hurricane Nate repairs facing our island community. For example, many of the side streets will require a new layer of crushed stone, road shoulders will need to be shaped to support drainage, numerous road signs and

posts must be replaced, the extreme west end of Bienville Blvd. will require substantial work to protect it from wave action, accommodate traffic and provide access to West End Beach, water & sewer infrastructure is damaged and the West End Beach/parking lot sustained significant storm impact"

Such damages and costs would not have occurred from Nate if the Corps had regularly placed the 29 million cubic yards of sand dredged from the channel in the shallow waters of the Mobile Pass ebb-tidal delta as proposed by the public and coastal engineers and scientists.

Further, the position stated by Justin is **CONTRARY** to the testimony Dr. Susan Rees (the Corps' sole expert witness) gave at the September 15, 2009 Fairness Hearing held to settle the Corps vs the Dauphin Island Property Owners Association lawsuit. Excerpts of specific comments made by Dr. Rees' in her sworn testimony is attached. I want to highlight here the important essence of her testimony which was intended to convince the presiding judge that the Class members should not be concerned with settling the lawsuit because prior to the Corps ever deciding to implement the 1986 authorized Mobile Harbor project, the Corps would do a thorough restudy of the original report. In doing so, Dr. Rees correctly referred to Corps policy and guidance that because of the amount of time that has passed since the original 1980 Survey Report was completed, a new report [the GRR] would have to consider "...whether conditions have changed since that original report was done". In that connection, Dr. Rees testified "...the placement of dredged material has changed significantly, and the environment has changed..." since the 1980 Survey Report was completed. Lastly, Dr. Rees stated the new report [the GRR] "...would definitely examine the impacts to the coastal processes of the entire region, not just Dauphin Island". Based on the present approach the Corps plans to pursue in the GRR, as described by Mr. McDonald, this leads one to ask two important questions;

- First, was Dr. Rees honest in the testimony she gave at the Fairness Hearing if she had knowledge the Corps never intended to address "changed conditions" in the study area since the original 1980 report was prepared?
- Second, since Dr Rees' sworn testimony is consistent with the requirements of paragraph 4.1b(1) on page 4-2 of the Corps' ER 1105-2-100, how does the Corps now justify its plans to ignore significant aspects of your agency's policy and guidance relevant to the GRR that is at odds with what she told the Court.

Curtis, you and the entire Mobile District staff engaged in the GRR Study, **KNOW** the 1980 Survey Report and EIS did not investigate the potential for a deepened and widened Outer Bar Channel to influence the erosion of Dauphin Island as COL Drake Wilson committed would occur in his July 9, 1975 letter (see attached). Despite that clear and unquestionable fact with which the Corps staff does not disagree, I find it extremely disconcerting, both as a federal taxpayer and a stakeholder having a direct interest in the outcome of the GRR Study, to have heard at the December 11 meeting, Corps attorney Michael Creswell say the GRR and Integrated SEIS will not honestly state for the record that the 1980 Survey Report and EIS failed to comply with Section 5 of the 1935 Rivers and Harbors Act by not investigating the potential for the recommended project to affect the configuration of Dauphin Island's Gulf shoreline. Thus, by refusing to be open and honest about that significant deficiency in the original 1980 report, which is directly relevant to the current GRR effort, that means the Mobile District is satisfied with hiding that important and cogent fact from the public, agencies, and its own upward reporting hierarchy. For that reason alone, I think it would be very prudent for the Mobile District to think long and hard before deciding to continue to pursue its current path on the GRR, and instead it should be imperative that the Mobile District include a comprehensive evaluation of the changes that have occurred in Dauphin Island's shoreline between the 1980 report and the baseline year considered in the GRR Study.

As you will note, I am sending a copy of this correspondence to Col DeLapp, our Congressional representatives, State Legislators, Corps' Division and Headquarters offices, and others.

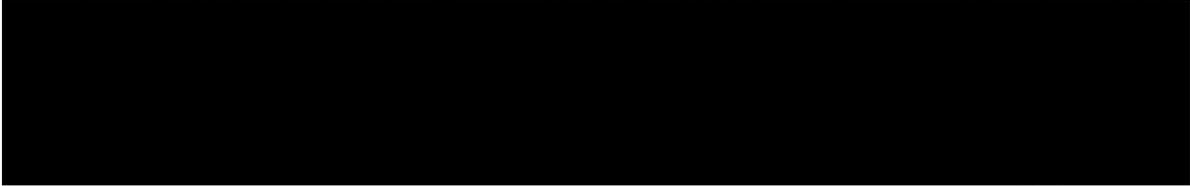
I look forward hearing from you about these significant concerns and how the Mobile District will address them.

Cc: Honorable Richard Shelby, Senator
Honorable Bradley Burn, Congressman
Honorable Doug Jones, Senator-Elect
Lieutenant General Todd T. Semonite, Commanding General & Chief of Engineers
Brig. General Diana M. Holland, Commander South Atlantic Division
Col. James A. DeLapp, Mobile District
Jimmy Lyons, Alabama State Port Authority
Mr. Christopher Militacher, EPA Region 4, NEPA Div. Director
State Senator Bill Hightower
State Representative David Sessions
Jeff Collier, Mayor – Town of Dauphin Island
Jason Johnson, Lagniappe
Glen Coffee, Sierra Club
Caroline Graves, Property Owner & DIPOA member

Enclosures

List of attendees December 12, 2017 meeting
Excerpts Sworn Testimony Dr. Susan Rees Corps Lawsuit
Mobile Harbor Outer Bard Channel Dredging History (1980-2016)
9 July 1975 Letter Col Drake Wilson to Congressman Jack Edwards
Excerpt 1978 Corps Beach Erosion Control & Hurricane Protection (Including Dauphin Island)
Photograph Dauphin Island 1950's

December 12, 2017 - Mobile District Corps of Engineers
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Cam Dyess



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IN THE UNITED STATES COURT OF FEDERAL CLAIMS

COPY

DAUPHIN ISLAND PROPERTY
OWNERS' ASSOCIATION, INC.,
a non-profit corporation;
and JAMES W. HARTMAN, ET. AL., NO. 00-115L
PLAINTIFFS,
vs.
THE UNITED STATES OF AMERICA,
DEFENDANT.

EXCERPT TESTIMONY

OBJECTION STATED BY DR. SUSAN IVESTER REES
FAIRNESS HEARING

Whereupon, the Fairness Hearing was held
before the Honorable Bohdan A. Futey, Senior
Federal Judge, at the United States District Court
House, 113 St. Joseph Street, Second Floor, Mobile,
Alabama, 36602, on Tuesday, the 15th day of
September, 2009, at 1:00 p.m.

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(APPEARANCES)

THE HONORABLE BOHDAN A. FUTEY'S LAW CLERK:
AMY HOGAN-BURNEY

(ATTORNEYS FOR THE PLAINTIFFS, DAUPHIN ISLAND
PROPERTY OWNERS ASSOCIATION AND JAMES HARTMAN, ET.
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EXAMINATION OF DR. SUSAN IVESTER REES (Excerpts):

Dr. Rees was an expert witness for the Corps and gave testimony on 9-15-09 at the Corps Lawsuit Fairness Hearing. Her testimony is applicable to the Corps plans as public input for the Widening and Deepening of the Mobile Harbor. Dr. Rees testimony **must be considered and followed by the Corps in the development of the GRR/EIS for Dauphin Island and Mobile harbor:**

Rees testimony on 9-15-09 Corps Lawsuit: Below are Excerpts of the Testimony of Dr. Susan Ivester Rees: September 15, 2009 Fairness Hearing, Mobile, Alabama; Questioned by Wells D. Burgess, US Department of Justice.

Q= Question. A = Answer

Q. And could you briefly state your employment history?

A. I have been employed with the Mobile District Corps of Engineers since 1981. Since that time I've held a number of positions with the Corps. Primarily in what is called the Coastal Environment Section of the Planning Division. The **duties** of that section are **to ensure** the environmental compliance of all of the federally authorized projects and military activities that are undertaken by the district.

Q. What are your current responsibilities?

A. Currently, I'm the program manager for the Mississippi Coastal Improvements Program.

Q. Are you familiar with the Corps' dredging operations on what we call the outer bar channel?

A. Yes, I am. The Mobile Harbor Project was one of the projects that I was responsible for.

Q. So I and the Court and everybody else understands this, are you telling us, then, if you increase the channel over what it's currently maintained, the State is going to have to pick up half the footing -- half the bill?

A. That's correct

Q. And that includes construction and maintenance?

A. That's correct.

Q. Okay. And do you have any estimation as A. I think ten years ago the estimate of construction was somewhere in the range of \$200 million, but based on recent experience that estimate is no longer valid.

Q. Thank you, Dr. Rees. I'm going to ask you now that are going to basically -- there's been some suggestion here that the Corps already has the funds to do this and it can just go out and basically start digging. And I need you to take the Court and also the class members here through the process that you believe needs to happen or that you know needs to happen based on your knowledge of the regulations and your experience and your current position before this additional dredging could occur.

A. **Engineering regulation 1105-2-100, Chapter 4**, dictates that for post-authorization projects -- and in this case if we were to try to deepen Mobile Harbor, that would be considered post-authorization -- that we have to do a re-evaluation report utilizing current planning criteria and current policy and regulations.

There are two types of reports that you can do. And basically the period of time that has elapsed since the original report was done and a consideration of whether conditions have changed since that original report was done, those two factors drive the level of reporting that is required.

For the case of Mobile Harbor, we would have to do what is called a general re-evaluation report. That basically brings all up to current condition. It looks project is still justified or not.

If you take Mobile Harbor specifically, it was originally authorized on the coal trade and the use of the McDuffie Coal Terminal. Today, the through-port and the port is vastly different from what it was in the late '80s, so there's **different economics** obviously, the cost of dredging and the placement of dredge material has changed significantly and the environment has changed. **And so we would have to take into consideration all of those aspects in preparing that general re-evaluation report.** And as far as the environmental compliance goes, because of the age of the original EIS we would have to do a supplement to that EIS.

Q. And I had asked you before, did I not, obviously you have years of experience with the National Environmental Policy Act compliance; is that correct?

A. Yes, I do.

Q. Now, would that also take into account engineering feasibility?

A. Yes.

Q. And economic benefit?

A. That's correct.

Q. And the cost benefit ratio?

A. Yes.

Q. I understand has that changed?

A. The cost benefit ration for a budgetable project changed last year.

Q. Now, how about would you have to have a new project agreement with the State?

A. If the findings of the general re-evaluation report were in the affirmative, prior to any construction activities, we would have to have a new partnership agreement with the State and the State Port Authority that would detail their costs for the initial construction and for the future maintenance as well as their other responsibilities.

Q. And is it correct to say -- I'll probably let the State speak to this, but the State would have to figure out how -- whether they could shoulder this additional expense; is that correct?

A. Well, they would have to figure out that and then they would also have to work with the Congressional delegation to get the Corps the money as well.

Q. **You mentioned that an environmental impact statement would be issued if there was any expansion over the current -- currently maintained dredging depths and width.** Would that environmental impact statement examine the impact on Dauphin Island of any expansion?

A. It would definitely examine the impacts to the coastal processes of the entire region, not just Dauphin Island.

Q. But including Dauphin Island?

A. Definitely.

Mobile Harbor Outer Bar Channel Dredging History (1980-2016)

(Source: USACE for the period 1980-2009 and estimated for the period 2010-2016 based on the average annual maintenance quantities reported for the preceding 30 years)

Dredging Date	Gross Quantity Dredged (yd ³)	Disposal Area Used ^{1/}
Feb-Dec 1980	1,129,337	Ocean DA
Jan-Mar 1981	610,623	Ocean DA
Dec 1982-Jan 1983	312,408	Ocean DA
Jan-Nov 1984	559,607	Ocean DA
Aug-Oct 1985	1,386,536	Ocean DA
Jan-Feb 1987	656,089	Nearshore Feeder Berm
Feb 1989-May 1990	^{2/} 6,755,352	Ocean DA
Aug-Sep 1992	466,607	Ocean DA
Nov-Dec 1995	621,172	Ocean DA
Aug-Dec 1997	710,996	Ocean DA
Sep-Oct 1998	1,279,780	Ocean DA
Aug-Sep 1999	71,380	Ocean DA
	54,600	SIBUA
May-Sep 1999	^{3/} 3,061,598	SIBUA
Apr-Jul 2000	758,280	Ocean DA
Mar 2002-May 2002	92,820	SIBUA
Jun 2004	230,110	SIBUA
Oct 2004-Nov 2004	1,184,817	SIBUA
Oct 2004-Jan 2005	1,808,765	SIBUA and at Lighthouse
Aug 2005	67,555	SIBUA
Apr-Jun 2006	487,975	SIBUA
Aug 2007	1,083,860	SIBUA
Nov-Dec 2008	585,430	SIBUA
Sept-Nov 2009	942,817	SIBUA
2010-2016 (estimated)	3,523,698	SIBUA
Total Dredged from Outer Bar Channel		
	29,442,209	For 30 years 1980-2016
Total Placed in Ocean DA		
	14,672,078	For 30 years 1980-2016
Total Placed at Nearshore Feeder Berm		
	656,089	For 1987 only
Total Placed in SIBUA or at Lighthouse		
	9,600,347	For 30 years 1980-2016
Average annual maintenance dredging quantity		
	503,385	For 37 years 1980-2016

^{1/} Ocean DA – EPA approved open water disposal site in the offshore Gulf of Mexico

SIBUA – Sand Island Beneficial Use Area

^{2/} New work deepening from 42 to 47 feet

^{3/} New work deepening from 47 to 49 feet.

^{4/} Excludes new work deepening in 1989-1990 and 1999

Method used to estimate maintenance dredging quantities 2010-2016 and total dredged 1980-2016:

Step 1: 24,918,514 - (6,755,352 + 3,061,598) = 15,101,564 (O&M dredging only for 1980 through 2009)

Step 2: 15,101,564 ÷ 30 = 503,385 yd³/year average O&M for 30-year period between 1980 and 2009

Step 3: 503,385 × 7 = 3,523,695 yd³ estimated as being dredged for 7-year period between 2010 and 2016

Step 4: 24,918,514 + 3,523,695 = 29,442,209 yd³ estimated dredged from Outer Bar Channel (1980 to 2016)

9 July 1975

Honorable Jack Edwards
House of Representatives
Washington, DC 20515

Dear Mr. Edwards:

For your information I am inclosing a copy of the transcript of the Workshop Meeting on Beach Erosion Control and Hurricane Protection for Mobile County held at Bayley's Ranch on 31 March 1975. I appreciate your attendance at the meeting and interest you have demonstrated in this study.

As you recall, little interest was exhibited at the meeting for structural plans that could be implemented under existing Federal authorities for beach erosion control. These authorities require the establishment of public property and public access to the shoreline as a condition for any significant Federal financial participation in a beach erosion control project. As indicated at the meeting, the establishment of public shoreline property would be strongly opposed by existing waterfront property owners. Furthermore, preliminary studies indicate that protection of the sparsely developed shoreline would not result in the necessary economic benefits to justify the construction of costly structures for beach erosion control and hurricane protection.

While structural measures specifically for beach erosion control are indicated to be economically unjustified and to have unacceptable social and community impacts, the need for protection of the shoreline was emphasized. Substantial interest was indicated in the concept of deposition of unconfined dredged material from the ship channel along the west bay shoreline and Dauphin Island for the abatement of erosion.

The prospect for satisfactorily alleviating erosion problems on Dauphin Island by depositing the sandy material dredged from the Mobile Bay entrance channel upon the Gulf shoreline of the island appears promising and will be pursued. The viability of depositing future "new work" material dredged from the ship channel within Mobile Bay upon the western shoreline cannot be determined without estuarine and other environmental impact studies but is considered meritorious of further consideration. Under the above concepts the eroding shorelines would be nourished by the

Appendix B.

I

SAMPLE-N

9 July 1975

Honorable Jack Edwards

dredged material primarily as disposal areas in support of the maintenance and modification of the Mobile Harbor navigation project. This plan would preserve any accreted land as the property of adjoining land owners and limit local costs resulting from the accreted land, to the amount required for necessary stabilization and a portion of the cost allocated to land enhancement. Therefore, the options for nourishment of the eroding shorelines with material dredged from the ship channel would be more appropriately considered under our ongoing study of navigation modifications for Mobile Harbor rather than under the study for beach erosion control and hurricane protection.

In view of the indications of the workshop meeting, further consideration for deposition of the dredged material from the ship channel along the eroding shorelines under the ongoing survey study for modification of the existing Federal project for Mobile Harbor is indicated to be warranted in lieu of the authorized beach erosion control and hurricane protection study. Since our study has not indicated any other likely structural alternatives for beach erosion control and hurricane protection, and in accordance with Corps' policy to apply our limited study funds where they can be most productive, I am proposing to conclude our beach erosion and hurricane protection study for Mobile County. A concise report which will address the foregoing considerations along with the finding that no additional Federal structural improvements are warranted at this time in the interest of beach erosion control and hurricane protection can be completed with programmed fiscal 1976 study funds. Any remaining surplus funds could be transferred to other studies. In lieu of this option, deferral of future studies into an inactive study category is indicated.

A plan to notify the Mobile City and County Commissions of our proposal to terminate the study in the near future, but, in the interim, would appreciate any views or comments you may have regarding the study and proposed course of action.

Sincerely yours,

1 Incl
As stated

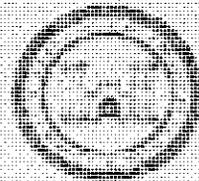
DRAKE WILSON
Colonel, CE
District Engineer

Appendix B

MOBILE COUNTY, ALABAMA
(Including Dauphin Island)



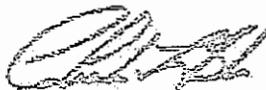
FEASIBILITY REPORT FOR
**BEACH EROSION CONTROL
AND
HURRICANE PROTECTION**



SEPTEMBER 1974 125

1978 Corps study about Dauphin Island

104. Studies *herein* indicate that the only acceptable measures that would be economically feasible that would partially resolve any of the flooding or erosion problems of the area would be the nearshore nourishment Plan defined herein as The Selected Plan. This plan would produce net economic benefits, is considered environmentally acceptable and subject to EPA approval of the disposal site designation, could be implemented under the authority of the Chief of Engineers for operation and maintenance of Mobile Harbor without additional authority from the Congress. Accordingly, the District Engineer recommends that the Chief of Engineers modify the present maintenance dredging practice for the entrance channel to Mobile Harbor to conform to the procedures outlined herein for the Selected Plan as soon as practical with such other modifications as he may deem appropriate.

 **II**

CHARLIE L. BLALOCK
Colonel, CE
District Engineer

103. The principal causes of shore erosion along the westernmost 11 miles of Dauphin Island are attributable to rise in sea level and maintenance dredging of the Mobile Bay entrance channel. Based on sea level stages recorded at Biloxi, Mississippi, the rates of rise of sea level between 1896 and 1972 and between 1940 and 1972 were .009 feet per year and .012 feet per year respectively. These data are shown on Plate II. Per Brunn, in the reference, Sea-Level Rise as a Cause of Shore Erosion, proposed the following formula for computing the rate of shoreline recession from the rate of sea level rise:

100. By letter, dated 21 July 1975, the Mobile County Commission, it was proposed that, in view of the indications from the workshop meeting, the ongoing beach erosion and hurricane study for Mobile County should be terminated. The Commission was also advised that the feasibility of placing dredged material from the Mobile ship channel onto the eroding shore would be pursued as part of the ongoing survey study for modifications of the existing Federal Navigation Project for Mobile Harbor. By letter, dated 1 October 1975, the Mobile Commission advised the District Engineer that the Commission concurred with the action stated in the 21 July 1975 letter.

110. In a letter dated 11 February 1977, the Mayor of Mobile requested that the Corps of Engineers investigate the feasibility of providing hurricane protection for the City of Mobile and shoreline erosion protection for the western shoreline of Mobile Bay. It was suggested that hurricane protection could be provided by construction seawalls or a series of ungated barriers strategically positioned in the Bay.

109. Effect assessment identifies the effects of all considered plans to determine the impacts that can be expected. Further, Section 122 of Public Law 91-611 supplements and extends the requirement of the National Environmental Policy Act of 1969 (PL 91-190) by requiring that the effect assessment identify the economic, social, and environmental factors associated with plans under consideration. Section 404 of Public Law 92-500 and Section 103 of Public Law 532 also requires that certain impacts on water quality be investigated and quantified before undertaking any action involving the discharge of dredged material into waters of the United States or ocean waters. Further criteria are established by Executive Orders, 11990 and 11988 which direct that all Federal water resource planning minimize destruction, loss or degradation of wetlands and development in the flood plain. Therefore, the effect assessment process is carried out to assure that all significant effects have been identified and their impacts evaluated. A summary of the effects of the considered plans is given in the following paragraphs.

116. Socioeconomic and Environment Criteria - The criteria for socioeconomic and environment consideration in water resource planning are prescribed by the National Environmental Policy Act of 1969 (PL 91-190), section 122 of the River and Harbor and Flood Control Act of 1970, (PL-611), and Section 404b of the Federal Water Pollution Control Act Amendments of 1972. The criteria prescribed that all significant adverse and beneficial economic, social and environmental effects of planned developments be considered and evaluated during formulation.

175. The No Action Alternative perceives a continuation of present conditions and practices without any provisions to reduce potential hurricane flooding or occurring beach erosion. Under this alternative

dredged material would continue to be deposited in the closest suitable area to the entrance channel. No monetary or other resources would be expended to transfer the dredged material to Dauphin Island's littoral system, and erosion along the western end of the island could be expected to continue at its present pace. Erosion would continue to claim valuable property on the island, ultimately causing hardships for island property owners and a lessening of the area's attractiveness for recreational activities.

176. The Nearshore Nourishment Plan should significantly reduce the present rate of erosion along the western 11 miles of Dauphin Island producing a net savings in land values over the additional cost for implementing the plan, while not eliminating, it would delay the ultimate effects of the No Action Plan. The savings realized from the Nearshore Nourishment Plan should be beneficially of National economic development; local property values, employment, business activities, tax revenues, and general economic growth; public services and facilities; natural and manmade resources; recreation and aesthetic values; and community and regional cohesion and growth. The plan should have no effects on air quality, noise, known archaeological remains, municipal water supply, or threatened or endangered species. As previously noted the Nearshore Nourishment Plan would have temporary, adverse effects on water quality, benthic life, fisheries, and other marine life similar to the present (No Action Plan) method of operations. No known vegetation or wetlands other than submerged bottoms would be affected. The plan is considered acceptable to local interests and would be completely reversible. It is reasonably certain that benefits for the considered plan will be achieved; however, the effectiveness of the considered plan cannot be fully documented. The area of geographical impact would be limited to the southern shoreline of Dauphin Island and adjoining offshore waters.



THIS IS

ALABAMA

Showing the way

SHARE THE BEACH IS TRYING
TO PROTECT NEWBORN
LOGGERHEAD SEA TURTLES
ALONG ALABAMA'S GULF COAST



At birth, loggerhead sea turtles are about 2.5 inches long. When fully grown, they can weigh 400 pounds. Babies will swim out to sea, halfway around the world during a two-year journey deep into the Atlantic Ocean. Females will return about 25 years later to within 2 miles of their birthplace to lay eggs. But once leaving the nest and finding the surf, baby males will never set foot on land again. *Share the Beach*.

Late night on Alabama's coastal shores is a scene of quiet beaches in nocturnal stillness. Or so it seems. What lies beneath the sand is a different story.

On any given summer evening a tiny reptilian nose may be below the surface. The newly hatched lookout loggerhead sea turtle has a mission: signal fellow babies in the 20-inch deep hole when the coast is clear. From underneath the earth, it feels the beach has cooled, signifying nighttime to the turtles and, in turn, mobilizing them.

The lead turtle is the first to emerge. Soon after, 112 more turtles follow, all bubbling out from the sand like grits in a boiling pot.

It is an amazing sight witnessed by few, and Mike Reynolds is a member of this exclusive club. As head of Share the Beach, he leads 450-plus volunteers dedicated to saving Alabama's coastal sea turtles from extinction.

In January 2018, Share the Beach united under the umbrella of the Alabama Coastal Foundation (ACF), an organization that addresses coastal conservation issues. "We are happy to work with Mike and his great volunteers," said Mark Berte, executive director of ACF. "Share the Beach fits our mission statement nicely: to improve and protect Alabama's coastal environment through cooperation, education and participation." ACF will write grants and raise money for the group, but as Berte noted, "Share the Beach will run exactly the same this year as last year, still under Mike's federal permit to handle wild turtles."

"I am fortunate to have dedicated volunteers," added Reynolds, known locally as "the turtle czar."

"They patrol 50 miles of beaches from the Florida state line to the tip of Dauphin Island daily from May to October (nesting season). They look for tracks leading to nests that need protect-

ing during a critical time — hatching." Protecting the nests is an important mission for a few reasons.

After digging out from underground, always at night, baby turtles look for and follow light — any light. Natural light saves their life. Artificial light can end it.

To turtles, illumination is interpreted as moonlight reflected on waves. It means home and safety. But on Alabama's coastline, light beacons can be vending machines, condo floodlights or even a beach party.

"Babies go to those sources looking for the ocean they will never find," the turtle czar said. "They die from exhaustion or starvation, are run over by cars or killed by ants."

When you combine natural predators with man-made hazards, Reynolds estimates about one out of 1,000 hatchlings will see adulthood. Share the Beach is concerned about this stat.

Group volunteers monitor nests, watching closely when newborns hatch and make their way to the surf. Baby reptiles are not touched by human hands unless absolutely necessary.

"Unfortunately, a critical part of a turtle's life cycle involves nesting on sandy beaches — the same places people nest," Reynolds added. Man and turtle can coexist, but there are reasons for concern.

"Our area is down to 47 nesting females," Reynolds notes. "Once gone, they are gone forever."

Since 2003, more than 50,000 sea turtles have hatched along Alabama's shoreline. Many got by with help from Share the Beach and Reynolds, who watched their nests, protected baby turtles and showed them the light.

Written for This Is Alabama by Emmett Burnett.

March 31, 2018

COL James A. DeLapp
U.S. Army Corps of Engineers, Mobile District
109 Saint Joseph Street
Mobile, AL 36602

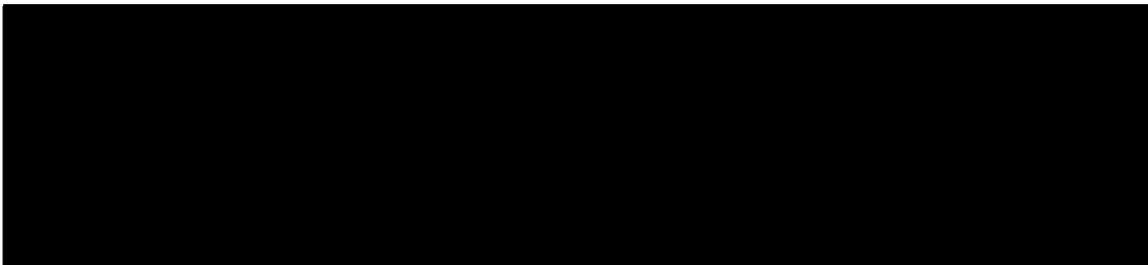
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The Corps has now admitted that half of the dredged sands placed in the Sand Island Beneficial Use Area (SIBUA) are accumulating instead of rejoining the natural littoral drift system to nourish Dauphin Island as the Corps consistently promised would occur over the past 20 years. That means, since 1999 when the SIBUA began to be used, Dauphin Island has been robbed of at least 7 million cubic yards of beach quality sands, causing significant erosion of the island. **If that volume of sands was spread 3 feet deep, it would cover an area 852 feet wide along the entire 14-mile length of the island.** The Corps' admission supports the observed erosion of the island and the Corps' own 1978 report, the National Park Service's 2006 report, and the US Geological Survey's 2007 report – all identifying the Mobile Harbor project as a contributor to the erosion of Dauphin Island and the Alabama-Mississippi barrier island system.

The Draft GRR will present the Corps' Tentatively Selected Plan (TSP) to deepen and widen Mobile Harbor. To comply with all federal laws and regulations, the TSP **MUST** include a Mitigation Plan to both halt future erosion and to restore Dauphin Island's historically eroded shoreline. The Mitigation Plan should consist of two features: (1) all future sands dredged from the Outer Bar Channel should be disposed in shallow waters to assure 100% of the sands are returned to the littoral drift system; and (2) the historic Gulf shoreline of Dauphin Island must be restored to at least the conditions that existed in 1999 before the Corps began use of the SIBUA.

In Section 302 of the Water Resources Development Act of 1996, Congress provided the Corps the specific authority to use Mobile Harbor dredged material to accomplish environmental restoration. It is time the Corps finally did the right thing and tell the Alabama State Port Authority that together they must develop and implement an acceptable Mitigation Plan to correct the adverse effects the Mobile Harbor project is having on the erosion of Dauphin Island – Alabama's only barrier island. The impending Draft GRR is the appropriate vehicle to take that important step.



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109 Saint Joseph Street
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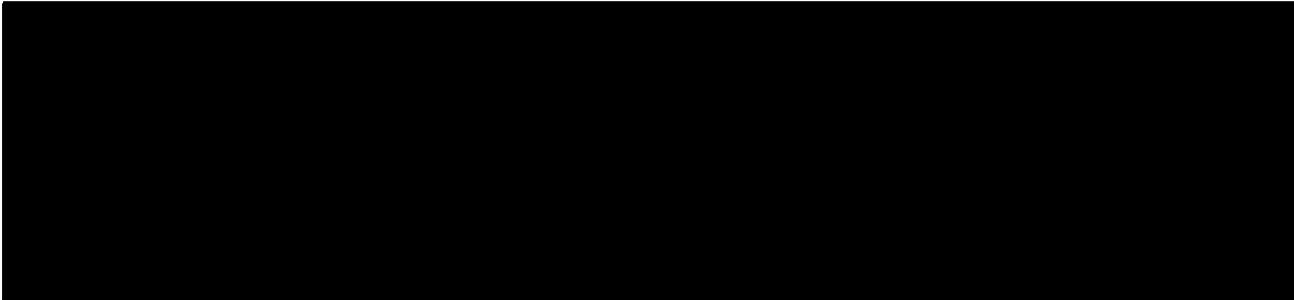
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U.S. Army Corps of Engineers, Mobile District
109 Saint Joseph Street
Mobile, AL 36602

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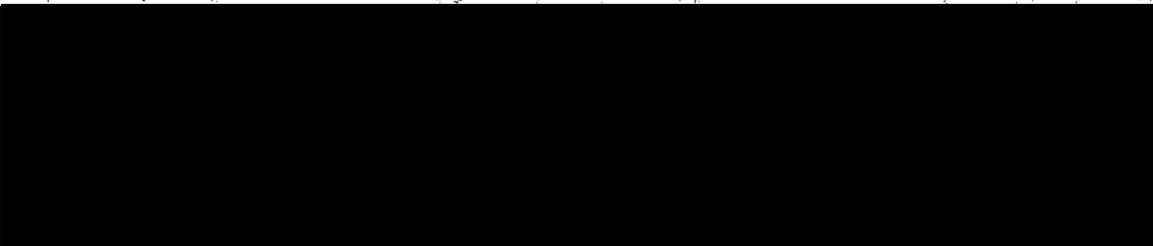
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Sincerely,



General Semonite -

haven't been happy with CDE District in a long time. My book relates some of the problems and also tells an interesting story @ Gen'l Denton Wilson, DE - He said I hit it off right at first & was a smooth operator as he asked how does a person(s) improve or change the image of the Corps? I suggested he put together a Strategic Advisory Committee out of those who receive the PN's - He did and the stories are in my book -

I noticed a Release no 18 - 014 posted on 2/9/18 requesting proposals for revised use of DM - I would bet mobile was the first to use WES's idea - millions of acres were used to cover Alcoa's mud lakes - a superfund site as nothing would live in the alkaline waters - we signed a displacement - you'll read @ it as the Dr. of the Port & probably CDE accepted the document and destroyed the "paradise" - I am in touch with Alcoa but politics in AL can be very corrupt - anyway if the contracts re: the recycling DM is interested encourage them to read Chronicle or to get to talk with Gene Paulik or Doug Harman Please read on



March 1, 2018

Colonel James A. Delapp
Corp of Engineers
P.O. Box 2288
Mobile, Al. 36628

As an involved citizen of Mobile and a respected environmentalist of coastal Alabama for many years I hereby submit these comments for the **Corps of Engineers (COE) Record for the Public Hearing (PH) and Re: Alabama State Port Authority's (ASPA) Proposed Widening and Deepening of the Mobile Ship Channel** held February 22, 2018 in Mobile, Alabama. I attended the previous Corps Public Hearing in Bayou La Batre and couldn't stomach another dog and pony farce.!

A proper Public Hearing (PH) has not been held by the Corps of Engineers (COE) in coastal Alabama for many years. There may be reasons for believing the COE and ASPA have joined forces and are violating the laws of the land, specifically the **Public Trust Doctrine (PTD)** and the **National Environmental Policy Act (NEPA)**.

I am being told by individuals attending the PH that the District Engineer of COE made it a point to take up a great deal of time at the beginning of the PH February 22 discussing at length Puerto Rico's situation-WHY?? **Did he due it intentionally** to shorten the public's time significantly in voicing their concerns and sharing their views for the Record?? People in the audience thought it very obvious and many now feel this **federal agency** may be **overstepping their boundaries** in supporting ASPA's bloated economics as well as this project over the public needs. A similar situation was discovered several years ago right after **BP's blowout**. The Department of Interior and Minerals Management Services ignored their responsibility and violated federal laws, even bending over backwards supporting the oil and gas industry every way they could. It became a national farce as MMS help cause the catastrophic blowout. The **acting inspector general** for the DOI quietly **recommended** the agency **adopt a scientific integrity policy**. They didn't.

If this project is somehow allowed to pass, then the container, maritime and automobile industries should be required to **assume all of the expenses and consequences** for their project? They should be required to request this permit in their names and for their needs and not make the taxpayer assume their debts.

The Public Trust Doctrine (PTD) protects and provides for the rights of the American public and Alabamians to enjoy public access and use of all of coastal Alabama's natural resources, in this case all that Mobile Bay offers. ASPA's proposed widening and deepening project poses significant threats to Mobile Bay's integrity, water quality, bottomlands/detritus, micro/macro marine life, underground water bodies (aquifers) and all of its other natural resources. The '**public interests**' or users of this body of water are commercial 'live li hood' families depending on fisheries/ recreational fishermen, shrimpers, oystermen, boaters and sailors, swimmers, tourists, families and bay side property owners.

As one who has focused half of her life and 'lain across barb wire to save' Mobile Bay from assaults, are AGAIN having to focus on another badly planned proposed project

which threatens this invaluable estuary almost out of existence—for special interests over the public interests! Why chance making our bay deeper and wider, and discover the containerships, marine traffic and ‘projected cars’ aren’t coming; ASPA’s economics are bloated and flawed, or just plain GREEDY in their wants! **A similar but possibly worst widening and deepening proposal by COE and ASD’s was denied in 1985!**

The PTD should not be ignored as no-one should be so ignorant as to believe they can ignore the laws and people’s NEEDS and VALUES! If they believe **Jimmy Lyons**, who is **not a biologist**, say ‘**open spraying**’ is the safest and best option in spreading millions of gallons of dredge material into the air and over the bay’s waters containing **unidentified toxic and hazardous chemicals** which may be threatening human lives then they are not smart enough to realize that ‘others are losing their shirts.’ (Oh by the way- Lyons also believes that coal dust is not harmful to humans?)

No-one truly knows **what the impacts have been** from this ‘scatter brained idea’ and it **should be a top priority** to identify the unknowns before this estuary is completely destroyed. [REDACTED] said “There are no oysters in Alabama right now. None. All the dredging you’ve been doing and have done for at least three years has covered up everything in the bay. If you stopped today, it’d take 10 years to get the pH factor back in the bay to produce local oysters.”

The million cubic yards of sprayed sediment and heavy turbidity loads may be **filling the gills** of fish, shrimp and oyster with ‘silt’ making them have trouble breathing the vital dissolved oxygen needed from the water column? **Coastal Alabamians have similar problems** breathing as the local air contains unidentified toxic/hazardous pollution loads released from the heavily congested transportation corridors, McDuffie’s coal handling facility, emissions from the numerous storage tanks and various chemical, cement and energy companies in Mobile/Baldwin Counties.

National Environmental Policy Act (NEPA) requires and supports citizen input and participation especially when a proposed project poses ‘**significant adverse affects on the environment and jeopardizes human life.**’ These words trigger the need for an overall EIS. This story needs to be told. A retired COE speaker at a Sierra Club meeting in coastal Alabama alerted the attendees as to how Director Jimmy Lyons of the ASPA was ‘illegally’ meeting behind closed doors with other state and federal agencies discussing his proposed channel and dredging project for Mobile Bay. He planned on filling the northern portion of the bay with disposal islands which are presently public lands. A little history...the Fish & Wildlife Service estimated that in the early days the Alabama State Docks (ASD), now the ASPA, had historically “taken, diked and filled” over 5,000 acres of public lands in the Mobile Harbor now ‘fast lands’ being used by the Port. They are McDuffie, Blakeley, Pinto Island and Gaillard Island. Following the meeting individuals and groups became involved and required the current overall EIS being put together for the project, instead of the proposed EA the ASPA planned on doing. You may enjoy reading my book-

[REDACTED], it covers the 70’s until 2017.

These are few historical moments that someone in power may consider being useful::

****Other ports in the Nation have deeper channels and **presently accommodate** and easily handle these huge ships and automobiles-so why try something that **isn't going to work in our very shallow** Mobile Bay? The bay is so shallow it requires frequent costly maintenance and the COE adds to these costs as they forget their responsibility and never seem able to do something right the first time in an environmental friendly manner. They believe in using the least costly methods such as capturing and dumping the loads in deep Gulf of Mexico waters or spraying it over bay's waters. 'Out of sight out of mind process.

**** The Waterways Experiment Station in Vicksburg warehouses contained estuary models such as Mobile Bay and the COE scientific board announced that dredged material was considered a "**natural resource**" and should be used as such. **This was news** but it seemed to challenge the Mobile District as they were dredging the **new "Theodore Industrial Channel** for the Industrial Park." The ASPS and Chamber of Commerce wanted an island in the bay and refused to consider placing millions of cu. yds. of dredge material onshore that could be used in construction and roads. **Common sense was ruled out**-Greed came into play! Mobile Bay ended up with the badly planned, extremely costly **Gaillard Island** which destroyed over 5 square miles of bay bottoms and surface area in the beginning and has become a sinkhole for millions of taxpayers' dollars annually.

****A similar situation occurred in the 70's with **Radcliff Dredging**. During their 24 hour dredging operations in Mobile Bay it was finally discovered the **heavy turbidity** and **huge sediment loads** were destroying water quality, killing marine life and destroying wetlands and grass beds through out the bay. The **operation was stopped**.

***** Dredge material was used in a pilot program in recovering a superfund site. The COE/ASD used Alcoa's area for 35 years '**freely**' dumping 15 million cubic yards of dredged material from the harbor into the six mud- lakes. According to the **Alcoa/ Ala's legal agreement** after that period **600 acres** would be turned into a **birding paradise** and re- turned to the people and state of Alabama as '**mitigation.**' This was beautifully done in the 600 acre area and contained lot of trees, shrubs and freshwater ponds caring for a variety of birds, butterflies and possibly wildlife, as it is close to the Mobile-Tensaw Delta. But the Director of the ASPA /COE violated this legal document and the birding paradise has been **destroyed completely**

***** There doesn't appear to be any kind of federal or biological oversight regarding the COE/ASPA operations in Mobile Bay as the deep holes or 'dead zones' throughout areas in the bay have been filled that once provided marine life a haven; the invaluable submerged and emergent grass beds and bay bottoms that were once lush in Arlington Point have been smothered; as have the Alabama's oyster beds and reefs.

*****The ASPA plans to dredge a deep holding area as anchorage for the huge container vessels in the Bay north of Fort Morgan Peninsula, but these ships need to stay in the Gulf. What happens when the Peninsula starts to disappear and slough off into the

*Dredge material
is a resource*

*restoring Alcoa's
mud lakes &
dredge material*

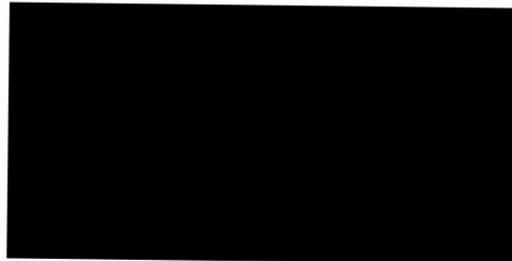
dredged holding basin as Mother Nature's natural holding stability would have been disturbed and removed... what will the state do? In 1985 the ASD's planned a huge coal handling terminal in this same area, but thank heavens it was stopped-one has to watch out for land grabs such as these.

**** Jeff Childs, a noted biologist with MMS warned "bringing in these huge foreign ships are likely to introduce **invasive exotic species** that may well yield much greater **significant adverse affects** than expected." This happened before in Mobile Bay and ended being an economic horror and presented nightmares! Jimmy Lyons, put this in your **economic** statement!

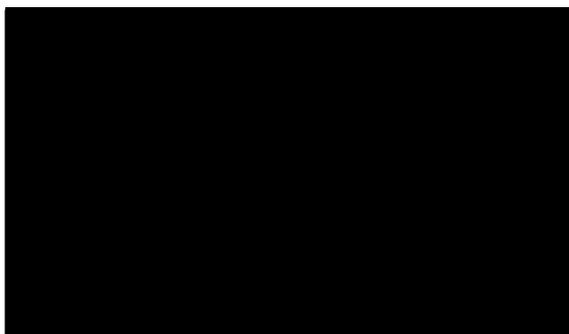
****During the COE's Tenn. Tom/Black Warrior '**boondoggle**' a few years back... people discovered there was no water coming from their wells in their backyards as the aquifers had suddenly dried up. It was finally discovered the **new deep cuts** for the canal had destroyed and dried up the underground springs close to the farms and homes. No-one assumed responsibility for their losses. The PTD now requires that underground water supplies be fully protected in the Nation. The point that needs to be made is the COE and ASD's have again requested a **deeper draft and channel** in the bay and these **should be denied forever**. Water supplies are too vital and must be preserved for the rights of present and future generations. These underground rivers or aquifers provide diverse benefits as they also **refurbish and replenish surface rivers and streams**, which provide for recreational trout fishing and other needs. There are numerous rivers that need protecting on both sides of Mobile Bay such as Fish, Fowl and Dog Rivers and fishermen need to be alerted and involved...

*****Costly and **catastrophic erosional processes** will occur within Mobile Bay with wider and deeper channels as more **ship waves** will threaten marshes, wetlands, the high banks on eastern shore and beaches of Mobile Bay will disappear and erode. This is probably why the **beach areas on the west side of Mobile Bay** are covered with rip rap? Alabama taxpayers will pay for the COE/ASPA short sightedness-AGAIN if this EIS is approved in near future! Will the Alabama taxpayer ever tire of footing the COE/ASPA bills for their badly planned 'special interests' projects?

The **Alabama Attorney General** needs to stay on top of this project and consider taking appropriate actions when necessary as the EIS hasn't been released yet. The citizens should be allowed a proper Public Hearing and have time to make comments on this questionable document. Citizen lawsuits need to be filed if this permit is granted and the AG hasn't done anything.



Copies to everyone



March 31, 2018

Col. James A. DeLapp
U. S. Army Corps of Engineers
Mobile District
109 Saint Joseph Street
Mobile, Alabama 36602

Dear Col. DeLapp:

This letter is to follow up the Corps' February 22, 2018 public meeting on the Mobile Harbor General Reevaluation Report (GRR) Study. I am writing to express my strong views on the actions that the Corps MUST take before releasing the Draft GRR and Supplement to the Environmental Impact Statement for public review.

The Corps has admitted that half of the dredged sands placed in the Sand Island Beneficial Use Area (SIBUA) are accumulating instead of rejoining the natural littoral drift system to nourish Dauphin Island (DI) as the Corps consistently promised would occur over the past twenty (20) years. Therefore, since 1999 when the SIBUA began, DI has been abused of at least 7 million cubic yards of beach-quality sand thereby causing significant erosion to the island. This loss equates to the 14-mile length of DI having sand accrete to the island 3 feet deep and 852 feet wide.

The Corps' admission supports the observed erosion of the island, the Corps' own 1978 report, the National Park Service's 2006 report, and the U.S. Geological Survey's 2007 report. Each of these reports cite the Mobile Harbor Project as the contributor to the erosion of DI and the Alabama-Mississippi barrier.

As a resident of South Louisiana for the last 47 years, I have seen what coastal erosion has done to our coastline. The hurricanes that have destroyed and eviscerated our barrier islands have devastated most of the coastal parishes in our state. Each hurricane brings the Gulf of Mexico further into the parish. Without DI the same problem is going to present itself in Alabama, particularly Mobile County, including the Port of Mobile. The damage that will be caused by the loss of DI will cause millions of dollars in damage to the City and Port of Mobile.

The Draft GRR will present the Corps' Tentatively Selected Plan (TSP) to deepen and widen Mobile Harbor. To comply with all federal laws and regulations, the TSP must include a mitigation plan to not only halt future erosion on DI, but also to restore DI's historically eroded shoreline. The mitigation plan should consist of two (2) features:

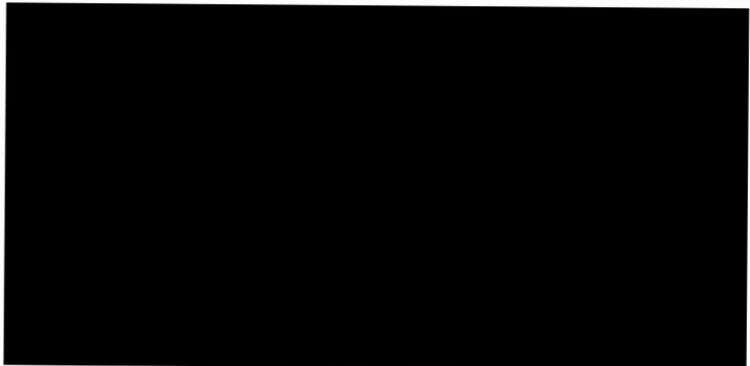
- 1) All future sands dredged from the Outer Bar Channel should be disposed in shallow waters to assure 100% of the sands are returned to the littoral drift system; and
- 2) The historic Gulf shoreline of Dauphin Island must be restored to at least the size and level that existed in 1999 before the Corps began use of the SIBUA.

In Section 302 of the Water Resources Development Act of 1996, Congress provided the Corps the specific authority to use the dredged material from Mobile Harbor to accomplish environmental restoration. Specifically it states:

'In disposing of dredged material from such project, the Secretary, after compliance with applicable laws and after opportunity for public review and comment, may consider alternatives to disposal of such material in the Gulf of Mexico, **including environmentally acceptable alternatives for beneficial uses of dredged material and environmental restoration.**' (Emphasis added).

It is time that the Corps finally did the right thing. The Corps along with the Alabama State Port Authority should and must develop and implement an acceptable mitigation plan to correct the adverse effects that the Mobile Harbor Project has on the maintenance of DI. It is imperative that DI is maintained to be able to counter the ill effects of hurricanes and tropical storms. The damage of Hurricane Nate this past year on DI is shocking. That Category 1 storm was as devastating to the integrity of DI as was the Category 5 Katrina in 2005. From the aerial photographs of the island taken this week, it is evident that a larger storm will again cut up DI into pieces, which will be the beginning of the end of DI. Louisiana watched over the years as hurricanes cut up Last Island until it finally disappeared. It started out as an island comparable in size to DI.

The impending Draft GRR is the appropriate vehicle to correct the damage done to Dauphin Island, the first line of defense for Mobile County.



March 21, 2018

Colonel Jon DeLapp, Commander Mobile District
United States Army Corps of Engineers
109 Saint Joseph Street
Mobile, AL 36602-3630

VIA UNITED STATES MAIL

Re: Disposal site for dredge material from the Mobile Outer Bar Ship Channel

Dear Colonel DeLapp:

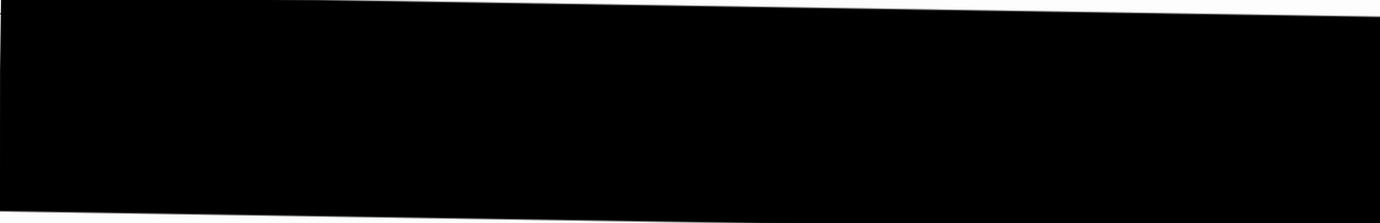
I write to you as a member of the 3,300-member Dauphin Island Property Owners Association regarding the disposal of sand dredged from the outer bar of the Mobile Ship Channel. The Board of Directors has requested that I inform the United States Corps of Engineers of the Association's position in light of recent data disclosed by the Corps of Engineers to the public in a February 22, 2018 meeting at the Corps of Engineers offices in Mobile, Alabama.

The Association is highly concerned that the placement of beach quality sand dredged from the outer bar of the Mobile Ship Channel be in an area where it will return to the littoral drift and limit the significant erosion that has been occurring on Dauphin Island over the past several decades. As you are aware the dredge material is currently being deposited in the Sand Island Beneficial Use Area (SIBUA) at a water depth of approximately twenty-seven feet. At the February 22, 2018 Corps meeting, Corps representatives indicated the sand is leaving that area at about one-half the deposited rate.

Consequently, the sand that the Corps of Engineers has been depositing in the SIBUA since 1999 is accumulating there, and only half the material dredged has left the SIBUA, leaving half the material at the disposal site. It is my understanding that approximately seven million cubic yards of sand remains in the SIBUA, and that area is nearing capacity.

These circumstances illustrate two concerns: 1) the sand is not returning to the littoral drift and having an opportunity to make its way to the beaches of Dauphin Island and 2) there now needs to be a different area for which the sand must be deposited as the SIBUA is nearing capacity. There have been discussions of extending the SIBUA area north and west, but still having the material deposited at a twenty-seven-foot depth.

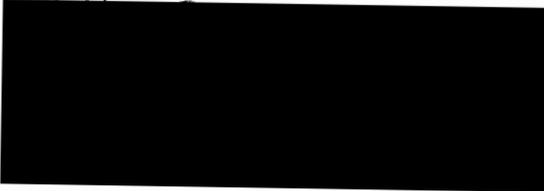
The current problem of the sand not returning into the littoral drift will not be solved or affected by simply continuing to place the sand at such water depths. It is our understanding that coastal engineering science indicates an effective water depth that will return the vast majority of this sand to the littoral drift should be in twenty feet of water or less, possibly as shallow as ten to fifteen feet of water. The Association appreciates the fact that disposal in shallower waters may require additional costs because of the draft of the vessels currently being used to deposit the sand, and there may be a necessity to pump or otherwise deliver the sand to a water depth of less than twenty feet.



It is imperative the sand be deposited in an area of less than twenty feet in order to begin returning the entire volume of the newly dredged sand to the littoral drift. This concern is exacerbated by the fact that the Corps is proposing to widen and deepen the Mobile Ship Channel, and that event will cause an additional five to twenty percent of the sand in the littoral drift to be captured in the outer bar of the Mobile Ship Channel. That additional sand will also be dredged and should be returned to the drift. Moving the sand disposal site to an area of less than twenty feet will only begin to repair the extensive damage that has been done to Dauphin Island by the amount of sand that has been removed from the littoral drift and remains in the SIBUA. Hopefully the remaining sand in the SIBUA will after decades return to the littoral drift, but a continued practice of depositing dredged sand material in water depths above twenty feet would only contribute to the further demise of the beaches of Dauphin Island. The Corps has been made aware of the value of Dauphin Island not only as a contributor to the regional economy, but also as a critical barrier island protecting the mainland from storm surges and damages because of hurricanes, tropical storms, and other natural calamities. It is important to the public that the geological integrity of the island remain intact to afford this protection.

As the Corps of Engineers has now publicly stated there is scientific data that the depositing of dredge material at the twenty-seven-foot depth has only allowed one-half of the sand over the last twenty years to have even the opportunity to return to the drift, it is imperative that changes be made in the dredge material disposal site. The only site that is acceptable to return this dredged material to the littoral drift is to deposit the sand would be in an area of less than a twenty feet depth.

We urge the Corps of Engineers to change the practices of the depositing of dredge material to the shallower areas so that they may benefit the public at large, the regional economy, the fisheries, the environment, and the safety of the citizens that live on Dauphin Island and the mainland of Mobile County. Serious consideration of these concerns by the Corps of Engineers will be deeply appreciated.



cc:

Brigadier General Diana M. Holland, Commander, South Atlantic Division, U.S. COE
Lieutenant General Todd T. Semonite, Commanding General & Chief of Engineers, U.S. COE
The Honorable Richard Shelby, United States Senator
The Honorable Doug Jones, United States Senator
The Honorable Bradley Byrne, United States Congressman
The Honorable David Sessions, Alabama State Representative
The Honorable Bill Hightower, Alabama State Senator
The Honorable Sandy Stimpson, Mayor, City of Mobile
The Honorable Jeff Collier, Mayor, Town of Dauphin Island
The Honorable Terry Downey, Mayor, City of Bayou La Batre
The Honorable Jerry Carl, Commissioner, Mobile County
The Honorable Kay Ivey, Governor, State of Alabama

[REDACTED]

[REDACTED]

Sent: Wednesday, January 24, 2018 10:20 AM
To: Flakes, Curtis M CIV (US)
Cc: Newell, David P CIV CESAM CESAD (US); caroline graves
Subject: [EXTERNAL] GRR/Mobile Harbor Expansion Study
Attachments: PDF-4830 COE DI.pdf

Mr. Flakes,

I have received and read the attached email from [REDACTED] describing her December 12, 2017, Corps meeting with [REDACTED] and Corp Employees concerning a GRR/Mobile Harbor expansion study.

Please be advised that I am a Dauphin Island Property Owner and it appears that she has some valid concerns.

I recall reading (in the past) a study by [REDACTED] that established a direct link between Mobile Bay dredging/dumping, policies/procedures and Dauphin Island Beach Erosion. Also be advised that I have worked with [REDACTED] in the past on a Project in Orange Beach and find him extremely credible.

Accordingly, I support [REDACTED] positions relative to beach erosion and request that these positions be given their due and proper consideration.

Very Respectively,

[REDACTED]

--

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[REDACTED]

Sent: Friday, February 23, 2018 2:29 AM
To: Mobile Harbor GRR; Newell, David P CIV CESAM CESAD (US); Flakes, Curtis M CIV (US)
Subject: [Non-DoD Source] 1997 Corps HQ directive to Mobile District to conduct investigation under Section 302 authority
Attachments: 1997 - HQ and SAD ltrs to SAM directing SAM to implement Sec 302 of WRDA of 1996.pdf; 1986 and 1996 Mobile Harbor authorization and amendment.pdf

David:

This is to follow-up our conversation tonight after the Mobile Harbor public meeting. As promised, attached are: (1) Corps HQ May 30, 1997 directive to the Mobile District; (2) SAD's subsequent endorsement; and (3) a related July 3, 1997 email from Dennis Barnett of SAD to Roger Burke of SAM. All three items of correspondence from Corps higher direct the District to investigate the authorized Mobile Harbor maintenance plan under the authority provided by Section 302 of the WRDA of 1996 (also attached). In conducting the investigation, the District was also directed to involve ALL stakeholders in a partnership agreement and to determine if the Mobile Harbor project Federal Standard should be adjusted by comparing the cost of alternatives to beneficially use dredged material, including environmental restoration; to the cost of disposal in deep Gulf waters as had been required in the WRDA of 1986 Mobile Harbor project authorization..

It was this correspondence that served as the basis for my comment at tonight's meeting. I am unaware of any investigation that may have been conducted by the District to comply with the Corps HQ directive and the accompanying SAD endorsement. As I said in my comment tonight, and as I have maintained since the initial Project Scoping Meeting over two years ago, the GRR Study should include an evaluation of an alternative(s) to comply with the discretionary Section 302 authority granted to the Corps, and now to the recently discovered 1997 directive from Corps higher authority to do so.

It is becoming increasingly unclear to a growing number of the concerned public why the Mobile District continues to refuse to evaluate alternatives allowed by Section 302 to counter the Dauphin Island erosion issue -- particularly since the District revealed tonight that beach quality sands (around 14 million cubic yards) placed in the Sand Island Beneficial Use Area (SIBUA) since 1999 are accumulating at a considerably faster rate than are being carried away from the site. Based on the 50% accumulation percentage reported by the District staff tonight, of the approximately 500,000 cubic yards of dredged sands placed in the SIBUA on an average annual basis, around 250,000 cubic yards remain in the site -- in effect being permanently removed from the littoral drift system. Thus, during the almost two decades since the District began placing sand in the SIBUA in 1999, around 7 million cubic yards of valuable beach quality sands have been effectively removed from the littoral drift system. That volume represents a significant loss of naturally provided nearshore sands. Further, that loss directly supports the observed decrease in depths within the SIBUA; the steady disappearance of the Sand/Pelican Island complex; and the continuing recession of the Dauphin Island shoreline and the decline in topography of Dauphin Island's west end.

As the District admitted tonight, the high sand accumulation/retention rate is also reducing the remaining capacity of the SIBUA to receive future dredged volumes, necessitating the need to extend the limits of the site to the northwest. The Mobile District stated it must make that change in the size and limits of the SIBUA even if the existing Outer Bar Channel dimensions are not increased as is presently proposed to occur. What the public would like to see is the SIBUA actually extended into more shallow waters of the ebb tidal delta shoal which would allow larger quantities of the sands to be reincorporated into the littoral drift system to rebuild the Sand/Pelican Island complex and to nourish Dauphin

Island's eroding shoreline. Such an alternative(s) must be identified and investigated in order to identify the true operational costs and to determine the effect on the Mobile Harbor project Federal Standard, as Corps HQ directed the Mobile District to do by letter of May 30, 1997. In view of what we learned tonight, further refusal by the Mobile District to conduct an evaluation of such alternatives does not represent a responsible action and will only weaken the GRR and its integrated SEIS when it is released for public review. Lastly, based on what we learned tonight, the Mobile District should discontinue referring to the SIBUA as a "beneficial use area", instead renaming it to the Sand Island Disposal Area.

BTW, this was the most informative public meeting the District has conducted to date the GRR Study. I recommend the District follow the same format for the public meeting that is typically held in connection with the release of the Draft GRR and SEIS.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]
Sent: Sunday, April 1, 2018 11:21 AM
To: Mobile Harbor GRR
Subject: [Non-DoD Source] Dauphin Island Sand Dredging
Attachments: DIPOA Letter

United States Army Corps of Engineers,

My husband, [REDACTED], and I are long time property owners on Dauphin Island. We completely agree and support the beliefs of the Dauphin Island Property Owners Association put forth in the attached letter.

We join our voices with them in urging the Corps of Engineers to change the practices of the depositing of dredge material to the shallower areas so that they may benefit the public at large, the regional economy, the fisheries, the environment, and the safety of the citizens that live on Dauphin Island and the mainland of Mobile County.

Sincerely,

[REDACTED]

March 21, 2018

Colonel Jon DeLapp
Commander Mobile District
United States Army Corps of Engineers
109 Saint Joseph Street
Mobile, AL 36602-3630

VIA UNITED STATES MAIL

Re: Disposal site for dredge material from the Mobile Outer Bar Ship Channel

Dear Colonel DeLapp:

I write to you as President of the 3,300 member Dauphin Island Property Owners Association regarding the disposal of sand dredged from the outer bar of the Mobile Ship Channel. The Board of Directors has requested that I inform the United States Corps of Engineers of the Association's position in light of recent data disclosed by the Corps of Engineers to the public in a February 22, 2018 meeting at the Corps of Engineers offices in Mobile, Alabama.

The Association is highly concerned that the placement of beach quality sand dredged from the outer bar of the Mobile Ship Channel be in an area where it will return to the littoral drift and limit the significant erosion that has been occurring on Dauphin Island over the past several decades. As you are aware the dredge material is currently being deposited in the Sand Island Beneficial Use Area (SIBUA) at a water depth of approximately twenty-seven feet. At the February 22, 2018 Corps meeting, Corps representatives indicated the sand is leaving that area at about one-half the deposited rate. Consequently, the sand that the Corps of Engineers has been depositing in the SIBUA since 1999 is accumulating there, and only half the material dredged has left the SIBUA, leaving half the material at the disposal site. It is my understanding that approximately seven million cubic yards of sand remains in the SIBUA, and that area is nearing capacity.

These circumstances illustrate two concerns: 1) the sand is not returning to the littoral drift and having an opportunity to make its way to the beaches of Dauphin Island and 2) there now needs to be a different area for which the sand must be deposited as the SIBUA is nearing capacity. There have been discussions of extending the SIBUA area north and west, but still having the material deposited at a twenty-seven foot depth. The current problem of the sand not returning back into the littoral drift will not be solved or affected by simply continuing to place the sand at such water depths. It is our understanding that coastal engineering science indicates an effective water depth that will return the vast majority of this sand to the littoral drift should be in twenty foot of water or less, possibly as shallow as ten to fifteen foot of water. The Association appreciates the fact that disposal in shallower waters may require additional costs because of the draft of the vessels currently being used to deposit the sand, and there may be a necessity to pump or otherwise deliver the sand to a water depth of less than twenty feet. Notwithstanding the costs, it is imperative the sand be deposited in an area of less than twenty feet in order to begin returning the entire volume of the newly dredged sand to the littoral drift. This concern is exacerbated by the fact that the Corps is proposing to widen and deepen the Mobile Ship Channel, and that event will cause an additional five to twenty percent of the sand in the littoral drift to be captured in the outer bar of the Mobile Ship Channel. That additional sand will also be dredged and should be returned to the drift.

Moving the sand disposal site to an area of less than twenty feet will only begin to repair the extensive damage that has been done to Dauphin Island by the amount of sand that has been removed from the littoral drift and remains in the SIBUA. Hopefully the remaining sand in the SIBUA will after decades return to the littoral drift, but a continued practice of depositing dredged sand material in water depths above twenty foot would only contribute to the further demise of the beaches of Dauphin Island.

The Corps has been made aware of the value of Dauphin Island not only as a contributor to the regional economy, but also as a critical barrier island protecting the mainland from storm surges and damages as a result of hurricanes, tropical storms, and other natural calamities. It is important to the public that the geological integrity of the island remain intact to afford this protection.

As the Corps of Engineers has now publicly stated there is scientific data that the depositing of dredge material at the twenty seven foot depth has only allowed one-half of the sand over the last twenty years to have even the opportunity to return to the drift, it is imperative that changes be made in the dredge material disposal site. The only site that is acceptable to return this dredged material to the littoral drift is to deposit the sand would be in an area of less than a twenty feet depth.

On behalf of the Dauphin Island Property Owners Association, I urge the Corps of Engineers to change the practices of the depositing of dredge material to the shallower areas so that they may benefit the public at large, the regional economy, the fisheries, the environment, and the safety of the citizens that live on Dauphin Island and the mainland of Mobile County.

Serious consideration of these concerns by the Corps of Engineers will be deeply appreciated.

Very truly yours,

Dennis J. Knizley
President
Dauphin Island Property Owners Association, Inc.

DJK/cmk

cc:

Brigadier General Diana M. Holland, Commander, South Atlantic Division,
United States Corps of Engineers
Lieutenant General Todd T. Semonite, Commanding General and Chief of
Engineers, United States Corps of Engineers
The Honorable Richard Shelby, United States Senator
The Honorable Doug Jones, United States Senator
The Honorable Bradley Byrne, United States Congressman
The Honorable David Sessions, Alabama State Representative
The Honorable Bill Hightower, Alabama State Senator
The Honorable Sandy Stimpson, Mayor, City of Mobile
The Honorable Jeff Collier, Mayor, Town of Dauphin Island
The Honorable Terry Downey, Mayor, City of Bayou La Batre
The Honorable Jerry Carl, Commissioner, Mobile County
The Honorable Kay Ivey, Governor, State of Alabama

Comment # 458

To: [REDACTED] [Mobile Harbor GRR](#)
Subject: [Non-DoD Source] Dauphin Island
Date: Monday, February 26, 2018 9:25:01 PM
Attachments: [feb corps meeting.docx](#)

At the meeting on the 22nd February, at the Convention Center, a group of about 100 attended.

Pascagoula Bar Channel and Horn Island in Mississippi have similar problems to Dauphin Island.

Dr. Robert Morton's 2007/2008 US GEOLOGICAL SERVICE REPORT, SHOWED HUMAN INTERVENTION (DREDGING) CAUSED THE EROSION OF THE Mississippi/Alabama barrier islands The Corps of Engineers was eroding sand to the Mississippi/Alabama barrier Islands.

Based on Dr Robert Morton's studies, and with the legislative help from Senator Trent Lott, the Mobile District Corps **used Dr Robert Mortons report as** justification for the Corps to receive **over a half a Billion dollars** of Federal money for their Mississippi Coastal Barrier Islands Restoration Project.

ONLY AFTER DR ROBERT MORTONS 2007 & 2008 STUDIES SHOWED HUMAN INTERVENTION (DREDGING) caused the erosion OF THE Mississippi/Alabama barrier islands DID THE CORPS GET THE HALF BILLION. This study by Dr. Robert Morton, **ACCEPTED BY THE CORPS FOR MISSISSIPPI**, should have been applied to ALABAMA during the Corps v Dauphin Island Federal law suit.

However, at the Federal law suit, the Corp hired, **and paid** Dr. Byrnes to testify on their behalf. Dr. Byrnes studies are **CONTRARY TO THE US GEOLOGICAL SERVICE REPORTS BY DR. ROBERT MORTON**, Dr Scott Douglas and Dr. Robert Dean.

Why did the Corps accept the report by Dr. Robert Morton for Mississippi, but chose to ignore it for Alabama and the Federal Law suit.

In order for the National Park Service to agree to the Corps restoration of the Mississippi Barrier Islands project, THE CORPS HAD TO ADMIT THAT THEIR DREDGING OF THE MOBILE PASS AND OTHER INLETS IN MISSISSIPPI HAD ADVERSELY IMPACTED THE Mississippi/Alabama barrier Island system, as Dr. Morton's study stated.

DAUPHIN ISLANDS PROTECTION OF THE MOBILE HARBOR AND ITS BILLIONS OF DOLLARS OF OIL/GAS INCOME THAT IS DERIVED FROM ALL THE RIGS AND GAS PIPELINES COMING INTO ALABAMA , **ONLY GO THROUGH DAUPHIN ISLAND.**

2009 Mobile District rejected Town of Dauphin Island request to extend the Sand Beneficial use Area, also rejected the Towns request for a public hearing.

THE ECONOMIC IMPACT FOR THE STATE OF ALABAMA IS \$425.3 BILLION. ALABAMA PORT AUTHORITY REVENUE ESTIMATED AT \$223 MILLION. \$573 MILLION IN DIRECT AND INDIRECT TAXES PAID TO STATE AND LOCAL GOVERNMENTS. OF THIS \$573 MILLION, NEARLY \$507 MILLION WAS DIRECTLY TIED TO THE ALABAMA STATE PORT AUTHORITY. WHAT WILL THE REVENUE BE FOR THE PORT AUTHORITY AND MOBILE COUNTY, WHEN THE SHIP CHANNEL IS DEEPENED AND WIDEND, 30% IS THE FIGURE PROJECTED BY MR LYONS AT THE MEETING.

AT A MEETING LAST YEAR, THE CORP REPRESENTATIVES HAD THE AUDACITY TO TELL THE MAYOR, SIERRA CLUB AND OTHERS THAT IT COSTS \$7 A CUBIC YARD TO DUMP AS IS, OR \$13 A CUBIC YARD TO PUT THE SAND IN THE BENEFICIAL AREA FOR DAUPHIN ISLAND. THE DELTA OF \$6 A LOAD WAS TOO HIGH. WHAT IS TOO HIGH IS THE DESTRUCTION OF DAUPHIN ISLAND, TAX BASE, FISHING, OYSTERS, LIVES, AND THE LIES WE HAVE LISTENED TO FOR SO MANY YEARS.

WITH THE REVENUES I JUST DESCRIBED, IT IS OUTRAGEOUS THAT WE HAVE TO KEEP COMING BACK TO THESE MEETINGS OVER AND OVER AGAIN, MORE STUDIES, MILLIONS OF MY TAX DOLLARS WASTED IN ORDER TO SAVE DAUPHIN ISLAND.

THE CORPS HAS TO DO THE RIGHT THING AND PUT OUR SAND BACK.

Comment # 459

To: [REDACTED] [Mobile Harbor GRR; Newell, David P CIV CESAM CESAD \(US\)](#)
Cc: [McDonald, Justin S CIV USARMY CESAM \(US\)](#)
Subject: [Non-DoD Source] Fwd: Missing slide(s) from presentation for Feb 22, 2018 Mobile Harbor public meeting?
Date: Thursday, March 1, 2018 8:12:53 AM
Attachments: [22 Feb 2018 Public Meeting - Final - \(SLIDES\).pdf](#)

David:

This is to follow-up my below message from Feb 23 requesting the slide we think Justin had on the screen at the Feb 22 public meeting concerning the District's proposed expansion of the SIBUA to address the dredged sand accumulation problem that is adversely affecting the continued utilization of the disposal area.

Thanks

[REDACTED]

-----Original Message-----

[REDACTED]
To: MobileHarborGRR <MobileHarborGRR@usace.army.mil>; david.p.newell <david.p.newell@usace.army.mil>; justin.s.mcdonald <justin.s.mcdonald@usace.army.mil>; curtis.m.flakes <curtis.m.flakes@usace.army.mil>; lisa.hunter <lisa.hunter@usace.army.mil>

[REDACTED]
Sent: Fri, Feb 23, 2018 8:00 pm

Subject: Missing slide(s) from presentation for Feb 22, 2018 Mobile Harbor public meeting?

David:

I've heard from several people today that the slide used by the Mobile District (i.e., Justin McDonald) at last night's public meeting showing the proposed northwestward expansion of the Sand Island Beneficial Use Area is not included in the slide presentation loaded on the Mobile Harbor GRR website.

I must admit from where I sat last night, it was a little difficult to discern the information contained on some of the slides. However, after downloading and reviewing the slide presentation myself, I have to agree that it appears that specific slide is missing, and possibly others.

The Mobile District should update the slide presentation to add ALL slides shown at last night's meeting. Any slide shown during the meeting should be considered a matter of the public record of the meeting's full proceedings. This is particularly true of the missing slide since it generated considerable discussion about future disposal location of beach quality sands dredged from the Outer Bar Channel -- an operational need that exists whether the channel is enlarged or not.

If the Mobile District believes it is necessary to edit the slide presentation, it should be to delete those slides dealing with the Puerto Rico Hurricane Recovery effort. The folks who attended the meeting last night, came there for the sole purpose of hearing about and asking questions on the Mobile District GRR Study. Some traveled several hundred miles just to attend the meeting. The time COL Delapp devoted to the Puerto Rico slides took away from the time that could have been devoted to the public asking questions. What is particularly galling to some folks is that several people had their hands up when the District shut down the meeting, forcing them to leave without being given the opportunity to ask their questions on the Mobile Harbor GRR Study while they had to listen to the Puerto Rico update.

Thanks



Comment # 460

To: [REDACTED] [Mobile Harbor GRR](#)
Subject: [Non-DoD Source] Letter with Questions & Concerns: Mobile Harbor GRR/EIS
Date: Friday, February 2, 2018 11:57:18 AM
Attachments: [2017-12-26 Ltr Curtis Flakes re Dec 12, 2017 mtg signed.pdf](#)
[2017-12-26 attachments for Ltr Curtis Flakes re Dec 12 2017 mt.pdf](#)

Attached is a letter mailed to Curtis Flakes in reference to a December 12, 2017 meeting with him and other Corps of Engineer personnel that I participated, along with [REDACTED], to seek answers to questions asked of the Corps at this meeting. After reviewing the meeting discussions, I came away with 2 specific concerns that are detailed in my letter and which still needs to be addressed.

I continue to believe that the Mobile District has intentionally ignored a significant flaw in the original 1980 EIS that failed to comply with Section 5 of the 1935 Rivers and Harbor Act which requires the Corps of Engineers to evaluate the effects of deepening and widening the Mobile navigation/ship channel on the adjacent shorelines occurring for a distance of at least 10 miles on both sides of Mobile Pass. If the Corps had complied with the 1935 law, the 1980 report would have included an investigation of the effects of enlarging the channel on Dauphin Island's shoreline, instead of ignoring the island as the report did. We have continually brought this fact to the Mobile District's attention. The GRR needs to address this error or omission and the GRR should specifically consider this law in this study of the maintenance dredging including the deficit sand deposited in the Open Gulf, and the ineffective SIBUA.

It is also apparent, as I have stated in my letter, that the Mobile District plans to ignore the provisions of paragraph 4.1b (1) on page 4-2 of the Corps' ER 1105-2-100 that specifically requires a GRR study to evaluate "changed conditions" in the study area that have occurred since the 1980 report was completed. In doing so, the Mobile District intends, as Justin McDonald stated, to only evaluate the effects of the disposal alternatives considered in the GRR on the Dauphin Island shoreline as it exists today. A consequence of that significant plan formulation decision is the GRR will completely ignore the "changed conditions" that have occurred in Dauphin Island's shoreline that have occurred during the 38 years since the 1980 report was completed as required by Corps agency regulations. It is obvious that the Mobile District's planned approach is clearly intended to ignore completely the extensive erosion of the Mobile Pass ebb-tidal delta and Dauphin Island that has occurred over the 38-year timeframe because of maintenance of the Outer Bar Channel that regularly intercepted and robbed the littoral drift system of over 29 million cubic yards of beach quality sands that were wastefully disposed in deep Gulf waters or placed in the non-effective euphemistically named Sand Island Beneficial Use Area.

Timing is of the utmost importance; the Corps schedule is moving forward to produce a draft GRR/SEIS for release and public review in June 2018. This GRR/EIS must fully comply with the requirements of:

(1) Section 5 of the 1935 Rivers and Harbor Act and all applicable Corps agency policy and guidance regulations and design manuals pertaining to that relevant federal statute; and

(2) Paragraph 4.1b (1) on page 4-2 of the Corps' ER 1105-2-100 regarding a full and honest investigation and disclosure of the "changed conditions" in the Gulf shoreline of Dauphin Island that have occurred during the 38 years since the original 1980 Mobile Harbor Survey Report was completed.

The two above specific evaluations not only are required by statute and Corps guidance, respectively, they are mandatory to ensure the GRR Study corrects a significant pertinent failure in the Corps' original 1980 report by addressing the historic loss of over 29,000,000 cubic yards of beach quality sands from the nearshore littoral drift sand transport system due to maintenance dredging that has contributed to present sand-starved condition of Dauphin Island and the significant erosion the island has experienced during the last almost four decades. In fact, the recent Hurricane Nate, a low level category 1 storm, caused an estimated \$8 million of infrastructure damage. The Island is in a weakened state and the decision to only address incremental impacts to the existing shoreline will position the Island for significant damage as a result of future storms.

It is especially critical for the Corps of Engineers Mobile District to address the above referenced issues in the Draft GRR and Supplement to the 1980 Environmental Impact Statement in the summer of 2018, as currently scheduled. I look forward to hearing from the Mobile Harbor GRR team that these items will be addressed in the GRR/EIS.

Sincerely,

A solid black rectangular redaction box covering the signature area.

Enclosures

December 26, 2017

Mr. Curtis M. Flakes,
Chief, Planning & Environmental Division
U.S. Army Corps of Engineers
Mobile District
P.O. Box 2288
Mobile, Alabama 36628

Dear Mr. Flakes,

I want to thank you for arranging the December 11 meeting to discuss the Mobile Harbor GRR Study. This was an important meeting for us to obtain answers to questions we have had for some time.

This letter addresses specific concerns I have. One important issue deals with how data from the Alabama Barrier Island Restoration Assessment (ABIRA) will be used in the GRR Study. Though David Newell provided some information, I am still concerned how this can happen since the ABIRA Comprehensive Report is scheduled for completion in March 2019, while the Draft GRR and SEIS is scheduled to be released in June of 2018 for a public review. Since these two separate report products have incompatible completion schedules, I would appreciate you elaborating in detail how data from the ABIRA will be used to produce the Draft GRR.

My greatest concern is associated with statements made by Justin MacDonald about the Mobile Harbor GRR Study. I strongly disagree with the Mobile District's position that the GRR will only evaluate the effects of the disposal alternatives considered on the Dauphin Island shoreline as it exists today. Such a position represents a travesty, completely disregarding paragraph 4.1b (1) on page 4-2 of the Corps' ER 1105-2-100 that requires a GRR study evaluate changed conditions in the study area that have occurred since the previous report was completed. It is obvious to the public that the Corps is taking the position that Justin stated in order to avoid having to admit the 1980 Survey Report was flawed because it failed to comply with Section 5 of the 1935 Rivers and Harbor Act. It is also obvious the Corps position is based upon your agency's clear intent to ignore completely the extensive erosion of the Mobile Pass ebb-tidal delta and Dauphin Island that occurred in the intervening 38 years as maintenance of the Outer Bar Channel continued to intercept and rob the littoral drift system of over 29 million cubic yards of beach quality sands that were wastefully disposed in deep Gulf waters and the non-effective Sand Beneficial Use Area (SIBUA). See attached USACE Mobile Harbor Outer Bar Channel Dredging History.

That institutionally accepted wasting of critically needed sands has left Dauphin Island in an extremely weakened condition is a fact. Now, minor storms regularly overwash the island, causing unnatural flooding of areas that once had higher elevations and were buffered by sand dunes. As a recent example, Hurricane Nate (barely a Category 1) caused extensive flooding, depositing sand on Bienville Blvd up to 6 feet deep that had to be removed at an estimated cost of over \$8 million. A document provided by the Town of Dauphin Island states:

“...contractors will have screened and deposited more than 50,000 cubic yards of sand along the island's south shoreline on the west end. As much as several hundred thousand yards of beach quality *sand* remains piled and scattered within town rights-of-way which could take another 45-60 days to remove. However, sand removal is only one part of the Hurricane Nate repairs facing our *island* community. For example, many of the side streets will require a new layer of crushed stone, road shoulders will need to be shaped to support drainage, numerous road signs and

posts must be replaced, the extreme west end of Bienville Blvd. will require substantial work to protect it from wave action, accommodate traffic and provide access to West End Beach, water & sewer infrastructure is damaged and the West End Beach/parking lot sustained significant storm impact”

Such damages and costs would not have occurred from Nate if the Corps had regularly placed the 29 million cubic yards of sand dredged from the channel in the shallow waters of the Mobile Pass ebb-tidal delta as proposed by the public and coastal engineers and scientists.

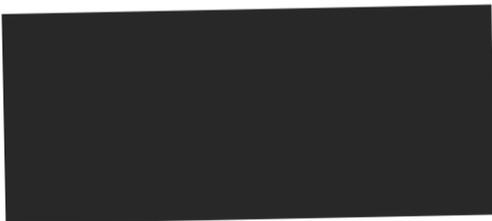
Further, the position stated by Justin is **CONTRARY** to the testimony Dr. Susan Rees (the Corps’ sole expert witness) gave at the September 15, 2009 Fairness Hearing held to settle the Corps vs the Dauphin Island Property Owners Association lawsuit. Excerpts of specific comments made by Dr. Rees’ in her sworn testimony is attached. I want to highlight here the important essence of her testimony which was intended to convince the presiding judge that the Class members should not be concerned with settling the lawsuit because prior to the Corps ever deciding to implement the 1986 authorized Mobile Harbor project, the Corps would do a thorough restudy of the original report. In doing so, Dr. Rees correctly referred to Corps policy and guidance that because of the amount of time that has passed since the original 1980 Survey Report was completed, a new report [the GRR] would have to consider “...whether conditions have changed since that original report was done”. In that connection, Dr. Rees testified “...the placement of dredged material has changed significantly, and the environment has changed...” since the 1980 Survey Report was completed. Lastly, Dr. Rees stated the new report [the GRR] “...would definitely examine the impacts to the coastal processes of the entire region, not just Dauphin Island”. Based on the present approach the Corps plans to pursue in the GRR, as described by Mr. McDonald, this leads one to ask two important questions;

- First, was Dr. Rees honest in the testimony she gave at the Fairness Hearing if she had knowledge the Corps never intended to address “changed conditions” in the study area since the original 1980 report was prepared?
- Second, since Dr Rees’ sworn testimony is consistent with the requirements of paragraph 4.1b(1) on page 4-2 of the Corps’ ER 1105-2-100, how does the Corps now justify its plans to ignore significant aspects of your agency’s policy and guidance relevant to the GRR that is at odds with what she told the Court.

Curtis, you and the entire Mobile District staff engaged in the GRR Study, **KNOW** the 1980 Survey Report and EIS did not investigate the potential for a deepened and widened Outer Bar Channel to influence the erosion of Dauphin Island as COL Drake Wilson committed would occur in his July 9, 1975 letter (see attached). Despite that clear and unquestionable fact with which the Corps staff does not disagree, I find it extremely disconcerting, both as a federal taxpayer and a stakeholder having a direct interest in the outcome of the GRR Study, to have heard at the December 11 meeting, Corps attorney Michael Creswell say the GRR and Integrated SEIS will not honestly state for the record that the 1980 Survey Report and EIS failed to comply with Section 5 of the 1935 Rivers and Harbors Act by not investigating the potential for the recommended project to affect the configuration of Dauphin Island’s Gulf shoreline. Thus, by refusing to be open and honest about that significant deficiency in the original 1980 report, which is directly relevant to the current GRR effort, that means the Mobile District is satisfied with hiding that important and cogent fact from the public, agencies, and its own upward reporting hierarchy. For that reason alone, I think it would be very prudent for the Mobile District to think long and hard before deciding to continue to pursue its current path on the GRR, and instead it should be imperative that the Mobile District include a comprehensive evaluation of the changes that have occurred in Dauphin Island’s shoreline between the 1980 report and the baseline year considered in the GRR Study.

As you will note, I am sending a copy of this correspondence to Col DeLapp, our Congressional representatives, State Legislators, Corps’ Division and Headquarters offices, and others.

I look forward hearing from you about these significant concerns and how the Mobile District will address them.



Cc: Honorable Richard Shelby, Senator
Honorable Bradley Burn, Congressman
Honorable Doug Jones, Senator-Elect
Lieutenant General Todd T. Semonite, Commanding General & Chief of Engineers
Brig. General Diana M. Holland, Commander South Atlantic Division
Col. James A. DeLapp, Mobile District
Jimmy Lyons, Alabama State Port Authority
Mr. Christopher Militacher, EPA Region 4, NEPA Div. Director
State Senator Bill Hightower
State Representative David Sessions
Jeff Collier, Mayor – Town of Dauphin Island
Jason Johnson, Lagniappe

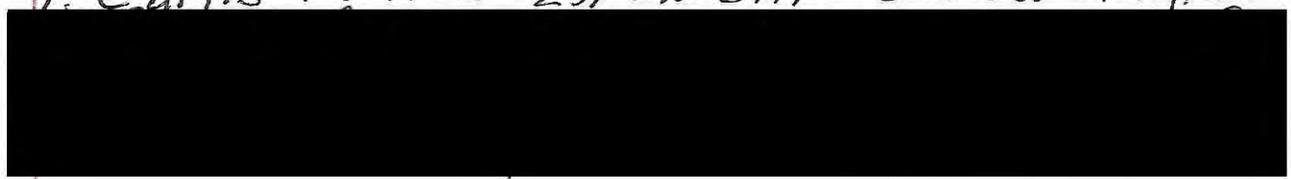


Enclosures

- List of attendees December 12, 2017 meeting
- Excerpts Sworn Testimony Dr. Susan Rees Corps Lawsuit
- Mobile Harbor Outer Bard Channel Dredging History (1980-2016)
- 9 July 1975 Letter Col Drake Wilson to Congressman Jack Edwards
- Excerpt 1978 Corps Beach Erosion Control & Hurricane Protection (Including Dauphin Island)
- Photograph Dauphin Island 1950's

December 12, 2017 - Mobile DISTRICT CORPS of ENGINEERS

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Cam Dyess



1 IN THE UNITED STATES COURT OF FEDERAL CLAIMS

2
3 C O P Y

4
5 DAUPHIN ISLAND PROPERTY

6 OWNERS' ASSOCIATION, INC.,

7 a non-profit corporation;

8 and JAMES W. HARTMAN, ET. AL.,

NO. 00-115L

9 PLAINTIFFS,

10 vs.

11 THE UNITED STATES OF AMERICA,

12 DEFENDANT.

13
14 EXCERPT TESTIMONY

15 OBJECTION STATED BY DR. SUSAN IVESTER REES

16 FAIRNESS HEARING

17
18 Whereupon, the Fairness Hearing was held
19 before the Honorable Bohdan A. Futey, Senior
20 Federal Judge, at the United States District Court
21 House, 113 St. Joseph Street, Second Floor, Mobile,
22 Alabama, 36602, on Tuesday, the 15th day of
23 September, 2009, at 1:00 p.m.

(APPEARANCES)

THE HONORABLE BOHDAN A. FUTEY'S LAW CLERK:
AMY HOGAN-BURNEY

(ATTORNEYS FOR THE PLAINTIFFS, DAUPHIN ISLAND
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EXAMINATION OF DR. SUSAN IVESTER REES (Excerpts):

Dr. Rees was an expert witness for the Corps and gave testimony on 9-15-09 at the Corps Lawsuit Fairness Hearing. Her testimony is applicable to the Corps plans as public input for the Widening and Deepening of the Mobile Harbor. Dr. Rees testimony **must be considered and followed by the Corps in the development of the GRR/EIS for Dauphin Island and Mobile harbor:**

Rees testimony on 9-15-09 Corps Lawsuit: Below are Excerpts of the Testimony of Dr. Susan Ivester Rees: September 15, 2009 Fairness Hearing, Mobile, Alabama; Questioned by Wells D. Burgess, US Department of Justice.

Q= Question. A = Answer

Q. And could you briefly state your employment history?

A. I have been employed with the Mobile District Corps of Engineers since 1981. Since that time I've held a number of positions with the Corps. Primarily in what is called the Coastal Environment Section of the Planning Division. The **duties** of that section are **to ensure** the environmental compliance of all of the federally authorized projects and military activities that are undertaken by the district.

Q. What are your current responsibilities?

A. Currently, I'm the program manager for the Mississippi Coastal Improvements Program.

Q. Are you familiar with the Corps' dredging operations on what we call the outer bar channel?

A. Yes, I am. The Mobile Harbor Project was one of the projects that I was responsible for.

Q. So I and the Court and everybody else understands this, are you telling us, then, if you increase the channel over what it's currently maintained, the State is going to have to pick up half the footing – half the bill?

A. That's correct

Q. And that includes construction and maintenance?

A. That's correct.

Q. Okay. And do you have any estimation as A. I think ten years ago the estimate of construction was somewhere in the range of \$200 million, but based on recent experience that estimate is no longer valid.

Q. Thank you, Dr. Rees. I'm going to ask you now that are going to basically – there's been some suggestion here that the Corps already has the funds to do this and it can just go out and basically start digging. And I need you to take the Court and also the class members here through the process that you believe needs to happen or that you know needs to happen based on your knowledge of the regulations and your experience and your current position before this additional dredging could occur.

A. **Engineering regulation 1105-2-100, Chapter 4**, dictates that for post-authorization projects -- and in this case if we were to try to deepen Mobile Harbor, that would be considered post-authorization -- that we have to do a re-evaluation report utilizing current planning criteria and current policy and regulations.

There are two types of reports that you can do. And basically the period of time that has elapsed since the original report was done and a consideration of whether conditions have changed since that original report was done, those two factors drive the level of reporting that is required.

For the case of Mobile Harbor, we would have to do what is called a general re-evaluation report. That basically brings all up to current condition. It looks project is still justified or not.

If you take Mobile Harbor specifically, it was originally authorized on the coal trade and the use of the McDuffie Coal Terminal. Today, the through-port and the port is vastly different from what it was in the late '80s, so there's **different economics** obviously, the cost of dredging and the placement of dredge material has changed significantly and the environment has changed. **And so we would have to take into consideration all of those aspects in preparing that general re-evaluation report.** And as far as the environmental compliance goes, because of the age of the original EIS we would have to do a supplement to that EIS.

Q. And I had asked you before, did I not, obviously you have years of experience with the National Environmental Policy Act compliance; is that correct?

A. Yes, I do.

Q. Now, would that also take into account engineering feasibility?

A. Yes.

Q. And economic benefit?

A. That's correct.

Q. And the cost benefit ratio?

A. Yes.

Q. I understand has that changed?

A. The cost benefit ration for a budgetable project changed last year.

Q. Now, how about would you have to have a new project agreement with the State?

A. If the findings of the general re-evaluation report were in the affirmative, prior to any construction activities, we would have to have a new partnership agreement with the State and the State Port Authority that would detail their costs for the initial construction and for the future maintenance as well as their other responsibilities.

Q. And is it correct to say -- I'll probably let the State speak to this, but the State would have to figure out how -- whether they could shoulder this additional expense; is that correct?

A. Well, they would have to figure out that and then they would also have to work with the Congressional delegation to get the Corps the money as well.

Q. You mentioned that an environmental impact statement would be issued if there was any expansion over the current -- currently maintained dredging depths and width. Would that environmental impact statement examine the impact on Dauphin Island of any expansion?

A. It would definitely examine the impacts to the coastal processes of the entire region, not just Dauphin Island.

Q. But including Dauphin Island?

A. Definitely.

Mobile Harbor Outer Bar Channel Dredging History (1980-2016)

(Source: USACE for the period 1980-2009 and estimated for the period 2010-2016 based on the average annual maintenance quantities reported for the preceding 30 years)

Dredging Date	Gross Quantity Dredged (yd ³)	Disposal Area Used ^{1/}
Feb-Dec 1980	1,129,337	Ocean DA
Jan-Mar 1981	610,623	Ocean DA
Dec 1982-Jan 1983	312,408	Ocean DA
Jan-Nov 1984	559,607	Ocean DA
Aug-Oct 1985	1,386,536	Ocean DA
Jan-Feb 1987	656,089	Nearshore Feeder Berm
Feb 1989-May 1990	^{2/} 6,755,352	Ocean DA
Aug-Sep 1992	466,607	Ocean DA
Nov-Dec 1995	621,172	Ocean DA
Aug-Dec 1997	710,996	Ocean DA
Sep-Oct 1998	1,279,780	Ocean DA
Aug-Sep 1999	71,380	Ocean DA
	54,600	SIBUA
May-Sep 1999	^{3/} 3,061,598	SIBUA
Apr-Jul 2000	758,280	Ocean DA
Mar 2002-May 2002	92,820	SIBUA
Jun 2004	230,110	SIBUA
Oct 2004-Nov 2004	1,184,817	SIBUA
Oct 2004-Jan 2005	1,808,765	SIBUA and at Lighthouse
Aug 2005	67,555	SIBUA
Apr-Jun 2006	487,975	SIBUA
Aug 2007	1,083,860	SIBUA
Nov-Dec 2008	585,430	SIBUA
Sept-Nov 2009	942,817	SIBUA
2010-2016 (estimated)	3,523,698	SIBUA
Total Dredged from Outer Bar Channel	29,442,209	For 30 years 1980-2016
Total Placed in Ocean DA	14,672,078	For 30 years 1980-2016
Total Placed at Nearshore Feeder Berm	656,089	For 1987 only
Total Placed in SIBUA or at Lighthouse	9,600,347	For 30 years 1980-2016
Average annual maintenance dredging quantity	503,385	For 37 years 1980-2016

^{1/} Ocean DA – EPA approved open water disposal site in the offshore Gulf of Mexico

SIBUA – Sand Island Beneficial Use Area

^{2/} New work deepening from 42 to 47 feet

^{3/} New work deepening from 47 to 49 feet.

^{4/} Excludes new work deepening in 1989-1990 and 1999

Method used to estimate maintenance dredging quantities 2010-2016 and total dredged 1980-2016:

Step 1: 24,918,514 - (6,755,352 + 3,061,598) = 15,101,564 (O&M dredging only for 1980 through 2009)

Step 2: 15,101,564 ÷ 30 = 503,385 yd³/year average OM for 30-year period between 1980 and 2009

Step 3: 503,385 × 7 = 3,523,695 yd³ estimated as being dredged for 7-year period between 2010 and 2016

Step 4: 24,918,514 + 3,523,695 = 29,442,209 yd³ estimated dredged from Outer Bar Channel (1980 to 2016)

9 July 1975

Honorable Jack Edwards
House of Representatives
Washington, DC 20515

Dear Mr. Edwards:

For your information I am inclosing a copy of the transcript of the Workshop Meeting on Beach Erosion Control and Hurricane Protection for Mobile County held at Bayley's Ranch on 31 March 1975. I appreciate your attendance at the meeting and interest you have demonstrated in this study.

As you recall, little interest was exhibited at the meeting for structural plans that could be implemented under existing Federal authorities for beach erosion control. These authorities require the establishment of public property and public access to the shoreline as a condition for any significant Federal financial participation in a beach erosion control project. As indicated at the meeting, the establishment of public shoreline property would be strongly opposed by existing waterfront property owners. Furthermore, preliminary studies indicate that protection of the sparsely developed shoreline would not result in the necessary economic benefits to justify the construction of costly structures for beach erosion control and hurricane protection.

While structural measures specifically for beach erosion control are indicated to be economically unjustified and to have unacceptable social and community impacts, the need for protection of the shoreline was emphasized. Substantial interest was indicated in the concept of deposition of unconfined dredged material from the ship channel along the west bay shoreline and Dauphin Island for the abatement of erosion.

The prospect for satisfactorily alleviating erosion problems on Dauphin Island by depositing the sandy material dredged from the Mobile Bay entrance channel upon the Gulf shoreline of the island appears promising and will be pursued. The viability of depositing future "new work" material dredged from the ship channel within Mobile Bay upon the western shoreline cannot be determined without estuarian and other environmental impact studies but is considered meritorious of further consideration. Under the above concepts the eroding shorelines would be nourished by the

Appendix B

SAMPD-N
Honorable Jack Edwards

9 July 1975

traged material primarily as disposal areas in support of the maintenance and modification of the Mobile Harbor navigation project. This plan would preserve any accreted land as the property of adjoining land owners and limit local costs resulting from the accreted land, to the amount required for necessary stabilization and a portion of the cost allocated to land enhancement. Therefore, the options for nourishment of the eroding shorelines with material dredged from the ship channel would be more appropriately considered under our ongoing study of navigation modifications for Mobile Harbor rather than under the study for beach erosion control and hurricane protection.

In view of the indications of the workshop meeting, further consideration for deposition of the dredged material from the ship channel along the eroding shorelines under the ongoing survey study for modification of the existing Federal project for Mobile Harbor is indicated to be warranted in lieu of the authorized beach erosion control and hurricane protection study. Since our study has not indicated any other likely structural alternatives for beach erosion control and hurricane protection, and in accordance with Corps' policy to apply our limited study funds where they can be most productive, I am proposing to conclude our beach erosion and hurricane protection study for Mobile County. A concise report which will address the foregoing considerations along with the finding that no additional Federal structural improvements are warranted at this time in the interest of beach erosion control and hurricane protection can be completed with programmed fiscal 1976 study funds. Any remaining surplus funds could be transferred to other studies. In lieu of this option, deferral of future studies into an inactive study category is indicated.

I plan to notify the Mobile City and County Commissions of our proposal to terminate the study in the near future, but, in the interim, would appreciate any views or comments you may have regarding the study and proposed course of action.

Sincerely yours,

1 Incl
As stated

DRAKE WILSON
Colonel, CE
District Engineer

MOBILE COUNTY, ALABAMA
(Including Dauphin Island)



PLANNING REPORT FOR
BEACH EROSION CONTROL
AND
HURRICANE PROTECTION



SEPTEMBER 1964

1978 Corps study about Dauphin Island

204. Studies *herein* indicate that the only acceptable measures that would be economically feasible that would partially resolve any of the flooding or erosion problems of the area would be the nearshore Nourishment Plan defined herein as The Selected Plan. This plan would produce net economic benefits, is considered environmentally acceptable and subject to EPA approval of the disposal site designation, could be implemented under the authority of the Chief of Engineers for operation and maintenance of Mobile Harbor without additional authority from the Congress. Accordingly, the District Engineer recommends that the Chief of Engineers modify the present maintenance dredging practice for the entrance channel to Mobile Harbor to conform to the procedures outlined herein for the Selected Plan as soon as practical with such other modifications as he may deem appropriate.

 II

CHARLIE L. BLALOCK
Colonel, CE
District Engineer

183. The principal causes of shore erosion along the westernmost 11 miles of Dauphin Island are attributable to rise in *sea* level and maintenance dredging of the Mobile Bay entrance channel. Based on sea level stages recorded at Biloxi, Mississippi, the rates of rise of sea level between 1896 and 1972 and between 1940 and 1972 were .009 feet per year and .012 feet per year respectively. These data are shown on Place II. Per Brunn, in the reference, Sea-Level Rise as a Cause of Shore Erosion, proposed the following formula for computing the rate of shoreline recession from the rate *of* sea level *rise*:

108. By letter, dated 21 July 1975, the Mobile County Commission, it was proposed that, in view of the indications from the workshop meeting, the ongoing beach erosion and hurricane study for Mobile County should be terminated. The Commission was also advised that the feasibility of placing dredged material from the Mobile ship channel onto the eroding shore would be pursued as part of the ongoing survey study for modifications of the existing Federal Navigation Project for Mobile Harbor. By letter, dated 1 October 1975, the Mobile Commission advised the District Engineer that the Commission concurred with the action stated in the 21 July 1975 letter.

110. In a letter dated 11 February 1977, the Mayor of Mobile requested that the Corps of Engineers investigate the feasibility of providing hurricane protection for the City of Mobile and shoreline erosion protection for the western shoreline of Mobile Bay. It was suggested that hurricane protection could be provided by construction seawalls or a series of ungated barriers strategically positioned in the Bay.

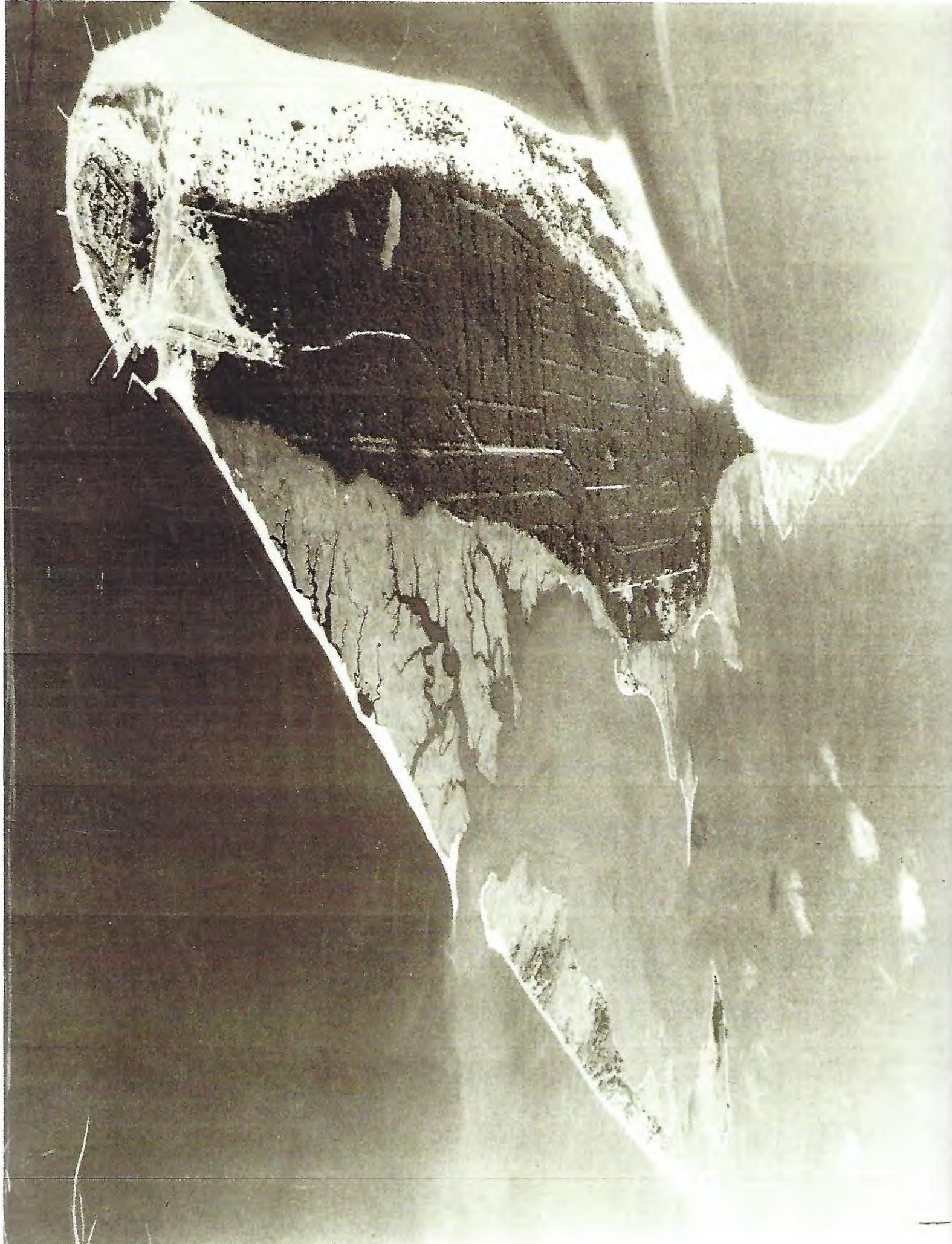
169. Effect assessment identifies the effects of all considered plans to determine the impacts that can be expected. Further, Section 122 of Public Law 91-611 supplements and extends the requirement of the National Environmental Policy Act of 1969 (PL 91-190) by requiring that the effect assessment identify the economic, social, and environmental factors associated with plans under consideration. Section 404 of Public Law 92-500 and Section 103 of Public Law 532 also requires that certain impacts on water quality be investigated and quantified before undertaking any action involving the discharge of dredged material into waters of the United States or ocean waters. Further criteria are established by Executive Orders 11990 and 11988 which direct that all Federal water resource planning minimize destruction, loss or degradation of wetlands and development in the flood plain. Therefore, the effect assessment process is carried out to assure that all significant effects have been identified and their impacts evaluated. A summary of the effects of the considered plans is given in the following paragraphs.

116. Socioeconomic and Environment Criteria - The criteria for socioeconomic and environment consideration in water resource planning are prescribed by the National Environmental Policy Act of 1969 (PL 91-190), section 122 of the River and Harbor and Flood Control Act of 1970, (PL-611), and Section 404b of the Federal Water Pollution Control Act Amendments of 1972. The criteria prescribed that all significant adverse and beneficial economic, social and environmental effects of planned developments be considered and evaluated during formulation.

175. The No Action Alternative perceives a continuation of present conditions and practices without any provisions to reduce potential hurricane flooding or occurring beach erosion. Under this alternative

dredged material would continue to be deposited in the closest suitable area to the entrance channel. No monetary or other resources would be expended to transfer the dredged material to Dauphin Island's littoral system, and erosion along the western end of the island could be expected to continue at its present pace. Erosion would continue to claim valuable property on the island, ultimately causing hardships for island property owners and a lessening of the area's attractiveness for recreational activities.

176. The Nearshore Nourishment Plan should significantly reduce the present rate of erosion along the western 11 miles of Dauphin Island producing a net savings in land values over the additional cost for implementing the plan, while not eliminating, it would delay the ultimate effects of the No Action Plan. The savings realized from the Nearshore Nourishment Plan should be beneficial to National economic development; local property values, employment, business activities, tax revenues, and general economic growth; public services and facilities; natural and manmade resources; recreation and aesthetic values; and community and regional cohesion and growth. The plan should have no effects on air quality, noise, known archaeological remains, municipal water supply, or threatened or endangered species. As previously noted the Nearshore Nourishment Plan would have temporary, adverse effects on water quality, benthic life, fisheries, and other marine life similar to the present (No Action Plan) method of operations. No known vegetation or wetlands other than submerged bottoms would be affected. The plan is considered acceptable to local interests and would be completely reversible. It is reasonably certain that benefits for the considered plan will be achieved; however, the effectiveness of the considered plan cannot be fully documented. The area of geographical impact would be limited to the southern shoreline of Dauphin Island and adjoining offshore waters.



Comment # 461

February 26, 2018

U.S. Army Corps of Engineers
Mobile District, 109 Saint Joseph Street
Mobile, AL 36602
MobileHarborGRR@usace.army.mil

Re: Comments Regarding Mobile Bay Dredging Impacts to Dauphin Island and Mobile Bay

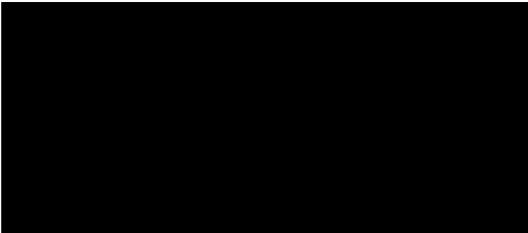
As a concerned Dauphin Island property owner, I support the comments below regarding direct impacts to both Dauphin Island and the bay itself due to past and potential future actions by the Corps of Engineers. The changes to the Dauphin Island Shoreline have been drastic and shocking over the past 30 years that I have been associated with the island. It is obvious to everyone that the island can not continue exist as we know it if the current rate of damage is allowed to continue.

- The Corps admitted during the February 22, 2018 public meeting, 50% of the Outer Bar Channel dredged sands placed in the so-called Sand Island Beneficial Use Area (SIBUA) are accumulating and not being reincorporated into the natural littoral drift system. Since 1999, when the SIBUA began to be used, this has robbed Dauphin Island of at least 7 million cubic yards of beach quality sands, causing significant erosion of the island. This impact will be made worse each time the Outer Bar Channel is dredged in the future. The Corps should cease referring to the SIBUA as a “beneficial use” disposal site because neither Sand nor Dauphin Island benefit from its use. More importantly, the Corps must identify an alternative disposal site to place dredged sands in shallow water less than 20 feet deep to assure the sands are effectively bypassed across the Outer Bar Channel to be reincorporated into the natural littoral drift system. The Corps can accomplish this under the authority provided by Section 302 of the Water Resources Development Act of 1996, with the Mobile Harbor Federal Standard being adjusted accordingly as already directed by Corps higher authority in its May 30, 1997 directive to the Mobile District.
- Corps regulations require significant adverse project impacts be mitigated. Based on the Corps’ admission that the so-called SIBUA is failing to meet its intended purpose which is contributing to the erosion of Dauphin Island, the Corps must include in the Mobile Harbor GRR an appropriate mitigation plan to compensate for at least 7 million cubic yards of beach quality sands that, since 1999, have been removed from the littoral drift system, representing an indirect project impact that has significantly contributed to the erosion of both Sand and Dauphin Islands. Further, the Corps’ admission also gives credence to the 1978 Corps report that first concluded maintenance of the Outer Bar Channel contributed to Dauphin Island’s erosion. The Corps has consistently refused to address in the GRR Study the effects of the cumulative removal of around 30 million cubic yards of sand from the littoral drift system that has occurred since 1980 due to maintenance of the Outer Bar Channel. In view of its February 22 admission, the Corps has no credible reason to continue advocating its present position and should begin immediately to investigate appropriate mitigation remedies that should be addressed in the Draft GRR to respond to this now acknowledged significant “changed condition” in the Study Area.
- The Corps is using a computer model in the GRR Study to evaluate the effects of Outer Bar Channel maintenance on sediment transport and water depths on the Mobile Pass ebb-tidal delta shoal. However, to date, the Corps has not extended the modeling efforts to consider the historic erosion of Dauphin Island’s Gulf shoreline. The Corps’ refusal to apply modelling to an evaluation of the historic shoreline erosion issue represents an incomplete investigation of the effects of the project-altered sand transport processes. If the Corps cannot demonstrate the model replicates the island’s observed historic shoreline and topographic erosion losses that have occurred since at least 1999, and preferably back to 1980, along with water depths over the ebb-tidal delta shoal, then the value and believability of the model and its results are called into serious question.

- At the February 22 public meeting, the Corps gave minimal coverage to where and how the increased quantity of dredged material from an enlarged channel will be disposed in Mobile Bay. There are serious environmental impact concerns associated with the return to thin-layer disposal that will directly affect thousands of acres of bay bottoms ever year, as well as possibility of indirectly affecting other areas if near-bottom plumes of sediment are moved by prevailing currents and wind-induced wave action. Further, the planned construction of a 1200-acre disposal island in the upper bay near large areas of productive grassbeds that are heavily used for commercial and recreational fishing is also a major concern. Section 302 of the Water Resources Development Act of 1996 allows the Corps to return to in-bay disposal only after it can demonstrate such disposal alternatives provide provable beneficial uses, including environmental restoration. So far, the Corps has not made a credible case of the benefits of a return to in-bay disposal.
- The Corps reported modeling of salinity and dissolved oxygen levels projected to occur with an enlarged channel would have no effects on oysters in Mobile Bay. However, existing information indicates oyster production in coastal Alabama has been on the decline for years. Commercial fishermen attending the meeting attribute increased siltation of oyster reefs to be the cause. These fishermen blame the siltation on the open water discharge of dredged material in the bay. The Corps' limited theoretical modeling performed to date of selected water quality variables does not appear to provide a complete picture of the environmental issues being faced by Mobile Bay's oyster reefs. The Corps needs to do more analysis of this important resource to support its claim that an enlarged channel will have "no effect" on oysters, which could represent the "canary in Mobile Bay" to gage the impacts of increased dredged material disposal in the bay.

Thank you for working hard to do the right thing for Mobile.

Best Regards,



Comment # 462

To: [REDACTED] [Mobile Harbor GRR](#)
Subject: [Non-DoD Source] Mobile Ship Channel Dredging
Date: Tuesday, April 10, 2018 5:37:46 PM
Attachments: [Letter to Corps.pdf](#)

To whom it may concern:

I am writing to support the position of the Dauphin Island Property Owners Association with regard to the depositing of beach quality sand from Mobile Ship Channel dredging. Please consider the long term effects on both Dauphin Island and the coastal areas that it protects as you make your decision.

Thanks you,

[REDACTED]

March 21, 2018

Colonel Jon DeLapp
Commander Mobile District
United States Army Corps of Engineers
109 Saint Joseph Street
Mobile, AL 36602-3630

VIA UNITED STATES MAIL

Re: Disposal site for dredge material from the Mobile Outer Bar Ship Channel

Dear Colonel DeLapp:

I write to you as President of the 3,300 member Dauphin Island Property Owners Association regarding the disposal of sand dredged from the outer bar of the Mobile Ship Channel. The Board of Directors has requested that I inform the United States Corps of Engineers of the Association's position in light of recent data disclosed by the Corps of Engineers to the public in a February 22, 2018 meeting at the Corps of Engineers offices in Mobile, Alabama.

The Association is highly concerned that the placement of beach quality sand dredged from the outer bar of the Mobile Ship Channel be in an area where it will return to the littoral drift and limit the significant erosion that has been occurring on Dauphin Island over the past several decades. As you are aware the dredge material is currently being deposited in the Sand Island Beneficial Use Area (SIBUA) at a water depth of approximately twenty-seven feet. At the February 22, 2018 Corps meeting, Corps representatives indicated the sand is leaving that area at about one-half the deposited rate. Consequently, the sand that the Corps of Engineers has been depositing in the SIBUA since 1999 is accumulating there, and only half the material dredged has left the SIBUA, leaving half the material at the disposal site. It is my understanding that approximately seven million cubic yards of sand remains in the SIBUA, and that area is nearing capacity.

These circumstances illustrate two concerns: 1) the sand is not returning to the littoral drift and having an opportunity to make its way to the beaches of Dauphin Island and 2) there now needs to be a different area for which the sand must be deposited as the SIBUA is nearing capacity. There have been discussions of extending the SIBUA area north and west, but still having the material deposited at a twenty-seven foot depth. The current problem of the sand not returning back into the littoral drift will not be solved or affected by simply continuing to place the sand at such water depths. It is our understanding that coastal engineering science indicates an effective water depth that will return the vast majority of this sand to the littoral drift should be in twenty foot of water or less, possibly as shallow as ten to fifteen foot of water. The Association appreciates the fact that disposal in shallower waters may require additional costs because of the draft of the vessels currently being used to deposit the sand, and there may be a necessity to pump or otherwise deliver the sand to a water depth of less than twenty feet. Notwithstanding the costs, it is imperative the sand be deposited in an area of less than twenty feet in order to begin returning the entire volume of the newly dredged sand to the littoral drift. This concern is exacerbated by the fact that the Corps is proposing to widen and deepen the Mobile Ship Channel, and that event will cause an additional five to twenty percent of the sand in the littoral drift to be captured in the outer bar of the Mobile Ship Channel. That additional sand will also be dredged and should be returned to the drift.

Moving the sand disposal site to an area of less than twenty feet will only begin to repair the extensive damage that has been done to Dauphin Island by the amount of sand that has been removed from the littoral drift and remains in the SIBUA. Hopefully the remaining sand in the SIBUA will after decades return to the littoral drift, but a continued practice of depositing dredged sand material in water depths above twenty foot would only contribute to the further demise of the beaches of Dauphin Island.

The Corps has been made aware of the value of Dauphin Island not only as a contributor to the regional economy, but also as a critical barrier island protecting the mainland from storm surges and damages as a result of hurricanes, tropical storms, and other natural calamities. It is important to the public that the geological integrity of the island remain intact to afford this protection.

As the Corps of Engineers has now publicly stated there is scientific data that the depositing of dredge material at the twenty seven foot depth has only allowed one-half of the sand over the last twenty years to have even the opportunity to return to the drift, it is imperative that changes be made in the dredge material disposal site. The only site that is acceptable to return this dredged material to the littoral drift is to deposit the sand would be in an area of less than a twenty feet depth.

On behalf of the Dauphin Island Property Owners Association, I urge the Corps of Engineers to change the practices of the depositing of dredge material to the shallower areas so that they may benefit the public at large, the regional economy, the fisheries, the environment, and the safety of the citizens that live on Dauphin Island and the mainland of Mobile County.

Serious consideration of these concerns by the Corps of Engineers will be deeply appreciated.

Very truly yours,

Dennis J. Knizley
President
Dauphin Island Property Owners Association, Inc.

DJK/cmK

cc:

Brigadier General Diana M. Holland, Commander, South Atlantic Division,
United States Corps of Engineers
Lieutenant General Todd T. Semonite, Commanding General and Chief of
Engineers, United States Corps of Engineers
The Honorable Richard Shelby, United States Senator
The Honorable Doug Jones, United States Senator
The Honorable Bradley Byrne, United States Congressman
The Honorable David Sessions, Alabama State Representative
The Honorable Bill Hightower, Alabama State Senator
The Honorable Sandy Stimpson, Mayor, City of Mobile
The Honorable Jeff Collier, Mayor, Town of Dauphin Island
The Honorable Terry Downey, Mayor, City of Bayou La Batre
The Honorable Jerry Carl, Commissioner, Mobile County
The Honorable Kay Ivey, Governor, State of Alabama

Comment # 463

To: [REDACTED] [Taylor, Peter F Jr CIV USARMY CESAM \(US\)](#)
Cc: [Mobile Harbor GRR](#); [Flakes, Curtis M CIV \(US\)](#)
Subject: [Non-DoD Source] Question for Corps at the Feb 22, 2018 Public Meeting
Date: Wednesday, March 21, 2018 12:44:11 AM
Attachments: [2018-02-22 Question for Corps at Town Hall.pdf](#)

Peter,

At the public meeting about the Mobile Harbor Widening and Deepening Project on February 22, 2018, I was one of the individuals who had an opportunity to ask a question. After I read the attached questions, Col DeLapp stated that he could not provide an answer at that time, but would personally get back to me with a response to my questions. I left a copy of this question with Lisa. I have yet to receive a response.

[REDACTED]

Corps of Engineers, Mobile District: February 22, 2018
Mobile Harbor Town Hall Meeting: Mobile Convention Center

Comments: Stan Graves – Dauphin Island, Alabama

Over the past two years, I have participated in several meetings, along with several others, with the Mobile District concerning the Mobile Harbor widening and deepening project. I have received the same statement during these meetings and the public hearings: the Mobile District will only study the effects of the deepening and widening of the Mobile Channel on Dauphin Islands shoreline, as it exists today, and will not evaluate the change conditions that have occurred since the 1980 EIS.

Dr. Susan Rees of the Mobile District testified, under oath and on behalf of the Corps as an expert witness, at the September 15, 2009 Fairness Hearing, to settle the Dauphin Island Property Owners Association 10-year lawsuit against the Government over Dauphin Island's erosion problem. During her sworn testimony, Dr. Rees stated that a supplement to the original Environmental Impact Statement would have to be conducted if there was any expansion to the ship channel. She said a General Reevaluation Report would have to consider "...whether conditions in the study area had changed..." since the 1980 Survey Report was completed. She also stated the GRR would "...definitely examine the impacts [of expanding the channel] to the coastal processes of...Dauphin Island. **Since the Dauphin Island shoreline has continued to erode over the years after the 1980 Survey Report was completed, was Dr. Rees' testimony at the 2009 Fairness Hearing factually correct that a GRR/EIS is required to address "changed conditions", or did she incorrectly, and in fact, make a false statement that the Corps is required to address the changed conditions? If Dr. Rees' testimony was correct, why is the GRR/EIS Study ignoring the increased erosion of Dauphin Island's shorelines that has occurred since the 1980 EIS report was prepared because there has certainly been changed conditions, environmentally, economically and physically?**

Also, NEPA guidelines are in play and requires that the Corps document the impacts of the maintenance dredging to ensure that "environmental issues are considered and to also provide Congress (and others receiving such recommendation) with a sound basis for evaluating the environmental aspects of the Mobile Harbor project.

In fact, the Eleventh Circuit summarizes the duty to supplement an EIS as follows: *[i]f, after the original EIS is prepared, the agency 'makes substantial changes in the proposed action that are relevant to environmental concerns,' or if there are 'significant new circumstances or information relevant to environmental concerns and bearing on the proposed action or its impacts,' the agency is required to prepare a supplemental environmental impact statement (SEIS).* Will the Mobile District follow the NEPA guidelines and address the changed conditions and prepare the supplemental EIS back to the 1980 EIS?



February 20, 2018

Curtis M. Flakes
Chief, Planning and Environmental Division
U.S. Army Corps of Engineers
Mobile District
ATTN: PD-F
Mobile, AL 36628

Dear Mr. Flakes,

My question is quite simple for the Corps of Engineers. Why does Dauphin Island Alabama NOT get attentive respect to issues impacting this barrier island from the Corps of Engineers' projects in Mobile Bay. Despite decades of pleas for help, requests for attentive scope toward protection rather than harm in promoting projects with negative impact to Dauphin Island, even a lawsuit to ensure no further harm come to Dauphin Island from such projects, and now a meeting yet again to serve as a forum for communication with Dauphin Island property owners and interested parties, will we be heard this time?

But apparently Dauphin Island, AL doesn't qualify for such attention even serving as protection to the inland Alabama coastal communities including the port city of Mobile. Rather than heed the concerns in protecting Dauphin Island, previous Corps of Engineering projects, in enlarging and deepening Mobile Bay, have left the barrier island far more exposed to storms in the Gulf of Mexico at great cost to the community.

The removal of dredged sand that could re-nourish the Island coastline has consistently been dumped further away from any natural flow that would bring the sand into the shore. Even a lawsuit by property owners in the early 2000s seeking redress from these practices was ignored.

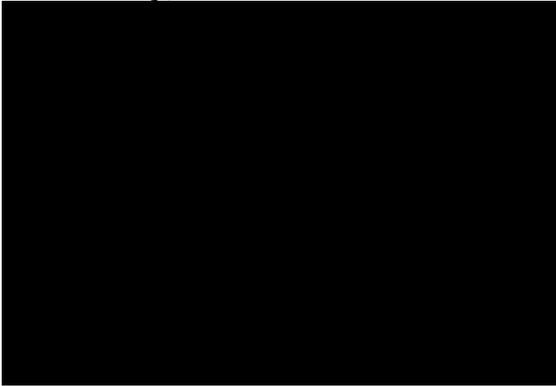
And now, after all the years of neglect not endured by east coast communities like Sandy decimated communities (projects Rockaway Beach, Gilgo Beach etc,) or the Midwest communities (Illinois and Indiana) or in Florida with projects by the Jackson District Corps, there suddenly appears a glimmer of hope. As of February 9, 2018, the U.S. Army Corps of Engineers announces a request for proposals for beneficial use of dredged material pilot projects pursuant to Section 1122 of the Water Resources Development Act (WRDA) of 2016. The pilot program can include projects for the purposes of:

- 1) reducing storm damage to property and infrastructure;
- 2) promoting public safety;
- 3) protecting, restoring and creating aquatic ecosystem habitats;
- 4) stabilizing stream systems and enhancing shorelines;
- 5) promoting recreation;
- 6) supporting risk management adaptation strategies; and

- 7) reducing the costs of dredging and dredged material placement or disposal, such as projects that use dredged material for: construction or fill material; civic improvement objectives; and, other innovative uses and placement alternatives that produce public economic or environmental benefits.

All this is precisely relevant to what Dauphin Islanders have been pleading for over the past several decades. Has the Corps not heard what was being asked of them by residents and property owners on this barrier island? Now they want proposals? Were the words spoken and papers written over the past many years referencing Dauphin Island by its various stakeholders not clearly to this effect? Have we now been heard only to be put off again until we create a written proposal for a pilot project according to a 2-year-old Act? Will there even be a Dauphin Island by that time?

Sincerely,



Comment #465

COL James A. DeLapp, District Commander
US Army Corps of Engineers – Mobile District
P.O. Box 2288
Mobile, AL 36602

Thursday, March 22, 2018

Sierra Club Alabama Chapter
C/O Jonathon Meeks
4075 Lawson Gap Rd.
Boaz, AL 35956-6507

Dear COL DeLapp:



I am writing you on behalf of the Sierra Club's 28,000 members and supporters in Alabama to provide comments on the information presented at the Corps' February 22, 2018 public meeting on the Mobile Harbor General Reevaluation Report (GRR) Study.

I was fortunate in being able to attend the public meeting. I want to thank the Mobile District for conducting the meeting in a Town Hall format that allowed the public to ask questions in a group setting, with everyone hearing the Corps' answers. The attendees with whom I spoke favored this type of meeting and wished that the previous two public meetings on the Mobile Harbor GRR Study had been held in a similar manner. The Sierra Club requests all future public meetings be held in this format. Our only suggestion is that all future public meetings not be restricted to a strict two-hour time limit. The Corps introduction consumed almost half of the meeting timeframe and when the Corps closed the meeting, many attendees still had their hands up patiently waiting the opportunity to ask questions, including three Sierra Club representatives.

This letter concentrates on the Mobile District's statement that at least half of the sands being placed in the Sand Island Beneficial Use Area (SIBUA) from routine dredging the Outer Bar Channel are remaining in the disposal area instead of moving landward at an appreciable rate to rejoin the littoral drift system. That admission is significant because approximately half of the littoral drift sands moving from the Fort Morgan Peninsula are being prevented from naturally nourishing Dauphin Island's Gulf shoreline. The loss of these sands is also contributing to the sand-starved condition of the Mississippi barrier islands to the west as pointed out in independent reports prepared by both the National Park Service and the US Geological Survey.

The attached table shows the volume of sands the Mobile District has dredged from the Outer Bar Channel since 1980. The volumes were obtained from the Mobile District and were cross-checked with the Byrnes *et al* 2010 report that is frequently referenced by your staff as an important source document. The table shows around 500,000 cubic yards of sands are dredged from the Outer Bar Channel on an average annual basis. That quantity is consistent with Corps statements made at the public meeting. The table also shows the Corps began using the SIBUA in 1999, with a total of around 14 million cubic yards of sands having been deposited there over the last 19 years. Therefore, based on the Corps' acknowledgement that half of the sands placed in the site remain there, we deduce that around 7 million cubic yards of beach quality sands have been effectively removed from the natural littoral drift system since 1999.

Most people have difficulty relating to how the cumulative loss of 7 million cubic yards of sands could have affected Dauphin Island over the last two decades. For that reason, we examined the Town of Dauphin Island's design to restore the island's West End beach. The objective of the Town's project is to increase island's longevity by nourishing the beach and dune system. The design was prepared in 2011 with a \$1.5 million federal grant, under the leadership of South Coast Engineers LLC and the assistance of Coastal Planning and Engineering, Inc. The design covered 4.25 miles of shoreline between the now sand-locked fishing pier and the end of the road and was based upon July 2010 surveys. We examined that segment of the design because the 7 million cubic yards dredged sands that have accumulated in the SIBUA would have been naturally transported by littoral drift to the island near the pier to nourish the 4.25-mile reach of shoreline. To address funding uncertainties, the Town prepared three alternative shoreline restoration designs. Relevant information for each alternative is provided in the following:

<u>Alternative</u>	<u>Volume</u>	<u>Cost</u>	<u>Restoration Objective</u>
1	3,580,000 yd ³	\$59 million	Restore beach sand volume to 1990 level
2	2,251,000 yd ³	\$38 million	Maintain 2010 shoreline for 10 years
3	1,120,000 yd ³	\$21 million	Maintain 2010 shoreline for 5 years

The above Volumes indicate how the removal of 7 million cubic yards of sand from the littoral drift system over the last 19 years has significantly influenced erosion of Dauphin Island's West End. This is also confirmed by the observed steady erosion and loss of the Sand/Pelican Island complex and by Corps survey data demonstrating the large mounds of sand that have accumulated in the SIBUA since 1999.

The respective Restoration Objectives for the three above alternatives also make it clear the Town's project was not intended to solve the root cause of Dauphin Island's erosion – only at providing a

temporary level of shoreline restoration. Now that the Corps has finally acknowledged its use of the SIBUA is interrupting natural littoral drift processes, the Corps is required by agency regulations to develop and implement an acceptable mitigation plan to restore the eroded shorelines, as well eliminating maintenance of the Mobile Harbor Outer Bar Channel as a contributing factor in any future erosion. Specifically, the introductory discussion in paragraph C-3e of Appendix C in ER 1105-2-100 (dated April 22, 2000) entitled "Mitigation Planning and Recommendations" requires the following:

"(1) General. District commanders shall ensure that project-caused adverse impacts to ecological resources have been avoided or minimized to the extent practicable, and that remaining, unavoidable impacts have been compensated to the extent justified. The recommended plan and the NED plan, if not one in the same, shall contain sufficient mitigation to ensure that either plan selected will not have more than negligible adverse impacts on ecological resources (Section 906(d), WRDA '86). Any such mitigation measures will be fully justified."

Therefore, the Sierra Club fully expects the Tentatively Selected Plan presented in the Draft GRR will contain appropriate mitigation measures to restore the Sand-Pelican Island complex and the Dauphin Island shorelines to the conditions that existed in at least 1999 and to identify a new disposal area that will assure all littoral drift sands moving from the Fort Morgan Peninsula and dredged by the Corps are fully integrated back into the littoral drift system on the western side of the Mobile Pass ebb-tidal delta.

The cost of such mitigation should become a project cost, resulting in the Federal Standard for the Mobile Harbor project being modified accordingly. No longer should Dauphin Island, island residents, businesses, Alabama's western coastal natural resources, and the Mississippi barrier islands be expected to bear the brunt of the impacts and the costs of unchecked shoreline erosion that has plagued the Alabama-Mississippi barrier island system since 1958 according to the US Geological Survey.

We were pleased to hear the Corps state at the meeting it had already begun considering actions to mitigate the shoreline erosion problem, including the potential expansion of the SIBUA to the northwest. However, dissection of the Corps statements indicate expansion of the SIBUA is being driven more by operational needs to increase future disposal capacity than by the need to select an alternative disposal area in much shallower nearshore waters to mitigate the erosion problem. As stated above, from the Sierra Club's perspective, the necessity to mitigate both historic and future shoreline losses must be a central objective of any effective mitigation plan.

Based on statements made at the public meeting, the Corps appears to be continuing to maintain its position of separating the GRR Study to enlarge the Mobile Harbor channel from the ongoing Mobile Bay Regional Sediment Management Program that is exploring potential “beneficial uses” of sediments dredged during maintenance of the same channel. Any attempt to address the environmental impacts of these two simultaneous, “similar and connected actions” and “interdependent parts” of the overall Mobile Harbor project in separate NEPA documents will be considered by the Sierra Club to represent “segmentation” of the Mobile Harbor project which could expose the Corps to a potential lawsuit. It is patently clear that these two efforts should be considered in a single NEPA document since they are “similar, connected, and interdependent actions” that are being pursued concurrently on the Mobile Harbor project – one action being directed at enlarging the channel and the other providing additional disposal capacity for the channel in an admitted attempt to lessen future maintenance costs. In fact, both efforts identify the same Congressional statute as the authority to justify them. The Corps’ present approach is in direct conflict with §1508.25 of the Council on Environmental Quality’s (CEQ) “Regulations for Implementing the Procedural Provisions of the NEPA” that defines the scope (i.e., range of actions, alternatives, and impacts) to be considered in an environmental impact statement. The Sierra Club has consistently pointed out to the Mobile District this conflict with the CEQ regulations and the need to combine these two efforts in the same NEPA document. The most recent discussion occurred during a July 19, 2017 meeting with you that was attended by Joe Mahoney, Carol Adams-Davis, and Glen Coffee of our Sierra Club Mobile Bay Group.

Our “segmentation” concern is magnified by the fact that very little discussion was devoted at the public meeting to explaining how and where the increased volume of sediments to be dredged during maintenance of a deepened ship channel in Mobile Bay will be disposed. The Sierra Club is aware the Corps has plans to return to disposing of the sediments within Mobile Bay under the discretionary authority provided by Section 302 of the Water Resources Development Act of 1996, provided such disposal can be demonstrated to represent beneficial uses, including environmental restoration. To date, it appears the Corps plans to employ two disposal approaches. The first approach would spread the dredged sediments in a thin layer could impact thousands of acres of bay bottoms every year, both directly and possibly indirectly by the near bottom movement of sediment plumes. The second approach would involve the planned construction of a 1200-acre island in the upper bay from dredged sediments. The Corps has yet to provide any information proving either of these approaches will satisfy the “beneficial uses” criteria specified in Section 302 to justify a return to dredged material disposal within Mobile Bay. The impending Mobile Harbor Draft GRR provides the appropriate vehicle to provide the public and agencies a comprehensive evaluation of not only the economic benefits of enlarging the Mobile Harbor project, but also a full disclosure of all environmental impacts associated with both the initial enlargement of the ship channel and the impacts that will result from maintaining an enlarged channel over the economic life of the project. Since the provision of adequate maintenance disposal capacity will continue to be an important issue for the Mobile Harbor project, the Tentatively Selected Plan identified in the Draft GRR should also include a Dredged Material Management Plan (DMMP) in accordance with the principles espoused in paragraph E-15 of Appendix E in ER 1105-2-100 (dated April 22, 2000):

“E-15. Dredged Material Management Plans. All Federally maintained navigation projects must demonstrate that there is sufficient dredged material disposal capacity for a minimum of 20 years. A preliminary assessment is required for all Federal navigation projects to document the continued viability of the project and the availability of dredged material disposal capacity sufficient to accommodate 20 years of maintenance dredging. If the preliminary assessment determines that there is not sufficient capacity to accommodate maintenance dredging for the next 20 years, then a dredged material management study must be performed.”

The response received from the Mobile District to a recent Freedom of Information Act request made by a representative of the Sierra Club for a copy of the required Preliminary Assessment for the existing Mobile Harbor project stated “no records” existed for such a document. Since Mobile District staff had previously informed members of the public that a DMMP has not been prepared, we can only assume the existing Mobile Harbor Project fails to comply with paragraph E-15 of Appendix E in ER 1105-2-100. Thus, this issue alone makes it even more important that the Tentatively Selected Plan presented in the Draft GRR must also include the required Preliminary Assessment to correct the present compliance deficiency for the Mobile Harbor project. Otherwise, how can the public be assured that sufficient disposal capacity has been identified to exist for the increased dredging volumes that will result from an enlarged channel, as well as knowing where the Corps plans to dispose of the dredged sediments?

The Sierra Club appreciates the opportunity to comment on the Mobile Harbor GRR Study. Should you have any questions, please contact me at |256| 572 0400

Thank you,

A handwritten signature in black ink, appearing to read "Jonathon Meeks". The signature is written in a cursive, flowing style with a large initial "J".

Jonathon Meeks

Chair

Sierra Club Alabama Chapter

CC:

Governor Kay Ivey

Rep David R. Sessions

Sen Doug Jones

Sen Richard Shelby

Mayor Jeff Collier, Town of Dauphin Island

Jerry Carl, Mobile County Commission

LTG Todd T Semonite, Chief of Engineers, Corps, Washington, DC

BG Diana M. Holland, Commander South Atlantic Division, Atlanta, GA

Mark T. Esper, Secretary of the Army, Washington, DC

R.D. James, Acting Assistant Secretary of the Army for Civil Works, Washington, DC

Jimmy Lyons, Alabama State Port Authority

Louie Miller, Chapter Director, Sierra Club Mississippi State Chapter, Jackson, MS

Rose Johnson, Vice Chair, Sierra Club, Gulfport, MS

Casi Callaway, Mobile Baykeeper

Roberta Swann, Mobile Bay National Estuary Program

Chris Militscher, EPA, Atlanta, GA

Southern Environmental Law Center, Birmingham, AL

Alabama Gulf Coast Recovery Council

Gulf Coast Ecosystem Restoration Council (Federal Council)

Mobile Harbor Outer Bar Channel Dredging History (1980-2016)

(Source: USACE for the period 1980-2009 and estimated for the period 2010-2016 based on the average annual maintenance quantities reported for the preceding 30 years)

Dredging Date	Gross Quantity Dredged (yd ³)	Disposal Area Used ^{1/}
Feb-Dec 1980	1,129,337	Ocean DA
Jan-Mar 1981	610,623	Ocean DA
Dec 1982-Jan 1983	312,408	Ocean DA
Jan-Nov 1984	559,607	Ocean DA
Aug-Oct 1985	1,386,536	Ocean DA
Jan-Feb 1987	656,089	Nearshore Feeder Berm
Feb 1989-May 1990	^{2/} 6,755,352	Ocean DA
Aug-Sep 1992	466,607	Ocean DA
Nov-Dec 1995	621,172	Ocean DA
Aug-Dec 1997	710,996	Ocean DA
Sep-Oct 1998	1,279,780	Ocean DA
Aug-Sep 1999	71,380	Ocean DA
	54,600	SIBUA
May-Sep 1999	^{3/} 3,061,598	SIBUA
Apr-Jul 2000	758,280	Ocean DA
Mar 2002-May 2002	92,820	SIBUA
Jun 2004	230,110	SIBUA
Oct 2004-Nov 2004	1,184,817	SIBUA
Oct 2004-Jan 2005	1,808,765	SIBUA and at Lighthouse
Aug 2005	67,555	SIBUA
Apr-Jun 2006	487,975	SIBUA
Aug 2007	1,083,860	SIBUA
Nov-Dec 2008	585,430	SIBUA
Sept-Nov 2009	942,817	SIBUA
2010-2016 (estimated)	3,523,698	SIBUA
Total Dredged from Outer Bar Channel	29,442,209	For 30 years 1980-2016
Total Placed in Ocean DA	14,672,078	For 30 years 1980-2016
Total Placed at Nearshore Feeder Berm	656,089	For 1987 only
Total Placed in SIBUA or at Lighthouse	9,600,347	For 30 years 1980-2016
Average annual maintenance dredging quantity	503,385	For 37 years 1980-2016

^{1/} Ocean DA – EPA approved open water disposal site in the offshore Gulf of Mexico

SIBUA – Sand Island Beneficial Use Area

^{2/} New work deepening from 42 to 47 feet

^{3/} New work deepening from 47 to 49 feet.

^{4/} Excludes new work deepening in 1989-1990 and 1999

Method used to estimate maintenance dredging quantities 2010-2016 and total dredged 1980-2016:

Step 1: 24,918,514 - (6,755,352 + 3,061,598) = 15,101,564 (O&M dredging only for 1980 through 2009)

Step 2: 15,101,564 ÷ 30 = 503,385 yd³/year average OM for 30-year period between 1980 and 2009

Step 3: 503,385 × 7 = 3,523,695 yd³ estimated as being dredged for 7-year period between 2010 and 2016

Step 4: 24,918,514 + 3,523,695 = **29,442,209 yd³** estimated dredged from Outer Bar Channel (1980 to 2016)

Decreased Air Quality

In speaking with the ACE economics representative, I was assured that the widening and deepening would not increase tonnage into and out of the port, but would simply increase efficiency for the vessels (and, one would assume, offer cost savings for the owners). When questioned “what was in it then” for the state of Alabama, she referred me to the Alabama Port Authority representative, PR person [REDACTED]. From [REDACTED] I gathered that we want to do this to remain competitive with other national/regional ports, and be poised to grow as growth happens naturally. What I couldn’t really get a straight answer on was whether, if we do nothing, our tonnage into the port decreases? Are we mainly looking at this expansion so that we can offer more efficiency to shippers??? So back to my concern, since it doesn’t make sense to claim that this expansion will not ultimately result in growth for the port...if we are preparing ourselves to allow more traffic into the port, then there is potential to affect air quality for the neighboring communities. [REDACTED], in a March 17, 2017 article for al.com, quoting Jimmy Lyons of the Port Authority as his source, said that this project will allow “many more ships to dock each year, making the port more attractive to shippers”.) Therefore, **I ask that the DSEIS include establishing monitoring at the Alabama Port Authority to ascertain a baseline level of air quality, so that effects on air quality of the proposed changes on future traffic volumes through the port, whether it increases, decreases, becomes more efficient, or stays the same (since no one seems to know what will actually result), will be measurable.**

Effects on Dauphin Island

I am not a home owner on Dauphin Island, so I have no vested interest in preserving the island for its value as real estate. My intention is that we do nothing to decrease its value as protection for the fragile ecosystem it shields. I realize that barrier islands, by their very nature, shift and grow and shrink. But this process happens over a large amount of time and the ecosystem has time to respond to those natural changes. (Actually, for these reasons, I don’t even think we should allow buildings on barrier islands like Dauphin Island...but that is an argument for another time.) However, in the process of widening and deepening the ship channel, every effort should be made, using all scientific understanding of the way sand distribution works, to not disrupt the natural replenishment of our priceless barrier island. **If the widening and deepening efforts put Dauphin Island at risk...then the Army Corps of Engineers should JUST SAY NO!** If studies from 1978 and 1987 (I saw reference to these in the Raines article) showed us where placement of dredged sand would yield the most benefit and where it causes harm, then please refer to those studies in your decision-making. If we are currently putting it in a place that is too deep (simply because it is less expensive to do so), so that is not renourishing the island, then please stop it! Cost becomes much less of a factor when it comes to caring for our irreplaceable ecosystem. Spend the money, learn from what others are doing, and take care of our Bay...please!

Integrating All Plans for Mobile Bay

Over the last few years, I have participated in numerous public meetings to look at what “the public” wants for their community. I participated in an ACE event in Coden a few years ago, as well as recent round tables in developing the new Map for Mobile, with other sessions in between. You say that you are integrating public opinion in the plans for ship channel “improvements”, but I have concerns that not enough effort has been made to consider ALL of these plans. The Map for Mobile was developed after the surveys that the ACE did a few years ago, so has the Map for Mobile been integrated into what you know the public wants for their community? I am sure that there are similar plans that have been developed for other areas around Mobile Bay that need to be considered as well.

Concern for Fisheries

I had a fairly long conversation last night with a young man (ACE employee) who is working on living shorelines for Mobile Bay, and shared with him my concerns that the dredging spoils from this massive widening and deepening (and the ongoing maintenance of a larger channel) not damage the precious, unique ecosystem that we enjoy in Mobile Bay and the larger five rivers system. He described the intensive testing that is now going on in that entire area and he seemed to really have a heart for protecting the environment of the area (which I don’t get a sense of when talking to people who want to expand to “help the economy”). Please listen to him...and to people like him. Don’t cut corners because we can’t afford to fully protect the environment. If there is any doubt about whether harm will be done...then this project is not right for this area. I’m sorry that I didn’t catch this young man’s name. He was standing right next to the economist.

Listening to the Public

While I appreciate the work that went into the “show” last night, I feel that it was a lousy venue for having discussions about the various aspects of this project. Not only did I struggle to even hear what each representative was telling me, I was also interested in hearing what other people are concerned about. As a plain (non-scientific) citizen, I can’t possibly understand all of the ramifications of this project on others people’s lives and livelihoods and the broader concerns for how the project will affect the environment. I would have appreciated participating in more of a full group Q&A session, and I hope that you have plans to schedule something like that in the future...before it is too late for citizen input to have an effect on your methodology going forward. Also, I was aware that the residents of Dauphin Island have a special interest in this project, since it presents a threat of increased erosion for that area, so I wonder why this meeting was sited in Daphne, which is such a distance for that group to travel. I would ask that you have additional meetings closer to where these concerned citizens live. It is only fair.

It's All About the Environment

And a final comment on some remarks made by Jimmy Lyons to [REDACTED], as reported in his recent article for al.com. According to Raines, "Lyons suggested that it was too early to focus on potential environmental issues, as the study of the proposal is still in the early stages." I would argue that this is EXACTLY when we need to work on determining the environmental impact of such large changes to the Mobile ship channel...when we can still make necessary adjustments and even consider halting the entire project. How can we know the impacts if we don't prepare baseline studies, such as the air quality testing that I suggest above, or the extensive testing described by the ACE scientist who is a living shorelines specialist? How could Mr. Lyons even suggest that we wait to look at the environmental impacts until after the project scope is set? By that time, there will be too much time and planning put into the project to call a halt or make radical changes to accommodate ecological concerns. As is often the case, I am astounded at the suggestion that environmental considerations should take a back seat to economic "progress" in this region. We must take all of the time that is needed to protect and preserve this precious resource that we steward...or we risk losing it all in the name of progress.

Thank you to all of you who are working to incorporate the concerns of citizens who love this area.

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

July 24, 2017

MobileHarborGRR@usace.army.mil

Re: Dauphin Island Erosion Problem/Mobile Harbor Environmental Impact Statement

Dear Mobile Harbor GRR:

The people of Dauphin Island are requesting that the Corps use previous data and incorporate this information into the new studies, The Alabama Coastal Comprehensive Plan (ACCP) and Alabama Barrier Island Assessment study that will be used for the Mobile Harbor EIS/GRR.

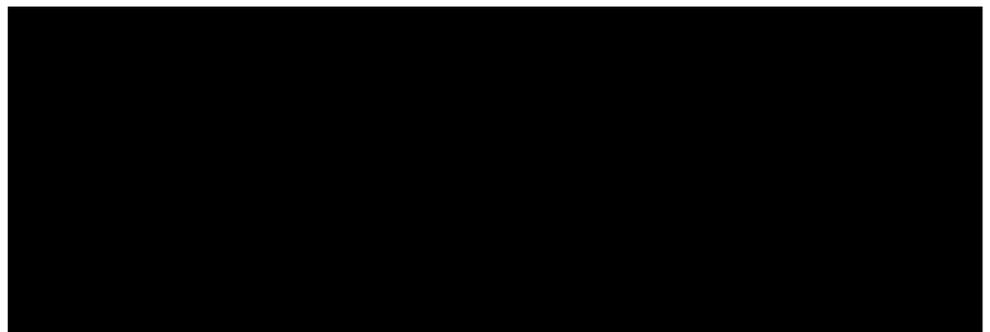
We are also requesting you insist that the Corps include the following information in the above studies and in all other studies for Mobile Harbor EIS/GRR studies.

1. Corps needs to include that the Corps produced the 1980 Environmental Impact Statement (EIS) for the Mobile Harbor Federal Navigation project, in which they left out all erosional impacts to Dauphin Island. Therefore, 1980 EIS was a “flawed” EIS and the impact of the maintenance dredging and the erosion and the historical sand loss to Dauphin Island must be addressed in the Mobile harbor GRR/EIS.
2. The Corps needs to include that they suppressed information from Congress that the Corps left out all of the environmental and erosion impacts to Dauphin Island in their original 1980 EIS.
3. Corps needs to include that they have failed to follow the National Environmental Policy Act of 1969 and other Federal Laws since 1935 that pertain to erosion to an adjacent shoreline caused by the Corps dredging a Federally Authorized project and the mitigation of the erosion.
4. Corps needs to include that in the Corps’ 1978 Dauphin Island study, the Corps admitted that the maintenance dredging caused the erosion to Dauphin Island shoreline. The Corps completely ignored the 1978 study in the 1980 EIS and 1980 Survey Report to modify the Mobile Harbor. Since that time, the Mobile District Corps has ignored their own recommendations in the 1978 study to bypass the sand in front of the shoreline of Dauphin Island.
5. Corps needs to include that Colonel Drake Wilson 1975 letter to Congressman Jack Edwards that states that the erosion on Dauphin Island would be part of the 1980 EIS and study for modification of the Mobile Harbor.

6. Corps needs to include that they did not add Dauphin Island's erosional impacts to the modification of the 1980 EIS/Mobile Harbor Survey Report and the Corps' study did not present the required analysis and investigation of the erosion to the Island.
7. Corps needs to include that the Corps intentionally left Dauphin Island out of the 1999 Regional Sediment Management Plan, even though Dauphin Island was the #1 initiative.
8. Corps needs to include the fact that the sand from the Sand Island Beneficial Use Area (SIBUA) does not reach Dauphin Island.
9. Corps needs to include all of the past US Geological Survey studies that state the Corps dredging of the Mobile Pass is the cause of the erosion to the Dauphin Island's shoreline and the Corps needs to include the conflicting opinions between the U.S. Geological Survey "Morton studies" 2007, 2008 and the Corps' 2008, 2010 studies about the cause of erosion on Dauphin Island.
10. Corps needs to include all studies that were done by other scientists and engineers that contradict the "paid-for-by-the-Corps" lawsuit study of 2008 and the updated 2010 study about Dauphin Island, including all studies by the renowned coastal engineer, Scott Douglass' and by the eminent coastal engineer, Dr. Robert Dean's reports about Dauphin Island.

(Robert G. Dean, Ph.D., P.E., D.CE, Dist.MASCE, NAE, a world leader in coastal engineering)

11. Corps needs to include that in 2016, the Corps stated that they would narrow the scope of the Supplement to the original *flawed* 1980 EIS, so the Corps would not have to address the erosion and the past sand losses on Dauphin Island and the Corps past destruction to the Island.
12. Corps needs to include that the Corps has not followed the Federal Laws and Corps manuals that govern "erosion attributable to Federal navigation works" and the 1992 and 1996 Federal Laws that would allow the Corps to put the dredged sand from the Mobile Harbor Federal Navigation Channel much closer to the western beaches of the Dauphin Island.
13. Corps needs to include that the Corps' Mobile District has ignored a PhD's study from the University of South Alabama about using a pipeline dredging and the conclusion was "no significant difference in unit costs" between the hopper dredging and the pipeline dredging. This study's facts show that by using a pipeline dredge there would be no difference in costs to put sand closer to Dauphin Island, per the *Least Costly* rule of the Corps.



Comment #469

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

District Engineer

US Army Corps of Engineers

ATTN: PD-F PO Box 2288

Mobile AL, 36628

Sent via email: MobileHarborGRR@usace.army.mil, accp@usace.army.mil

Dear District Engineer,

I am writing again regarding the ongoing erosion crisis facing Dauphin Island, AL. We have owned a home there for sixteen years.

Dauphin Island is an important protector and barrier for Alabama's western coastal shoreline. Over the sixteen years we have lived there we have lost over 100 feet of beach due to erosion. This erosion is due to Corps' of Engineers maintenance dredging of the Mobile Harbor Outer Bar Chanel.

We understand that this channel maintenance must take place. What we and concerned members of the Dauphin Island community think is that there needs deposition of dredged sand so it replenishes the beaches of the island. Further, there needs to be a dialogue with those directly affected by dredging.

Further erosion of the island has dire consequences for the island, the biodiversity, and the Alabama shoreline.

Please consider the requests, previously submitted, to change dredging and sand disposal practices.

Thank you for your consideration.

Sincerely,

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]



[REDACTED]

Date: Feb. 29, 2016

Ms. Jennifer Jacobson
United States Army Corp of Engineers
Mobile District, Planning & Environmental Division
Coastal Environment Team
RE: Public Notice: FP15-MH01-10
PO Box 2288

Mobile, Alabama 36628-0001

Dear Ms. Jacobson,

Please accept the following comments to be considered by the USACOE for their preparation of the Supplemental Environmental Impact Statement for the widening of Mobile Channel.

1. Resolve the conflict between the 1980 EIS and the Corps 1976 report concluding maintenance of the outer bar channel contributes to the erosion of Dauphin Island.
2. Ensure that all dredging and dredging maintenance maintains (and restores) the littoral transport continuity
3. Verify the application of all GCRSM principles as a primary activity for this navigation project
4. Ensure that all project decisions are in the context of the sediment system and all regional implications are addressed.
5. Ensure that sediment transport along natural lines is re-established and maintained.
6. As stated in another USACOE EIS (Bayou Casotte Harbor Channel Improvement);
 - a. Enhance natural resources within the project area
 - b. Provide beneficial placement of dredged material
 - c. Contribute to the preservation of historically significant resources within the project area



7. Comply with Section 5 of the River and Harbor Act of 1935 and rectify noncompliance by the USACOE 1980 report and EIS

8. State a basis of acceptance of the USGS Open-File Report 2007-1161, “Historical Changes in the Mississippi-Alabama Barrier Islands and the Roles of Extreme Storms, Sea Level, and Human Activities”, especially concentrating on Discussions and Conclusions page 27 “Considering the three primary causes of land loss, the one that experienced the greatest change in historical time was the reduction in sand supply related to dredging the navigation channels through the outer bars of the tidal inlets. Sand supply is also the only factor where the historical trend of the factor (progressively increased reduction in sand supply attendant with increased dredging depths) temporally matched the trend of progressively increased land loss.”
 - a. With acceptance of this basis:
 - i. Please analyze continuing erosion impact of the economic activities of Dauphin Island

 - ii. Please analyze Dauphin Island continuing erosion impact of the Audubon Bird Sanctuary, the protected maritime forest habitat on the island and one of the first areas of migrant bird landfall and recently recognized by the National Audubon Society as being “Globally Important” for bird migrations.

 - iii. Please analyze Dauphin Island continuing erosion impact on Dauphin Island protection of oyster beds, and also the salt marshes that are critical to the juvenile shrimp, fish and crab communities.

 - iv. Please analyze Dauphin Island continuing erosion impact on Fort Gaines Historic site

9. Include explanation of dredging material drift zone deposition impact versus sediment transport along natural lines.

I hope that the USACOE will take this opportunity to address and resolve these issues. Addressing and fixing the previous EIS inconsistencies will also make this SEIS consistent with other work product that the USACOE has produced.

Sincerely,

██████████

Comment #471

█

To:

█
[Mobile Harbor GRR](#)

Subject:

[Non-DoD Source] The Corps has admitted it is interrupting the flow of sand to Dauphin Island

Date:

Friday, March 30, 2018 10:31:43 AM

As a property owner on the west end of Dauphin Island, I am very concerned about the erosion of the beaches and the dredging practices of the Corps of Engineers.

The Corps admitted during the February 22, 2018 public meeting, 50% of the Outer Bar Channel dredged sands placed in the so-called Sand Island Beneficial Use Area (SIBUA) are accumulating and not being reincorporated into the natural littoral drift system. Since 1999, when the SIBUA began to be used, this has robbed Dauphin Island of at least 7 million cubic yards of beach quality sands, causing significant erosion of the island. This impact will be made worse each time the Outer Bar Channel is dredged in the future. The Corps should cease referring to the SIBUA as a “beneficial use” disposal site because neither Sand nor Dauphin Island benefit from its use. More importantly, the Corps must identify an alternative disposal site to place dredged sands in shallow water less than 20 feet deep to assure dredged beach quality sands are effectively bypassed across the Outer Bar Channel to be reincorporated into the natural littoral drift system. The Corps can accomplish this under the authority provided by Section 302 of the Water Resources Development Act of 1996, with the Mobile Harbor Federal Standard being adjusted accordingly as already directed by Corps higher authority in its May 30, 1997 directive to the Mobile District.

Federal law, the Council on Environmental Quality's National Environmental Policy Act regulations, and the Corps' own agency policy and regulations require significant adverse project impacts be MITIGATED. Based on the Corps' admission that use of the so-called SIBUA is actually contributing to the erosion of Dauphin Island, the Corps must include in the June Mobile Harbor Draft Report an appropriate MITIGATION PLAN to compensate for at least 7 million cubic yards of beach quality sands that have been removed from the nearshore littoral drift system since 1999, creating an indirect adverse project impact that has significantly contributed to the erosion of both Sand and Dauphin Islands. Further, the Corps' recent admission also gives strong credence to the Corps' 1978 report that first concluded maintenance of the Outer Bar Channel contributed to Dauphin Island's erosion. The Corps has consistently refused to address in the ongoing Mobile Harbor Study the erosion effects resulting from the cumulative removal of around 30 million cubic yards of sand from the littoral drift system since 1980 associated with the maintenance of the Outer Bar Channel. In view of its February 22 admission, the Corps has no credible reason to continue advocating its present position and should begin immediately to investigate MITIGATION REMEDIES in the ongoing Mobile Harbor Study to appropriately respond to this now acknowledged significant “changed condition and adverse project impact” in the Study Area. The existing Mobile Harbor Study provides the Corps with sufficient authority to move forward in MITIGATING the significant adverse erosion impact created by the Mobile Harbor project that the Corps has long refused to acknowledge was occurring.

Respectfully,

█

Comment #472

[REDACTED]

To:

[REDACTED]

[Mobile Harbor GRR](#)

Subject:

[Non-DoD Source] Protect Dauphin Island - Replace the Sand

Date:

Tuesday, March 20, 2018 12:25:17 PM

The Corps admitted during the February 22, 2018 public meeting, 50% of the Outer Bar Channel dredged sands placed in the so-called Sand Island Beneficial Use Area (SIBUA) are accumulating and not being reincorporated into the natural littoral drift system. Since 1999, when the SIBUA began to be used, this has robbed Dauphin Island of at least 7 million cubic yards of beach quality sands, causing significant erosion of the island. This impact will be made worse each time the Outer Bar Channel is dredged in the future. The Corps should cease referring to the SIBUA as a “beneficial use” disposal site because neither Sand nor Dauphin Island benefit from its use. More importantly, the Corps must identify an alternative disposal site to place dredged sands in shallow water less than 20 feet deep to assure dredged beach quality sands are effectively bypassed across the Outer Bar Channel to be reincorporated into the natural littoral drift system. The Corps can accomplish this under the authority provided by Section 302 of the Water Resources Development Act of 1996, with the Mobile Harbor Federal Standard being adjusted accordingly as already directed by Corps higher authority in its May 30, 1997 directive to the Mobile District.

Federal law, the Council on Environmental Quality's National Environmental Policy Act regulations, and the Corps' own agency policy and regulations require significant adverse project impacts be MITIGATED. Based on the Corps' admission that use of the so-called SIBUA is actually contributing to the erosion of Dauphin Island, the Corps must include in the June Mobile Harbor Draft Report an appropriate MITIGATION PLAN to compensate for at least 7 million cubic yards of beach quality sands that have been removed from the nearshore littoral drift system since 1999, creating an indirect adverse project impact that has significantly contributed to the erosion of both Sand and Dauphin Islands. Further, the Corps' recent admission also gives strong credence to the Corps' 1978 report that first concluded maintenance of the Outer Bar Channel contributed to Dauphin Island's erosion. The Corps has consistently refused to address in the ongoing Mobile Harbor Study the erosion effects resulting from the cumulative removal of around 30 million cubic yards of sand from the littoral drift system since 1980 associated with the maintenance of the Outer Bar Channel. In view of its February 22 admission, the Corps has no credible reason to continue advocating its present position and should begin immediately to investigate MITIGATION REMEDIES in the ongoing Mobile Harbor Study to appropriately respond to this now acknowledged significant “changed condition and adverse project impact” in the Study Area. The existing Mobile Harbor Study provides the Corps with sufficient authority to move forward in MITIGATING the significant adverse erosion impact created by the Mobile Harbor project that the Corps has long refused to acknowledge was occurring.

Thank you for your consideration.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

██████

To:

██████

[Mobile Harbor GRR](#)

Subject:

[Non-DoD Source] Proposed widening of Mobile Bay - Meeting of February 22nd

Date:

Saturday, March 10, 2018 5:02:43 PM

Dear Sir or Madam,

I am a full time resident of Dauphin Island and have a vested interest in the outcome of the proposed dredging and widening of Mobile Bay and the damage it has done and will do to Dauphin Island.

For the first time, the Corps has admitted that the sand that has been dredged in the past is disrupting the natural littoral drift system, causing erosion to Dauphin Island. Dauphin Island is not just a place for people to live and enjoy; it is vital protection to the coast of mainland Alabama and the Alabama Port. An alternative disposal site **MUST** be identified that will benefit Dauphin Island, which will in turn benefit the mainland coast and the port. The Corps can accomplish this under the authority provided by Section 302 of the Water Resources Development Act of 1996.

Corps regulations require significant adverse project impacts be mitigated. Based on the Corps' admission that the so-called SIBUA is failing to meet its intended purpose which is contributing to the erosion of Dauphin Island, the Corps must include in the Mobile Harbor GRR an appropriate mitigation plan to compensate for at least 7 million cubic yards of beach quality sands that, since 1999, have been removed from the littoral drift system, representing an indirect project impact that has significantly contributed to the erosion of both Sand and Dauphin Islands. Further, the Corps' admission also gives credence to the 1978 Corps report that first concluded maintenance of the Outer Bar Channel contributed to Dauphin Island's erosion. The Corps has consistently refused to address in the GRR Study the effects of the cumulative removal of around 30 million cubic yards of sand from the littoral drift system that has occurred since 1980 due to maintenance of the Outer Bar Channel. In view of its February 22 admission, the Corps has no credible reason to continue advocating its present position and should begin immediately to investigate appropriate mitigation remedies that should be addressed in the Draft GRR to respond to this now acknowledged significant "changed condition" in the Study Area.

The Corps is using a computer model in the GRR Study to evaluate the effects of Outer Bar Channel maintenance on sediment transport and water depths on the Mobile Pass ebb-tidal delta shoal. However, to date, the Corps has not extended the modeling efforts to consider the historic erosion of Dauphin Island's Gulf shoreline. The Corps' refusal to apply modelling to an evaluation of the historic shoreline erosion issue represents an incomplete investigation of the effects of the project-altered sand transport processes. If the Corps cannot demonstrate the model replicates the island's observed historic shoreline and topographic erosion losses that have occurred since at least 1999, and preferably back to 1980, along with water depths over the ebb-tidal delta shoal, then the value and believability of the model and its results are called into serious question.

At the February 22 public meeting, the Corps gave minimal information as to where and how the increased quantity of dredged material from an enlarged channel will be disposed in Mobile Bay. There are serious environmental impact concerns associated with the return to thin-layer disposal that will directly affect thousands of acres of bay bottoms every year, as well as possibility of indirectly affecting other areas if near-bottom plumes of sediment are moved by prevailing currents and wind-induced wave action. Further, the planned construction of a 1200-acre disposal island in the upper bay near large areas of productive grassbeds that are heavily used for commercial and recreational fishing is also a major concern. Section 302 of the Water Resources Development Act of 1996 allows the Corps to return to in-bay disposal only after it can demonstrate such disposal alternatives provide provable beneficial uses, including environmental restoration. So far, the Corps has not made a credible case of the benefits of a return to in-bay disposal.

The Corps reported modeling of salinity and dissolved oxygen levels projected to occur with an enlarged channel would have no effects on oysters in Mobile Bay. However, existing information indicates oyster production in coastal Alabama has been on the decline for years. Commercial fishermen attending the meeting attribute increased siltation of oyster reefs to be the cause. These fishermen blame the siltation on the open water discharge of dredged material in the bay. The Corps' limited theoretical modeling performed to date of selected water quality variables does not appear to provide a complete picture of the environmental issues being faced by Mobile Bay's oyster reefs. The Corps needs to do more analysis of this important resource to support its claim that an enlarged channel will have "no effect" on oysters, which could represent the "canary in Mobile Bay" to gauge the impacts of increased dredged material disposal in the bay.

Thank you for your time and consideration,

[REDACTED]

[REDACTED]

[REDACTED]

Comment #474

To: [REDACTED] [Mobile Harbor GRR](#)
Subject: [Non-DoD Source] Mobile Harbor Project
Date: Thursday, March 22, 2018 9:38:18 AM

I would like to offer my request that you consider mitigation efforts to ensure that Dauphin Island does not lose further sand due to the project in Mobile.

I concur fully with sentiments offered below:

"The Corps admitted during the February 22, 2018 public meeting, 50% of the Outer Bar Channel dredged sands placed in the so-called Sand Island Beneficial Use Area (SIBUA) are accumulating and not being reincorporated into the natural littoral drift system. Since 1999, when the SIBUA began to be used, this has robbed Dauphin Island of at least 7 million cubic yards of beach quality sands, causing significant erosion of the island. This impact will be made worse each time the Outer Bar Channel is dredged in the future. The Corps should cease referring to the SIBUA as a "beneficial use" disposal site because neither Sand nor Dauphin Island benefit from its use. More importantly, the Corps must identify an alternative disposal site to place dredged sands in shallow water less than 20 feet deep to assure dredged beach quality sands are effectively bypassed across the Outer Bar Channel to be reincorporated into the natural littoral drift system. The Corps can accomplish this under the authority provided by Section 302 of the Water Resources Development Act of 1996, with the Mobile Harbor Federal Standard being adjusted accordingly as already directed by Corps higher authority in its May 30, 1997 directive to the Mobile District.

Federal law, the Council on Environmental Quality's National Environmental Policy Act regulations, and the Corps' own agency policy and regulations require significant adverse project impacts be MITIGATED. Based on the Corps' admission that use of the so-called SIBUA is actually contributing to the erosion of Dauphin Island, the Corps must include in the June Mobile Harbor Draft Report an appropriate MITIGATION PLAN to compensate for at least 7 million cubic yards of beach quality sands that have been removed from the nearshore littoral drift system since 1999, creating an indirect adverse project impact that has significantly contributed to the erosion of both Sand and Dauphin Islands. Further, the Corps' recent admission also gives strong credence to the Corps' 1978 report that first concluded maintenance of the Outer Bar Channel contributed to Dauphin Island's erosion. The Corps has consistently refused to address in the ongoing Mobile Harbor Study the erosion effects resulting from the cumulative removal of around 30 million cubic yards of sand from the littoral drift system since 1980 associated with the maintenance of the Outer Bar Channel. In view of its February 22 admission, the Corps has no credible reason to continue advocating its present position and should begin immediately to investigate MITIGATION REMEDIES in the ongoing Mobile Harbor Study to appropriately respond to this now acknowledged significant "changed condition and adverse project impact" in the Study Area. The existing Mobile Harbor Study provides the Corps with sufficient authority to move forward in MITIGATING the significant adverse erosion impact created by the Mobile Harbor project that the Corps has long refused to acknowledge was occurring".

Sincerely,

[REDACTED]

[REDACTED]

[REDACTED]

Comment #476

To: [REDACTED]
Subject: [Mobile Harbor GRR](#)
Date: [Non-DoD Source] Ship Chanel near Dauphin Island
Tuesday, February 20, 2018 4:15:10 PM

To whom it may concern

I have been a property owner on Dauphin Island for almost 40 years. I have seen our beaches come and go but mostly go. There is a sentiment that widening and deepening the ship Chanel will only make the erosion worse. This little island can't stand any more of the same, let alone an increase in erosion that the planned Chanel will surely cause.

Please proceed cautiously as the fate of this beautiful place rest in your collective hands.

You will be a hero or a goat to future generations. Choose wisely.

[REDACTED]

Comment #477

█

To:

█
[Mobile Harbor GRR](#)

Subject:

[Non-DoD Source] Alterations to Mobile Bay ship channel

Date:

Wednesday, March 28, 2018 6:16:23 PM

To who it may concern

On several occasions we have sent comments to you about the proposed widening and deepening of our ship channel and the adverse effect this project will have on our beaches and properties on Dauphin Island. As part time residents of this Island for almost 40 years we have seen our beaches slowly disappear. Common sense makes me believe that the removal of sands from the ship channel, interrupting its normal westerly migration is the primary reason for our beach erosion. Your recent comment that findings show that large portions of this dredge placed offshore never makes it to Dauphin Island and sinks in deeper waters. Closer placement of this dredge to our island could help us regain sands we would lose and shorten your trip to drop this dredge, helping both of us to reach our goals.

We hope you will give more consideration to this project and be certain that the actions you take will not make damage to our island irreversible. The future of Dauphin Island is your hands, please choose wisely.

,

Sent from my iPad

Comment #478

To: [REDACTED]

[Mobile Harbor GRR](#)

Subject:

[Non-DoD Source] Demand for Mitigation of Dauphin Island Beaches

Date:

Tuesday, March 20, 2018 2:57:11 PM

To whom it may concern,

I am a seventeen year resident of Dauphin Island, a professional civil engineer, and a very active volunteer with Share The Beach (Alabama's sea turtle nesting program) and the Sea Turtle Stranding and Salvage Network. I am deeply saddened by the fact that the U.S. Army Corps of Engineers has neglected the ongoing loss of longshore sediment transport caused by adherence to a dredging plan that failed long ago. I am very familiar with design of coastal structures and their impact on sediment transport, and I also know that the USACE is very aware of the effect that coastal structures, such as a ship channel, have on sediment transport because you literally wrote the book on it. I am in possession of a printed set of the Shore Protection Manuals as well as a huge digital library of other engineering documents published by the USACE. Considering the fact that you own the Coastal and Hydraulics Laboratory in Vicksburg, MS and you have probably published more information about the design and impact of coastal structures than any other entity, the science of near shore sediment processes have been well understood by the USACE for a very long time.

At the February 22, 2018 public meeting on Dauphin Island, the corps acknowledged that much of the sand that has been deposited in the Sand Island Beneficial Use Area has not entered the natural littoral system as expected. I know that the breaking waves are the driving force for longshore sediment transport and that waves break in water that is approximately 1.3 times the water depth. It seems obvious that any beneficial use area should be constantly reevaluated to ensure that it is performing as intended. As soon as the local bathymetry revealed that deep water was present between the SIBUA and the shallow area of Sand Island, the plan should have been modified accordingly. Coastal systems are dynamic; therefore, any beneficial use area should be dynamic as well. Even the corps' current acknowledgment that sand should be placed in water less than 20 ft deep does not begin to mitigate the damage that has been done by clinging to a plan that failed long ago.

I believe that the USACE has been grossly negligent by waiting so long to admit that Dauphin Island is now at a deficit of 7,000,000 cubic yards of sand. I performed a few calculations so that I could explain what the quantity represents to others, and it would be a volume of sand equivalent to 3 ft deep and 852 ft wide along the entire gulf beach of Dauphin Island.

Barrier islands do move due to tropical storms and hurricanes, but it is easy to see that Dauphin Island doesn't just move around; it is eroding away. This has affected the local economy by loss of tourism, and many homes have been damaged that may have been spared if there had been more natural protection from storms. Many homes have been abandoned because the property is now underwater, and the long beautiful beach that belonged to the DIPOA has been mostly washed away. The Town of Dauphin Island is struggling to maintain the East End Beach and the West End Beach due to constant erosion. The only reason our main public beach hasn't suffered is that Sand Island has now joined Dauphin Island, but Sand Island is rapidly eroding, and once it is gone, that beach will suffer erosion just as the other beaches do.

Aside from the losses to property owners and residents, our nesting sea turtle population is greatly affected by the loss of nesting habitat. Sea turtles already suffer from the affects of fishing and pollution, but we lose many nests because turtles are forced to lay their eggs at a lower elevation than they would naturally. Trained volunteers relocate the nests when necessary, but often, the new location isn't much better than the original one because the natural dune system is gone throughout much of the island. Some sections of beach no longer have any viable nesting habitat. After a hatchling emerges from the nest, she will spend roughly 25 years at sea, and when she matures, she will return to her natal beach to nest. Share The Beach is desperately trying to protect an endangered species that are returning to nest on a beach that looks very different than the one they left 25 years ago. These turtles will not go elsewhere to nest because Dauphin Island is their home beach and their instincts tell them to nest here.

I will paste a portion of an email from some local residents because it accurately expresses my beliefs regarding the

current situation.

"Federal law, the Council on Environmental Quality's National Environmental Policy Act regulations, and the Corps' own agency policy and regulations require significant adverse project impacts be MITIGATED. Based on the Corps' admission that use of the so-called SIBUA is actually contributing to the erosion of Dauphin Island, the Corps must include in the June Mobile Harbor Draft Report an appropriate MITIGATION PLAN to compensate for at least 7 million cubic yards of beach quality sands that have been removed from the nearshore littoral drift system since 1999, creating an indirect adverse project impact that has significantly contributed to the erosion of both Sand and Dauphin Islands. Further, the Corps' recent admission also gives strong credence to the Corps' 1978 report that first concluded maintenance of the Outer Bar Channel contributed to Dauphin Island's erosion. The Corps has consistently refused to address in the ongoing Mobile Harbor Study the erosion effects resulting from the cumulative removal of around 30 million cubic yards of sand from the littoral drift system since 1980 associated with the maintenance of the Outer Bar Channel. In view of its February 22 admission, the Corps has no credible reason to continue advocating its present position and should begin immediately to investigate MITIGATION REMEDIES in the ongoing Mobile Harbor Study to appropriately respond to this now acknowledged significant "changed condition and adverse project impact" in the Study Area. The existing Mobile Harbor Study provides the Corps with sufficient authority to move forward in MITIGATING the significant adverse erosion impact created by the Mobile Harbor project that the Corps has long refused to acknowledge was occurring. "

From the USACE study in 1978, the corps admitted, "Erosion would continue to claim valuable property on the island, ultimately causing hardships for island property owners and a lessening of the area's attractiveness for recreational activities." By the corps's own admission at the recent meeting, we are at a deficit of 7,000,000 cubic yards of sand, so forty years later, we are still suffering the affects of a failed plan. Like many island residents, I am angered by the corp's failure to remedy a problem that was first recognized forty years ago and still persists today.

Dauphin Island is a historic and special place that is much different than any other coastal community. We are the only inhabited island on the Mississippi Sound, but only half the island is inhabited. The island will probably never become commercialized like Gulf Shores and Orange Beach because of the vision our planners had in the 1950's. We are a small, close-knit community that remain committed to protect are diminishing island. Like many other residents and property owners, I am not opposed to modifying the current ship channel into Mobile Bay, but ALL PLANS TO WIDEN OR DEEPEN THE SHIP CHANNEL SHOULD BE HALTED UNTIL THE AFFECTS OF CURRENT DREDGING PRACTICES ARE FULLY MITIGATED AND A BETTER PLAN CAN BE ESTABLISHED THAT WILL PREVENT SUCH SEVERE DAMAGE TO OUR BEACHES IN THE FUTURE.

I plan to forward copies of my letter to all concerned parties affected by the negligence of the U.S Army Corps of Engineers.

Respectfully,

A large black rectangular redaction box covering the signature area.

To:

[Mobile Harbor GRR](#)

Subject:

[Non-DoD Source] Dauphin Island AL

Date:

Wednesday, February 28, 2018 10:14:54 AM

Dear Sirs:

These comments deal with serious issues affecting both Dauphin Island and Mobile Bay.

* The Corps admitted during the February 22, 2018 public meeting, 50% of the Outer Bar Channel dredged sands placed in the so-called Sand Island Beneficial Use Area (SIBUA) are accumulating and not being reincorporated into the natural littoral drift system. Since 1999, when the SIBUA began to be used, this has robbed Dauphin Island of at least 7 million cubic yards of beach quality sands, causing significant erosion of the island. This impact will be made worse each time the Outer Bar Channel is dredged in the future. The Corps should cease referring to the SIBUA as a “beneficial use” disposal site because neither Sand nor Dauphin Island benefit from its use. More importantly, the Corps must identify an alternative disposal site to place dredged sands in shallow water less than 20 feet deep to assure the sands are effectively bypassed across the Outer Bar Channel to be reincorporated into the natural littoral drift system. The Corps can accomplish this under the authority provided by Section 302 of the Water Resources Development Act of 1996, with the Mobile Harbor Federal Standard being adjusted accordingly as already directed by Corps higher authority in its May 30, 1997 directive to the Mobile District.

* Corps regulations require significant adverse project impacts be mitigated. Based on the Corps’ admission that the so-called SIBUA is failing to meet its intended purpose which is contributing to the erosion of Dauphin Island, the Corps must include in the Mobile Harbor GRR an appropriate mitigation plan to compensate for at least 7 million cubic yards of beach quality sands that, since 1999, have been removed from the littoral drift system, representing an indirect project impact that has significantly contributed to the erosion of both Sand and Dauphin Islands. Further, the Corps’ admission also gives credence to the 1978 Corps report that first concluded maintenance of the Outer Bar Channel contributed to Dauphin Island’s erosion. The Corps has consistently refused to address in the GRR Study the effects of the cumulative removal of around 30 million cubic yards of sand from the littoral drift system that has occurred since 1980 due to maintenance of the Outer Bar Channel. In view of its February 22 admission, the Corps has no credible reason to continue advocating its present position and should begin immediately to investigate appropriate mitigation remedies that should be addressed in the Draft GRR to respond to this now acknowledged significant “changed condition” in the Study Area.

* The Corps is using a computer model in the GRR Study to evaluate the effects of Outer Bar Channel maintenance on sediment transport and water depths on the Mobile Pass ebb-tidal delta shoal. However, to date, the Corps has not extended the modeling efforts to consider the historic erosion of Dauphin Island’s Gulf shoreline. The Corps’ refusal to apply modelling to an evaluation of the historic shoreline erosion issue represents an incomplete investigation of the effects of the project-altered sand transport processes. If the Corps cannot demonstrate the model replicates the island’s observed historic shoreline and topographic erosion losses that have occurred since at least 1999, and preferably back to 1980, along with water depths over the ebb-tidal delta shoal, then the value and believability of the model and its results are called into serious question.

* At the February 22 public meeting, the Corps gave minimal coverage to where and how the increased quantity of dredged material from an enlarged channel will be disposed in Mobile Bay. There are serious environmental impact concerns associated with the return to thin-layer disposal that will directly affect thousands of acres of bay bottoms every year, as well as possibility of indirectly affecting other areas if near-bottom plumes of sediment are moved by prevailing currents and wind-induced wave action. Further, the planned construction of a 1200-acre disposal island in the upper bay near large areas of productive grassbeds that are heavily used for commercial and recreational fishing is also a major concern. Section 302 of the Water Resources Development Act of 1996 allows the Corps to return to in-bay disposal only after it can demonstrate such disposal alternatives provide provable beneficial uses, including environmental restoration. So far, the Corps has not made a credible case of the benefits

of a return to in-bay disposal.

* The Corps reported modeling of salinity and dissolved oxygen levels projected to occur with an enlarged channel would have no effects on oysters in Mobile Bay. However, existing information indicates oyster production in coastal Alabama has been on the decline for years. Commercial fishermen attending the meeting attribute increased siltation of oyster reefs to be the cause. These fishermen blame the siltation on the open water discharge of dredged material in the bay. The Corps' limited theoretical modeling performed to date of selected water quality variables does not appear to provide a complete picture of the environmental issues being faced by Mobile Bay's oyster reefs. The Corps needs to do more analysis of this important resource to support its claim that an enlarged channel will have "no effect" on oysters, which could represent the "canary in Mobile Bay" to gage the impacts of increased dredged material disposal in the bay.

Respectfully,

A solid black rectangular redaction box covering the signature area.

Comment #480

To: [REDACTED] [Mobile Harbor GRR](#)
Subject: [Non-DoD Source] Dauphin Island Erosion
Date: Thursday, March 22, 2018 10:31:10 AM

To whom it may concern:

The Corps admitted during the February 22, 2018 public meeting, 50% of the Outer Bar Channel dredged sands placed in the so-called Sand Island Beneficial Use Area (SIBUA) are accumulating and not being reincorporated into the natural littoral drift system. Since 1999, when the SIBUA began to be used, this has robbed Dauphin Island of at least 7 million cubic yards of beach quality sands, causing significant erosion of the island. This impact will be made worse each time the Outer Bar Channel is dredged in the future. The Corps should cease referring to the SIBUA as a “beneficial use” disposal site because neither Sand nor Dauphin Island benefit from its use. More importantly, the Corps must identify an alternative disposal site to place dredged sands in shallow water less than 20 feet deep to assure dredged beach quality sands are effectively bypassed across the Outer Bar Channel to be reincorporated into the natural littoral drift system. The Corps can accomplish this under the authority provided by Section 302 of the Water Resources Development Act of 1996, with the Mobile Harbor Federal Standard being adjusted accordingly as already directed by Corps higher authority in its May 30, 1997 directive to the Mobile District.

Federal law, the Council on Environmental Quality's National Environmental Policy Act regulations, and the Corps' own agency policy and regulations require significant adverse project impacts be MITIGATED. Based on the Corps' admission that use of the so-called SIBUA is actually contributing to the erosion of Dauphin Island, the Corps must include in the June Mobile Harbor Draft Report an appropriate MITIGATION PLAN to compensate for at least 7 million cubic yards of beach quality sands that have been removed from the nearshore littoral drift system since 1999, creating an indirect adverse project impact that has significantly contributed to the erosion of both Sand and Dauphin Islands. Further, the Corps' recent admission also gives strong credence to the Corps' 1978 report that first concluded maintenance of the Outer Bar Channel contributed to Dauphin Island's erosion. The Corps has consistently refused to address in the ongoing Mobile Harbor Study the erosion effects resulting from the cumulative removal of around 30 million cubic yards of sand from the littoral drift system since 1980 associated with the maintenance of the Outer Bar Channel. In view of its February 22 admission, the Corps has no credible reason to continue advocating its present position and should begin immediately to investigate MITIGATION REMEDIES in the ongoing Mobile Harbor Study to appropriately respond to this now acknowledged significant “changed condition and adverse project impact” in the Study Area. The existing Mobile Harbor Study provides the Corps with sufficient authority to move forward in MITIGATING the significant adverse erosion impact created by the Mobile Harbor project that the Corps has long refused to acknowledge was occurring.

[REDACTED]

Comment #481

[REDACTED]

To:

[REDACTED]
[Mobile Harbor GRR](#)

Subject:

[EXTERNAL] Dauphin Island erosion

Date:

Wednesday, March 1, 2017 8:00:13 AM

My business ships goods out of Mobile using the shipping channel. I also own a home on Dauphin Island (30+ years). I still don't understand how Dauphin Island ends up being everyone's doormat. I am not involved in anything political but generally assume the COE and others know full well that the Mobile shipping channel is in some way connected to the serious erosion problems on Dauphin Island. Why not simply step up and do the right thing?

[REDACTED]

Sent from my mobile phone

Comment #482

To: [REDACTED]
Subject: [Mobile Harbor GRR](#)
Date: [EXTERNAL] Mobile Bay Dredging and distribution
Thursday, October 5, 2017 2:49:24 PM

I am writing because I was unable to attend the meeting in Bayou la Batre on September 14. My husband and I own a home and a condo on Dauphin Island. Unfortunately, we were out of the country in August and September. We are hopeful that some very important questions were addressed/answered at that meeting.

Our concerns are for the potential impact and more erosion on the southern shore of Dauphin Island. We are concerned about how the dredged sand and sediments will impact water quality and oysters, shrimp, and fish. We are concerned with the continuing erosion and degradation of nesting sites for the endangered Loggerhead sea turtles. We are concerned for those of us who call Dauphin Island home and have seen our properties decrease. We are concerned about people who own businesses here and depend on the beaches for potential customers. When will you revisit and analyze the historic loss of sand from nearshore littoral system since 1980 because of maintenance of the Outer Bar Channel?

We would also encourage you to come to Dauphin Island to hold a "workshop meeting" where attendees can ask questions and get the answers. (Like a "Town Hall Meeting")

We are terrified and frustrated that no one seems to be listening or taking our concerns seriously.

Sincerely,

[REDACTED]

Sent from my iPad

Comment #483

To: [REDACTED] c.david.turner@usace.army.mil; [CEIG](#); [Bush, Eric L CIV USARMY CESAD \(US\)](#); [Mobile Harbor GRR](#); [Newell, David P CIV CESAM CESAD \(US\)](#); [McDonald, Justin S CIV USARMY CESAM \(US\)](#); [Flakes, Curtis M CIV \(US\)](#); lisa.hunter@usace.army.mil

Cc: bill.hightower@alsenate.gov; carl.dyess@alsenate.gov; eliska.morgan@dcnr.alabama.gov; patti.powell@dcnr.alabama.gov; dcnr.commissioner@dcnr.alabama.gov

Subject: [Non-DoD Source] Fwd: Proposed dredging to Mobile Bay Harbor

Date: Wednesday, May 16, 2018 12:15:29 PM

Sent from my iPad

Begin forwarded message:

[REDACTED]

Date: May 16, 2018 at 11:57:14 AM CDT
To: james.a.delapp@usace.army.mil <<mailto:james.a.delapp@usace.army.mil>>
Subject: Proposed dredging to Mobile Bay Harbor

Dear Sir:

I am writing about the proposed dredging of Mobile Harbor and the placement of the dredged sand. As you know, the Army Corps of Engineers' practices in the past have led to severe erosion of Dauphin Island. It is estimated that 7,000,000 cubic yards of sand have not reached Dauphin Island after dredging since 1999. That much sand would have made a significant impact and improvement of this island.

The Corps' own 1978 Dauphin Island erosion study/plan recommended putting a nearshore berm in front of the island. Yet, that practice was never implemented. I am asking "WHY?" since the Corps has used that practice all over the U.S. coastline??

Dauphin Island, as the only barrier island in Alabama, is an incredibly important place for the rich and varied marine life, for protection of the Mississippi Sound and mainland, for the many tourists who travel here every year to enjoy the natural beauty and fishing, and for those of us who live here and call this place "home".

It is just inconceivable to me why the C of E will not admit the mistakes of the past and plan to correct and improve the placement of dredged sand so as to restore and protect this precious Alabama resource.

Sincerely,

[REDACTED]

Comment #484

To: [REDACTED] [Mobile Harbor GRR](#)
Subject: [Non-DoD Source] Dauphin Island, AL
Date: Tuesday, March 20, 2018 1:50:51 PM

Dear Sir,

The Corps admitted during the February 22, 2018 public meeting, 50% of the Outer Bar Channel dredged sands placed in the so-called Sand Island Beneficial Use Area (SIBUA) are accumulating and not being reincorporated into the natural littoral drift system. Since 1999, when the SIBUA began to be used, this has robbed Dauphin Island of at least 7 million cubic yards of beach quality sands, causing significant erosion of the island. This impact will be made worse each time the Outer Bar Channel is dredged in the future. The Corps should cease referring to the SIBUA as a “beneficial use” disposal site because neither Sand nor Dauphin Island benefit from its use. More importantly, the Corps must identify an alternative disposal site to place dredged sands in shallow water less than 20 feet deep to assure dredged beach quality sands are effectively bypassed across the Outer Bar Channel to be reincorporated into the natural littoral drift system. The Corps can accomplish this under the authority provided by Section 302 of the Water Resources Development Act of 1996, with the Mobile Harbor Federal Standard being adjusted accordingly as already directed by Corps higher authority in its May 30, 1997 directive to the Mobile District.

Federal law, the Council on Environmental Quality's National Environmental Policy Act regulations, and the Corps' own agency policy and regulations require significant adverse project impacts be MITIGATED. Based on the Corps' admission that use of the so-called SIBUA is actually contributing to the erosion of Dauphin Island, the Corps must include in the June Mobile Harbor Draft Report an appropriate MITIGATION PLAN to compensate for at least 7 million cubic yards of beach quality sands that have been removed from the nearshore littoral drift system since 1999, creating an indirect adverse project impact that has significantly contributed to the erosion of both Sand and Dauphin Islands. Further, the Corps' recent admission also gives strong credence to the Corps' 1978 report that first concluded maintenance of the Outer Bar Channel contributed to Dauphin Island's erosion. The Corps has consistently refused to address in the ongoing Mobile Harbor Study the erosion effects resulting from the cumulative removal of around 30 million cubic yards of sand from the littoral drift system since 1980 associated with the maintenance of the Outer Bar Channel. In view of its February 22 admission, the Corps has no credible reason to continue advocating its present position and should begin immediately to investigate MITIGATION REMEDIES in the ongoing Mobile Harbor Study to appropriately respond to this now acknowledged significant “changed condition and adverse project impact” in the Study Area. The existing Mobile Harbor Study provides the Corps with sufficient authority to move forward in MITIGATING the significant adverse erosion impact created by the Mobile Harbor project that the Corps has long refused to acknowledge was occurring.

Please take whatever steps necessary to move forward with mitigating the adverse erosion impact on Dauphin Island.

Sincerely,

[REDACTED]

Comment #485

To:

Mobile Harbor GRR

Cc:

Stan Graves; Glen Coffee

Subject:

[Non-DoD Source] Dauphin Island restoration/Mobile Harbor dredging - Meeting - Feb. 22, 2018

Date:

Tuesday, March 27, 2018 8:44:23 AM

As a property owner on Dauphin Island and a citizen concerned about the impact that the proposed dredging of Mobile Ship Channel on the island's shore, enclosed are the following comments/questions:

The Corps admitted during the February 22, 2018 public meeting, 50% of the Outer Bar Channel dredged sands placed in the so-called Sand Island Beneficial Use Area (SIBUA) are accumulating and not being reincorporated into the natural littoral drift system. Since 1999, when the SIBUA began to be used, this has robbed Dauphin Island of at least 7 million cubic yards of beach quality sands, causing significant erosion of the island. This impact will be made worse each time the Outer Bar Channel is dredged in the future. The Corps should cease referring to the SIBUA as a "beneficial use" disposal site because neither Sand nor Dauphin Island benefit from its use. More importantly, the Corps must identify an alternative disposal site to place dredged sands in shallow water less than 20 feet deep to assure the sands are effectively bypassed across the Outer Bar Channel to be reincorporated into the natural littoral drift system. The Corps can accomplish this under the authority provided by Section 302 of the Water Resources Development Act of 1996, with the Mobile Harbor Federal Standard being adjusted accordingly as already directed by Corps higher authority in its May 30, 1997 directive to the Mobile District.

Corps regulations require significant adverse project impacts be mitigated. Based on the Corps' admission that the so-called SIBUA is failing to meet its intended purpose which is contributing to the erosion of Dauphin Island, the Corps must include in the Mobile Harbor GRR an appropriate mitigation plan to compensate for at least 7 million cubic yards of beach quality sands that, since 1999, have been removed from the littoral drift system, representing an indirect project impact that has significantly contributed to the erosion of both Sand and Dauphin Islands. Further, the Corps' admission also gives credence to the 1978 Corps report that first concluded maintenance of the Outer Bar Channel contributed to Dauphin Island's erosion. The Corps has consistently refused to address in the GRR Study the effects of the cumulative removal of around 30 million cubic yards of sand from the littoral drift system that has occurred since 1980 due to maintenance of the Outer Bar Channel. In view of its February 22 admission, the Corps has no credible reason to continue advocating its present position and should begin immediately to investigate appropriate mitigation remedies that should be addressed in the Draft GRR to respond to this now acknowledged significant "changed condition" in the Study Area.

The Corps is using a computer model in the GRR Study to evaluate the effects of Outer Bar Channel maintenance on sediment transport and water depths on the Mobile Pass ebb-tidal delta shoal. However, to date, the Corps has not extended the modeling efforts to consider the historic erosion of Dauphin Island's Gulf shoreline. The Corps' refusal to apply modelling to an evaluation of the historic shoreline erosion issue represents an incomplete investigation of the effects of the project-altered sand transport processes. If the Corps cannot demonstrate the model replicates the island's observed historic shoreline and topographic erosion losses that have occurred since at least 1999, and preferably back to 1980, along with water depths over the ebb-tidal delta shoal, then the value and believability of the model and its results are called into serious question.

At the February 22 public meeting, the Corps gave minimal coverage to where and how the increased quantity of dredged material from an enlarged channel will be disposed in Mobile Bay. There are serious environmental impact concerns associated with the return to thin-layer disposal that will directly affect thousands of acres of bay bottoms every year, as well as possibility of indirectly affecting other areas if near-bottom plumes of sediment are moved by prevailing currents and wind-induced wave action. Further, the planned construction of a 1200-acre disposal island in the upper bay near large areas of productive grassbeds that are heavily used for commercial and recreational fishing is also a major concern. Section 302 of the Water Resources Development Act of 1996 allows the Corps to return to in-bay disposal only after it can demonstrate such disposal alternatives provide provable beneficial uses, including environmental restoration. So far, the Corps has not made a credible case of the benefits of a return to in-bay disposal.

The Corps reported modeling of salinity and dissolved oxygen levels projected to occur with an enlarged channel would have no effects on oysters in Mobile Bay. However, existing information indicates oyster production in coastal Alabama has been on the decline for years. Commercial fishermen attending the meeting attribute increased siltation of oyster reefs to be the cause. These fishermen blame the siltation on the open water discharge of dredged

material in the bay. The Corps' limited theoretical modeling performed to date of selected water quality variables does not appear to provide a complete picture of the environmental issues being faced by Mobile Bay's oyster reefs. The Corps needs to do more analysis of this important resource to support its claim that an enlarged channel will have "no effect" on oysters, which could represent the "canary in Mobile Bay" to gage the impacts of increased dredged material disposal in the bay.

I appreciate that the Corps, in my opinion, has started thinking in broader terms with regard to the entire Mobile Bay area, especially Dauphin Island, and the impact that the Ship Channel dredging activities will have on the overall area, rather than just focusing on the economic impact and revenue that this will purportedly bring to the State through increased shipping. A barrier island, which protects the entire coastline of western Mobile County, is much more important than bringing in more revenue to the State. Mr Lyons' focus is on bringing in more revenue to the State. He indicated that he is also a property owner on the island. If something is not done soon, he won't have much of an island to retire to in a few years. If not for the island, quite a bit of Alabama's coastline would be put in harm's way.
Thank you.

[REDACTED]

Comment #486

From:

Subject:

Date:

[REDACTED]

[REDACTED] [GRR](#)

[Non-DoD Source] Comments-Mobile Bay Ship Channel/Depth and Width Increase

Wednesday, April 11, 2018 4:16:59 PM

Dear Col. James Delap,

The proposed deepening and widening of the Mobile Bay Ship Channel will result in much larger vessels using and frequenting the Alabama State Docks and the Mobile Brookley Container Transfer Facility. Larger vessels with deeper drafts and wider widths, when coupled with an increase in speed due to easier and safer navigation, translates to an increase in vessel generated waves. Vessel waves are influenced by a variety of factors. It has been demonstrated that the maximum wave height of a high-vessel travelling in deep water is primarily a function of displacement to length ratio and the corresponding period is primarily a function of the vessel's waterline and associated speed. If steps are not taken to properly account for these influences, and preventive measures are not taken to slow the wave action generated from the larger ships, then substantial shoreline erosion will occur to the east and west shorelines of upper Mobile Bay located north of Gaillard Island. This portion of the bay, which is considered a bounded waterway, has already seen extensive erosion to the shoreline due to the increase in the container shipping at the Mobile Brookley Container Transfer Terminal.

The introduction of a larger vessel's wash with periods, wave energy, and wave power several hundred percent longer than normally experienced can lead quickly to erosion. The shorelines in the upper Mobile Bay are composed of soil banks supported by riparian vegetation, muddy sands with a beach-like and sandy muds or sand with a beach-like profile. These types of shorelines, especially within a narrowing, bounded and confined area, are not accustomed to large vessel induced wave action. These large vessels generate bow and stern wake, the magnitude of which is influenced by type, shape displacement and speed of the vessel. These wave generating factors can also affect "drawdown" which is caused by ship propellers forcing large amounts of water from beneath the boat. On the shoreline the displacement of water from the vessel results in water being pulled away from the shore, resulting in offshore transport of sediment. Furthermore, the proximity of the vessel to the shoreline and characteristics of the bank, can effect their intensity and in time the degree of shoreline impact. In the long term, waves generated from these larger commercial vessels can directly impact the shoreline by destabilizing it and washing it away, accelerate erosion which is already occurring to damaged areas, and waves can erode soil from the bank from slow, steady, and repeated impact over time.

Due to these concerns, it is suggested that the Corp of Engineers consider setting vessel speed limits, undertake a full-scale wash study of potential vessel-generated erosion and implement an erosion monitoring program in the event the Mobile Bay Ship Channel is deepened and widened. It is recommended that a Protect-in-Place Strategy for Minimizing and Controlling Erosion be designed and constructed adjacent to the upper Mobile Bay Ship Channel in order to:

- * Suppress or diminish the wave generated energy source from the larger commercial vessels frequenting the Mobile Bay Ship Channel
- * Shield the shoreline by constructing a rip-rap breakwater barrier and/or a series of groins along the east and west flanks of the ship channel (constructed above wave height with periodic recreational boating passage gaps)

beginning at point from Gaillard Island to the Brookley Container Terminal

A breakwater partition will protect the shoreline against damaging wave action by causing vessel induced waves to break at the structure instead of on the shore. After the wave breaks, it is not so high and thus contains less energy. Side benefits of a constructed breakwater would be enhancement of recreational and commercial fishing opportunities and juvenile fish and oyster protection by providing additional reef structure in Mobile Bay.

Thank you.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Comment #487

From: [REDACTED]
To: [Mobile Harbor GRR](#)
Subject: [Non-DoD Source] February 22, 2018 - Public Meeting - Comments
Date: Thursday, March 1, 2018 9:17:50 AM

Below are comments to affecting both Dauphin Island and Mobile Bay.

* The Corps admitted during the February 22, 2018 public meeting, 50% of the Outer Bar Channel dredged sands placed in the so-called Sand Island Beneficial Use Area (SIBUA) are accumulating and not being reincorporated into the natural littoral drift system. Since 1999, when the SIBUA began to be used, this has robbed Dauphin Island of at least 7 million cubic yards of beach quality sands, causing significant erosion of the island. This impact will be made worse each time the Outer Bar Channel is dredged in the future. The Corps should cease referring to the SIBUA as a “beneficial use” disposal site because neither Sand nor Dauphin Island benefit from its use. More importantly, the Corps must identify an alternative disposal site to place dredged sands in shallow water less than 20 feet deep to assure the sands are effectively bypassed across the Outer Bar Channel to be reincorporated into the natural littoral drift system for Dauphin Island. The Corps can accomplish this under the authority provided by Section 302 of the Water Resources Development Act of 1996, with the Mobile Harbor Federal Standard being adjusted accordingly as already directed by Corps higher authority in its May 30, 1997 directive to the Mobile District.

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in coastal Alabama has been on the decline for years. Commercial fishermen attending the meeting attribute increased siltation of oyster reefs to be the cause. These fishermen blame the siltation on the open water discharge of dredged material in the bay. The Corps' limited theoretical modeling performed to date of selected water quality variables does not appear to provide a complete picture of the environmental issues being faced by Mobile Bay's oyster reefs. The Corps needs to do more analysis of this important resource to support its claim that an enlarged channel will have "no effect" on oysters, which could represent the "canary in Mobile Bay" to gage the impacts of increased dredged material disposal in the bay.

[REDACTED]

[REDACTED]

[REDACTED]

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Comment #488

From: [REDACTED]
To: [Flakes, Curtis M CIV \(US\)](#); [Newell, David P CIV CESAM CESAD \(US\)](#); [Paine, Joseph W CIV USARMY CESAM \(US\)](#); [McDonald, Justin S CIV USARMY CESAM \(US\)](#); [Dyess, Carl E CIV USARMY CESAM \(US\)](#); [Jacobson, Jennifer L CIV USARMY CESAM \(US\)](#); [Creswell, Michael W CIV \(US\)](#)
Subject: [EXTERNAL] Dauphin Island
Date: Wednesday, January 24, 2018 12:48:53 PM

Dear Mr. Flakes and other Corps' employees:

Since you and the eight other Mobile District employees, who attended the Corps' Dec. 12, 2017 meeting were considered to have special expertise for the Mobile Harbor Channels, the maintenance dredging and its effects on Dauphin Island. As such, each of you have a duty to speak and not to remain silent and to disclose to the public and property owners on the Island, all information of the past erosion impacts caused by Mobile Harbor and Channels and all future erosion impacts to Dauphin Island from the massive expansion to the Mobile Harbor Entrance Channel/Outer Bar Channel for the SEIS/GRR/Mobile Harbor study.

As employees of the US Corps of Engineers, who have taken an oath to the Constitution and to follow the Federal Laws and by each of you having special expertise, I am asking you to disclose all information and not conceal, omit or state any half-truth to me about the erosion to Dauphin Island, concerning:

- All information that the Corps has failed to inform Congress and the public about the erosion on the Island including the 1980 EIS/Mobile Harbor Survey Report failed to comply with the 1935 Rivers and Harbors Act by not studying the erosion impacts to Dauphin Island and the Mobile Entrance Channel for 10 miles on each side?
- An accurate accounting of the sand in SIBUA and exactly where the sand leaving that site goes?
- The massive expansion to the Mobile Harbor Entrance Channel/Outer Bar Channel for the SEIS/GRR/Mobile Harbor study and the future effects to Dauphin Island's shoreline.
- The Corps' Mobile Harbor project contributing to the degradation of the environment and erosion to the shoreline of Dauphin Island.
- All past and future environmental and erosional impacts on Dauphin Island's shoreline from the dredging of the Mobile Harbor Entrance Channel project, including any significant adverse impacts on fish, turtles and wildlife resources on the Island.
- All information about the Corps dredging the Mobile Harbor Entrance Channel/Outer Bar Channel as the cause to the erosion to the shoreline of Dauphin Island, which has been stated in the Corps' own documentation, other agencies documentation and other coastal engineers studies that was not included in the Corps' 2008 study and the updated 2010 study.
- All information about the US Geological Survey's Robert Morton's 2007 and 2008 studies for the Corps' MsCIP study, which state "Historical land-loss trends and engineering records show that progressive increases in land-loss rate correlate with nearly simultaneous deepening of channels dredged across the outer bars" and correlated the land-loss on the Island between 1958 to 2006 and concluded that the Corps maintenance dredging was causing the erosion on Dauphin Island.
- All Corps' and Port Authority responsibilities to mitigate the erosion to the Island caused by the dredging of the Federally Authorized Mobile Harbor Deep-draft Entrance Channel.

· All Federal Laws and Corps' manuals for the Corps to mitigate the erosion impacts to the Island, resulting from Federal Navigation operation and maintenance activities, subject to Federal control and responsibility, on a adjacent shoreline and the interruption of sediment transport to the shoreline.

· The Corps ensuring that the future deepening and widening of the Mobile Harbor Entrance Channel does not block the littoral drift, and cause severe downdrift erosion? The Corps mitigating the erosion to the Island by the Corps placing the sand directly on the shoreline and in the future in a nearshore berm in shallow water in front of the whole Island every time the Corps dredges, as the Corps does in other parts of the Country?

I am asking each of you speak and not to stay silent and to provide your expertise for questions I have not asked, because of my lack of knowledge of the Corps' process or the terms the Corps uses for Federal Project.

Just because a questions was not asked, it does not alleviate the Corps from providing all other truthful information about the Corps' dredging of the Entrance Channel and its past and future erosion effects on Dauphin Island.

[REDACTED]

[REDACTED]

[REDACTED]

Comment #489

From: [REDACTED]
To: [Mobile Harbor GRR](#)
Subject: [Non-DoD Source] Public Meeting Input – Mobile Harbor GRR Study
Date: Sunday, April 15, 2018 7:01:36 PM

Dear COL DeLapp,

This letter is to follow up on comments made during the February 22, 2018 public meeting on the Mobile Harbor GRR study and SEIS. There are two main issues that concern me: erosion of Dauphin Island and establishing baseline air quality measurements near the Mobile Harbor.

Mitigation of Dauphin Island Erosion

At the February meeting the Corps acknowledged that dredged sands placed in the SIBUA have not been joining the littoral drift system to replenish Dauphin Island since 1999, when the SIBUA was placed in service. This means that sand dredged from the ship channel has essentially been withheld from Dauphin Island for that entire period of time. Since Dauphin Island serves as a critical barrier protecting the fragile ecosystem of the area, this must be rectified now that the problem has been identified. Your plan to widen and deepen the Mobile Harbor must include a mitigation plan to stop this erosion and to restore that sand which has been diverted for the past 20 years. Furthermore, future plans for dredge disposal must include placement to ensure that the sand will enter the littoral drift system to benefit our precious barrier island.

Establish Baseline Air Quality Measurements

The National Environmental Policy Act requires you to examine all of the direct effects that will result from the deepening and widening project, as well as any reasonable foreseeable indirect impacts from connected actions. This would include any expected cumulative impacts on air quality from increased traffic, which will happen as a direct result of the project. My understanding is that the Port Authority is claiming that this analysis is outside the scope of the project, which it most assuredly is not.

There is no scientific way to measure the actual impacts without first installing air quality monitors to establish a baseline measure of air quality before the project, specifically concentrating on things such as diesel soot from transportation and emissions from petrochemical tank storage. It is incumbent upon the Corps to make sure that the scope of the study you are doing is proper, and I feel that, unless you provide for adequate air quality monitoring, you are not meeting that requirement of NEPA.

Sincerely,

[REDACTED]

Comment #490

From: [Dauphin Island Restoration](#)
To: [Mobile Harbor GRR](#)
Subject: [EXTERNAL] Comments on the Public Scoping Meeting in January 2016
Date: Monday, February 29, 2016 11:59:49 PM

Email to:

Ms. Jennifer Jacobson

US Army Corps of Engineers

Mobile District, Planning & Environmental Division

Coastal Environment Team

PO Box 2288

Mobile, Alabama 36628-0001

On January 12, 2016, I attended a “scoping meeting” for the general public at the Alabama Cruise Terminal, regarding the proposed expansion in depth and width of the Mobile Bay Shipping Channel.

There are many issues to be addressed around the scope of the project, and some have been broached by other concerned citizens. Those concerns will be posted on the Dauphin Island Restoration website in the coming days, weeks and months.

My comments on the meeting (and the study) focus on two key points:

Meeting Format

First of all, the event was not a meeting by any stretch of the imagination.

A public “meeting” is generally constructed with guests/invitees/speakers at the front of a meeting room or conference space, and there is an audience of people who wish to ask questions, express support or concerns, etc. The typical format is a brief talk or presentation, with audience members allowed to ask questions. And those questions, and the answers provided by the speakers, are heard by everyone else in the room.

As I’m sure you know, the event was set up more like a trade show. A rectangle of tables were arranged around the center of the room. At each table were one or more representatives of the Corps. Each table also displayed posters, and prints of where the ASPA plans to widen the channel for a passing lane, as well as other information.

Attendees at the meeting could go up to the individual tables and ask questions of the people manning those tables, but there was no way for those individuals to ask questions where everyone else attending could hear them.

I find it troubling that the “trade show” format was employed for the event. This created a vacuum of information. Only those gathered around a specific table heard what was being asked by a single person and what was said in response.

The strategy employed here prevented important questions from being raised in front of those who had not considered such questions. A number of concerned citizens have become very educated on the proposed project, and on the history of dredging in Mobile Bay, and those people were, for all intents and purposes, “silenced” by this format which restricted the reach of information to the less-informed.

Conflicts of Interest

The 1978 study, performed by the Corps themselves, concluded that dredging did contribute to erosion on Dauphin Island. Some of the current parties involved (directly or indirectly) in this new study have stated both privately and publicly that the 1978 study was not “based on science.” Yet there has never been any explanation of how the information in the 1978 study was “non-science” and how this new study will be performed differently. Conflicting statements have also been made by certain persons about the previous study and how the littoral drift is affected.

In light of the biased parties involved, I believe that it is a grievous conflict of interest to have the Corps perform the new study. That ship may have already sailed, as they say. But nevertheless, I wish to voice my concerns. I am skeptical that the results of the study will be impartial, and that it will be, in fact, “based on science” and not tilted toward a result desired by certain parties who wish to do nothing about the erosion problem on Dauphin Island.

Those are my two high-level points of concern. Other points will be posted on our website for the public to read.

Sincerely,

Laura Martin

Dauphin Island Restoration

Task Force

P.O. Box 352

Dauphin Island, AL 36528

Comment #491

From: [REDACTED]
To: [Mobile Harbor GRR](#)
Cc: coffeegl@aol.com; sgraves1@bellsouth.net
Subject: [Non-DoD Source] Mobile Bay Dredging
Date: Thursday, March 22, 2018 1:30:24 PM

To Whom It May Concern:

I have received and read over the meeting summary from the Corp's public meeting on the Mobile Bay on February 22, 2018. In the past several years, the Corps of Engineer's Policy of widening and deepening Mobile Bay and their disposal of the sand has caused considerable damage to Dauphin Island.

The Corps admitted during the February 22, 2018 public meeting, 50% of the Outer Bar Channel dredged sands placed in the so-called Sand Island Beneficial Use Area (SIBUA) are accumulating and not being reincorporated into the natural littoral drift system. Since 1999, when the SIBUA began to be used, this has robbed Dauphin Island of at least 7 million cubic yards of beach quality sands, causing significant erosion of the island. This impact will be made worse each time the Outer Bar Channel is dredged in the future. The Corps should cease referring to the SIBUA as a "beneficial use" disposal site because neither Sand nor Dauphin Island benefit from its use. More importantly, the Corps must identify an alternative disposal site to place dredged sands in shallow water less than 20 feet deep to assure dredged beach quality sands are effectively bypassed across the Outer Bar Channel to be reincorporated into the natural littoral drift system. The Corps can accomplish this under the authority provided by Section 302 of the Water Resources Development Act of 1996, with the Mobile Harbor Federal Standard being adjusted accordingly as already directed by Corps higher authority in its May 30, 1997 directive to the Mobile District.

Federal law, the Council on Environmental Quality's National Environmental Policy Act regulations, and the Corps' own agency policy and regulations require significant adverse project impacts be MITIGATED. Based on the Corps' admission that use of the so-called SIBUA is actually contributing to the erosion of Dauphin Island, the Corps must include in the June Mobile Harbor Draft Report an appropriate MITIGATION PLAN to compensate for at least 7 million cubic yards of beach quality sands that have been removed from the nearshore littoral drift system since 1999, creating an indirect adverse project impact that has significantly contributed to the erosion of both Sand and Dauphin Islands. Further, the Corps' recent admission also gives strong credence to the Corps' 1978 report that first concluded maintenance of the Outer Bar Channel contributed to Dauphin Island's erosion. The Corps has consistently refused to address in the ongoing Mobile Harbor Study the erosion effects resulting from the cumulative removal of around 30 million cubic yards of sand from the littoral drift system since 1980 associated with the maintenance of the Outer Bar Channel. In view of its February 22 admission, the Corps has no credible reason to continue advocating its present position and should begin immediately to investigate MITIGATION REMEDIES in the ongoing Mobile Harbor Study to appropriately respond to this now acknowledged significant "changed condition and adverse project impact" in the Study Area. The existing Mobile Harbor Study provides the Corps with sufficient authority to move forward in MITIGATING the significant adverse erosion impact created by the Mobile Harbor project that the Corps has long refused to acknowledge was occurring.

I look forward to the Corps new policies on this subject.

Sincerely,

[REDACTED]

[REDACTED]

Comment #492

From: [REDACTED]
To: [Mobile Harbor GRR](#)
Subject: [Non-DoD Source] Dauphin Island - Mobile Bay
Date: Friday, March 9, 2018 9:48:47 AM

To Whom It May Concern:

I have received and read over the meeting summary from the Corp's public meeting on the Mobile Bay on February 22, 2018. In the past several years, the Corps of Engineer's Policy of widening and deepening Mobile Bay and their disposal of the sand has caused considerable damage to Dauphin Island.

I know that this is not the intent of the Corps of Engineers, but what the Corps is doing is causing extensive damage to the beaches of Dauphin Island. To prevent further erosion, please consider changing what the Corps is currently doing and consider the following proposals:

* Corps regulations require significant adverse project impacts be mitigated. Based on the Corps' admission that the so-called SIBUA is failing to meet The Corps admitted during the February 22, 2018 public meeting, 50% of the Outer Bar Channel dredged sands placed in the so-called Sand Island Beneficial Use Area (SIBUA) are accumulating and not being reincorporated into the natural littoral drift system. Since 1999, when the SIBUA began to be used, this has robbed Dauphin Island of at least 7 million cubic yards of beach quality sands, causing significant erosion of the island. This impact will be made worse each time the Outer Bar Channel is dredged in the future. The Corps should cease referring to the SIBUA as a "beneficial use" disposal site because neither Sand nor Dauphin Island benefit from its use. More importantly, the Corps must identify an alternative disposal site to place dredged sands in shallow water less than 20 feet deep to assure the sands are effectively bypassed across the Outer Bar Channel to be reincorporated into the natural littoral drift system. The Corps can accomplish this under the authority provided by Section 302 of the Water Resources Development Act of 1996, with the Mobile Harbor Federal Standard being adjusted accordingly as already directed by Corps higher authority in its May 30, 1997 directive to the Mobile District.

* Its intended purpose which is contributing to the erosion of Dauphin Island, the Corps must include in the Mobile Harbor GRR an appropriate mitigation plan to compensate for at least 7 million cubic yards of beach quality sands that, since 1999, have been removed from the littoral drift system, representing an indirect project impact that has significantly contributed to the erosion of both Sand and Dauphin Islands. Further, the Corps' admission also gives credence to the 1978 Corps report that first concluded maintenance of the Outer Bar Channel contributed to Dauphin Island's erosion. The Corps has consistently refused to address in the GRR Study the effects of the cumulative removal of around 30 million cubic yards of sand from the littoral drift system that has occurred since 1980 due to maintenance of the Outer Bar Channel. In view of its February 22 admission, the Corps has no credible reason to continue advocating its present position and should begin immediately to investigate appropriate mitigation remedies that should be addressed in the Draft GRR to respond to this now acknowledged significant "changed condition" in the Study Area.

* The Corps is using a computer model in the GRR Study to evaluate the effects of Outer Bar Channel maintenance on sediment transport and water depths on the Mobile Pass ebb-tidal delta shoal. However, to date, the Corps has not extended the modeling efforts to consider the historic erosion of Dauphin Island's Gulf shoreline. The Corps' refusal to apply modelling to an evaluation of the historic shoreline erosion issue represents an incomplete investigation of the effects of the project-altered sand transport processes. If the Corps cannot demonstrate the model replicates the island's observed historic shoreline and topographic erosion losses that have occurred since at least 1999, and preferably back to 1980, along with water depths over the ebb-tidal delta shoal, then the value and believability of the model and its results are called into serious question.

* At the February 22 public meeting, the Corps gave minimal coverage to where and how the increased quantity of dredged material from an enlarged channel will be disposed in Mobile Bay. There are serious environmental impact concerns associated with the return to thin-layer disposal that will directly affect thousands of acres of bay bottoms ever year, as well as possibility of indirectly affecting other areas if near-bottom plumes of sediment are moved by prevailing currents and wind-induced wave action. Further, the planned construction of a 1200-acre

disposal island in the upper bay near large areas of productive grassbeds that are heavily used for commercial and recreational fishing is also a major concern. Section 302 of the Water Resources Development Act of 1996 allows the Corps to return to in-bay disposal only after it can demonstrate such disposal alternatives provide provable beneficial uses, including environmental restoration. So far, the Corps has not made a credible case of the benefits of a return to in-bay disposal.

* The Corps reported modeling of salinity and dissolved oxygen levels projected to occur with an enlarged channel would have no effects on oysters in Mobile Bay. However, existing information indicates oyster production in coastal Alabama has been on the decline for years. Commercial fishermen attending the meeting attribute increased siltation of oyster reefs to be the cause. These fishermen blame the siltation on the open water discharge of dredged material in the bay. The Corps' limited theoretical modeling performed to date of selected water quality variables does not appear to provide a complete picture of the environmental issues being faced by Mobile Bay's oyster reefs. The Corps needs to do more analysis of this important resource to support its claim that an enlarged channel will have "no effect" on oysters, which could represent the "canary in Mobile Bay" to gage the impacts of increased dredged material disposal in the bay.

I look forward to the Corps new policies on this subject.

Sincerely,

[REDACTED]

[REDACTED]

Comment #493

From: [REDACTED]
To: [Mobile Harbor GRR](#)
Cc: [Dad](#)
Subject: [Non-DoD Source] Dauphin Island Erosion
Date: Friday, March 30, 2018 11:25:51 PM

US Army Corps of Engineers,

As a homeowner on Dauphin Island for the last 15 years, I have witnessed firsthand the deterioration of Alabama's sole barrier island that is meant to protect its coastline. With the devastation of Ivan, Katrina, Ike and others, we have watched beaches and neighbors disappear from the the landscape. The spot on the beach where I proposed to my wife less than ten years ago is now under water at low tide.

While efforts have been made to replenish the losses, each storm brings new challenges and Dauphin Island continues to be a "back burner issue." As stakeholders in the future of the island and protectors of the coastline, we are pleading for more effective reincorporation of the sands dredged in and around the Outer Bar Channel.

The Corps admitted during the February 22, 2018 public meeting, 50% of the Outer Bar Channel dredged sands placed in the so-called Sand Island Beneficial Use Area (SIBUA) are accumulating and not being reincorporated into the natural littoral drift system. Since 1999, when the SIBUA began to be used, this has robbed Dauphin Island of at least 7 million cubic yards of beach quality sands, causing significant erosion of the island. This impact will be made worse each time the Outer Bar Channel is dredged in the future. The Corps should cease referring to the SIBUA as a "beneficial use" disposal site because neither Sand nor Dauphin Island benefit from its use. More importantly, the Corps must identify an alternative disposal site to place dredged sands in shallow water less than 20 feet deep to assure dredged beach quality sands are effectively bypassed across the Outer Bar Channel to be reincorporated into the natural littoral drift system. The Corps can accomplish this under the authority provided by Section 302 of the Water Resources Development Act of 1996, with the Mobile Harbor Federal Standard being adjusted accordingly as already directed by Corps higher authority in its May 30, 1997 directive to the Mobile District Federal district.

Federal law, the Council on Environmental Quality's National Environmental Policy Act regulations, and the Corps' own agency policy and regulations require significant adverse project impacts be MITIGATED. Based on the Corps' admission that use of the so-called SIBUA is actually contributing to the erosion of Dauphin Island, the Corps must include in the June Mobile Harbor Draft Report an appropriate MITIGATION PLAN to compensate for at least 7 million cubic yards of beach quality sands that have been removed from the near shore littoral drift system since 1999, creating an indirect adverse project impact that has significantly contributed to the erosion of both Sand and Dauphin Islands. Further, the Corps' recent admission also gives strong credence to the Corps' 1978 report that first concluded maintenance of the Outer Bar Channel contributed to Dauphin Island's erosion. The Corps has consistently refused to address in the ongoing Mobile Harbor Study the erosion effects resulting from the cumulative removal of around 30 million cubic yards of sand from the littoral drift system since 1980 associated with the maintenance of the Outer Bar Channel. In view of its February 22 admission, the Corps has no credible reason to continue advocating its present position and should begin immediately to investigate MITIGATION REMEDIES in the ongoing Mobile Harbor Study to appropriately respond to this now acknowledged significant "changed condition and adverse project impact" in the Study Area. The existing Mobile Harbor Study provides the Corps with sufficient authority to move forward in MITIGATING the significant adverse erosion impact created by the Mobile Harbor project that the Corps has long refused to acknowledge was occurring.

Sincerely,

[REDACTED]

[REDACTED]

[REDACTED]

Comment #494

From: [REDACTED]
To: [Mobile Harbor GRR](#)
Subject: [Non-DoD Source] Dredging of Mobile Bay
Date: Wednesday, April 11, 2018 7:53:06 PM

Just a few concerns and comments about the dredging of the Mobile Bay over the last 38 years.

the practices of the Corps of Engineers continually dredged and took the spoils away from the natural migration of sands and sediments to the west which would have allowed deposits to rest on Dauphin Island and move on west to other islands (Cat, Petit Bois, etc) along the way.

The sands were put in the "beneficial use area" which was not beneficial to Dauphin Island.

This practice surely needs to stop.

The newest proposal of scattering a thin layer of dredge materials across the bottom of Mobile Bay is a disastrous idea. The few grass beds remaining and growing in our bay would be covered, the oyster shell beds would be destroyed, fishes wiped out, etc. Mobile Bay along the west coast is a muddy mess.

This proposal would further destroy our once beautiful bay. It would be detrimental to the aquatic community, wildlife dependent upon the bay waters and shores, recreational and commercial fishermen s livelihood, the ability of the bay use for recreational users, etc.

We need the Corps of Engineers to recognize the need to dredge and place sediment responsibly so that Mobile Bay can become a more vibrant body of water and to allow Dauphin Island the natural ability to collect sands from the east.

[REDACTED]

Comment #495

From: [REDACTED]
To: [Mobile Harbor GRR](#)
Cc: [Joseph G. Murray](#)
Subject: [Non-DoD Source] Additional comments - 2/22/2018 Public mtg Mobile Harbor Channel deepening and widening project
Date: Wednesday, April 4, 2018 1:38:49 PM

To whom it may concern:

Please find attached comments concerning the Mobile Harbor channel deepening / widening project.

First, I have not dealt with the ACOE on a formal basis. I normally deal with the USNRC as a part of my consulting business. When I submit comments to the USNRC, they are docketed, and available in their entirety for public view and retrieval (through their Adams agency wide system). In addition, they are taken into consideration. When I last made comments to the ACOE, I found my comments as an addendum, with personal information redacted. Please publish my comments with personal information available. Complete transparency helps to ensure unassailable results.

Since I am a remote owner of Dauphin Island property, I was unable to attend the 2/22/18 public meeting. I have, however, been afforded a summary of the event, and from this summary I will make my comments.

1. The corp admitted during the meeting that 50% of the dredged sands placed in the SIBUA are not being reincorporated into the natural littoral drift system. Because of this, it is apparent that the erosion caused by this lack of sand is the fault of the ACOE and a mitigation plan must be put in place. The Corps' admission gives credence to the 1978 Corps report that first concluded maintenance of the Outer Bar Channel contributed to Dauphin Island's erosion. Future dredging must account for the reintroduction of all dredged material returning to its normal flow patterns thus minimizing the impact to the environment. As was stated to me by an associate, the Corps can accomplish this under the authority provided by Section 302 of the Water Resources Development Act of 1996, with the Mobile Harbor Federal Standard being adjusted accordingly as already directed by Corps higher authority in its May 30, 1997 directive to the Mobile District.

Also, a recovery plan must be put in place to account for and rectify the lost sand and subsequent erosion/damage to Dauphin Island. The island needs to be returned to its previous natural state before permanent environmental and historical damage occurs.

Both the mitigation efforts and the recovery efforts should be planned and addressed in the draft GRR.

2. The corp is using modeling and simulations in its GRR. The corp should extend the modeling to the historic erosion of the Dauphin Island shoreline. This is an opportunity for the corp to show the efficacy of the model. If the model can't agree with the past, it certainly can't foresee the future. In my own world of nuclear reactors, model proofs are the most important part of justification for their continued use.

3. The corp needs to make a credible case for the return to in-bay disposal only after it can demonstrate such disposal alternatives provide provable beneficial uses, including environmental restoration.

4. The corp states that the existing methodologies have no impact on the oyster production, but existing information indicates oyster production in coastal Alabama has been on the decline for years. According to the summary of the 2/22 meeting I received, commercial fishermen attending the meeting attribute increased siltation of oyster reefs to be the cause. The corp needs to do better analysis of this issue. Once again, modeling of the past will help for the future. Also, just like looking for the source of any problem, if nothing else has changed, then what remains is most likely the source of the problem.

*** Finally, I would also like to add that when the corp has existing issued work product (reports, analyses, engineering studies, calculations, etc.) that discuss the erosion causes, and when the corp has publicly admitted that the sands are not returning to their normal littoral flow status, the corp as a whole, and individuals within the corp can and will lose any qualified immunity from further damage that may occur due to their negligent actions (or

inactions) by ignoring their own knowledge base. The Federal 5th Circuit Court of Appeals did this to the corp after Katrina.

Included below is a copy of the last set of comments that I submitted in February 2016. I have not yet received any response to these comments.

Best Regards,

[REDACTED]

[REDACTED]

[REDACTED]

"It doesn't matter how beautiful your theory is, it doesn't matter how smart you are. If it doesn't agree with experiment, it's wrong." --- Richard P. Feynman.

Date: Feb. 29, 2016

U.S. Army Corps of Engineers

Mobile District

109 Saint Joseph Street

Mobile, AL 36602

Dear Ms. Jacobson,

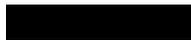
Please accept the following comments to be considered by the USACOE for their preparation of the Supplemental Environmental Impact Statement for the widening of Mobile Channel.

1. Resolve the conflict between the 1980 EIS and the Corps 1976 report concluding maintenance of the outer bar channel contributes to the erosion of Dauphin Island.
2. Ensure that all dredging and dredging maintenance maintains (and restores) the littoral transport continuity
3. Verify the application of all GCRSM principles as a primary activity for this navigation project
4. Ensure that all project decisions are in the context of the sediment system and all regional implications are addressed.
5. Ensure that sediment transport along natural lines is re-established and maintained.
6. As stated in another USACOE EIS (Bayou Casotte Harbor Channel Improvement);
 - a. Enhance natural resources within the project area

- b. Provide beneficial placement of dredged material
 - c. Contribute to the preservation of historically significant resources within the project area
7. Comply with Section 5 of the River and Harbor Act of 1935 and rectify noncompliance by the USACOE 1980 report and EIS
8. State a basis of acceptance of the USGS Open-File Report 2007-1161, "Historical Changes in the Mississippi-Alabama Barrier Islands and the Roles of Extreme Storms, Sea Level, and Human Activities", especially concentrating on Discussions and Conclusions page 27 "Considering the three primary causes of land loss, the one that experienced the greatest change in historical time was the reduction in sand supply related to dredging the navigation channels through the outer bars of the tidal inlets. Sand supply is also the only factor where the historical trend of the factor (progressively increased reduction in sand supply attendant with increased dredging depths) temporally matched the trend of progressively increased land loss."
- a. With acceptance of this basis:
 - i. Please analyze continuing erosion impact of the economic activities of Dauphin Island
 - ii. Please analyze Dauphin Island continuing erosion impact of the Audubon Bird Sanctuary, the protected maritime forest habitat on the island and one of the first areas of migrant bird landfall and recently recognized by the National Audubon Society as being "Globally Important" for bird migrations.
 - iii. Please analyze Dauphin Island continuing erosion impact on Dauphin Island protection of oyster beds, and also the salt marshes that are critical to the juvenile shrimp, fish and crab communities.
 - iv. Please analyze Dauphin Island continuing erosion impact on Fort Gaines Historic site
9. Include explanation of dredging material drift zone deposition impact versus sediment transport along natural lines.

I hope that the USACOE will take this opportunity to address and resolve these issues. Addressing and fixing the previous EIS inconsistencies will also make this SEIS consistent with other work product that the USACOE has produced.

Sincerely,



Comment #496

From: [REDACTED]
To: [REDACTED]; [Mobile Harbor GRR](#); [REDACTED]
Subject: [Non-DoD Source] Mobile Harbor Channel Dredging
Date: Tuesday, March 20, 2018 3:40:15 PM

As a Mobile County coastal property owner, I am requesting that the Corps and Port District replace the 7,000,000 cubic yards of beach quality sand that has been lost to Dauphin Island due to the Corps' Mobile Channel dredging practices since 1980. The deepening/widening of the shipping channel should provide quality sand to begin this repair of Dauphin Island beaches. Thank you. [REDACTED]

Comment #497

From: [REDACTED]
To: [Mobile Harbor GRR](#)
Subject: [Non-DoD Source] dredging concerns
Date: Monday, April 2, 2018 11:08:48 AM

Dear neighbors,

I'm sure you've heard much more detailed language from other people about beach erosion on Dauphin Island. My email is simple and straightforward: Please modify your dredging and deposit practices to ensure the preservation of Dauphin Island beaches.

With thanks,

[REDACTED]

Comment #498

From: [Redacted]
To: [Mobile Harbor GRR](#)
Subject: [Non-DoD Source] Fwd: RESULTS of Corps public meeting on Mobile Harbor Project
Date: Monday, March 5, 2018 3:19:51 PM

Please carefully read the forwarded message and in the future deposit the dredged sand in a place more helpful to Dauphin Island! Thank you-- [Redacted]

----- Forwarded message -----

From: [Redacted]
Date: Sat, Mar 3, 2018 at 9:35 AM
Subject: Re: RESULTS of Corps public meeting on Mobile Harbor Project
To: [Redacted]

[Redacted]

This is to see if you have sent comments to the Corps following the Feb 22 public meeting. If you did, I would appreciate you sending me a copy.

I'm checking only because we are disappointed in the small number of the public that has sent to the Corps thus far. Since the Corps is now leaning backward in recognition that we have been right on the erosion issue over all these years, we need to collectively lean forward to take maximum advantage of the changed situation, before the Corps can develop a new position that is unfavorable to Dauphin Island.

Thanks, and I really don't mean to be overly pushy.

[Redacted]

-----Original Message-----

From: [Redacted]
Sent: Mon, Feb 26, 2018 8:35 am
Subject: Re: RESULTS of Corps public meeting on Mobile Harbor Project

I will be glad to sign a petition re: the above if there is one available. Appreciate all you [Redacted]

On Sun, Feb 25, 2018 at 9:27 PM, [Redacted]:

Meeting Summary

Around 100 people attended the Corps' Feb 22 public meeting on the Mobile Harbor deepening and widening project. The meeting was held in a town hall format that allowed the public to ask questions, some of which the Corps was not prepared to answer. Two major take-aways from the meeting were:

* For the first time, the Corps admitted 50% of the sands dredged from the Outer Bar Channel and placed in the so-called Sand Island Beneficial Use Area (SIBUA) remain within that site instead of being moved by currents to Dauphin Island as the Corps has claimed occurred for the last two decades. Thus, half of all sands dredged since 1999 have been effectively removed from the natural littoral drift system. That means, since 1999, around 7 million cubic yards of naturally provided sands have been prevented from reaching and nourishing Dauphin Island. That represents a significant cumulative loss of beach quality sands, which is contributing to the sand-starved nature of Dauphin Island and its observed erosion – an impact that is made worse each time the Outer Bar Channel is dredged. And, this does not include the dredged sands that were historically dumped into the open Gulf prior to 1999 when the Corps began use of the SIBUA. Despite the Corps' acknowledgement of the Mobile Harbor project created sand deficit, the Corps did not say what it will do to mitigate the erosion problem.

* To reduce the costs of maintaining the ship channel, the Corps plans to resume the practice of disposing sediments dredged from the Bay Channel into the open waters of Mobile Bay. However, the Corps did not elaborate on what the potential impacts of such disposal could be on biological communities such as oyster reefs.

Submit Comments to the Corps

This June, the Corps will release the Mobile Harbor Draft General Reevaluation Report and Supplement to the 1980 Environmental Impact Statement for public review. To continue placing pressure on the Corps to do the right thing, the public MUST submit comments to follow-up the public meeting. Comments can be either emailed to: MobileHarborGRR@usace.army.mil <<mailto:MobileHarborGRR@usace.army.mil>> or mailed to: U.S. Army Corps of Engineers, Mobile District, 109 Saint Joseph Street, Mobile, AL 36602

We recommend you submit ALL five of the following comments to the Corps. These comments deal with serious issues affecting both Dauphin Island and Mobile Bay.

* The Corps admitted during the February 22, 2018 public meeting, 50% of the Outer Bar Channel dredged sands placed in the so-called Sand Island Beneficial Use Area (SIBUA) are accumulating and not being reincorporated into the natural littoral drift system. Since 1999, when the SIBUA began to be used, this has robbed Dauphin Island of at least 7 million cubic yards of beach quality sands, causing significant erosion of the island. This impact will be made worse each time the Outer Bar Channel is dredged in the future. The Corps should cease referring to the SIBUA as a “beneficial use” disposal site because neither Sand nor Dauphin Island benefit from its use. More importantly, the Corps must identify an alternative disposal site to place dredged sands in shallow water less than 20 feet deep to assure the sands are effectively bypassed across the Outer Bar Channel to be reincorporated into the natural littoral drift system. The Corps can accomplish this under the authority provided by Section 302 of the Water Resources Development Act of 1996, with the Mobile Harbor Federal Standard being adjusted accordingly as already directed by Corps higher authority in its May 30, 1997 directive to the Mobile District.

* Corps regulations require significant adverse project impacts be mitigated. Based on the Corps' admission that the so-called SIBUA is failing to meet its intended purpose which is contributing to the erosion of Dauphin Island, the Corps must include in the Mobile Harbor GRR an appropriate mitigation plan to compensate for at least 7 million cubic yards of beach quality sands that, since 1999, have been removed from the littoral drift system, representing an indirect project impact that has significantly contributed to the erosion of both Sand and Dauphin Islands. Further, the Corps' admission also gives credence to the 1978 Corps report that first concluded maintenance of the Outer Bar Channel contributed to Dauphin Island's erosion. The Corps has consistently refused to address in the GRR Study the effects of the cumulative removal of around 30 million cubic yards of sand from the littoral drift system that has occurred since 1980 due to maintenance of the Outer Bar Channel. In view of its February 22 admission, the Corps has no credible reason to continue advocating its present position and should begin immediately to investigate appropriate mitigation remedies that should be addressed in the Draft GRR to respond to this now acknowledged significant “changed condition” in the Study Area.

* The Corps is using a computer model in the GRR Study to evaluate the effects of Outer Bar Channel

maintenance on sediment transport and water depths on the Mobile Pass ebb-tidal delta shoal. However, to date, the Corps has not extended the modeling efforts to consider the historic erosion of Dauphin Island's Gulf shoreline. The Corps' refusal to apply modelling to an evaluation of the historic shoreline erosion issue represents an incomplete investigation of the effects of the project-altered sand transport processes. If the Corps cannot demonstrate the model replicates the island's observed historic shoreline and topographic erosion losses that have occurred since at least 1999, and preferably back to 1980, along with water depths over the ebb-tidal delta shoal, then the value and believability of the model and its results are called into serious question.

* At the February 22 public meeting, the Corps gave minimal coverage to where and how the increased quantity of dredged material from an enlarged channel will be disposed in Mobile Bay. There are serious environmental impact concerns associated with the return to thin-layer disposal that will directly affect thousands of acres of bay bottoms ever year, as well as possibility of indirectly affecting other areas if near-bottom plumes of sediment are moved by prevailing currents and wind-induced wave action. Further, the planned construction of a 1200-acre disposal island in the upper bay near large areas of productive grassbeds that are heavily used for commercial and recreational fishing is also a major concern. Section 302 of the Water Resources Development Act of 1996 allows the Corps to return to in-bay disposal only after it can demonstrate such disposal alternatives provide provable beneficial uses, including environmental restoration. So far, the Corps has not made a credible case of the benefits of a return to in-bay disposal.

* The Corps reported modeling of salinity and dissolved oxygen levels projected to occur with an enlarged channel would have no effects on oysters in Mobile Bay. However, existing information indicates oyster production in coastal Alabama has been on the decline for years. Commercial fishermen attending the meeting attribute increased siltation of oyster reefs to be the cause. These fishermen blame the siltation on the open water discharge of dredged material in the bay. The Corps' limited theoretical modeling performed to date of selected water quality variables does not appear to provide a complete picture of the environmental issues being faced by Mobile Bay's oyster reefs. The Corps needs to do more analysis of this important resource to support its claim that an enlarged channel will have "no effect" on oysters, which could represent the "canary in Mobile Bay" to gauge the impacts of increased dredged material disposal in the bay.

We are starting to make a difference. Your comments will have an impact. As usual, thanks for your support.

[REDACTED]

Comment #499

From: [REDACTED]
To: James.A.Delapp@usace.mil
Cc: [Mobile Harbor GRR](#)
Subject: [Non-DoD Source] Fw: Mobile Harbor Dredging--Dauphin Island erosion
Date: Sunday, April 1, 2018 9:58:07 AM

Subject: Mobile Harbor Dredging--Dauphin Island erosion

Col. Delapp,

My name is [REDACTED]. I live in [REDACTED] but recently attended the Feb. 21 Army Corp. of Engineers' meeting regarding the Mobile Harbor Dredging Project. Let me preface this by saying, I don't know "beans" about littoral drifts or marine resource assessment studies and my comments don't hold a candle to some of the comments from people at the meeting whose livelihood depends on Mobile Bay and the Mississippi Sound and their impact on fishing, shrimping, etc.

My comments center around the fact that my wife and I love Dauphin Island and are dismayed, frustrated, and quite puzzled at why those entities who stand to be the most impacted by the continued erosion of Dauphin Is., seem to be the ones who are the least interested in finding a workable solution to this problem.

The entities I refer to are: the State of Alabama, the City of Mobile, the Port of Mobile, and the U.S. Corps of Engineers.

The state of Alabama should be very worried since Dauphin Is. and Gulf Shores represent the "Golden Geeses" of Alabama resort tourism. If this seashore is jeopardized, the State stands to lose significant revenue. I would bet that if you asked 100 residents of Alabama, almost all would say they value their seashore and would do whatever possible to insure the stability and future of this shoreline. The City of Mobile and the Port should be worried as Dauphin Island provides a significant barrier from storm surges (that's why they call it a Barrier Island !). If the island is jeopardized, the Mississippi Sound will incur significant damage as a wildlife refuge and seafood incubator. Once the wetlands and the barrier islands disappear, bad things happen. Just look at the vulnerability New Orleans faces as a result of the deterioration of the Mississippi alluvial fan and marshlands to the South. The big beneficiary in this issue is the Port of Mobile. It stands to benefit tremendously from this dredging in terms of increased revenue from shipping. This benefit should not be had at the detriment of the barrier islands and the Miss. Sound. The Port and the Corp should be a partner, not an adversary, to the islands and the Sound in helping solve this problem.

During the meeting the Corp acknowledged the fact that the dredged sand deposited into the Sand Island Beneficial Use Area (SIBUA), had not been transported via the littoral drift toward Dauphin Island as originally thought. In fact, you stated that only half of the estimated sand had actually made its way out of the SIBUA. It is said that the sign of insanity is doing the same thing over and over and expecting at different result. Obviously half of the approx. 7 million cubic yards deposited in this area since 1999 has been lost and can never be used to help replenish Dauphin Island's eroding shore.

The Corp indicated that they were evaluating the need to move the SIBUA farther North and West. This will only be

beneficial if the sand is deposited in more shallow waters so that the "Drift" can move it Westward as it has historically done.

Obviously, the island is going to lose sand due to the ebb and flow of mother nature. But this increased erosion MUST be attributed, in large part, to the dredging of the Bar Channel and its affect on the normal littoral drift westward.

IN CONCLUSION.....PLEASE USE COMMON SENSE AND DO WHAT IS RIGHT AND CONSIDER RELOCATING THE SIBUA FARTHER NORTH AND WEST OF THE EXISTING AREA AND ASSURE THAT THE SAND IS DEPOSITED IN SHALLOW ENOUGH WATERS TO INSURE THAT IT CAN BE TRANSPORTED VIA DRIFT WESTWARD AS IT HAS HISTORICALLY BEEN ABLE TO DO. If not, Alabama will continue to lose a valuable and irretrievably resource. Once Dauphin Island is gone, it is gone forever.

I look forward to seeing the Mobile Harbor General Reevaluation Report and the inclusion of the above suggestion.

Sincerely,

████████████████████

████████████████████████████████████████

Comment #500

From: [REDACTED]
To: [Mobile Harbor GRR](#)
Subject: [Non-DoD Source] Mobile Harbor Dredging--Dauphin Island erosion
Date: Monday, March 5, 2018 10:18:01 AM

To: Corp of Engineers.

My name is [REDACTED] I live in [REDACTED] but recently attended the Feb. 21 Army Corp. of Engineers' meeting regarding the Mobile Harbor Dredging Project. Let me preface this by saying, I don't know "beans" about littoral drifts or marine resource assessment studies and my comments don't hold a candle to some of the comments from people at the meeting whose livelihood depends on Mobile Bay and the Mississippi Sound and their impact on fishing, shrimping, etc.

My comments center around the fact that my wife and I love Dauphin Island and are dismayed, frustrated, and quite puzzled at why those entities who stand to be the most impacted by the continued erosion of Dauphin Is., seem to be the ones who are the least interested in finding a workable solution to this problem.

The entities I refer to are: the State of Alabama, the City of Mobile, the Port of Mobile, and the U.S. Corps of Engineers.

The state of Alabama should be very worried since Dauphin Is. and Gulf Shores represent the "Golden Geeses" of Alabama resort tourism. If this seashore is jeopardized, the State stands to lose significant revenue. I would bet that if you asked 100 residents of Alabama, almost all would say they value their seashore and would do whatever possible to insure the stability and future of this shoreline. The City of Mobile and the Port should be worried as Dauphin Island provides a significant barrier from storm surges (that's why they call it a Barrier Island !). If the island is jeopardized, the Mississippi Sound will incur significant damage as a wildlife refuge and seafood incubator. Once the wetlands and the barrier islands disappear, bad things happen. Just look at the vulnerability New Orleans faces as a result of the deterioration of the Mississippi alluvial fan and marshlands to the South. The big beneficiary in this issue is the Port of Mobile. It stands to benefit tremendously from this dredging in terms of increased revenue from shipping. This benefit should not be had at the detriment of the barrier islands and the Miss. Sound. The Port and the Corp should be a partner, not an adversary, to the islands and the Sound in helping solve this problem.

During the meeting the Corp acknowledged the fact that the dredged sand deposited into the Sand Island Beneficial Use Area (SIBUA), had not been transported via the littoral drift toward Dauphin Island as originally thought. In fact, you stated that only half of the estimated sand had actually made its way out of the SIBUA. It is said that the sign of insanity is doing the same thing over and over and expecting at different result. Obviously half of the approx. 7 million cubic yards deposited in this area since 1999 has been lost and can never be used to help replenish Dauphin Island's eroding shore.

The Corp indicated that they were evaluating the need to move the SIBUA farther North and West. This will only be beneficial if the sand is deposited in more shallow waters so that the "Drift" can move it Westward as it has historically done.

Obviously, the island is going to lose sand due to the ebb and flow of mother nature. But this increased erosion MUST be attributed, in large part, to the dredging of the Bar Channel and its affect on the normal littoral drift

westward.

IN CONCLUSION.....PLEASE USE COMMON SENSE AND DO WHAT IS RIGHT AND CONSIDER RELOCATING THE SIBUA FARTHER NORTH AND WEST OF THE EXISTING AREA AND ASSURE THAT THE SAND IS DEPOSITED IN SHALLOW ENOUGH WATERS TO INSURE THAT IT CAN BE TRANSPORTED VIA DRIFT WESTWARD AS IT HAS HISTORICALLY BEEN ABLE TO DO. If not, Alabama will continue to lose a valuable and irretrievably resource. Once Dauphin Island is gone, it is gone forever.

I look forward to seeing the Mobile Harbor General Reevaluation Report and the inclusion of the above suggestion.

Sincerely,

[REDACTED]

[REDACTED]

Comment #501

From: [REDACTED]
To: [Mobile Harbor GRR](#)
Subject: [Non-DoD Source] Widening and Deepening of the Mobile Bay
Date: Wednesday, February 21, 2018 1:53:42 PM

Dear United States Army Corps of Engineers,

I think it is great you guys are widening the Mobile Bay but I am concerned about the effects it could have with the erosion on Dauphin Island. I do not own any land on Dauphin Island but my family goes down there every year for vacation. Please place the dredged material on or close to the shoreline to help the island. I have great respect for the army and I believe both the army and Dauphin Island can work together to help solve this issue.

Sincerely,

[REDACTED]

Comment #502

From: [REDACTED]
To: [Mobile Harbor GRR](#)
Cc: [REDACTED]
Subject: [Non-DoD Source] Dauphin Island erosion
Date: Thursday, March 22, 2018 8:53:42 AM

US Army Corps of Engineers:

I have owned a house on the west end of Dauphin Island for the past fifteen years. Over the past many years we have seen erosion of the Island in epic proportions.

Dauphin Island is the only barrier island for the state of Alabama and most important to the state in many respects.

The Corps admitted during the February 22, 2018 public meeting, 50% of the Outer Bar Channel dredged sands placed in the so-called Sand Island Beneficial Use Area (SIBUA) are accumulating and not being reincorporated into the natural littoral drift system. Since 1999, when the SIBUA began to be used, this has robbed Dauphin Island of at least 7 million cubic yards of beach quality sands, causing significant erosion of the island. This impact will be made worse each time the Outer Bar Channel is dredged in the future. The Corps should cease referring to the SIBUA as a “beneficial use” disposal site because neither Sand nor Dauphin Island benefit from its use. More importantly, the Corps must identify an alternative disposal site to place dredged sands in shallow water less than 20 feet deep to assure dredged beach quality sands are effectively bypassed across the Outer Bar Channel to be reincorporated into the natural littoral drift system. The Corps can accomplish this under the authority provided by Section 302 of the Water Resources Development Act of 1996, with the Mobile Harbor Federal Standard being adjusted accordingly as already directed by Corps higher authority in its May 30, 1997 directive to the Mobile District.

Federal law, the Council on Environmental Quality's National Environmental Policy Act regulations, and the Corps' own agency policy and regulations require significant adverse project impacts be MITIGATED. Based on the Corps' admission that use of the so-called SIBUA is actually contributing to the erosion of Dauphin Island, the Corps must include in the June Mobile Harbor Draft Report an appropriate MITIGATION PLAN to compensate for at least 7 million cubic yards of beach quality sands that have been removed from the nearshore littoral drift system since 1999, creating an indirect adverse project impact that has significantly contributed to the erosion of both Sand and Dauphin Islands. Further, the Corps' recent admission also gives strong credence to the Corps' 1978 report that first concluded maintenance of the Outer Bar Channel contributed to Dauphin Island's erosion. The Corps has consistently refused to address in the ongoing Mobile Harbor Study the erosion effects resulting from the cumulative removal of around 30 million cubic yards of sand from the littoral drift system since 1980 associated with the maintenance of the Outer Bar Channel. In view of its February 22 admission, the Corps has no credible reason to continue advocating its present position and should begin immediately to investigate MITIGATION REMEDIES in the ongoing Mobile Harbor Study to appropriately respond to this now acknowledged significant “changed condition and adverse project impact” in the Study Area. The existing Mobile Harbor Study provides the Corps with sufficient authority to move forward in MITIGATING the significant adverse erosion impact created by the Mobile Harbor project that the Corps has long refused to acknowledge was occurring.

Sincerely,

[REDACTED]

[REDACTED]

[REDACTED]

Comment #503

From: [REDACTED]
To: [Mobile Harbor GRR](#)
Subject: [Non-DoD Source] Dauphin Island
Date: Friday, March 23, 2018 11:37:03 AM

Dear Sir,

The Corps admitted during the February 22, 2018 public meeting, 50% of the Outer Bar Channel dredged sands placed in the so-called Sand Island Beneficial Use Area (SIBUA) are accumulating and not being reincorporated into the natural littoral drift system. Since 1999, when the SIBUA began to be used, this has robbed Dauphin Island of at least 7 million cubic yards of beach quality sands, causing significant erosion of the island. This impact will be made worse each time the Outer Bar Channel is dredged in the future. The Corps should cease referring to the SIBUA as a “beneficial use” disposal site because neither Sand nor Dauphin Island benefit from its use. More importantly, the Corps must identify an alternative disposal site to place dredged sands in shallow water less than 20 feet deep to assure dredged beach quality sands are effectively bypassed across the Outer Bar Channel to be reincorporated into the natural littoral drift system. The Corps can accomplish this under the authority provided by Section 302 of the Water Resources Development Act of 1996, with the Mobile Harbor Federal Standard being adjusted accordingly as already directed by Corps higher authority in its May 30, 1997 directive to the Mobile District.

Federal law, the Council on Environmental Quality's National Environmental Policy Act regulations, and the Corps' own agency policy and regulations require significant adverse project impacts be MITIGATED. Based on the Corps' admission that use of the so-called SIBUA is actually contributing to the erosion of Dauphin Island, the Corps must include in the June Mobile Harbor Draft Report an appropriate MITIGATION PLAN to compensate for at least 7 million cubic yards of beach quality sands that have been removed from the nearshore littoral drift system since 1999, creating an indirect adverse project impact that has significantly contributed to the erosion of both Sand and Dauphin Islands. Further, the Corps' recent admission also gives strong credence to the Corps' 1978 report that first concluded maintenance of the Outer Bar Channel contributed to Dauphin Island's erosion. The Corps has consistently refused to address in the ongoing Mobile Harbor Study the erosion effects resulting from the cumulative removal of around 30 million cubic yards of sand from the littoral drift system since 1980 associated with the maintenance of the Outer Bar Channel. In view of its February 22 admission, the Corps has no credible reason to continue advocating its present position and should begin immediately to investigate MITIGATION REMEDIES in the ongoing Mobile Harbor Study to appropriately respond to this now acknowledged significant “changed condition and adverse project impact” in the Study Area. The existing Mobile Harbor Study provides the Corps with sufficient authority to move forward in MITIGATING the significant adverse erosion impact created by the Mobile Harbor project that the Corps has long refused to acknowledge was occurring.

Please take whatever steps necessary to move forward with mitigating the adverse erosion impact on Dauphin Island.

Sincerely,

[REDACTED]
[REDACTED]

Comment #504

From: [REDACTED]
To: [Mobile Harbor GRR](#)
Subject: [Non-DoD Source] Dauphin Island Erosion
Date: Friday, March 30, 2018 10:28:25 PM

US Army Corps of Engineers:

I am writing to you out of my concern for the ongoing problem with erosion to Dauphin Island.

I have been visiting Dauphin Island with my family for several years and have enjoyed the wildlife, town and beaches. Over this period of time, I have grown increasingly concerned as I've observed the erosion of the island. We have watched as the shoreline increasingly encroached on beachfront properties leaving some home sites in the water and others perilously close to the shoreline. As part of a family that owns beach front property and someone dedicated to environmental conservation, this is alarming and disconcerting.

Not only are the properties on Dauphin Island in danger of disappearing, but the coastal communities located in this area of the state are in danger as well. Dauphin Island is the only barrier island for the state of Alabama that provides protection for these communities and their inhabitants. It is imperative that the Corps of Engineers give consideration to the residents presently affected by the erosion problem as well as those in danger if the erosion problem is not remedied.

The Corps admitted during the February 22, 2018 public meeting, 50% of the Outer Bar Channel dredged sands placed in the so-called Sand Island Beneficial Use Area (SIBUA) are accumulating and not being reincorporated into the natural littoral drift system. Since 1999, when the SIBUA began to be used, this has robbed Dauphin Island of at least 7 million cubic yards of beach quality sands, causing significant erosion of the island. This impact will be made worse each time the Outer Bar Channel is dredged in the future. The Corps should cease referring to the SIBUA as a "beneficial use" disposal site because neither Sand nor Dauphin Island benefit from its use. More importantly, the Corps must identify an alternative disposal site to place dredged sands in shallow water less than 20 feet deep to assure dredged beach quality sands are effectively bypassed across the Outer Bar Channel to be reincorporated into the natural littoral drift system. The Corps can accomplish this under the authority provided by Section 302 of the Water Resources Development Act of 1996, with the Mobile Harbor Federal Standard being adjusted accordingly as already directed by Corps higher authority in its May 30, 1997 directive to the Mobile District Federal district.

Federal law, the Council on Environmental Quality's National Environmental Policy Act regulations, and the Corps' own agency policy and regulations require significant adverse project impacts be MITIGATED. Based on the Corps' admission that use of the so-called SIBUA is actually contributing to the erosion of Dauphin Island, the Corps must include in the June Mobile Harbor Draft Report an appropriate MITIGATION PLAN to compensate for at least 7 million cubic yards of beach quality sands that have been removed from the near shore littoral drift system since 1999, creating an indirect adverse project impact that has significantly contributed to the erosion of both Sand and Dauphin Islands. Further, the Corps' recent admission also gives strong credence to the Corps' 1978 report that first concluded maintenance of the Outer Bar Channel contributed to Dauphin Island's erosion.

The Corps has consistently refused to address in the ongoing Mobile Harbor Study the erosion effects resulting from the cumulative removal of around 30 million cubic yards of sand from the littoral drift system since 1980 associated with the maintenance of the Outer Bar Channel. In view of its February 22 admission, the Corps has no credible

reason to continue advocating its present position and should begin immediately to investigate MITIGATION REMEDIES in the ongoing Mobile Harbor Study to appropriately respond to this now acknowledged significant “changed condition and adverse project impact” in the Study Area. The existing Mobile Harbor Study provides the Corps with sufficient authority to move forward in MITIGATING the significant adverse erosion impact created by the Mobile Harbor project that the Corps has long refused to acknowledge was occurring.

Thank you for your time,

--

[REDACTED]

[REDACTED]

[REDACTED]

Comment #505

From: [REDACTED]
To: [Mobile Harbor GRR](#)
Subject: [Non-DoD Source] Dauphin Island, AL
Date: Wednesday, March 21, 2018 7:05:36 AM

Dear Sir,

The Corps admitted during the February 22, 2018 public meeting, 50% of the Outer Bar Channel dredged sands placed in the so-called Sand Island Beneficial Use Area (SIBUA) are accumulating and not being reincorporated into the natural littoral drift system. Since 1999, when the SIBUA began to be used, this has robbed Dauphin Island of at least 7 million cubic yards of beach quality sands, causing significant erosion of the island. This impact will be made worse each time the Outer Bar Channel is dredged in the future. The Corps should cease referring to the SIBUA as a “beneficial use” disposal site because neither Sand nor Dauphin Island benefit from its use. More importantly, the Corps must identify an alternative disposal site to place dredged sands in shallow water less than 20 feet deep to assure dredged beach quality sands are effectively bypassed across the Outer Bar Channel to be reincorporated into the natural littoral drift system. The Corps can accomplish this under the authority provided by Section 302 of the Water Resources Development Act of 1996, with the Mobile Harbor Federal Standard being adjusted accordingly as already directed by Corps higher authority in its May 30, 1997 directive to the Mobile District.

Federal law, the Council on Environmental Quality's National Environmental Policy Act regulations, and the Corps' own agency policy and regulations require significant adverse project impacts be MITIGATED. Based on the Corps' admission that use of the so-called SIBUA is actually contributing to the erosion of Dauphin Island, the Corps must include in the June Mobile Harbor Draft Report an appropriate MITIGATION PLAN to compensate for at least 7 million cubic yards of beach quality sands that have been removed from the nearshore littoral drift system since 1999, creating an indirect adverse project impact that has significantly contributed to the erosion of both Sand and Dauphin Islands. Further, the Corps' recent admission also gives strong credence to the Corps' 1978 report that first concluded maintenance of the Outer Bar Channel contributed to Dauphin Island's erosion. The Corps has consistently refused to address in the ongoing Mobile Harbor Study the erosion effects resulting from the cumulative removal of around 30 million cubic yards of sand from the littoral drift system since 1980 associated with the maintenance of the Outer Bar Channel. In view of its February 22 admission, the Corps has no credible reason to continue advocating its present position and should begin immediately to investigate MITIGATION REMEDIES in the ongoing Mobile Harbor Study to appropriately respond to this now acknowledged significant “changed condition and adverse project impact” in the Study Area. The existing Mobile Harbor Study provides the Corps with sufficient authority to move forward in MITIGATING the significant adverse erosion impact created by the Mobile Harbor project that the Corps has long refused to acknowledge was occurring.

Please take whatever steps necessary to move forward with mitigating the adverse erosion impact on Dauphin Island.

Sincerely,

[REDACTED]

Comment #506

From: [REDACTED]
To: [Mobile Harbor GRR](#); [Bradley Byrne](#)
Subject: [Non-DoD Source] Re: Dredging causing Dauphin Island erosion
Date: Wednesday, March 21, 2018 12:49:48 PM

I think it is important for the Corp to rectify situation outlined below and stop causing erosion on Dauphin Island immediately

The Corps admitted during the February 22, 2018 public meeting, 50% of the Outer Bar Channel dredged sands placed in the so-called Sand Island Beneficial Use Area (SIBUA) are accumulating and not being reincorporated into the natural littoral drift system. Since 1999, when the SIBUA began to be used, this has robbed Dauphin Island of at least 7 million cubic yards of beach quality sands, causing significant erosion of the island. This impact will be made worse each time the Outer Bar Channel is dredged in the future. The Corps should cease referring to the SIBUA as a “beneficial use” disposal site because neither Sand nor Dauphin Island benefit from its use. More importantly, the Corps must identify an alternative disposal site to place dredged sands in shallow water less than 20 feet deep to assure dredged beach quality sands are effectively bypassed across the Outer Bar Channel to be reincorporated into the natural littoral drift system. The Corps can accomplish this under the authority provided by Section 302 of the Water Resources Development Act of 1996, with the Mobile Harbor Federal Standard being adjusted accordingly as already directed by Corps higher authority in its May 30, 1997 directive to the Mobile District.

Federal law, the Council on Environmental Quality's National Environmental Policy Act regulations, and the Corps' own agency policy and regulations require significant adverse project impacts be MITIGATED. Based on the Corps' admission that use of the so-called SIBUA is actually contributing to the erosion of Dauphin Island, the Corps must include in the June Mobile Harbor Draft Report an appropriate MITIGATION PLAN to compensate for at least 7 million cubic yards of beach quality sands that have been removed from the nearshore littoral drift system since 1999, creating an indirect adverse project impact that has significantly contributed to the erosion of both Sand and Dauphin Islands. Further, the Corps' recent admission also gives strong credence to the Corps' 1978 report that first concluded maintenance of the Outer Bar Channel contributed to Dauphin Island's erosion. The Corps has consistently refused to address in the ongoing Mobile Harbor Study the erosion effects resulting from the cumulative removal of around 30 million cubic yards of sand from the littoral drift system since 1980 associated with the maintenance of the Outer Bar Channel. In view of its February 22 admission, the Corps has no credible reason to continue advocating its present position and should begin immediately to investigate MITIGATION REMEDIES in the ongoing Mobile Harbor Study to appropriately respond to this now acknowledged significant “changed condition and adverse project impact” in the Study Area. The existing Mobile Harbor Study provides the Corps with sufficient authority to move forward in MITIGATING the significant adverse erosion impact created by the Mobile Harbor project that the Corps has long refused to acknowledge was occurring.

[REDACTED]

Comment #507

From: [REDACTED]
To: [Mobile Harbor GRR](#)
Cc: [Bradley Byrne](#)
Subject: [Non-DoD Source] Dredging causing Dauphin Island erosion
Date: Tuesday, March 20, 2018 1:19:13 PM

I think it is important for the Corp to rectify situation outlined below and stop causing erosion on Dauphin Island immediately

The Corps admitted during the February 22, 2018 public meeting, 50% of the Outer Bar Channel dredged sands placed in the so-called Sand Island Beneficial Use Area (SIBUA) are accumulating and not being reincorporated into the natural littoral drift system. Since 1999, when the SIBUA began to be used, this has robbed Dauphin Island of at least 7 million cubic yards of beach quality sands, causing significant erosion of the island. This impact will be made worse each time the Outer Bar Channel is dredged in the future. The Corps should cease referring to the SIBUA as a “beneficial use” disposal site because neither Sand nor Dauphin Island benefit from its use. More importantly, the Corps must identify an alternative disposal site to place dredged sands in shallow water less than 20 feet deep to assure dredged beach quality sands are effectively bypassed across the Outer Bar Channel to be reincorporated into the natural littoral drift system. The Corps can accomplish this under the authority provided by Section 302 of the Water Resources Development Act of 1996, with the Mobile Harbor Federal Standard being adjusted accordingly as already directed by Corps higher authority in its May 30, 1997 directive to the Mobile District.

Federal law, the Council on Environmental Quality's National Environmental Policy Act regulations, and the Corps' own agency policy and regulations require significant adverse project impacts be MITIGATED. Based on the Corps' admission that use of the so-called SIBUA is actually contributing to the erosion of Dauphin Island, the Corps must include in the June Mobile Harbor Draft Report an appropriate MITIGATION PLAN to compensate for at least 7 million cubic yards of beach quality sands that have been removed from the nearshore littoral drift system since 1999, creating an indirect adverse project impact that has significantly contributed to the erosion of both Sand and Dauphin Islands. Further, the Corps' recent admission also gives strong credence to the Corps' 1978 report that first concluded maintenance of the Outer Bar Channel contributed to Dauphin Island's erosion. The Corps has consistently refused to address in the ongoing Mobile Harbor Study the erosion effects resulting from the cumulative removal of around 30 million cubic yards of sand from the littoral drift system since 1980 associated with the maintenance of the Outer Bar Channel. In view of its February 22 admission, the Corps has no credible reason to continue advocating its present position and should begin immediately to investigate MITIGATION REMEDIES in the ongoing Mobile Harbor Study to appropriately respond to this now acknowledged significant “changed condition and adverse project impact” in the Study Area. The existing Mobile Harbor Study provides the Corps with sufficient authority to move forward in MITIGATING the significant adverse erosion impact created by the Mobile Harbor project that the Corps has long refused to acknowledge was occurring.

Sincerely

[REDACTED]

Comment #508

From: [REDACTED]
To: [Mobile Harbor GRR](#)
Subject: [Non-DoD Source] Public Comments on the Mobile Harbor Deepening and Widening Study
Date: Tuesday, April 10, 2018 1:16:28 PM

Public Comments on the Deepening and Widening of the Mobile Ship Channel

The ship channel dredging and spoil disposal practices over the last 38 years has robbed the south side of Dauphin Island millions of cubic yards of beach sand that would have been transported onto those shores due to the natural littoral drift of sands from east to west in the Gulf of Mexico. The “Beneficial use area” has not been beneficial in replenishing the sands on the south side of Dauphin Island. This must be corrected now, regardless of obtaining approval for the widening and deepening of the Mobile Ship channel for Supertankers or not.

A better disposal site must be selected and proven such that the sand deposits will enhance the natural drift of beach sands along the coast to the west of the channel on the south side of Dauphin Island and beyond to the barrier islands of Petit Bois and the sequential Mississippi Gulf Coast barrier islands.

Thin layer disposal of dredge materials inside Mobile Bay is not acceptable due to the destruction of the few established grass beds in Mobile Bay. Mobile Bay has practically been destroyed with the Corp of Engineer’s practices and the state of Alabama’s practices of allowing the harvesting of millions of cubic yards of oyster shells for the causeway and other roadbeds, uncovering the highly erodible soils on the bottom of the bay and causing siltation and deteriorating the habitat for oysters, grass beds and clams over the past 80 years. This thin layer disposal is not an asset for the bay’s aquatic community, the wildlife or the recreational and commercial fisherman that depend upon the bay.

I have friends who’s houses are on the Western Shore of Mobile Bay and the bay is nothing more than a mud hole. No grass beds, no oyster reefs, highly erodible soils that get churned up with every passing storm, even just tropical storms and depressions. The bay is a mess environmentally speaking.

[REDACTED]

[REDACTED]

Comment #509

From: [REDACTED]
To: [Mobile Harbor GRR](#)
Subject: [Non-DoD Source] Dauphin Island and Mobile Bay channel
Date: Wednesday, March 21, 2018 6:43:12 AM

Gentlemen,

As a concerned member of a barrier island that is under siege I urge you to follow your own directives regarding the widening and deepening of the Mobile Harbor. While I have NO illusions that the project isn't a done deal, I fervently hope that your agency has a mitigation plan and follows it. Based on the many years that the Corp has been complicit in the destruction of Dauphin Island and losses of not only the beaches but the islands ability to continue to serve as a first shredder of hurricane impact. Surely a value on the islands ability to buffer inland damage SHOULD be, at the very least, something of great value to all.

Yes, I own property there. Yes, I have been harmed by the sand destruction. Yes, I understand that the channel needs maintenance. What I don't understand is why the island and its life should be adversely harmed without a clear plan that rights the wrongs of the past and more importantly guarantees that further harm not take place. A mitigation plan that WORKS and is mindful of the unintended consequences which surely occur when dealing with nature. Get the right the first time please.

[REDACTED]

Comment #510

From: [REDACTED]
To: [Mobile Harbor GRR](#)
Subject: [Non-DoD Source] Dauphin Is. Property owners
Date: Wednesday, April 11, 2018 8:46:51 PM

Dear Col. DeLapp:

Dennis Knizley, president of the Dauphin Island Property Owners Association, wrote you a letter dated 21 March 2018. May I request my email address or mailing address be included

in any response the Corps makes pertaining to erosion on Dauphin Island caused by the Mobile Ship Channel?

My family has owned a residence and other property on the West Surf Beach of the island for almost sixty years, since 1960. I know first hand the experience of seeing beach property

disappear, starved of the natural sand supply provided by the west flowing littoral.

My hope is that under your command, serious progress can be made in mitigating this problem.

Very Sincerely,

[REDACTED]

Comment #511

From: [REDACTED]
To: [Newell, David P CIV CESAM CESAD \(US\)](#)
Subject: [EXTERNAL] DAUPHIN ISLAND, AL
Date: Thursday, January 25, 2018 8:00:24 AM

January 25, 2018

Dear Mr. Flakes and other Corps' employees:

Since you and the eight other Mobile District employees, who attended the Corps' Dec. 12, 2017 meeting were considered to have special expertise for the Mobile Harbor Channels, the maintenance dredging and its effects on Dauphin Island. As such, each of you have a duty to speak and not to remain silent and to disclose to the public and property owners on the Island, all information of the past erosion impacts caused by Mobile Harbor and Channels and all future erosion impacts to Dauphin Island from the massive expansion to the Mobile Harbor Entrance Channel/Outer Bar Channel for the SEIS/GRR/Mobile Harbor study.

As employees of the US Corps of Engineers, who have taken an oath to the Constitution and to follow the Federal Laws and by each of you having special expertise, I am asking you to disclose all information and not conceal, omit or state any half-truth to me about the erosion to Dauphin Island, concerning:

- * All information that the Corps has failed to inform Congress and the public about the erosion on the Island including the 1980 EIS/Mobile Harbor Survey Report failed to comply with the 1935 Rivers and Harbors Act by not studying the erosion impacts to Dauphin Island and the Mobile Entrance Channel for 10 miles on each side?
- * An accurate accounting of the sand in SIBUA and exactly where the sand leaving that site goes?
- * The massive expansion to the Mobile Harbor Entrance Channel/Outer Bar Channel for the SEIS/GRR/Mobile Harbor study and the future effects to Dauphin Island's shoreline.
- * The Corps' Mobile Harbor project contributing to the degradation of the environment and erosion to the shoreline of Dauphin Island.
- * All past and future environmental and erosional impacts on Dauphin Island's shoreline from the dredging of the Mobile Harbor Entrance Channel project, including any significant adverse impacts on fish, turtles and wildlife resources on the Island.
- * All information about the Corps dredging the Mobile Harbor Entrance Channel/Outer Bar Channel as the cause to the erosion to the shoreline of Dauphin Island, which has been stated in the Corps' own documentation, other agencies documentation and other coastal engineers studies that was not included in the Corps' 2008 study and the updated 2010 study.
- * All information about the US Geological Survey's Robert Morton's 2007 and 2008 studies for the Corps' MsCIP study, which state "Historical land-loss trends and engineering records show that progressive increases in land-loss rate correlate with nearly simultaneous deepening of channels dredged across the outer bars" and correlated the land-loss on the Island between 1958 to 2006 and concluded that the Corps maintenance dredging was causing the erosion on Dauphin Island.
- * All Corps' and Port Authority responsibilities to mitigate the erosion to the Island caused by the dredging of the Federally Authorized Mobile Harbor Deep-draft Entrance Channel.
- * All Federal Laws and Corps' manuals for the Corps to mitigate the erosion impacts to the Island, resulting from Federal Navigation operation and maintenance activities, subject to Federal control and responsibility, on a adjacent shoreline and the interruption of sediment transport to the shoreline.
- * The Corps ensuring that the future deepening and widening of the Mobile Harbor Entrance Channel does not block the littoral drift, and cause severe downdrift erosion? The Corps mitigating the erosion to the Island by the Corps placing the sand directly on the shoreline and in the future in a nearshore berm in shallow water in front of the whole Island every time the Corps dredges, as the Corps does in other parts of the Country?

I am asking each of you speak and not to stay silent and to provide your expertise for questions I have not asked, because of my lack of knowledge of the Corps' process or the terms the Corps uses for Federal Project.

Just because a questions was not asked, it does not alleviate the Corps from providing all other truthful information about the Corps' dredging of the Entrance Channel and its past and future erosion effects on Dauphin Island.

Respectfully yours,

[REDACTED]

[REDACTED]

Comment #512

From: [REDACTED]
To: [Flakes, Curtis M CIV \(US\)](#); [Newell, David P CIV CESAM CESAD \(US\)](#); [Paine, Joseph W CIV USARMY CESAM \(US\)](#); [McDonald, Justin S CIV USARMY CESAM \(US\)](#); [Boatman, Todd H CIV USARMY CESAM \(US\)](#); [Creswell, Michael W CIV \(US\)](#); [Jacobson, Jennifer L CIV USARMY CESAM \(US\)](#); [Kleinschrodt, Ashley N CIV USARMY CESAM \(US\)](#); [Dyess, Carl E CIV USARMY CESAM \(US\)](#)
Subject: [EXTERNAL] Corps" devious statements about Dauphin Island, Dec. 12, 2017
Date: Thursday, January 25, 2018 6:06:23 AM

The Attorney's statement means that as a result of not telling Congress about the past impacts to the Island, the Corps can ignore that the erosion impacts ever existed.

Dear Mr. Flakes and other Corps' employees:

Since you and the eight other Mobile District employees, who attended the Corps' Dec. 12, 2017 meeting were considered to have special expertise for the Mobile Harbor Channels, the maintenance dredging and its effects on Dauphin Island. As such, each of you have a duty to speak and not to remain silent and to disclose to the public and property owners on the Island, all information of the past erosion impacts caused by Mobile Harbor and Channels and all future erosion impacts to Dauphin Island from the massive expansion to the Mobile Harbor Entrance Channel/Outer Bar Channel for the SEIS/GRR/Mobile Harbor study.

As employees of the US Corps of Engineers, who have taken an oath to the Constitution and to follow the Federal Laws and by each of you having special expertise, I am asking you to disclose all information and not conceal, omit or state any half-truth to me about the erosion to Dauphin Island, concerning:

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agencies documentation and other coastal engineers studies that was not included in the Corps' 2008 study and the updated 2010 study.

- All information about the US Geological Survey's Robert Morton's 2007 and 2008 studies for the Corps' MsCIP study, which state "Historical land-loss trends and engineering records show that progressive increases in land-loss rate correlate with nearly simultaneous deepening of channels dredged across the outer bars" and correlated the land-loss on the Island between 1958 to 2006 and concluded that the Corps maintenance dredging was causing the erosion on Dauphin Island.
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- All Federal Laws and Corps' manuals for the Corps to mitigate the erosion impacts to the Island, resulting from Federal Navigation operation and maintenance activities, subject to Federal control and responsibility, on a adjacent shoreline and the interruption of sediment transport to the shoreline.
- The Corps ensuring that the future deepening and widening of the Mobile Harbor Entrance Channel does not block the littoral drift, and cause severe downdrift erosion? The Corps mitigating the erosion to the Island by the Corps placing the sand directly on the shoreline and in the future in a nearshore berm in shallow water in front of the whole Island every time the Corps dredges, as the Corps does in other parts of the Country?

I am asking each of you speak and not to stay silent and to provide your expertise for questions I have not asked, because of my lack of knowledge of the Corps' process or the terms the Corps uses for Federal Project.

Just because a questions was not asked, it does not alleviate the Corps from providing all other truthful information about the Corps' dredging of the Entrance Channel and its past and future erosion effects on Dauphin Island.

Sincerely,

Name

[Redacted Name]

P.S. Some of the Federal Laws and Corps manuals that specifically apply to mitigation that the Corps is failing to tell you.

33 U.S. Code § 2211 – Harbors

(b) Operation and maintenance

(c) Erosion or shoaling attributable to Federal navigation works: Costs of constructing projects or measures for the prevention or mitigation of erosion or shoaling damages attributable to Federal navigation works shall be shared in the same proportion as the cost sharing provisions applicable to the project causing such erosion or shoaling. The non-Federal interests for the project causing the erosion or shoaling shall agree to operate and maintain such

measures.

33 U.S. Code § 2241 – Definitions

For purposes of this subchapter—

(1) Deep-draft harbor

The term “deep-draft harbor” means a harbor which is authorized to be constructed to a depth of more than 45 feet (other than a project which is authorized by section 202 of this title).

(2) Eligible operations and maintenance

(A) Except as provided in subparagraph (B), the term “eligible operations and maintenance” means all Federal operations, maintenance, repair, and rehabilitation, including

(iv) mitigating for impacts resulting from Federal navigation operation and maintenance activities;

1987 Corps Environmental Engineering for Deep-Draft Navigation Projects Manual No. 1110-2- 1202

Chapter 6 Mitigation Decision Analysis

6-1. Policy...Damage from Federal navigation work along the shorelines of the United States must be prevented or mitigated

6-3. Justification for Mitigation.

a. ...Endangered and threatened species and critical habitats will be given special consideration, with specific requirements for these resources covered in the Endangered Species Act of 1973

b. Impacts resulting from dredged material disposal and hydraulic changes are largely on bay bottoms, shorelines, wetlands, vegetated shallows, and riparian zones.

1990 Beach and Nearshore Placement of Material Dredged from Federally Authorized

Navigation Projects U.S. Army Engineer Institute for Water Resources Water Resources Support Center

"The latter is comprised of authorities given by the Congress to the Secretary of the Army, acting through the Chief of Engineers, to investigate and construct certain types of small projects. Accordingly, there are a number of

authorities which provide a broad base of alternatives to beneficially use dredged material for the nourishment of beaches when placement of the materials does not constitute the least costly and approved dredged material disposal, or the material is not placed under the authority of Section 145, WRDA 1976 as amended. These alternative authorities and possibilities are enumerated below."

"New or modified navigation projects in which the dredged material placement could, if warranted, be separable feature intended to prevent or mitigate expected project-induced erosion effects."

"If an existing Federal navigation project is identified as the causal factor of a quantifiable degree of erosion and attendant damage along an adjacent shore, placement of dredged material could be used as a corrective measure under authority of Section 111, RHA 1968, as amended by Section 940, WRDA 1986."

With respect to the execution of legislative authority provided by Section 933, WRDA 1986, ER 1165- 2-130 contains the following guidance. It is Corps policy to accomplish construction and maintenance dredging in the least costly and most environmentally sound manner possible (ER 1130-2-307).

If placement of dredged material on a beach or beaches is determined by the Corps to be the least costly acceptable means for disposal of the material, then such placement should be considered integral to accomplishment of the project work and not subject to any special non-Federal cost sharing requirements

Most of the navigation projects using dredged material for beach nourishment are located in the Jacksonville, Mobile, Los Angeles and Detroit Districts.

* Most uses of dredged material for beach nourishment do not involve financial participation by entities other than the Corps.

1993 Review of Geologic Data Sources for Coastal Sediment Budgets by Edward Meisburger USACE Coastal Engineering Research Center <Blocked<http://www.dtic.mil/dtic/tr/fulltext/u2/a262158.pdf>>
Blocked<http://www.dtic.mil/dtic/tr/fulltext/u2/a262158.pdf>

Where tidal inlets interrupt the free flow of alongshore drift, they reduce or virtually eliminate the supply of sediment to down-current beaches, causing sand starvation and often serious erosion problems.

Thus, the creation of an inlet by man or nature can seriously affect the sediment budget of downdrift locales. Inlets by fixed or mobile sand bypassing plants that are capable of pumping littoral drift across the inlet where it can reach the downdrift shore.

Although a certain portion of the drift can naturally bypass the inlet by means of the ebb tidal shoals, this is usually a slow process and often accounts for only a modest portion of the total drift.

1995 Corps Engineering and Design EM 1110-2-1810, USACE, 31 January 1995

COASTAL GEOLOGY

(4) Interruption of sediment transport at engineered inlets.

(a) At most sites, the designers of a project must ensure that the structures do not block the littoral drift; otherwise, severe downdrift erosion can occur. ...Net longshore sand transport occurs across the bridge. If the bar is not sufficiently broad and shallow, sediment is deposited until an effective sand bridge is reestablished. Unfortunately, this concept suggests that maintenance of a permanent channel deep enough for safe navigation is usually inconsistent with sediment transport around the entrance by natural processes. Sand bypassing using pumps or dredges can mitigate many of the negative effects of inlet jetties and navigation channels (EM 1110-2-1616) Knowles 1988)

(c) Most engineering activities at inlets have some effect on the distribution of sediment. Sand bypassing using pumps or dredges can mitigate many of the negative effects of inlet jetties and navigation channels (EM 1110-2-1616) Knowles 1988)

1996 Shoreline Protection and Beach Erosion Control Study Final Report: An Analysis of the U.S. Army Corps of Engineers Shore Protection Program

“In 1976, PL 94-587 authorized the placement of sand from dredging of navigational projects on adjacent beaches if requested by the interested state government and in the public interest, with the increased cost paid for by the non-Federal interests.”

“The Corps complies with all environmental laws and Executive Orders. The Corps carefully considers and seeks to balance the environmental and development needs of the Nation in full compliance with the National Environmental Policy Act of 1969 (NEPA) and other authorities provided by Congress and the Executive Branch. ...”.

“Those significant adverse impacts that cannot be avoided are mitigated as required by Subsection 906(d) of the WRDA'86”.

“This subsection requires the Secretary of the Army to include in reports submitted to Congress for authorization of construction, a specific plan to mitigate fish and wildlife losses or a determination that the project will not have a significant adverse impact on fish and wildlife resources.”





Comment #513

From: [REDACTED]
To: [Mobile Harbor GRR](#)
Cc: [REDACTED]
Subject: [Non-DoD Source] Mobile Harbor Draft General Reevaluation Report and Supplement
Date: Monday, March 26, 2018 6:01:21 PM

Hello Sirs;

My name is [REDACTED]. My husband and I have been property owners and supporters of the preservation of Dauphin Island and the surrounding marsh area on the eastern side of the Island. My parents were property owners as were my husbands family. The beach erosion has been considerable over the past 40 years with each major storm contributing to the Islands structural material(sand) being lost.

We have watched, read and been involved in trying to educate others as to the importance of the dredging of the sound changing because what man has done weakened the structure of the Island causing storms to be additional corrosive catastrophes. I remember the beach line on the south side when my husband proposed to me 45 years ago and it was considerably further out into the where the water is now.

The Corps admitted during the February 22, 2018 public meeting, 50% of the Outer Bar Channel dredged sands placed in the so-called Sand Island Beneficial Use Area (SIBUA) are accumulating and not being reincorporated into the natural littoral drift system. Since 1999, when the SIBUA began to be used, this has robbed Dauphin Island of at least 7 million cubic yards of beach quality sands, causing significant erosion of the island. This impact will be made worse each time the Outer Bar Channel is dredged in the future. The Corps should cease referring to the SIBUA as a "beneficial use" disposal site because neither Sand nor Dauphin Island benefit from its use. More importantly, the Corps must identify an alternative disposal site to place dredged sands in shallow water less than 20 feet deep to assure dredged beach quality sands are effectively bypassed across the Outer Bar Channel to be reincorporated into the natural littoral drift system. The Corps can accomplish this under the authority provided by Section 302 of the Water Resources Development Act of 1996, with the Mobile Harbor Federal Standard being adjusted accordingly as already directed by Corps higher authority in its May 30, 1997 directive to the Mobile District.

Federal law, the Council on Environmental Quality's National Environmental Policy Act regulations, and the Corps' own agency policy and regulations require significant adverse project impacts be MITIGATED. Based on the Corps' admission that use of the so-called SIBUA is actually contributing to the erosion of Dauphin Island, the Corps must include in the June Mobile Harbor Draft Report an appropriate MITIGATION PLAN to compensate for at least 7 million cubic yards of beach quality sands that have been removed from the nearshore littoral drift system since 1999, creating an indirect adverse project impact that has significantly contributed to the erosion of both Sand and Dauphin Islands. Further, the Corps' recent admission also gives strong credence to the Corps' 1978 report that first concluded maintenance of the Outer Bar Channel contributed to Dauphin Island's erosion. The Corps has consistently refused to address in the ongoing Mobile Harbor Study the erosion effects resulting from the cumulative removal of around 30 million cubic yards of sand from the littoral drift system since 1980 associated with the maintenance of the Outer Bar Channel. In view of its February 22 admission, the Corps has no credible reason to continue advocating its present position and should begin immediately to investigate MITIGATION REMEDIES in the ongoing Mobile Harbor Study to appropriately respond to this now acknowledged significant "changed condition and adverse project impact" in the Study Area. The existing Mobile Harbor Study provides the Corps with sufficient authority to move forward in MITIGATING the significant adverse erosion impact created by the Mobile Harbor project that the Corps has long refused to acknowledge was occurring.

Please correct the mistakes made and replace the sand so Dauphin Island and the vitally important marshland will be restored.

Thank you
Deborah Hall

[Redacted]

[Redacted]

Comment #514

From: [REDACTED]
To: [Mobile Harbor GRR](#)
Subject: [EXTERNAL] Dauphin Island sand
Date: Friday, March 3, 2017 10:01:40 PM

I am asking why the Corps of Engineers has not used the Billions of Dollars of Economic Value as justification to put sand on Dauphin Island.

The Corps has to be stopped from eroding Dauphin Island further and the only way to stop them is by letting our elective officials know the true facts about what the Corps has done to Dauphin Island with its maintenance dredging of the Mobile Entrance Channel.

[REDACTED]

Comment #515

From: [REDACTED]
To: [Mobile Harbor GRR](#)
Subject: [Non-DoD Source] Interrupting the Natural Flow of Sand from Fort Morgan to Dauphin Island.
Date: Friday, March 23, 2018 12:59:47 PM

To Whom it May Concern,

The Corps admitted during the February 22, 2018 public meeting, 50% of the Outer Bar Channel dredged sands placed in the Sand Island Beneficial Use Area (SIBUA) are accumulating and not being reincorporated into the natural littoral drift system. Since 1999, when the SIBUA began to be used, this has robbed Dauphin Island of at least 7 million cubic yards of beach quality sands, causing significant erosion of the island. This impact will be made worse each time the Outer Bar Channel is dredged in the future. The Corps should cease referring to the SIBUA as a “beneficial use” disposal site because neither Sand nor Dauphin Island benefit from its use. More importantly, the Corps must identify an alternative disposal site to place dredged sands in shallow water less than 20 feet deep to assure dredged beach quality sands are effectively bypassed across the Outer Bar Channel to be reincorporated into the natural littoral drift system. The Corps can accomplish this under the authority provided by Section 302 of the Water Resources Development Act of 1996, with the Mobile Harbor Federal Standard being adjusted accordingly as already directed by Corps higher authority in its May 30, 1997 directive to the Mobile District.

Federal law, the Council on Environmental Quality's National Environmental Policy Act regulations, and the Corps' own agency policy and regulations require significant adverse project impacts be MITIGATED. Based on the Corps' admission that use of the so-called SIBUA is actually contributing to the erosion of Dauphin Island, the Corps must include in the June Mobile Harbor Draft Report an appropriate MITIGATION PLAN to compensate for at least 7 million cubic yards of beach quality sands that have been removed from the nearshore littoral drift system since 1999, creating an indirect adverse project impact that has significantly contributed to the erosion of both Sand and Dauphin Islands. Further, the Corps' recent admission also gives strong credence to the Corps' 1978 report that first concluded maintenance of the Outer Bar Channel contributed to Dauphin Island's erosion. The Corps has consistently refused to address in the ongoing Mobile Harbor Study the erosion effects resulting from the cumulative removal of around 30 million cubic yards of sand from the littoral drift system since 1980 associated with the maintenance of the Outer Bar Channel. In view of its February 22 admission, the Corps has no credible reason to continue advocating its present position and should begin immediately to investigate MITIGATION REMEDIES in the ongoing Mobile Harbor Study to appropriately respond to this now acknowledged significant “changed condition and adverse project impact” in the Study Area. The existing Mobile Harbor Study provides the Corps with sufficient authority to move forward in MITIGATING the significant adverse erosion impact created by the Mobile Harbor project that the Corps has long refused to acknowledge was occurring.

Sincerely,

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Comment #516

From: [REDACTED]
To: [Mobile Harbor GRR](#)
Subject: [Non-DoD Source] OUR SAND!!
Date: Monday, February 26, 2018 2:18:18 PM

Corps regulations require significant adverse project impacts be mitigated. Based on the Corps' admission that the so-called SIBUA is failing to meet its intended purpose which is contributing to the erosion of Dauphin Island, the Corps must include in the Mobile Harbor GRR an appropriate mitigation plan to compensate for at least 7 million cubic yards of beach quality sands that, since 1999, have been removed from the littoral drift system, representing an indirect project impact that has significantly contributed to the erosion of both Sand and Dauphin Islands. Further, the Corps' admission also gives credence to the 1978 Corps report that first concluded maintenance of the Outer Bar Channel contributed to Dauphin Island's erosion. The Corps has consistently refused to address in the GRR Study the effects of the cumulative removal of around 30 million cubic yards of sand from the littoral drift system that has occurred since 1980 due to maintenance of the Outer Bar Channel. In view of its February 22 admission, the Corps has no credible reason to continue advocating its present position and should begin immediately to investigate appropriate mitigation remedies that should be addressed in the Draft GRR to respond to this now acknowledged significant "changed condition" in the Study Area.

[REDACTED]

Comment #517

From: [REDACTED]
Subject: [Non-DoD Source] The right thing to do!!
Date: Monday, February 26, 2018 2:16:22 PM

The Corps admitted during the February 22, 2018 public meeting, 50% of the Outer Bar Channel dredged sands placed in the so-called Sand Island Beneficial Use Area (SIBUA) are accumulating and not being reincorporated into the natural littoral drift system. Since 1999, when the SIBUA began to be used, this has robbed Dauphin Island of at least 7 million cubic yards of beach quality sands, causing significant erosion of the island. This impact will be made worse each time the Outer Bar Channel is dredged in the future. The Corps should cease referring to the SIBUA as a “beneficial use” disposal site because neither Sand nor Dauphin Island benefit from its use. More importantly, the Corps must identify an alternative disposal site to place dredged sands in shallow water less than 20 feet deep to assure the sands are effectively bypassed across the Outer Bar Channel to be reincorporated into the natural littoral drift system. The Corps can accomplish this under the authority provided by Section 302 of the Water Resources Development Act of 1996, with the Mobile Harbor Federal Standard being adjusted accordingly as already directed by Corps higher authority in its May 30, 1997 directive to the Mobile District.

[REDACTED]

Comment #518

From: [REDACTED]
To: [Mobile Harbor GRR](#)
Subject: [Non-DoD Source] Dauphin Island
Date: Tuesday, March 20, 2018 7:32:41 PM

My family and I own three beach front properties on the west side of Dauphin Island. We have built expensive rental homes on all three properties with a total investment of nearly \$2,000,000. We are quite concerned that the erosion issues are worsening. Some of our fellow property owners to the west of us have seen their properties slip into the water and become valueless. We were assured the Army Corps of Engineers was well aware of the erosion issues affecting the beach and dutifully working to restore properties to their former elevations.

Instead, over the past three years, we have seen a lot of conversation and little else:

The Corps admitted during the February 22, 2018 public meeting, 50% of the Outer Bar Channel dredged sands placed in the so-called Sand Island Beneficial Use Area (SIBUA) are accumulating and not being reincorporated into the natural littoral drift system. Since 1999, when the SIBUA began to be used, this has robbed Dauphin Island of at least 7 million cubic yards of beach quality sands, causing significant erosion of the island. This impact will be made worse each time the Outer Bar Channel is dredged in the future. The Corps should cease referring to the SIBUA as a “beneficial use” disposal site because neither Sand nor Dauphin Island benefit from its use. More importantly, the Corps must identify an alternative disposal site to place dredged sands in shallow water less than 20 feet deep to assure dredged beach quality sands are effectively bypassed across the Outer Bar Channel to be reincorporated into the natural littoral drift system. The Corps can accomplish this under the authority provided by Section 302 of the Water Resources Development Act of 1996, with the Mobile Harbor Federal Standard being adjusted accordingly as already directed by Corps higher authority in its May 30, 1997 directive to the Mobile District.

Federal law, the Council on Environmental Quality's National Environmental Policy Act regulations, and the Corps' own agency policy and regulations require significant adverse project impacts be MITIGATED. Based on the Corps' admission that use of the so-called SIBUA is actually contributing to the erosion of Dauphin Island, the Corps must include in the June Mobile Harbor Draft Report an appropriate MITIGATION PLAN to compensate for at least 7 million cubic yards of beach quality sands that have been removed from the nearshore littoral drift system since 1999, creating an indirect adverse project impact that has significantly contributed to the erosion of both Sand and Dauphin Islands. Further, the Corps' recent admission also gives strong credence to the Corps' 1978 report that first concluded maintenance of the Outer Bar Channel contributed to Dauphin Island's erosion. The Corps has consistently refused to address in the ongoing Mobile Harbor Study the erosion effects resulting from the cumulative removal of around 30 million cubic yards of sand from the littoral drift system since 1980 associated with the maintenance of the Outer Bar Channel. In view of its February 22 admission, the Corps has no credible reason to continue advocating its present position and should begin immediately to investigate MITIGATION REMEDIES in the ongoing Mobile Harbor Study to appropriately respond to this now acknowledged significant “changed condition and adverse project impact” in the Study Area. The existing Mobile Harbor Study provides the Corps with sufficient authority to move forward in MITIGATING the significant adverse erosion impact created by the Mobile Harbor project that the Corps has long refused to acknowledge was occurring.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Comment #519

From: [REDACTED]
To: [Mobile Harbor GRR](#)
Subject: [Non-DoD Source] I approve of each of the following
Date: Monday, February 26, 2018 9:02:48 AM

* The Corps admitted during the February 22, 2018 public meeting, 50% of the Outer Bar Channel dredged sands placed in the so-called Sand Island Beneficial Use Area (SIBUA) are accumulating and not being reincorporated into the natural littoral drift system. Since 1999, when the SIBUA began to be used, this has robbed Dauphin Island of at least 7 million cubic yards of beach quality sands, causing significant erosion of the island. This impact will be made worse each time the Outer Bar Channel is dredged in the future. The Corps should cease referring to the SIBUA as a “beneficial use” disposal site because neither Sand nor Dauphin Island benefit from its use. More importantly, the Corps must identify an alternative disposal site to place dredged sands in shallow water less than 20 feet deep to assure the sands are effectively bypassed across the Outer Bar Channel to be reincorporated into the natural littoral drift system. The Corps can accomplish this under the authority provided by Section 302 of the Water Resources Development Act of 1996, with the Mobile Harbor Federal Standard being adjusted accordingly as already directed by Corps higher authority in its May 30, 1997 directive to the Mobile District.

* Corps regulations require significant adverse project impacts be mitigated. Based on the Corps’ admission that the so-called SIBUA is failing to meet its intended purpose which is contributing to the erosion of Dauphin Island, the Corps must include in the Mobile Harbor GRR an appropriate mitigation plan to compensate for at least 7 million cubic yards of beach quality sands that, since 1999, have been removed from the littoral drift system, representing an indirect project impact that has significantly contributed to the erosion of both Sand and Dauphin Islands. Further, the Corps’ admission also gives credence to the 1978 Corps report that first concluded maintenance of the Outer Bar Channel contributed to Dauphin Island’s erosion. The Corps has consistently refused to address in the GRR Study the effects of the cumulative removal of around 30 million cubic yards of sand from the littoral drift system that has occurred since 1980 due to maintenance of the Outer Bar Channel. In view of its February 22 admission, the Corps has no credible reason to continue advocating its present position and should begin immediately to investigate appropriate mitigation remedies that should be addressed in the Draft GRR to respond to this now acknowledged significant “changed condition” in the Study Area.

* The Corps is using a computer model in the GRR Study to evaluate the effects of Outer Bar Channel maintenance on sediment transport and water depths on the Mobile Pass ebb-tidal delta shoal. However, to date, the Corps has not extended the modeling efforts to consider the historic erosion of Dauphin Island’s Gulf shoreline. The Corps’ refusal to apply modelling to an evaluation of the historic shoreline erosion issue represents an incomplete investigation of the effects of the project-altered sand transport processes. If the Corps cannot demonstrate the model replicates the island’s observed historic shoreline and topographic erosion losses that have occurred since at least 1999, and preferably back to 1980, along with water depths over the ebb-tidal delta shoal, then the value and believability of the model and its results are called into serious question.

* At the February 22 public meeting, the Corps gave minimal coverage to where and how the increased quantity of dredged material from an enlarged channel will be disposed in Mobile Bay. There are serious environmental impact concerns associated with the return to thin-layer disposal that will directly affect thousands of acres of bay bottoms every year, as well as possibility of indirectly affecting other areas if near-bottom plumes of sediment are moved by prevailing currents and wind-induced wave action. Further, the planned construction of a 1200-acre disposal island in the upper bay near large areas of productive grassbeds that are heavily used for commercial and recreational fishing is also a major concern. Section 302 of the Water Resources Development Act of 1996 allows the Corps to return to in-bay disposal only after it can demonstrate such disposal alternatives provide provable beneficial uses, including environmental restoration. So far, the Corps has not made a credible case of the benefits of a return to in-bay disposal.

* The Corps reported modeling of salinity and dissolved oxygen levels projected to occur with an enlarged channel would have no effects on oysters in Mobile Bay. However, existing information indicates oyster production in coastal Alabama has been on the decline for years. Commercial fishermen attending the meeting attribute increased siltation of oyster reefs to be the cause. These fishermen blame the siltation on the open water discharge of dredged material in the bay. The Corps’ limited theoretical modeling performed to date of selected water quality

variables does not appear to provide a complete picture of the environmental issues being faced by Mobile Bay's oyster reefs. The Corps needs to do more analysis of this important resource to support its claim that an enlarged channel will have "no effect" on oysters, which could represent the "canary in Mobile Bay" to gage the impacts of increased dredged material disposal in the bay.

I am an owner of three rental properties on Dauphin Island: [REDACTED]. I am quite concerned that the Corps has not properly addressed the serious erosion issue experienced on the beachfront, resulting in a major loss of beachfront sand and even some waterfront lots at the west end of the island which are now under several feet of water and worthless. I have nearly [REDACTED] invested on the island. The continued loss of sand could seriously affect my financial viability. I am [REDACTED] years old and not in any position to recover such a loss. I know many other owners there are in a similar situation; so this issue needs your serious attention.

Hopefully,

[REDACTED]

Comment #520

From: [REDACTED]
To: [Mobile Harbor GRR](#)
Cc: [REDACTED]
Subject: [Non-DoD Source] Mobile Ship Channel Sand Mitigation
Date: Tuesday, March 20, 2018 5:56:17 PM

The citizens of Dauphin Island need your help to stop the erosion the Army Corps of Engineers is creating while dredging the Mobile Ship Channel.

The Corps admitted during the February 22, 2018 public meeting, 50% of the Outer Bar Channel dredged sands placed in the so-called Sand Island Beneficial Use Area (SIBUA) are accumulating and not being reincorporated into the natural littoral drift system. Since 1999, when the SIBUA began to be used, this has robbed Dauphin Island of at least 7 million cubic yards of beach quality sands, causing significant erosion of the island. This impact will be made worse each time the Outer Bar Channel is dredged in the future. The Corps should cease referring to the SIBUA as a “beneficial use” disposal site because neither Sand nor Dauphin Island benefit from its use. More importantly, the Corps must identify an alternative disposal site to place dredged sands in shallow water less than 20 feet deep to assure dredged beach quality sands are effectively bypassed across the Outer Bar Channel to be reincorporated into the natural littoral drift system. The Corps can accomplish this under the authority provided by Section 302 of the Water Resources Development Act of 1996, with the Mobile Harbor Federal Standard being adjusted accordingly as already directed by Corps higher authority in its May 30, 1997 directive to the Mobile District.

Federal law, the Council on Environmental Quality's National Environmental Policy Act regulations, and the Corps' own agency policy and regulations require significant adverse project impacts be MITIGATED. Based on the Corps' admission that use of the so-called SIBUA is actually contributing to the erosion of Dauphin Island, the Corps must include in the June Mobile Harbor Draft Report an appropriate MITIGATION PLAN to compensate for at least 7 million cubic yards of beach quality sands that have been removed from the nearshore littoral drift system since 1999, creating an indirect adverse project impact that has significantly contributed to the erosion of both Sand and Dauphin Islands. Further, the Corps' recent admission also gives strong credence to the Corps' 1978 report that first concluded maintenance of the Outer Bar Channel contributed to Dauphin Island's erosion. The Corps has consistently refused to address in the ongoing Mobile Harbor Study the erosion effects resulting from the cumulative removal of around 30 million cubic yards of sand from the littoral drift system since 1980 associated with the maintenance of the Outer Bar Channel. In view of its February 22 admission, the Corps has no credible reason to continue advocating its present position and should begin immediately to investigate MITIGATION REMEDIES in the ongoing Mobile Harbor Study to appropriately respond to this now acknowledged significant “changed condition and adverse project impact” in the Study Area. The existing Mobile Harbor Study provides the Corps with sufficient authority to move forward in MITIGATING the significant adverse erosion impact created by the Mobile Harbor project that the Corps has long refused to acknowledge was occurring.

Please help us by finding ways to restore the sand which would naturally be replenishing Dauphin Island were it not for the inappropriate dredging practices currently used. Thank you for your help and we look forward to hearing of the actions taken to protect this valuable barrier island and our home!

[REDACTED]

Comment #521

From: [REDACTED]
To: [Mobile Harbor GRR](#)
Subject: [Non-DoD Source] Dauphin Island
Date: Tuesday, March 20, 2018 2:17:19 PM

The Corps admitted during the February 22, 2018 public meeting, 50% of the Outer Bar Channel dredged sands placed in the so-called Sand Island Beneficial Use Area (SIBUA) are accumulating and not being reincorporated into the natural littoral drift system. Since 1999, when the SIBUA began to be used, this has robbed Dauphin Island of at least 7 million cubic yards of beach quality sands, causing significant erosion of the island. This impact will be made worse each time the Outer Bar Channel is dredged in the future. The Corps should cease referring to the SIBUA as a “beneficial use” disposal site because neither Sand nor Dauphin Island benefit from its use. More importantly, the Corps must identify an alternative disposal site to place dredged sands in shallow water less than 20 feet deep to assure dredged beach quality sands are effectively bypassed across the Outer Bar Channel to be reincorporated into the natural littoral drift system. The Corps can accomplish this under the authority provided by Section 302 of the Water Resources Development Act of 1996, with the Mobile Harbor Federal Standard being adjusted accordingly as already directed by Corps higher authority in its May 30, 1997 directive to the Mobile District.

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[REDACTED]

Comment #522

From: [REDACTED]
To: [DeLapp, James Andrew \(Jim\) COL USARMY CESAM \(US\)](mailto:DeLapp, James Andrew (Jim) COL USARMY CESAM (US))
Cc: c.david.turner@usace.army.mil; [CEIG](#); [Bush, Eric L CIV USARMY CESAD \(US\)](#); [Mobile Harbor GRR](#); [Newell, David P CIV CESAM CESAD \(US\)](#); [McDonald, Justin S CIV USARMY CESAM \(US\)](#); [Flakes, Curtis M CIV \(US\)](#); lisa.hunter@usace.army.mil; [Taylor, Peter F Jr CIV USARMY CESAM \(US\)](#); [REDACTED]; [REDACTED]; bill.hightower@alsenate.gov; [Paine, Joseph W CIV USARMY CESAM \(US\)](#); [Boatman, Todd H CIV USARMY CESAM \(US\)](#); [Creswell, Michael W CIV \(US\)](#); [Jacobson, Jennifer L CIV USARMY CESAM \(US\)](#); [Kleinschrodt, Ashley N CIV USARMY CESAM \(US\)](#); [Dyess, Carl E CIV USARMY CESAM \(US\)](#)
Subject: [Non-DoD Source] Corps false statements in public meetings
Date: Friday, March 9, 2018 5:32:42 PM

Dear Col. DeLapp,

Once again, the Corps employees are making false statements to the public and the press at a public meeting on 2/22/18, in Mobile, Alabama about the deepening and widening of the Mobile Harbor and the Outer Bar Channel. Blocked<https://lagniappemobile.com/corps-move-dredge-disposal-closer-dauphin-island/>

1. Corps employee, Justin McDonald's comment to the public and press about SIBUA:

"When you look at [sediment] transport rates from 1999 to current, it's transported out of the site at about half the rate we've put it in," Corps engineer Justin McDonald said. "So, it's moving out at a lower rate than we're putting it in, and it's accumulating."

How can that statement be true, when at the Corps meeting on December 12, 2017, Justin McDonald acknowledged THE SAND ISLAND BENEFICIAL USE AREA (SIBUA) DISPOSAL SITE IS NOT MONITORED AND THAT THE CORPS DOES NOT KNOW WHERE ANY SAND LEAVING THE SITE ACTUALLY GOES.

2. Again, Corps employee, Justin McDonald's untruthful comments to the public and press about

"Asked if the proposed course change was a concession that maintenance dredging has had an adverse effect on the island, McDonald reasserted the Corps' position that studies have shown there's only been a "minimal effect" on the erosion of Dauphin Island from channel dredging."

We both know that the Corps has document after document and manual after manual, about Federal Laws that go back to 1935, for the prevention or mitigation of damage to the adjacent shoreline that is attributable to Federal navigation projects.

* "Interruption of sediment transport at engineered inlets" "the designers of a project must ensure that the structures do not block the littoral drift; otherwise, severe downdrift erosion can occur"

Col. DeLapp, you know that I have sent the Corps employees and you, multiple studies that contradict his statement. Do you want me to resend all of the studies that contradict, the Corps' only study (Byrnes 2008) that back up his claim, again?

3. Again, Corps employee, Justin McDonald's makes another false statement to the public and press about the Federal Standard and that the Mobile District Corps does not have the Authority to change the dumping of the dredged material.

"He also said any change is simply the Corps "trying to do a better thing" within its required parameters of using "the least cost, most environmentally acceptable disposal method."

"We can't just go put [sand] on the beaches at Dauphin Island. We don't have the authority to do that, and it exceeds the federal standard cost," he said.

This was another intentional false statement to mislead the public and press in a public meeting into believing that

the Mobile District Corps does not have the authority to do anything besides the minimum of the “Federal Standard”.

The Corps can put the sand on the beaches at Dauphin Island and the Corps can put the sand in a nearshore berm in front of the whole island, as they have done all over the Country.

I have sent you, over and over again, the Federal law that specifically pertains to the Mobile Harbor, which for some reason, the Mobile District employees do not seem to be able to comprehend or understand.

For one more time, under the Water Resources Development Act of 1996 (P.L. 104-303), Section 302, specifically gives authorization to the Mobile District Corps to change disposal of the dredged sand for environmentally acceptable alternatives for beneficial uses of dredged material and environmental restoration.’’

Sec. 207 which provides for the placement of dredged sediment via methods that are not the least-cost option when the Corps determines incremental costs are reasonable in relation to environmental benefits.

Sec. 302. Mobile Harbor, Alabama. “In disposing of dredged material from such project, the Secretary... may consider alternatives to disposal of such material in the Gulf of Mexico, including environmentally acceptable alternatives for beneficial uses of dredged material and environmental restoration.’’

I don’t know why the Corps employees keep making the same statements that they don’t have the authorization to change the dredging dump sites, when the South Atlantic Division notified the Mobile District on May 30, 1997 and July 3, 1997, stating “in the interest of environmental protection and restoration”, they could modify the authorized maintenance plan of the Mobile Harbor project, under the 1996 Law. The statements from SAD:

1. Section 302 of WRDA 96 affords an excellent opportunity to revisit the authorized plan for maintenance of Mobile Harbor in the interest of environmental protection and restoration and economic efficiency
2. As O&M funds for the Mobile Harbor project will permit, you should investigate opportunities to modify the authorized maintenance plan in accordance with Section 302. Any investigations you undertake in this regard should address appropriate adjustments to the "Federal standard" (or Base Plan) for channel maintenance along with any opportunities for use of Section 1135 and 204 authorities to implement pertinent features of the modified maintenance plan.
4. Justin McDonald stated, “We feel like we’ve developed a revised dredge material disposal location that’s more beneficial for Dauphin Island than the current one.”

That seems to be another false statement by a Corps employee, unless he is twisting his words to make the public think the Corps is really going to put the sand closer to the Island.

According to the Corps’ slides presented that night, Slide 21, only the “New Work” picture shows the new placement of dredged material near the sand Island, BUT under “Maintenance Dredging” does not show any new placements for the dredged sand? Why is that?

The Corps made statements that night about putting the sand in 27 feet of water, BUT under their documentation, the Corps knows that the sand does not move at that depth. The Corps must identify an alternative disposal site to place dredged sands from the Outer Bar, in shallow water on the 15-foot depth contour to bypassed the sand, to make sure the sand actually reaches the entire Island’s shoreline.

Col. DeLapp, why doesn’t the Corps follow its 1978 study’s plan to put a nearshore berm in front of the Island. The best place for that dredged sand to be placed is in that general location centered on the 15-foot depth contour with all of it placed between the 12 and 18-foot depth contour. The Corps has been following those depths across the Country. I have attached the 1978 plan.

Col. DeLapp, you need to have a meeting with the Corps employees under your command and tell them to stop making false statement to the public and the press.

By making the false statements, it looks as though, the Corps employees do not care what they say or do, just to hide all of their bad acts towards Dauphin Island. Surely, you do not want the Corps to keep harming the people of Dauphin Island in the future. I thought the US Army was to protect Americans not destroy their property.

Over the years, the people have not had the knowledge to scrutinized the Corps' the erosion to Dauphin Island, BUT please be assured, that the people will not stand by anymore, while the Corps' employees lies to the them about the Corps erosion to the Island's shoreline.

Sincerely,

A black rectangular redaction box covering the signature of the sender.

PS I am including my previous email sent to you on March 1, 2018 to you to refresh your memory.

Dear Col. DeLapp,

Is the Corps so afraid of my questions that the Corps deliberately planned not to let me speak, and ask questions at a public meeting?

Lisa ? came up to me before the meeting under the pretense to introduce herself. She said she knew all about my emails about Dauphin Island and I told her I had questions for the Corps that night. She stated that the Mobile District calls me a "prolific writer" about Dauphin Island.

It was not until the meeting started, I realized that Lisa decided whom to call on for questions. I was shocked when she intentionally did not call on me during the meeting, even though I had my hand raised, the whole time and I ask her if she was going to let me ask a question. She ignored me the entire meeting.

As I have stated before, the buck stops with you.

This means, the Mobile District Corps, under your command, intentionally discriminated against me and denied me my First Amendment Rights of Freedom of Speech, to speak and protest what the Corps is doing to Dauphin Island. Because I have a stake in the outcome of the Corps actions, the Mobile District Corps employees calculatedly violate my esteemed Constitution Rights of Freedom of Speech, by excluding me from asking questions and to stop others from hearing my protest against the Corps.

This shows that the Mobile District Corps will undermine Democracy and the citizens' First Amendment Rights to cover-up their past destruction of Dauphin Island.

After the Corps sent out the notice that stated:

“After the Corps presentation, members of the public will have the opportunity to ask the commander and team questions, make comments and share concerns related to possible impacts associated with the potential project.”

“The town hall meeting is one opportunity to share comments that will become part of the preparation of a Draft Supplemental Environmental Impact Statement for the proposed project.”

Not only did I, but many others travel hundreds of miles just to attend the meeting.

Even though it was a pack house, you had the Corps shut down the meeting, forcing many owners to leave the meeting without being given the opportunity to ask their questions.

You could have allowed extra time by making up the time you wasted, the 20 to 30 minutes on Puerto Rico, which had nothing to do with the Mobile Harbor at all. This would have ensured that citizens receive an honest explanation of the Corps’ erosion impacts to the Island. As I have told you before, the people of Dauphin Island are enraged that the Mobile District is in charge of helping Puerto Rico, while the Corps has done nothing to help Dauphin Island after hurricanes for the last 38 years. The Mobile District Corps even made sure that Dauphin Island was not included in the Mississippi/Alabama barrier Island study after hurricane Katrina, even though Dauphin Island was the lead island in the chain. Not all of the Islands were federal property.

Since the Corps has lied to the people of Dauphin Island so many times in the past, about the placement of the dredged sand and whether the sand would reach the island and re-nourish the shoreline. Now, the people need detail information about how the Corps is going to mitigate the erosion to Dauphin Island and the Corps’ commitment to the island.

Col. DeLapp, I am asking you now to answer my questions that the Corps refused to let me ask you personally, at the meeting.

How is the Corps going to mitigate the CORPS’ EROSION IMPACTS TO DAUPHIN ISLAND?

Your statements to me in two different letters in May 2017:

“I also wish to convey that the USACE is actively investigating a strategy to modify our current dredging and placement practices that would beneficially place the sand dredged from the bar channel in a manner that would direct it to Dauphin Island.”

I want to know the exact plan; the Corps will use to modify the maintenance dredging practices that would place sand near Dauphin Island. It has been over 10 months since you made that statement with no answer.

Unless your statements to me are another lie that will never be fulfilled by the Corps. Like the Corps statements at the ASPA meeting on November 25, 2013, about widening the channel, when Susan Rees stated that the Corps could put a permanent pump-out station near the beneficial use area to pump sand to the beaches, as the Corps is doing at Perdido Pass. Jimmy Lyons even mentioned using geotubes for the beaches, to help the sand to accrete, as being done near Billy Goat Hole.

Col. DeLapp, Is the Corps still considering Rees’ recommendations about putting a permanent pump-out station to pump the sand from SIBUA to off-set the erosion to the Dauphin Island beaches? If not, why not?

By the Corps statements at the meeting that they are using the Corps’ super computers to calculate all details of the Mobile Harbor studies. What have the calculations on the “Super Computers” said about the erosion on Dauphin Island?

The Corps presented the 28 slides at the meeting:

Not one of the slides made any statement about the environmental impacts on Dauphin Island by the Corps dredging.

Not one of the slides shows any impacts from the deepening and widening of the Channels.

Slide 11 and 21 shows the places where the Corps is planning on putting the New Work dredge material, BUT on the picture next to it, under maintenance dredging nothing has changed.

Slide 23, 24, 25, 26 There were no pictures in either the Byrnes 2008 study or the USGS 2017 study, which showed pictures, like the ones, the Corps put in their slides. Why did the Corps make up pictures in the Corps slides that state they come from those studies? Was this done to mislead the public?

Or, is the Corps going to continue to LIE to the public and continue to use the Byrnes 2008 study?

The Mobile District is basing the future deepening and widening of the Entrance Channel on the paid-for-by-the-Corps Lawsuit study, the Byrnes' 2008 study, even though it has been contradicted by multiples studies by noted Coastal engineers and scientists.

Col. DeLapp, Please explain how can two studies for the Mobile District, about the same barrier island chain, be totally opposite from each other? The Byrnes 2008 study was produced by Mobile District at the same time the Morton's 2007 was produced for the Mobile District Corps for the Miss/Al barrier islands that Dauphin Island is the lead in the chain. In one study, Byrnes 2008, stating that the dredging of the deep-draft shipping channel does not cause erosion on the barrier Island, and Morton 2007 stating the dredging of the deep-draft shipping channels caused land-loss and erosion on the barrier islands, and because of the Morton study, the Mobile District Corps received over a half billion dollars for the barrier islands in Mississippi.

Col. DeLapp, for your information and to clear this up, for the last time. Robert Dean's report contradicting the Byrnes 2008 report, is still part of the Lawsuit settlement.

According to the Department of Justice statements:

"Plaintiffs' counsel refused to assent to these Principles, advising that the class members would never assent to the conclusions of the Principal Investigator's Report, and that counsel would not request Dr. Dean to withdraw his dissent."

The eminent Coastal Engineer, Dr. Robert Dean, "indicated that the [Byrnes' 2008] Final Report was fundamentally flawed, not reliable and at best inconclusive." The Corps knew that in Dr. Dean's "Concluding Report", he questioned multiple facts about the Corps' sediment data in the "2008 Final Report" for the lawsuit.

Dr. Robert Dean states:

"Additionally, as discussed in the following sections, there are data and methodology used in the ACRE report that are central to the findings which I do not consider as appropriate nor correct. This review report identifies those issues that are considered necessary to complete the analysis and provide a more complete foundation for addressing the two Central Questions."

"I conclude that certain critical portions of the [Byrnes 2008] Final Report are arbitrary in their methods of analysis and acceptance/interpretation of the available data resulting in uncertainty remaining in the final results."

"The available bases for evaluating the impact of a deepened channel on the adjacent shorelines include: (1) Analysis and interpretation of data, (2) Experience and judgment, and (3) Application of accepted coastal engineering methodology. The main approach followed in the Final Report was in the assembly, synthesis and analysis of the available data sources in the vicinity of Mobile Bay Entrance. Some of these data were collected many years ago at times when the survey control and technology were of lesser quality than at present. My experience in conducting and analyzing hydrographic surveys has documented the need to examine these data carefully before acceptance and that survey data may contain bias. The position adopted in the [Byrnes] Final Report is that any bias in the available survey data is negligible. Additionally, there is uncertainty as to some of the methodology applied with regard to shoreline changes and sea level changes over the period of record of more than a century."

These are some of the things Dr. Dean questioned in the Byrnes report

- * Possible Bias in Surveys
- * The description of the modern sediment budget.
- * Shoreline Changes Along Morgan Peninsula
- * Volume Changes
- * Net Longshore Sediment Transport Along Morgan Peninsula
- * Two major concerns with the sediment budget are: (1) The large volume increases reported on the east and west ebb lobes of the ETS, and (2) The large net westward longshore sediment transport along Morgan Peninsula.
- * Sediment Budget
- * Need for Further Consideration of Processes Related to Dredging Impact
- * Effects of Dredging on the Bypassing Bar

The 1918 Survey

“The validity of the 1918 survey needs to be investigated further. I cannot believe the magnitudes of shoreline or volume changes presented in the ACRE reports. I am still attempting to determine whether horizontal position corrections are known for these data or can be established for this survey.”

“Coastal engineering knowledge is sufficient to discuss likely changes in bypassing modes as a result of channel deepening. Figure 14 presents a conceptual description of the likely modes of sediment transport before and after channel deepening. Prior to channel deepening, the net sand transport entering the channel from Morgan Peninsula would be transported seaward by the ebb tidal currents and the “lip” of the channel at a depth of 20 feet (or so) would cause a hydraulic “back pressure” and cause some of the water and sediment to flow laterally, both to the east and west lobes of the ETS as shown in Figure 14a. With the channel deepened to 49 feet and the removal of the 20 foot “lip”, the back pressure is reduced and more of the sediment is jetted to deeper water where onshore sediment transport is dependent to a substantial degree on wave mobilization processes”

“The sand bypass mechanisms are a result of both wave and current action. Because of the deeper channel, the sand transporting (bypassing) action due to waves has diminished significantly.”

“The sediment budget developed in the report is for the period 1918 to the approximate present and thus represents average conditions over that period. The current maintenance dredging (from April 1990 to June 2006) exceeds 500,000 cy/year which is nearly twice the average value used in the sediment budget presented in the ACRE report. Thus, the current sediment budget should be developed and presented along with discussion of any major uncertainties.”

He questions the findings “in the ACRE report that the ebb tidal shoals have been accreting since approximately 1918 at the rate of about 400,000 cy/year and it is believed that the method of accounting for Relative Sea Level Rise and perhaps bias in survey data may be responsible.” Also questioned are “the validity of the 1918 data on Morgan Peninsula which resulted in a net westward longshore sediment transport of 612,000 cy/year, a very large quantity which occurs at very few locations along the entire United States coastline. Both the 1918 data and the analysis methodology are concerns”.

The Byrnes’ 2008 study used the USACE Sediment Budget Analysis that was incorrect.

Corps’ December 2011 Memorandum for MsCIP, it stated that the Corps surveys for the sediment budget analysis were incorrect.

“USACE (Justin McDonald): Stated that the USACE surveys that were provided for the sediment budget analysis were incorrect. They have been corrected and a comparison of the corrected and uncorrected surveys is being performed to determine the magnitude of the difference. if any additional analysis is needed to correct for the “busted” USACE surveys.”

USGS Morton’s 2007 study contradicts the information in the Byrnes 2008 study.

The Morton’s 2007 was produced for the Mobile District use, for the Miss/Al barrier islands that Dauphin Island is the lead in the chain, at the same time the Mobile District was producing the Byrnes 2008 study. How can two studies for the Mobile District about the same barrier island chain, be totally opposite from each other, with one

study, Byrnes 2008, stating that the dredging of the shipping channel does not cause erosion on the Island and the Morton 2007 stating the dredging of the deep-draft shipping channels caused erosion on the barrier island, which the Mobile District Corps received over a half billion dollars for the barrier islands in Mississippi.

The correlation of dates in USGS Robert Morton's 2007 study and the dates of the Corps dredging of the Mobile Outer Bar Channel that represent the periods of land-loss and erosion on Dauphin Island.

According to the USGS Robert Morton's 2007 study

- * The only factor that has a historical trend that coincides with the progressive increase in rates of land loss is the progressive reduction in sand supply associated with nearly simultaneous deepening of channels dredged across the outer bars of the three tidal inlets maintained for deep-draft shipping

- * The navigation channels act as sediment sinks, removing sand that otherwise would have been available for beaches immediately downdrift of the channel.

- * Sand supply is the only factor contributing to barrier island land loss that can be managed directly to mitigate the losses by placement of dredged material so that the adjacent barrier island shores receive it for island nourishment and rebuilding.

- * [Dauphin Island] "But after 1958 the island entered a net erosional phase that has persisted and most recently accelerated. Rates of land loss between 1958 and 1996 averaged 6.1 ha/yr and between 1996 and 2006 averaged 12.9 ha/yr."

That adds up to 880 acres or 880 football fields that have eroded off of Dauphin Island.

The following shows how Morton's studies dates correlate with the dates of the Corps' dredging of the Mobile Entrance Channel for the land loss and erosion on Dauphin Island.

1. Morton: between 1958 and 1996, Dauphin Island rate of land loss averaged 15.07 acres/year

In 1956, Corps dredged the initial phase of the Mobile Entrance Channel, 42-ft deep by 600-ft wide and in 1965, the channel was completed to the authorized depth of 42 ft.

2. Morton: between 1996 and 2006, Dauphin Island land rate of loss averaged 31.87 acres/year

In 1990, Corps dredged the channel from 42ft. to 47 ft. by 600 ft. across Mobile Outer Bar for a distance of 6.1 miles into the Gulf of Mexico

In 1999, the Mobile Outer Bar Channel was deepened another two feet to 49 ft. by 600 ft.

The Morton 2007 study shows that after the two main dredging periods of the Corps' deepening and widening of the Mobile Outer Bar Channel produced a major land loss on Dauphin Island.

Also, the Corps' 1978 study stated that Dauphin Island's land loss for 13 acres/year from erosion, because of the Corps' dredging of the Entrance Channel, backs up the Morton's study land loss rates.

1978 Study "...along the westernmost 11 miles of Dauphin Island. At present, this section of the island is losing about 13.5 acres of property per year to erosion."

The conflicting facts about the Byrnes' 2008 Report, the Corps' lawsuit study.

The Byrnes 2008 lawsuit study, states that the Corps only dredges 274,000 cubic yards/year out of the Mobile Outer Bar entrance Channel.

“Maintenance dredging records indicated that approximately 274,000 cy of sand was extracted from the channel each year between 1917 and 1987 and disposed of offshore.”

The Byrnes' 2008 Final Report lawsuit study averaged dredging records 1917-1987, stopped just three years before the Phase I construction was completed in 1990, and did not take into account in the averaged amounts that, the Mobile entrance channel was deepened at two different times, 1990 from 42 to 47 feet, the channel extended to 6.1 miles in the Gulf. Again, in 1999 the channel was deepened from 47 to 49 ft. The two construction phases consisted of over 10,000,000 million cubic yards for new work that was dredged out of the channel.

The Byrnes 2008 averaged dredged amount 274,000 cys does not make sense. From 1974 to 2006, the Corps dredged over 26,914,254 cys of sand from the Outer Bar Channel. That is 841,070 thousand cys of sand a year, three times the amount stated in Byrnes 2008 study

After the time of the deepening of the channel in 1999, the dredging rates have increased significantly from those reported in the study. Just between 2000 to 2006, the averaged rate was 760,461 cys/year.

The 2003 Endangered Species Act -Section 7 Consultation Biological Opinion stated:
Annually, an average of 6.1 million CY of material are dredged from Mobile Bay channels; 888,000 CY are dredged from the bar channel; and 1.2 million CY are dredged (by pipeline dredge) from Mobile River channels.

Thus, the Byrnes 2008 study's calculations of the averaged historical sediment dredged amount of 274,000 cys, was not representative of present-day dredging amounts after the 1990s expansion was completed.

During the 1990s, the Mobile Entrance Channel was deepened, it was also lengthened to provide safe navigation from offshore. Thus, the deeper channels not only provided a better trap for sand moving east to west, alongshore, but also resulted in longer channels, which captured more of sand that was being transported in the offshore zone.

Byrnes 2008 study conflicts with the information by Fish and Wildlife Service study

INVENTORY OF HABITAT MODIFICATIONS TO TIDAL INLETS IN THE COASTAL MIGRATION AND WINTERING RANGE OF THE PIPING PLOVER

Over half (54%) of the sandy, tidal inlet habitat within the U.S. continental migration and wintering range of the piping plover that existed in 2010-2011 has been modified by human actions within the last century or so, including dredging activities, sediment mining, of inlets.

The maintenance of navigation channels by dredging, especially deep ship channels such as those in Alabama and Mississippi can significantly alter the natural coastal processes on adjacent inlet shorelines and has been described by Otvos (2006), Morton (2008), Otvos and Carter (2008), Beck and Wang (2009), and Stockdon et al. (2010).

The dredging of navigation channels contributes to the cumulative effects by removing or redistributing the local and regional sediment supply; the maintenance dredging of deep ship channels can convert a natural inlet that normally bypasses sediment from one shoreline to the other into a sediment sink where sediment no longer bypasses the inlet. Of the dredged inlets included in this analysis, dredging efforts began as early as the 1800s and continue to the present, generating long-term and even permanent effects on inlet habitat; at least 11 inlets initiated dredging in the 19th century, .. dredged as early as ..Mobile Pass (AL) in 1857.

The National Oceanic and Atmospheric Administration (NOAA) and U.S. Fish and Wildlife Service (USFWS) lists the following species within the Dauphin Island area:

The Florida manatee is a subspecies of the West Indian Manatee. Between October and April, Florida manatees

concentrate in areas of warmer water. During summer months, the species can be found along the Alabama coast, manatee sightings have been documented in Mobile Bay and/or its tributaries for the past several years, within designated Gulf Sturgeon critical habitat. Piping plover (*Charadrius melodus*) Least Tern (*Sterna antillarum*), Bald eagle (*Haliaeetus leucocephalus*) listed species for Mobile County

The piping plover and least tern occur along the Gulf Coast and occur on Dauphin Island and impact on their nesting site, would be disrupted by the continued maintenance dredging and placement activities that has eroded Dauphin Island beaches

Review of Policy Conflicts and Obstacles to Large-Scale Restoration of Wetlands and Other Habitats Division of Habitat and Resource Conservation U.S. Fish and Wildlife Service

“This example represents an increased cost to Federal or State funding sources when sand from the dredging project could be used to renourish the beach at an incremental cost as opposed to performing two entirely separate projects both requiring mobilization/demobilization of equipment, etc. There have been several past instances where opportunities to use dredged material have been missed in favor of using hopper dredges and placing the material in offshore disposal sites.

Dr. Scott Douglass studies contradict the facts in Byrnes 2008 study:

1991 “Summary of Existing Coastal Engineering Data for Dauphin Island” by Dr. Scott L. Douglass

“Dr. Douglass restates the Corps’ procedure for maintaining and deepening the ship channel and notes that the natural depth was only about 20 feet, but dredging has increased this pass to 50 feet deep. Dr. Douglass confirms the Corps’ conclusion that the material dredged and dumped in deep water is permanently lost from the Dauphin Island shoreline and estimates that the total amount dredged to be approximately 15 million cubic yards of beach quality sand.”

1992 “Coastal Processes of Dauphin Island, Alabama” by Dr. Scott L. Douglass, about the erosion on Dauphin Island^[L]_{SEP}]

“Almost all the dredged material, sand, has been permanently removed from the littoral system of the Alabama coast. The Littoral system has not received any littoral drift from the east of Mobile Pass in at least fifty years.” He added “Dredging of the Mobile Ship Channel has removed 15 million cubic yards of beach quality sand from the littoral system of the State of Alabama since 1974. Perhaps as much as 50 million cubic yards of sand have been permanently removed this century.”^[L]_{SEP}] “The dredging of the Mobile Ship Channel has also indirectly affected Dauphin Island by changing the wave climate and the tidal hydraulics of the Mobile Pass.

2000 The renowned coastal engineer, Dr. Scott Douglass, study about the Corps’ dredging of the Mobile Ship Channel and again the Corps ignores his study.

“State-of-the-beaches of Alabama”, Scott L. Douglass

“Consideration should be given to restoring the volume of beach sands that have historically been removed at Mobile Pass. Probably between 20 and 50 million cubic yards (the volumes prior to 1974 are apparently unknown) of sand have been removed from the littoral system this past century. This could be partially restored with limited beach nourishment.” Through some calculations, the beaches on Dauphin Island could be as much as 1,000 feet wider if the aforementioned volume of sand was placed directly along the Gulf of Mexico shoreline

....Millions of cubic yards of sand have been removed from the littoral system near the Sand Island Lighthouse in the past several decades.

...In essence, the “river of sand” that feeds the beaches of the west end of Dauphin Island is being interrupted by the dredging removal near the lighthouse....“It appears that the west end beaches are beginning to suffer severely from

decades of complete littoral blockage near the lighthouse.”

2009 Do we really care? We are destroying the beaches of Dauphin Island...

By SCOTT DOUGLASS, 2009

Univ. South Alabama

Special to the Press-Register

“The debates about the future of the beaches of Dauphin Island have now reached the point where I wonder if we care enough to save what we love about coastal Alabama. I say that because - in spite of a recent report to the contrary - the truth is, we are destroying the beaches of Dauphin Island.”

“By not artificially bypassing sand dredged from the south end of the Mobile Ship Channel, we are also increasing potential hurricane storm surge and wave damage in the Bayou La Batre area, undermining the Dauphin Island Lighthouse, and causing tremendous changes to the ecosystem of the south end of the county. These include killing the most productive oyster reefs in the state and increasing erosion of the extremely productive wetlands of the Mississippi Sound. In essence, we are needlessly ruining south Mobile County to save a few bucks.”

“The solution is clear: The Port of Mobile, or some other local or state agency, should fund the additional costs required to put dredged sand back in the beach system.”

“The sand that comprises the beaches of Alabama flows, in some respects, like a river of sand along the Gulf shore in response to waves. Most of that movement is to the west until the sand reaches an inlet, or "pass," like Mobile Pass - the water between Fort Gaines (on Dauphin Island) and Fort Morgan.”

“At Mobile Pass, however, the sand falls into the south end of the Mobile Ship Channel, where it is dredged and disposed of in deep water beyond the beach system. Instead of that wasteful disposal practice, we should have been artificially bypassing the sand to the downdrift beaches in order to replicate the natural process that's interrupted by the ship channel. That is a basic principle of prudent coastal management, and it is sound coastal engineering practice.”

“By not following that basic principle, well over 20 million cubic yards of sand have been permanently removed from the beach system of Mobile County by the ship channel dredging practices. This is a tremendous amount of sand.”

“The U.S. Army Corps of Engineers' 1978 report about Dauphin Island and the dredging problem correctly and prophetically said that if we did not start artificially bypassing sand, then "erosion would continue to claim valuable property on the island, ultimately causing hardships for island property owners and a lessening of the area's attractiveness for recreational activities.”

“All of that has occurred and more. A 1992 report by the University of South Alabama also warned of the problems brewing on the island due to the offshore disposal of dredged sand. As the primary author of that report, I never thought things would get this far without being fixed.”

“Dauphin Island experiences tremendous natural changes because it is a barrier island next to a very large inlet. Most shoreline fluctuations nationwide occur in similar locations. The presently ongoing migration of Pelican/Sand Island onto Dauphin Island at the fishing pier is one such example. This is geology happening right before our eyes.”

“The same thing happened around 1710 and again around 1860, so it seems to be a 150-year cycle. But the recent report by a [Byrnes] consultant to the U.S. Army Corps of Engineers tries to conclude something that is physically impossible.”

“Why is it impossible? Because another principle of coastal engineering is a "sediment budget," not unlike your personal budget, where we keep track of sand moving into and out of an area. If more sand comes in than leaves, you have widening beaches. But if less sand comes in than leaves, your beaches will erode. The dredging is like a continuing series of large withdrawals from your checking account. And this consultant's [Byrnes] report is arguing that you are broke because you have always spent money, and not because he has been taking the withdrawals from

your account.”

“Every cubic yard of sand removed by dredging is a cubic yard of erosion downdrift in the river of sand. It is telling that the [Byrnes] report was supposed to have had a co-author but that co-author could not agree with the impossible and wrote in a dissent that the [Byrnes] report was "inconclusive, at best." This dissenter [Robert Dean] is the most highly-regarded coastal engineer in the nation and has been a member of the National Academy of Engineering for decades because of his seminal contributions in the field.”

“One question that I am often asked is, "Why do we not just put the dredged sand back on the beaches?" The answer, of course, is money. It will cost more to place the sand back on the beaches, or in shallow water so that waves move it to the beaches, than to dump it in deepwater. That's because ocean-going dredges are very efficient at moving large amounts of sand.”

Scott L. Douglass is the author of the book "Saving America's Beaches: The Causes of and Solutions to Beach Erosion" and is a professor of civil engineering at the University of South Alabama.

The Geological Survey of Alabama and the Dept. of Interior study contradict the facts in Byrnes 2008.

The time period of the erosion on the shoreline, correlates with land-loss stated in the Morton 2007 and the Corps dredging phase 1 of the Mobile Entrance channel

“1993 Geological, Economic, and Environmental Characterization of Selected Near-term Leasable Offshore Sand Deposits and Competing Onshore Sources for Beach Nourishment” Final Report.

“highest priority areas of beach replenishment were two areas on the Gulf beaches of Dauphin Island;”

“This study is concerned with the erosion that has taken place on Dauphin Island between 1955-1985”

“Based on the information conveyed by the composited overlays, shoreline areas showing significant erosion for the 1955-85 period were identified”

“The currently eroding Gulf shoreline areas of southeastern Dauphin Island could be restored approximately to the 1955 shoreline position by application of about 1.8 million yd³ of sand. At present, erosional regimes remain in effect on the southeastern shoreline of the island resulting in continuing loss of property. In the vicinity of the Dauphin Island Park, erosion is against a relatively narrow section of dunes that protect inland developed areas, including a public school.”

“All totaled, the five target areas contain over 700 million yd³ of high quality sand”

1995 MMS Continues Agreement with Alabama toward Restoration of Dauphin Island

SEP

The U.S. Department of the Interior's Minerals Management Service (MMS) awarded \$57,500 to the University of Alabama to develop a demonstration project using offshore sand resources for restoration of Dauphin Island, MMS officials announced today. "This funding will provide for the first year of a possible three-year cooperative study to determine the feasibility of restoring the severely eroding Dauphin Island by using sand from federal waters," said MMS Director Cynthia Quarterman.

“The study will culminate in scientific and engineering recommendations for island restoration. Sedimentary and erosional regimes will be used to model and analyze environmental conditions at the offshore resource site, along island beaches and across nearshore.”

"Since 1991, three cooperative studies have been completed with Alabama," said Quarterman. "Results have led to selection of a promising resource site located 4 to 8 miles off the southeast coast of Dauphin Island. Analyses indicate that about 30 million cubic yards of sand are present, and it's clean and suitable for restoration."

Including these funds, MMS has provided more than \$175,000 to Alabama since 1991

1995 Hummell, R. L., & Smith, W. E. (1995). Geologic and Environmental Characterization and near-term lease potential of an offshore sand resource site for use in beach nourishment projects on Dauphin Island, Alabama; Alabama Geological Survey Report for MMS Cooperative Agreement No. 14-35-0001-30725

This study correlates the erosion periods on Dauphin Island the same as Morton's 2007 study

1996 Hummell, R. L., & Smith, W. E. (1996). Geologic Resource Delineation and Hydrographix

Characterization of an Offshore Sand Resource site for use in Beach Nourishment Projects on Dauphin Island, Alabama. Alabama Geological Survey Report for MMS Cooperative Agreement No. 14-35-0001-30781.

“Additional ground surveys were conducted along southeastern Dauphin Island eroding shoreline segments to document shoreline loss for the 1994-96 period and recalculate the estimated sand required to restore selected segments of shoreline to their 1955 positions”

“Current erosion rates are essentially unchanged from those reported by Parker and others (1993) and Hummel and Smith (1995). The Gulf of Mexico shoreline of southeastern Dauphin Island could be restored to near the 1955 shoreline position by application of about 2.4 million cubic yards of sand.”

“The Gulf of Mexico shoreline along the southeastern portion of Dauphin Island was determined by GSA to have the highest prioritization of all eroding shoreline segments.”

This information was used to supplement the existing shoreline loss information compiled in Phase 2 (1955-85) and Phase 3 (1985-94) in estimating sand required to restore selected segments of Dauphin Island shoreline to their 1955 positions.

“The legislature of the State of Alabama passed a joint Senate and House Resolution (HJR-324) on June 28, 1995 creating the Alabama Coastal Area Erosion Task Force, which is comprised of various local officials and state and federal agencies.”

“The GSA’s coastal research and the sand resources cooperative work effort between the MMS, the University of Alabama (UA), and the GSA represents the technical/scientific component of a beach nourishment program for Dauphin Island.”

COASTAL ZONE ‘95

Meetings were held during the convention with various State of Alabama and federal agency coastal professionals to discuss beach nourishment projects on Dauphin Island.

1996 NATIONAL CONFERENCE ON BEACH PRESERVATION

The senior author attended the 9th annual National Conference on Beach Preservation Technology in St. Petersburg, Florida, January 24-26, 1996 “report back to the Alabama Coastal Area Erosion Task Force; and apply the acquired knowledge toward development of a recommendation to MMS for a beach nourishment demonstration project on Dauphin Island.

1997 Hydrographic Numerical Model Investigation and Analysis of an Offshore Sand Resource Site For Use in Beach Nourishment Projects on Dauphin Island, Alabama. Hummel, R. L. (1997). Alabama Geological Survey Report for MMS Cooperative Agreement No. 14-35-0001-30781.

“The results of this study show that the depth and length of the ebb-flood tidal channel are the primary factors in determining nearshore sediment transport pathways. In general, when the channel is deep and extends from Morgan Peninsula to the southern apex of the ebb-tidal delta of Mobile Bay, the channel acts as a barrier to sediment transport from the Morgan Peninsula Gulf of Mexico shoreline across Main Pass to Dauphin Island Gulf of Mexico shoreline.”

“Sediment starvation, brought about by the main nearshore sediment transport pathway following the margin of the ebb-tidal delta of Mobile Bay, results in a state of erosion for most of the southeastern Dauphin Island shoreline.”

1998 The Congressional Committee has to urge the Corps to protect Dauphin Island

Title I Department Of Defense—Civil Department of the Army Corps of Engineers—Civil
General Investigations, Congressional Record, House, September 25, 1998

The conferees recognize the serious erosion problems being experienced on the east end of Dauphin Island, Alabama. To counter this threat to property and habitat, the conferees urge the U.S. Army Corps of Engineers, acting in coordination with non-Federal interests, to initiate a small beach restoration project on the east end of Dauphin Island, Alabama, utilizing alternative sand recapture technologies.

2006 Gulf of Mexico 2005 Beach Topographic Monitoring and Shoreline Change Analysis,
Baldwin and Mobile Counties, ALABAMA OPEN FILE REPORT 0613
Blockedhttp://www.ogb.state.al.us/gsa/coastal/OFR/OFR%200613%20Beach%2005-9092.pdf

The Alabama Department of Conservation and Natural Resources State Lands Division

..Studies by Douglass, Sanchez, and Jenkins (1999) and Douglass (2001) showed that the beaches on this reach have been receding since 1970

[Dauphin Island].....Beach loss was attributed to the removal of sand from the littoral system by disposing of dredge spoil from the Mobile Ship Channel at sites from which the sand is transported from the littoral system.

2006 Another Sand study for Dauphin Island, but Dauphin Island did not get the sand.
ALABAMA State Geologists report ISSN 0039-0089.

“The State Geologist serves as the Governor’s representative to the Minerals Management Service OCS Policy Committee, ...the Coastal Area Erosion Task Force, ...Environment and Natural Resources Committee.”

“...Due to the importance of tourism along Alabama’s beaches to the state’s economy, it is vital to maintain the gulf-fronting beaches along Dauphin Island and Baldwin County.”

“...The Sand Resources project is a cooperative study between the Minerals Management Service and the GSA. The main purpose of this study is the identification of sand resources on the Gulf of Mexico’s inner continental shelf suitable for beach nourishment programs. Secondary information includes coastal erosion”

Robert Morton’s other studies contradict the fact in Byrnes 2008 study

2003 An Overview of Coastal Land Loss: With Emphasis on the Southeastern United States
by Robert A. Morton

USGS Open File Report 03-337

Summary: In states bordering the Gulf of Mexico and the Atlantic Ocean, vast areas of coastal land have been destroyed since the mid 1800s as a result of natural processes and human activities. ..whereas the most important human activities are sediment excavation, river modification, and coastal construction. As a result of these agents and activities, coastal land loss is manifested most commonly as beach/bluff erosion and coastal submergence.

“..coastal recession is the result of insufficient sediment supply compared to sediment removal.”

“..Humans have also contributed significantly to the deficit in sediment supply ... dredging tidal inlets.”

“These natural and artificial reductions in coastal sediment supply have resulted in the erosion of many beaches, barrier islands, and deltas.”

“Role of Human Activities: Transportation”

“Shipping has always played a vital role in our nation’s economy and it was for that reason that shallow coastal waters were deepened in the 1800s to create or enlarge major ports”

“... Abnormally high rates of land loss occur along ship channels”

“.....contribute to coastal land loss by regulating river discharge and sediment load delivered to downstream deltas and beaches.

“Deep-draft navigation channels are often constructed from artificial inlets or converted from tidal inlets and rivers. ... they always create large sediment sinks that remove some beach-quality sand from the littoral system. ...In turn these modifications can initiate or accelerate land loss by locally enhancing erosive forces, increasing water levels, and decreasing sediment supply.”

2004 National Assessment of Shoreline Change: Part 1, Historical Shoreline Changes and Associated Coastal Land Loss along the U.S. Gulf of Mexico
U.S. Geological Survey Robert A. Morton, Tara L. Miller, and Laura J. Moore

"We owe a debt of gratitude to Scott Douglass (Alabama)".

The USGS National Assessment of Shoreline Change represents the first time that shorelines from original data sources have been compiled and rates of shoreline change have been calculated on a national scale using internally consistent methods.

Natural reductions in sand supply during the past few thousand years were further aggravated by recent human activities such as damming rivers, dredging channels, and constructing jetties.

...Before the littoral drift system was altered, sand was naturally bypassed around tidal inlets and shared between neighboring coastal segments.

Now there are many coastal compartments deep navigation channels like those maintained at the entrance to Tampa, Mobile, Galveston, and Corpus Christi Bays.

This human interference with littoral drift has caused some formerly accreting or stable shores to begin eroding (Morton, 1979).

2008 Historical Changes in the Mississippi-Alabama Barrier-Island Chain and the Roles of Extreme Storms, Sea Level, and Human Activities by Robert A. Morton 2008
U.S. Geological Survey Abstract

Historical land-loss trends and engineering records show that progressive increases in land-loss rate correlate with nearly simultaneous deepening of channels dredged across the outer bars of the three tidal inlets maintained for deep-draft shipping.

This correlation indicates that channel-maintenance activities along the MS-AL barriers have impacted the sediment budget by disrupting the alongshore sediment transport system and progressively reducing sand supply. Direct management of this causal factor can be accomplished by strategically placing dredged sediment where adjacent barrier-island shores will receive it for island nourishment and rebuilding.

2011 Historical Bathymetry and Bathymetric Change in the Mississippi-Alabama Coastal Region, 1847–2009 by Noreen A. Buster and Robert A. Morton
U.S. Geological Survey

... "When a coastal system is altered by human activity such as dredging, as is the case of the MS-AL coastal region, the natural state and processes are altered, and alongshore sediment transport can be disrupted."
"As a result of deeply dredged channels, adjacent island migration is blocked, nearshore environments downdrift in the littoral system become sediment starved, and sedimentation around the channels is modified.

In fact, Col. DeLapp, by the Corps not acknowledging or accepting all other studies that conflict with the Byrnes 2008, 2010 studies, shows that the Corps already has a well-established pattern of suppression and distortion in past scientific studies as far as Dauphin Island is concerned. This put the Corps into an alarming and disturbing position of collecting the corrupted data in the past Byrnes 2008, 2010 studies, and the Corps incorporating the data and interpreting the facts in the new studies. This gives the Corps the ability to deceive the public by arranging data in the studies that only justifies the Corps' point of view, and a way to hold the Corps blameless for the erosion on the Island.

The Corps' historic actions indicate the Mobile District has consistently demonstrated a sustained "conflict of interest" regarding the erosion of Dauphin Island. This brings into question, how the Corps can be trusted to manage the SEIS/GRR studies about Dauphin Island with objectivity?

If I do not receive an answer from you within the next 14 days, I will know that your statements to me in your May letters were LIES just to appease me, until you finish SEIS/GRR Mobile Harbor study, and it is too late to change it.

Sincerely,



Comment #523

From:

Subject:

Date:

[EXTERNAL] Dauphin Island Economic Value to Mobile County, the State of Alabama and the Nation

Friday, March 3, 2017 6:40:07 PM

Dauphin Island Economic Value to Mobile County, the State of Alabama and the Nation:

The Mobile District Corps of Engineers stated in a 2010 letter to Congressman Bonner that the Corps could provide “for the placement of beach-quality sand dredged from navigation channels on the adjacent beaches provided the action is in the public interest” and is economically justified.

Dauphin Island represent Billions of Dollars of Economic Value to the State of Alabama and the Nation, yet the economic value has been suppressed by the Corps of Engineers to cover-up, once again, their responsibility to protect the Island from erosion.

Fact: The Corps’ dredging of the Entrance Channel is causing the erosion to Dauphin Island’s shoreline.

The Federal Laws and Corps of Engineers own documentation states, “Damage from Federal navigation work along the shorelines of the United States must be prevented or mitigated”. Dauphin Island is adjacent to one of the deepest federally authorized channels in the United States. Why hasn’t the State and the Corps of Engineers followed the Federal Laws and the Corps policies to keep Dauphin Island from eroding away?

As a barrier island, Dauphin Island is the first line of defense for Mobile County and Mobile Bay. According to NOAA:

“the first line of defense during storms that threaten coastal communities, barrier islands are very important for reducing the devastating effects of wind and waves and for absorbing storm energy. They are also important marine habitat that supports commercially important fish species, as well as birds, sea turtles and other wildlife species.”

The Energy & Environment Committee of the Southern Legislative Conference (SLC) of The Council of State Governments (CSG) in February 2015, stated:

“Dauphin Island, Alabama”

"Dauphin Island is a barrier island located three miles south of Mobile Bay. Though small, the Island is of tremendous economic importance to the Mobile Bay area and the entire state of Alabama. The Island buffers the Bay area from hurricanes and protects the ecological health of the Mobile Bay estuary, a fishery so important it has been dubbed the “fertile crescent” by many prominent marine biologists."

.....

"Strengthening the resilience of the Island is of critical importance to the Mobile Bay estuary and the Port of Mobile. According to Scott Douglas, a coastal engineering expert at the University of South Alabama in Mobile, if not restored, the barrier island is at risk of complete elimination during the next major hurricane. The loss of Dauphin Island would leave the Mobile Bay and the Port of Mobile vulnerable to direct hits by future storms. The Port of Mobile supports 127,591 direct and indirect jobs; a more than \$506 million in direct and indirect tax impact; and has an overall economic value of \$18.7 billion.”

“Furthermore, major economic drivers such as Airbus, Austal and ThyssenKrupp are located near the Port and would be directly in harm’s way. In order to protect economic interests such as these, a stable and well-supported Dauphin Island is essential and, therefore, an investment in the resilience of Dauphin Island is an investment in the future of Alabama’s economy.” [emphasis added]

Dauphin Island’s Economic Value 1

Dauphin Island Economic Value to Mobile County, the State of Alabama and the Nation
is Dauphin Island’s protection of the Mobile Harbor and its Billion dollar industries:

* The Mobile Harbor's Outer Bar Channel is the entrance to the second largest inland waterway in the United States.

* Martin Associates stated in a 2013 study that they, "estimates \$22.3 Billion in total economic value for the State of Alabama from the cargo and vessel activity the Port of Mobile", and the Port of Mobile generated \$573 million dollars in taxes paid to State and local governments by individuals, as well as firms dependent upon the Port of Mobile cargo and ship repair activity.

* Dauphin Island protects the Billions of Dollar industries, such as Airbus, Austal and ThyssenKrupp, which are located near the Port and are directly in harm's way.

With the substantial amount of money the Federal Government receives from the cargo ships coming into the Port, the State's one-half Billion of dollar a year from direct and indirect taxes from the Port, and the Port's \$22 Billion dollars in economic value to the State of Alabama, why is the State of Alabama and the Mobile District Corps of Engineers allowing Dauphin Island to erode away?

Dauphin Island's Economic Value 2

Dauphin Island's Economic Value to Mobile County, the State of Alabama and the Nation is the BILLIONS OF DOLLARS of Oil/Gas income that is derived from all of the rigs and gas pipelines coming into Alabama that only go through Dauphin Island and around the Island.

The Port Authority's \$700 million dollar growth is attributed to the original \$100 Million Dollars that came from the Oil/Gas income/royalties to the State of Alabama. This money was the results of the income/royalties coming from rigs and pipelines that only go through and around Dauphin Island. The State provided \$100 Million Dollars in 2000, for the massive expansion to the Port without any stipulations in the provision, to protect Dauphin Island's shoreline from erosion from dredging of the Mobile Entrance Channel.

Since the early 1980s when gas was discovered in the Gulf of Mexico, the State of Alabama and the Federal Government leased offshore tracts to oil and gas companies. The offshore natural gas industry has grown up south and southwest of Dauphin Island. In 1991, BP Exploration, Inc. installed directionally drilled pipelines under Dauphin Island. These pipelines delivered gas from offshore platforms in the Gulf of Mexico to onshore facilities.

According to the BP Oil Spill Restore documentation more than 90 percent of the nation's offshore crude oil and natural gas is produced in the Gulf of Mexico and the federal treasury receives roughly \$4.5 billion dollars each year from offshore leases and royalties. In 2012, Offshore Gas/oil brought in profits to Alabama of \$291,628,000 and Alabama Trust Fund value at that time was \$2.9 Billion.

In addition, Dauphin Island's Billions of Dollars of Economic Value is from the 200 Gas/Oil industries, which have located in Mobile County and are dependent upon natural gas in Mobile Bay and offshore of Alabama.

* According to the Mobile Chamber of Commerce, "Since Alabama first leased its waters for natural gas drilling in the early 1980s, a thriving cluster of more than 200 businesses has developed to serve the oil and gas industry in state waters and in adjacent federal deepwater. ExxonMobil, the major gas producer in Mobile Bay and offshore Alabama – along with W&T Offshore and Williams Mobile Bay Producer Services – processes millions of cubic feet of gas per day. Natural gas from Mobile is piped by major interstate pipelines to markets throughout the Southeast and the entire East Coast."

* “As off-shore drilling increases, Mobile area shipbuilders are responding to the market demand. At facilities along the Mobile River and down on Bayou La Batre Canal, companies build off-shore supply and rig-tending vessels as well as repair rigs.”

* “the ship canal is home to Aker Solutions, Offshore Inland Marine, Technip’s “spool base” home base for Technip’s “Deep Blue” and “Apache II” pipe-laying vessels as well as three shore base service contractors – Midstream Fuel Service, Construction Solutions, and Core Industries. These shore bases are able to provide products and services to drilling rigs and platforms in shallow water, deepwater, and ultradeepwater.” Furthermore, Berg Spiral Pipe Corporation has built a new Greenfield DSAW Spiral Welded Pipe Mill in Mobile with sizes from 24” through 56” to satisfy customer requirements for on shore and off shore gas pipelines. Serimax North America is a global enterprise service provider to the oil & gas industry with world class welding and fabrication services.”

In summary:

Dauphin Island has the full burden of all gas pipelines coming into Alabama.

Dauphin Island Economic Value justification as a barrier island it is the first line of defense for hurricane protection to Mobile County.

- * The protection of Billions of Dollars of industries located in Mobile County that are dependent on the Port.
- * The Billions of Dollars of gas/oil income/royalties from the gas pipelines that go only through the Island
- * The Billions of Dollars of income from the 200+ industries that support the Natural Gas Industry in Mobile County.

The Billions of Dollars of income coming to the Federal Government and the State of Alabama is the economic justification of Dauphin Island’s value.

Why has the Mobile District Corps of Engineers not followed the Federal Law and denied “the placement of beach-quality sand dredged from navigation channels on the adjacent beaches provided the action is in the public interest” on Dauphin Island? Dauphin Island’s protection of Billions of Dollars of industries is in the public interest and economically justified.

It is time to put a stop to the Mobile District Corps of Engineers distortion of the truth and refusing to acknowledge that the dredging of the Mobile’s Entrance Channel is a direct cause of the erosion on Dauphin Island’s shoreline.

It is time to put a stop to the Corps not disclosing and following all of the Federal Laws and Corps polices, to mitigate the erosion impacts to Dauphin Island’s shoreline that is adjacent to one of the deepest Federally Authorized Navigation channels in the Country.

It is time to put a stop to the Mobile District’s Corps of Engineers not acknowledging or using Dauphin Island’s Economic Value of Billions of Dollars to justify placing the dredged sand on Dauphin Island’s shoreline.

It is in the public interest, economically justified that Dauphin Island should be protected, and the shoreline stabilized before the Mobile District Corps of Engineers starts the massive deepening and widening of the Mobile Harbor. This can be accomplished by the Corps pumping sand directly onto the whole southern shoreline. In addition, the Island should be protected during the dredging for the expansion to the entrance channel by depositing the dredged sand in a nearshore berm in front of the whole Island, below the mean high tide within the 5 to 10 foot depths, as the Corps does in Florida and other parts of the Country.

In the future, the Corps should commit to the Town of Dauphin Island the direct beneficial reuse of 100 percent of the sand dredged from the Outer Bar Channel and bypass the sand into a nearshore berm in front of the whole southern shoreline each time the channel is dredged. This is important to combat the Corps future erosion to

Dauphin Island and to restore endangered habitat on the Island.

Why hasn't the Corps used the Billions of Dollars of Economic Value as justification to put sand on Dauphin Island.

The Corps has to be stopped from eroding Dauphin Island any further, and the true facts about what the Corps has done to Dauphin Island with its maintenance dredging of the Mobile Entrance Channel.

Sincerely,

A large black rectangular redaction box covering the signature area.

Comment #524

From: [REDACTED]
To: [DeLapp, James Andrew \(Jim\) COL USARMY CESAM \(US\)](#)
Cc: [Mobile Harbor GRR](#); [Newell, David P CIV CESAM CESAD \(US\)](#); [McDonald, Justin S CIV USARMY CESAM \(US\)](#); [Flakes, Curtis M CIV \(US\)](#); lisa.hunter@usace.army.mil
Subject: [Non-DoD Source] Corps trying to shut me up!
Date: Thursday, March 1, 2018 3:49:35 PM

Dear Col. DeLapp,

Is the Corps so afraid of my questions that the Corps deliberately planned not to let me speak, and ask questions at a public meeting?

Lisa ? came up to me before the meeting under the pretense to introduce herself. She said she knew all about my emails about Dauphin Island and I told her I had questions for the Corps that night. She stated that the Mobile District calls me a “prolific writer” about Dauphin Island.

It was not until the meeting started, I realized that Lisa decided whom to call on for questions. I was shocked when she intentionally did not call on me during the meeting, even though I had my hand raised, the whole time and I ask her if she was going to let me ask a question. She ignored me the entire meeting.

As I have stated before, the buck stops with you.

This means, the Mobile District Corps, under your command, intentionally discriminated against me and denied me my First Amendment Rights of Freedom of Speech, to speak and protest what the Corps is doing to Dauphin Island. Because I have a stake in the outcome of the Corps actions, the Mobile District Corps employees calculatedly violate my esteemed Constitution Rights of Freedom of Speech, by excluding me from asking questions and to stop others from hearing my protest against the Corps.

This shows that the Mobile District Corps will undermine Democracy and the citizens’ First Amendment Rights to cover-up their past destruction of Dauphin Island.

After the Corps sent out the notice that stated:

“After the Corps presentation, members of the public will have the opportunity to ask the commander and team questions, make comments and share concerns related to possible impacts associated with the potential project.”

“The town hall meeting is one opportunity to share comments that will become part of the preparation of a Draft Supplemental Environmental Impact Statement for the proposed project.”

Not only did I, but many others travel hundreds of miles just to attend the meeting.

Even though it was a pack house, you had the Corps shut down the meeting, forcing many owners to leave the meeting without being given the opportunity to ask their questions.

You could have allowed extra time by making up the time you wasted, the 20 to 30 minutes on Puerto Rico, which had nothing to do with the Mobile Harbor at all. This would have ensured that citizens receive an honest explanation of the Corps’ erosion impacts to the Island. As I have told you before, the people of Dauphin Island are enraged that the Mobile District is charge of helping Puerto Rico, while the Corps has done nothing to help Dauphin Island after hurricanes for the last 38 years. The Mobile District Corps even made sure that Dauphin Island was not included the Mississippi/Alabama barrier Island study after hurricane Katrina, even though Dauphin Island was the lead island in the chain. Not all of the Islands were federal property.

Since the Corps has lied to the people of Dauphin Island so many times in the past, about the placement of the dredged sand and whether the sand would reach the island and re-nourish the shoreline. Now, the people need detail information about how the Corps is going to mitigate the erosion to Dauphin Island and the Corps’ commitment to the island.

Col. DeLapp, I am asking you now to answer my questions that the Corps refused to let me ask you personally, at the meeting.

How is the Corps going to mitigate the CORPS' EROSION IMPACTS TO DAUPHIN ISLAND?

Your statements to me in two different letters in May 2017:

"I also wish to convey that the USACE is actively investigating a strategy to modify our current dredging and placement practices that would beneficially place the sand dredged from the bar channel in a manner that would direct it to Dauphin Island."

I want to know the exact plan; the Corps will use to modify the maintenance dredging practices that would place sand near Dauphin Island. It has been over 10 months since you made that statement with no answer.

Unless your statements to me are another lie that will never be fulfilled by the Corps. Like the Corps statements at the ASPA meeting on November 25, 2013, about widening the channel, when Susan Rees stated that the Corps could put a permanent pump-out station near the beneficial use area to pump sand to the beaches, as the Corps is doing at Perdido Pass. Jimmy Lyons even mentioned using geotubes for the beaches, to help the sand to accrete, as being done near Billy Goat Hole.

Col. DeLapp, Is the Corps still considering Rees recommendations about putting a permanent pump-out station to pump the sand from SIBUA to off-set the erosion to the Dauphin Island beaches? If not, why not?

By the Corps statements at the meeting that they are using the Corps' super computers to calculate all details of the Mobile Harbor studies. What have the calculations on the "Super Computers" said about the erosion on Dauphin Island?

The Corps presented the 28 slides at the meeting:

- * Not one of the slides made any statement about the environmental impacts on Dauphin Island by the Corps dredging.

- * Not one of the slides shows any impacts from the deepening and widening of the Channels.

- * Slide 11 and 21 shows the places where the Corps is planning on putting the New Work dredge material, BUT on the picture next to it, under maintenance dredging nothing has changed.

- * Slide 23, 24, 25, 26 There were no pictures in either the Byrnes 2008 study or the USGS 2017 study, which showed pictures, like the ones, the Corps put in their slides. Why did the Corps make up pictures in the Corps slides that state they come from those studies? Was this done to mislead the public?

Or, is the Corps going to continue to LIE to the public and continue to use the Byrnes 2008 study?

The Mobile District is basing the future deepening and widening of the Entrance Channel on the paid-for-by-the-

Corps Lawsuit study, the Byrnes' 2008 study, even though it has been contradicted by multiples studies by noted Coastal engineers and scientists.

Col. DeLapp, Please explain how can two studies for the Mobile District, about the same barrier island chain, be totally opposite from each other? The Byrnes 2008 study was produced by Mobile District at the same time the Morton's 2007 was produced for the Mobile District Corps for the Miss/Al barrier islands that Dauphin Island is the lead in the chain. In one study, Byrnes 2008, stating that the dredging of the deep-draft shipping channel does not cause erosion on the barrier Island, and Morton 2007 stating the dredging of the deep-draft shipping channels caused land-loss and erosion on the barrier islands, and because of the Morton study, the Mobile District Corps received over a half billion dollars for the barrier islands in Mississippi.

Col. DeLapp, for your information and to clear this up, for the last time. Robert Dean's report contradicting the Byrnes 2008 report, is still part of the Lawsuit settlement.

According to the Department of Justice statements:

"Plaintiffs' counsel refused to assent to these Principles, advising that the class members would never assent to the conclusions of the Principal Investigator's Report, and that counsel would not request Dr. Dean to withdraw his dissent."

The eminent Coastal Engineer, Dr. Robert Dean, "indicated that the [Byrnes' 2008] Final Report was fundamentally flawed, not reliable and at best inconclusive." The Corps knew that in Dr. Dean's "Concluding Report", he questioned multiple facts about the Corps' sediment data in the "2008 Final Report" for the lawsuit.

Dr. Robert Dean states:

"Additionally, as discussed in the following sections, there are data and methodology used in the ACRE report that are central to the findings which I do not consider as appropriate nor correct. This review report identifies those issues that are considered necessary to complete the analysis and provide a more complete foundation for addressing the two Central Questions."

"I conclude that certain critical portions of the [Byrnes 2008] Final Report are arbitrary in their methods of analysis and acceptance/interpretation of the available data resulting in uncertainty remaining in the final results."

"The available bases for evaluating the impact of a deepened channel on the adjacent shorelines include: (1) Analysis and interpretation of data, (2) Experience and judgment, and (3) Application of accepted coastal engineering methodology. The main approach followed in the Final Report was in the assembly, synthesis and analysis of the available data sources in the vicinity of Mobile Bay Entrance. Some of these data were collected many years ago at times when the survey control and technology were of lesser quality than at present. My experience in conducting and analyzing hydrographic surveys has documented the need to examine these data carefully before acceptance and that survey data may contain bias. The position adopted in the [Byrnes] Final Report is that any bias in the available survey data is negligible. Additionally, there is uncertainty as to some of the methodology applied with regard to shoreline changes and sea level changes over the period of record of more than a century."

These are some of the things Dr. Dean questioned in the Byrnes report

- * Possible Bias in Surveys
- * The description of the modern sediment budget.
- * Shoreline Changes Along Morgan Peninsula
- * Volume Changes
- * Net Longshore Sediment Transport Along Morgan Peninsula
- * Two major concerns with the sediment budget are: (1) The large volume increases reported on the east and west ebb lobes of the ETS, and (2) The large net westward longshore sediment transport along Morgan Peninsula.
- * Sediment Budget
- * Need for Further Consideration of Processes Related to Dredging Impact

* Effects of Dredging on the Bypassing Bar
The 1918 Survey

“The validity of the 1918 survey needs to be investigated further. I cannot believe the magnitudes of shoreline or volume changes presented in the ACRE reports. I am still attempting to determine whether horizontal position corrections are known for these data or can be established for this survey.”

“Coastal engineering knowledge is sufficient to discuss likely changes in bypassing modes as a result of channel deepening. Figure 14 presents a conceptual description of the likely modes of sediment transport before and after channel deepening. Prior to channel deepening, the net sand transport entering the channel from Morgan Peninsula would be transported seaward by the ebb tidal currents and the “lip” of the channel at a depth of 20 feet (or so) would cause a hydraulic “back pressure” and cause some of the water and sediment to flow laterally, both to the east and west lobes of the ETS as shown in Figure 14a. With the channel deepened to 49 feet and the removal of the 20 foot “lip”, the back pressure is reduced and more of the sediment is jetted to deeper water where onshore sediment transport is dependent to a substantial degree on wave mobilization processes”

“The sand bypass mechanisms are a result of both wave and current action. Because of the deeper channel, the sand transporting (bypassing) action due to waves has diminished significantly.”

“The sediment budget developed in the report is for the period 1918 to the approximate present and thus represents average conditions over that period. The current maintenance dredging (from April 1990 to June 2006) exceeds 500,000 cy/year which is nearly twice the average value used in the sediment budget presented in the ACRE report. Thus, the current sediment budget should be developed and presented along with discussion of any major uncertainties.”

He questions the findings “in the ACRE report that the ebb tidal shoals have been accreting since approximately 1918 at the rate of about 400,000 cy/year and it is believed that the method of accounting for Relative Sea Level Rise and perhaps bias in survey data may be responsible.” Also questioned are “the validity of the 1918 data on Morgan Peninsula which resulted in a net westward longshore sediment transport of 612,000 cy/year, a very large quantity which occurs at very few locations along the entire United States coastline. Both the 1918 data and the analysis methodology are concerns”.

The Byrnes’ 2008 study used the USACE Sediment Budget Analysis that was incorrect. Corps’ December 2011 Memorandum for MsCIP, it stated that the Corps surveys for the sediment budget analysis were incorrect.

“USACE (Justin McDonald): Stated that the USACE surveys that were provided for the sediment budget analysis were incorrect. They have been corrected and a comparison of the corrected and uncorrected surveys is being performed to determine the magnitude of the difference. if any additional analysis is needed to correct for the “busted” USACE surveys.”

USGS Morton’s 2007 study contradicts the information in the Byrnes 2008 study.

The Morton’s 2007 was produced for the Mobile District use, for the Miss/Al barrier islands that Dauphin Island is the lead in the chain, at the same time the Mobile District was producing the Byrnes 2008 study. How can two studies for the Mobile District about the same barrier island chain, be totally opposite from each other, with one study, Byrnes 2008, stating that the dredging of the shipping channel does not cause erosion on the Island and the Morton 2007 stating the dredging of the deep-draft shipping channels caused erosion on the barrier island, which the Mobile District Corps received over a half billion dollars for the barrier islands in Mississippi.

The correlation of dates in USGS Robert Morton’s 2007 study and the dates of the Corps dredging of the Mobile Outer Bar Channel that represent the periods of land-loss and erosion on Dauphin Island.

According to the USGS Robert Morton’s 2007 study

* The only factor that has a historical trend that coincides with the progressive increase in rates of land loss is the progressive reduction in sand supply associated with nearly simultaneous deepening of channels dredged across

the outer bars of the three tidal inlets maintained for deep-draft shipping

* The navigation channels act as sediment sinks, removing sand that otherwise would have been available for beaches immediately downdrift of the channel.

* Sand supply is the only factor contributing to barrier island land loss that can be managed directly to mitigate the losses by placement of dredged material so that the adjacent barrier island shores receive it for island nourishment and rebuilding.

* [Dauphin Island] “But after 1958 the island entered a net erosional phase that has persisted and most recently accelerated. Rates of land loss between 1958 and 1996 averaged 6.1 ha/yr and between 1996 and 2006 averaged 12.9 ha/yr.”

That adds up to 880 acres or 880 football fields that have eroded off of Dauphin Island.

The following shows how Morton’s studies dates correlate with the dates of the Corps’ dredging of the Mobile Entrance Channel for the land loss and erosion on Dauphin Island.

1. Morton: between 1958 and 1996, Dauphin Island rate of land loss averaged 15.07 acres/year

In 1956, Corps dredged the initial phase of the Mobile Entrance Channel, 42-ft deep by 600-ft wide and in 1965, the channel was completed to the authorized depth of 42 ft.

2. Morton: between 1996 and 2006, Dauphin Island land rate of loss averaged 31.87 acres/year

In 1990, Corps dredged the channel from 42ft. to 47 ft. by 600 ft. across Mobile Outer Bar for a distance of 6.1 miles into the Gulf of Mexico

In 1999, the Mobile Outer Bar Channel was deepened another two feet to 49 ft. by 600 ft.

The Morton 2007 study shows that after the two main dredging periods of the Corps’ deepening and widening of the Mobile Outer Bar Channel produced a major land loss on Dauphin Island.

Also, the Corps’ 1978 study stated that Dauphin Island’s land loss for 13 acres/year from erosion, because of the Corps’ dredging of the Entrance Channel, backs up the Morton’s study land loss rates.

1978 Study “...along the westernmost 11 miles of Dauphin Island. At present, this section of the island is losing about 13.5 acres of property per year to erosion.”

The conflicting facts about the Byrnes’ 2008 Report, the Corps’ lawsuit study.

The Byrnes 2008 lawsuit study, states that the Corps only dredges 274,000 cubic yards/year out of the Mobile Outer Bar entrance Channel.

“Maintenance dredging records indicated that approximately 274,000 cy of sand was extracted from the channel each year between 1917 and 1987 and disposed of offshore.”

The Byrnes’ 2008 Final Report lawsuit study averaged dredging records 1917-1987, stopped just three years before the Phase I construction was completed in 1990, and did not take into account in the averaged amounts that, the Mobile entrance channel was deepened at two different times, 1990 from 42 to 47 feet, the channel extended to 6.1 miles in the Gulf. Again, in 1999 the channel was deepened from 47 to 49 ft. The two construction phases consisted of over 10,000,000 million cubic yards for new work that was dredged out of the channel.

The Byrnes 2008 averaged dredged amount 274,000 cys does not make sense. From 1974 to 2006, the Corps dredged over 26,914,254 cys of sand from the Outer Bar Channel. That is 841,070 thousand cys of sand a year, three times the amount stated in Byrnes 2008 study

After the time of the deepening of the channel in 1999, the dredging rates have increased significantly from those reported in the study. Just between 2000 to 2006, the averaged rate was 760,461 cys/year.

The 2003 Endangered Species Act -Section 7 Consultation Biological Opinion stated:
Annually, an average of 6.1 million CY of material are dredged from Mobile Bay channels; 888,000 CY are dredged from the bar channel; and 1.2 million CY are dredged (by pipeline dredge) from Mobile River channels.

Thus, the Byrnes 2008 study's calculations of the averaged historical sediment dredged amount of 274,000 cys, was not representative of present-day dredging amounts after the 1990s expansion was completed.

During the 1990s, the Mobile Entrance Channel was deepened, it was also lengthened to provide safe navigation from offshore. Thus, the deeper channels not only provided a better trap for sand moving east to west, alongshore, but also resulted in longer channels, which captured more of sand that was being transported in the offshore zone.

Byrnes 2008 study conflicts with the information by Fish and Wildlife Service study

INVENTORY OF HABITAT MODIFICATIONS TO TIDAL INLETS IN THE COASTAL MIGRATION AND WINTERING RANGE OF THE PIPING PLOVER

Over half (54%) of the sandy, tidal inlet habitat within the U.S. continental migration and wintering range of the piping plover that existed in 2010-2011 has been modified by human actions within the last century or so, including dredging activities, sediment mining, of inlets.

The maintenance of navigation channels by dredging, especially deep ship channels such as those in Alabama and Mississippi can significantly alter the natural coastal processes on adjacent inlet shorelines and has been described by Otvos (2006), Morton (2008), Otvos and Carter (2008), Beck and Wang (2009), and Stockdon et al. (2010).

The dredging of navigation channels contributes to the cumulative effects by removing or redistributing the local and regional sediment supply; the maintenance dredging of deep ship channels can convert a natural inlet that normally bypasses sediment from one shoreline to the other into a sediment sink where sediment no longer bypasses the inlet. Of the dredged inlets included in this analysis, dredging efforts began as early as the 1800s and continue to the present, generating long-term and even permanent effects on inlet habitat; at least 11 inlets initiated dredging in the 19th century, .. dredged as early as ..Mobile Pass (AL) in 1857.

The National Oceanic and Atmospheric Administration (NOAA) and U.S. Fish and Wildlife Service (USFWS) lists the following species within the Dauphin Island area:

The Florida manatee is a subspecies of the West Indian Manatee. Between October and April, Florida manatees concentrate in areas of warmer water. During summer months, the species can be found along the Alabama coast, manatee sightings have been documented in Mobile Bay and/or its tributaries for the past several years, within designated Gulf Sturgeon critical habitat. Piping plover (*Charadrius melodus*) Least Tern (*Sterna antillarum*), Bald eagle (*Haliaeetus leucocephalus*) listed species for Mobile County

The piping plover and least tern occur along the Gulf Coast and occur on Dauphin Island and impact on their nesting site, would be disrupted by the continued maintenance dredging and placement activities that has eroded Dauphin Island beaches

Review of Policy Conflicts and Obstacles to Large-Scale Restoration of Wetlands and
Other Habitats Division of Habitat and Resource Conservation U.S. Fish and Wildlife
Service

“This example represents an increased cost to Federal or State funding sources when sand from the dredging project could be used to renourish the beach at an incremental cost as opposed to performing two entirely separate projects both requiring mobilization/demobilization of equipment, etc. There have been several past instances where opportunities to use dredged material have been missed in favor of using hopper dredges and placing the material in offshore disposal sites.

Dr. Scott Douglass studies contradict the facts in Byrnes 2008 study:

1991 “Summary of Existing Coastal Engineering Data for Dauphin Island” by Dr. Scott L. Douglass

“Dr. Douglass restates the Corps’ procedure for maintaining and deepening the ship channel and notes that the natural depth was only about 20 feet, but dredging has increased this pass to 50 feet deep. Dr. Douglass confirms the Corps’ conclusion that the material dredged and dumped in deep water is permanently lost from the Dauphin Island shoreline and estimates that the total amount dredged to be approximately 15 million cubic yards of beach quality sand.”

1992 “Coastal Processes of Dauphin Island, Alabama” by Dr. Scott L. Douglass, about the erosion on Dauphin Island^L_{SEP}

“Almost all the dredged material, sand, has been permanently removed from the littoral system of the Alabama coast. The Littoral system has not received any littoral drift from the east of Mobile Pass in at least fifty years.” He added “Dredging of the Mobile Ship Channel has removed 15 million cubic yards of beach quality sand from the littoral system of the State of Alabama since 1974. Perhaps as much as 50 million cubic yards of sand have been permanently removed this century.”^L_{SEP} “The dredging of the Mobile Ship Channel has also indirectly affected Dauphin Island by changing the wave climate and the tidal hydraulics of the Mobile Pass.

2000 The renowned coastal engineer, Dr. Scott Douglass, study about the Corps’ dredging of the Mobile Ship Channel and again the Corps ignores his study.

“State-of-the-beaches of Alabama”, Scott L. Douglass

“Consideration should be given to restoring the volume of beach sands that have historically been removed at Mobile Pass. Probably between 20 and 50 million cubic yards (the volumes prior to 1974 are apparently unknown) of sand have been removed from the littoral system this past century. This could be partially restored with limited beach nourishment.” Through some calculations, the beaches on Dauphin Island could be as much as 1,000 feet wider if the aforementioned volume of sand was placed directly along the Gulf of Mexico shoreline

....Millions of cubic yards of sand have been removed from the littoral system near the Sand Island Lighthouse in the past several decades.

...In essence, the “river of sand” that feeds the beaches of the west end of Dauphin Island is being interrupted by the dredging removal near the lighthouse....“It appears that the west end beaches are beginning to suffer severely from decades of complete littoral blockage near the lighthouse.”

2009 Do we really care? We are destroying the beaches of Dauphin Island...

By SCOTT DOUGLASS, 2009

Univ. South Alabama

Special to the Press-Register

“The debates about the future of the beaches of Dauphin Island have now reached the point where I wonder if we care enough to save what we love about coastal Alabama. I say that because - in spite of a recent report to the contrary - the truth is, we are destroying the beaches of Dauphin Island.”

“By not artificially bypassing sand dredged from the south end of the Mobile Ship Channel, we are also increasing

potential hurricane storm surge and wave damage in the Bayou La Batre area, undermining the Dauphin Island Lighthouse, and causing tremendous changes to the ecosystem of the south end of the county. These include killing the most productive oyster reefs in the state and increasing erosion of the extremely productive wetlands of the Mississippi Sound. In essence, we are needlessly ruining south Mobile County to save a few bucks.”

“The solution is clear: The Port of Mobile, or some other local or state agency, should fund the additional costs required to put dredged sand back in the beach system.”

“The sand that comprises the beaches of Alabama flows, in some respects, like a river of sand along the Gulf shore in response to waves. Most of that movement is to the west until the sand reaches an inlet, or "pass," like Mobile Pass - the water between Fort Gaines (on Dauphin Island) and Fort Morgan.”

“At Mobile Pass, however, the sand falls into the south end of the Mobile Ship Channel, where it is dredged and disposed of in deep water beyond the beach system. Instead of that wasteful disposal practice, we should have been artificially bypassing the sand to the downdrift beaches in order to replicate the natural process that's interrupted by the ship channel. That is a basic principle of prudent coastal management, and it is sound coastal engineering practice.”

“By not following that basic principle, well over 20 million cubic yards of sand have been permanently removed from the beach system of Mobile County by the ship channel dredging practices. This is a tremendous amount of sand.”

“The U.S. Army Corps of Engineers' 1978 report about Dauphin Island and the dredging problem correctly and prophetically said that if we did not start artificially bypassing sand, then "erosion would continue to claim valuable property on the island, ultimately causing hardships for island property owners and a lessening of the area's attractiveness for recreational activities.”

“All of that has occurred and more. A 1992 report by the University of South Alabama also warned of the problems brewing on the island due to the offshore disposal of dredged sand. As the primary author of that report, I never thought things would get this far without being fixed.”

“Dauphin Island experiences tremendous natural changes because it is a barrier island next to a very large inlet. Most shoreline fluctuations nationwide occur in similar locations. The presently ongoing migration of Pelican/Sand Island onto Dauphin Island at the fishing pier is one such example. This is geology happening right before our eyes.”

“The same thing happened around 1710 and again around 1860, so it seems to be a 150-year cycle. But the recent report by a [Byrnes] consultant to the U.S. Army Corps of Engineers tries to conclude something that is physically impossible.”

“Why is it impossible? Because another principle of coastal engineering is a "sediment budget," not unlike your personal budget, where we keep track of sand moving into and out of an area. If more sand comes in than leaves, you have widening beaches. But if less sand comes in than leaves, your beaches will erode. The dredging is like a continuing series of large withdrawals from your checking account. And this consultant's [Byrnes] report is arguing that you are broke because you have always spent money, and not because he has been taking the withdrawals from your account.”

“Every cubic yard of sand removed by dredging is a cubic yard of erosion downdrift in the river of sand. It is telling that the [Byrnes] report was supposed to have had a co-author but that co-author could not agree with the impossible and wrote in a dissent that the [Byrnes] report was "inconclusive, at best." This dissenter [Robert Dean] is the most highly-regarded coastal engineer in the nation and has been a member of the National Academy of Engineering for decades because of his seminal contributions in the field.”

“One question that I am often asked is, "Why do we not just put the dredged sand back on the beaches?" The answer, of course, is money. It will cost more to place the sand back on the beaches, or in shallow water so that waves move it to the beaches, than to dump it in deepwater. That's because ocean-going dredges are very efficient at moving large amounts of sand.”

Scott L. Douglass is the author of the book "Saving America's Beaches: The Causes of and Solutions to Beach Erosion" and is a professor of civil engineering at the University of South Alabama.

The Geological Survey of Alabama and the Dept. of Interior study contradict the facts in Byrnes 2008.

The time period of the erosion on the shoreline, correlates with land-loss stated in the Morton 2007 and the Corps dredging phase 1 of the Mobile Entrance channel

“1993 Geological, Economic, and Environmental Characterization of Selected Near-term Leasable Offshore Sand Deposits and Competing Onshore Sources for Beach Nourishment” Final Report.

“highest priority areas of beach replenishment were two areas on the Gulf beaches of Dauphin Island;”

“This study is concerned with the erosion that has taken place on Dauphin Island between 1955-1985”

“Based on the information conveyed by the composited overlays, shoreline areas showing significant erosion for the 1955-85 period were identified”

“The currently eroding Gulf shoreline areas of southeastern Dauphin Island could be restored approximately to the 1955 shoreline position by application of about 1.8 million yd³ of sand. At present, erosional regimes remain in effect on the southeastern shoreline of the island resulting in continuing loss of property. In the vicinity of the Dauphin Island Park, erosion is against a relatively narrow section of dunes that protect inland developed areas, including a public school.”

“All totaled, the five target areas contain over 700 million yd³ of high quality sand”

1995 MMS Continues Agreement with Alabama toward Restoration of Dauphin Island

SEP

The U.S. Department of the Interior's Minerals Management Service (MMS) awarded \$57,500 to the University of Alabama to develop a demonstration project using offshore sand resources for restoration of Dauphin Island, MMS officials announced today. "This funding will provide for the first year of a possible three-year cooperative study to determine the feasibility of restoring the severely eroding Dauphin Island by using sand from federal waters," said MMS Director Cynthia Quarterman.

“The study will culminate in scientific and engineering recommendations for island restoration. Sedimentary and erosional regimes will be used to model and analyze environmental conditions at the offshore resource site, along island beaches and across nearshore.”

"Since 1991, three cooperative studies have been completed with Alabama," said Quarterman. "Results have led to selection of a promising resource site located 4 to 8 miles off the southeast coast of Dauphin Island. Analyses indicate that about 30 million cubic yards of sand are present, and it's clean and suitable for restoration."

Including these funds, MMS has provided more than \$175,000 to Alabama since 1991

1995 Hummell, R. L., & Smith, W. E. (1995). Geologic and Environmental Characterization and near-term lease potential of an offshore sand resource site for use in beach nourishment projects on Dauphin Island, Alabama; Alabama Geological Survey Report for MMS Cooperative Agreement No. 14-35-0001-30725

This study correlates the erosion periods on Dauphin Island the same as Morton's 2007 study

1996 Hummell, R. L., & Smith, W. E. (1996). Geologic Resource Delineation and Hydrographix Characterization of an Offshore Sand Resource site for use in Beach Nourishment Projects on Dauphin Island, Alabama. Alabama Geological Survey Report for MMS Cooperative Agreement No. 14-35-0001-30781.

“Additional ground surveys were conducted along southeastern Dauphin Island eroding shoreline segments to document shoreline loss for the 1994-96 period and recalculate the estimated sand required to restore selected segments of shoreline to their 1955 positions”

“Current erosion rates are essentially unchanged from those reported by Parker and others (1993) and Hummell and Smith (1995). The Gulf of Mexico shoreline of southeastern Dauphin Island could be restored to near the 1955 shoreline position by application of about 2.4 million cubic yards of sand.”

“The Gulf of Mexico shoreline along the southeastern portion of Dauphin Island was determined by GSA to have the highest prioritization of all eroding shoreline segments.”

This information was used to supplement the existing shoreline loss information compiled in Phase 2 (1955-85) and

Phase 3 (1985-94) in estimating sand required to restore selected segments of Dauphin Island shoreline to their 1955 positions.

“The legislature of the State of Alabama passed a joint Senate and House Resolution (HJR-324) on June 28, 1995 creating the Alabama Coastal Area Erosion Task Force, which is comprised of various local officials and state and federal agencies.”

“The GSA’s coastal research and the sand resources cooperative work effort between the MMS, the University of Alabama (UA), and the GSA represents the technical/scientific component of a beach nourishment program for Dauphin Island.”

COASTAL ZONE ‘95

Meetings were held during the convention with various State of Alabama and federal agency coastal professionals to discuss beach nourishment projects on Dauphin Island.

1996 NATIONAL CONFERENCE ON BEACH PRESERVATION

The senior author attended the 9th annual National Conference on Beach Preservation Technology in St. Petersburg, Florida, January 24-26, 1996 “report back to the Alabama Coastal Area Erosion Task Force; and apply the acquired knowledge toward development of a recommendation to MMS for a beach nourishment demonstration project on Dauphin Island.

1997 Hydrographic Numerical Model Investigation and Analysis of an Offshore Sand Resource Site For Use in Beach Nourishment Projects on Dauphin Island, Alabama. Hummell, R. L. (1997). Alabama Geological Survey Report for MMS Cooperative Agreement No. 14-35-0001-30781.

“The results of this study show that the depth and length of the ebb-flood tidal channel are the primary factors in determining nearshore sediment transport pathways. In general, when the channel is deep and extends from Morgan Peninsula to the southern apex of the ebb-tidal delta of Mobile Bay, the channel acts as a barrier to sediment transport from the Morgan Peninsula Gulf of Mexico shoreline across Main Pass to Dauphin Island Gulf of Mexico shoreline.”

“Sediment starvation, brought about by the main nearshore sediment transport pathway following the margin of the ebb-tidal delta of Mobile Bay, results in a state of erosion for most of the southeastern Dauphin Island shoreline.”

1998 The Congressional Committee has to urge the Corps to protect Dauphin Island

Title I Department Of Defense—Civil Department of the Army Corps of Engineers—Civil
General Investigations, Congressional Record, House, September 25, 1998

The conferees recognize the serious erosion problems being experienced on the east end of Dauphin Island, Alabama. To counter this threat to property and habitat, the conferees urge the U.S. Army Corps of Engineers, acting in coordination with non-Federal interests, to initiate a small beach restoration project on the east end of Dauphin Island, Alabama, utilizing alternative sand recapture technologies.

2006 Gulf of Mexico 2005 Beach Topographic Monitoring and Shoreline Change Analysis,
Baldwin and Mobile Counties, ALABAMA OPEN FILE REPORT 0613
Blockedhttp://www.ogb.state.al.us/gsa/coastal/OFR/OFR%200613%20Beach%2005-9092.pdf

The Alabama Department of Conservation and Natural Resources State Lands Division
..Studies by Douglass, Sanchez, and Jenkins (1999) and Douglass (2001) showed that the beaches on this reach have been receding since 1970

[Dauphin Island].....Beach loss was attributed to the removal of sand from the littoral system by disposing of dredge spoil from the Mobile Ship Channel at sites from which the sand is transported from the littoral system.

2006 Another Sand study for Dauphin Island, but Dauphin Island did not get the sand.
ALABAMA State Geologists report ISSN 0039-0089.

“The State Geologist serves as the Governor’s representative to the Minerals Management Service OCS Policy Committee, ...the Coastal Area Erosion Task Force, ...Environment and Natural Resources Committee.”

“...Due to the importance of tourism along Alabama’s beaches to the state’s economy, it is vital to maintain the gulf-fronting beaches along Dauphin Island and Baldwin County.”

“...The Sand Resources project is a cooperative study between the Minerals Management Service and the GSA. The main purpose of this study is the identification of sand resources on the Gulf of Mexico’s inner continental shelf suitable for beach nourishment programs. Secondary information includes coastal erosion”

Robert Morton’s other studies contradict the fact in Byrnes 2008 study

2003 An Overview of Coastal Land Loss: With Emphasis on the Southeastern United States
by Robert A. Morton

USGS Open File Report 03-337

Summary: In states bordering the Gulf of Mexico and the Atlantic Ocean, vast areas of coastal land have been destroyed since the mid 1800s as a result of natural processes and human activities. ..whereas the most important human activities are sediment excavation, river modification, and coastal construction. As a result of these agents and activities, coastal land loss is manifested most commonly as beach/bluff erosion and coastal submergence.

“..coastal recession is the result of insufficient sediment supply compared to sediment removal.”

“..Humans have also contributed significantly to the deficit in sediment supply ... dredging tidal inlets.”

“These natural and artificial reductions in coastal sediment supply have resulted in the erosion of many beaches, barrier islands, and deltas.”

“Role of Human Activities: Transportation”

“Shipping has always played a vital role in our nation’s economy and it was for that reason that shallow coastal waters were deepened in the 1800s to create or enlarge major ports”

“... Abnormally high rates of land loss occur along ship channels”

“.....contribute to coastal land loss by regulating river discharge and sediment load delivered to downstream deltas and beaches.

“Deep-draft navigation channels are often constructed from artificial inlets or converted from tidal inlets and rivers. ... they always create large sediment sinks that remove some beach-quality sand from the littoral system. ...In turn these modifications can initiate or accelerate land loss by locally enhancing erosive forces, increasing water levels, and decreasing sediment supply.”

2004 National Assessment of Shoreline Change: Part 1, Historical Shoreline Changes and Associated Coastal Land Loss along the U.S. Gulf of Mexico
U.S. Geological Survey Robert A. Morton, Tara L. Miller, and Laura J. Moore

"We owe a debt of gratitude to Scott Douglass (Alabama)".

The USGS National Assessment of Shoreline Change represents the first time that shorelines from original data sources have been compiled and rates of shoreline change have been calculated on a national scale using internally consistent methods.

Natural reductions in sand supply during the past few thousand years were further aggravated by recent human activities such as damming rivers, dredging channels, and constructing jetties.

...Before the littoral drift system was altered, sand was naturally bypassed around tidal inlets and shared between neighboring coastal segments.

Now there are many coastal compartments deep navigation channels like those maintained at the entrance to

Tampa, Mobile, Galveston, and Corpus Christi Bays.

This human interference with littoral drift has caused some formerly accreting or stable shores to begin eroding (Morton, 1979).

2008 Historical Changes in the Mississippi-Alabama Barrier-Island Chain and the Roles of Extreme Storms, Sea Level, and Human Activities by Robert A. Morton 2008
U.S. Geological Survey Abstract

Historical land-loss trends and engineering records show that progressive increases in land-loss rate correlate with nearly simultaneous deepening of channels dredged across the outer bars of the three tidal inlets maintained for deep-draft shipping.

This correlation indicates that channel-maintenance activities along the MS-AL barriers have impacted the sediment budget by disrupting the alongshore sediment transport system and progressively reducing sand supply. Direct management of this causal factor can be accomplished by strategically placing dredged sediment where adjacent barrier-island shores will receive it for island nourishment and rebuilding.

2011 Historical Bathymetry and Bathymetric Change in the Mississippi-Alabama Coastal Region, 1847–2009 by Noreen A. Buster and Robert A. Morton
U.S. Geological Survey

... "When a coastal system is altered by human activity such as dredging, as is the case of the MS-AL coastal region, the natural state and processes are altered, and alongshore sediment transport can be disrupted."
"As a result of deeply dredged channels, adjacent island migration is blocked, nearshore environments downdrift in the littoral system become sediment starved, and sedimentation around the channels is modified.

In fact, Col. DeLapp, by the Corps not acknowledging or accepting all other studies that conflict with the Byrnes 2008, 2010 studies, shows that the Corps already has a well-established pattern of suppression and distortion in past scientific studies as far as Dauphin Island is concerned. This put the Corps into an alarming and disturbing position of collecting the corrupted data in the past Byrnes 2008, 2010 studies, and the Corps incorporating the data and interpreting the facts in the new studies. This gives the Corps the ability to deceive the public by arranging data in the studies that only justifies the Corps' point of view, and a way to hold the Corps blameless for the erosion on the Island.

The Corps' historic actions indicate the Mobile District has consistently demonstrated a sustained "conflict of interest" regarding the erosion of Dauphin Island. This brings into question, how the Corps can be trusted to manage the SEIS/GRR studies about Dauphin Island with objectivity?

If I do not receive an answer from you within the next 14 days, I will know that your statements to me in your May letters were LIES just to appease me, until you finish SEIS/GRR Mobile Harbor study, and it is too late to change it.

Sincerely,



Comment #525

From: [REDACTED]
To: [Flakes, Curtis M CIV \(US\)](#); [Newell, David P CIV CESAM CESAD \(US\)](#); [Paine, Joseph W CIV USARMY CESAM \(US\)](#); [McDonald, Justin S CIV USARMY CESAM \(US\)](#); [Boatman, Todd H CIV USARMY CESAM \(US\)](#); [Creswell, Michael W CIV \(US\)](#); [Jacobson, Jennifer L CIV USARMY CESAM \(US\)](#); [Kleinschrodt, Ashley N CIV USARMY CESAM \(US\)](#); [Dyess, Carl E CIV USARMY CESAM \(US\)](#)
Cc: [DeLapp, James Andrew \(Jim\) COL USARMY CESAM \(US\)](#); [REDACTED]
Subject: [Non-DoD Source] Corps" Duty to speak and not to remain silent
Date: Thursday, February 8, 2018 3:33:44 AM

Dear Mr. Flakes and other Corps' employees:

Since you and the eight other Mobile District employees, who attended the Corps' Dec. 12, 2017 meeting were considered to have special expertise for the Mobile Harbor Channels, the maintenance dredging and its effects on Dauphin Island. As such, each of you have a duty to speak and not to remain silent and to disclose to the public and property owners on the Island, all information of the past erosion impacts caused by Mobile Harbor and Channels and all future erosion impacts to Dauphin Island from the massive expansion to the Mobile Harbor Entrance Channel/Outer Bar Channel for the SEIS/GRR/Mobile Harbor study.

As employees of the US Corps of Engineers, who have taken an oath to the Constitution and to follow the Federal Laws and by each of you having special expertise, I am asking you to disclose all information and not conceal, omit or state any half-truth to me about the erosion to Dauphin Island, concerning:

- * All information that the Corps has failed to inform Congress and the public about the erosion on the Island including the 1980 EIS/Mobile Harbor Survey Report failed to comply with the 1935 Rivers and Harbors Act by not studying the erosion impacts to Dauphin Island and the Mobile Entrance Channel for 10 miles on each side?
- * An accurate accounting of the sand in SIBUA and exactly where the sand leaving that site goes?
- * The massive expansion to the Mobile Harbor Entrance Channel/Outer Bar Channel for the SEIS/GRR/Mobile Harbor study and the future effects to Dauphin Island's shoreline.
- * The Corps' Mobile Harbor project contributing to the degradation of the environment and erosion to the shoreline of Dauphin Island.
- * All past and future environmental and erosional impacts on Dauphin Island's shoreline from the dredging of the Mobile Harbor Entrance Channel project, including any significant adverse impacts on fish, turtles and wildlife resources on the Island.
- * All information about the Corps dredging the Mobile Harbor Entrance Channel/Outer Bar Channel as the cause to the erosion to the shoreline of Dauphin Island, which has been stated in the Corps' own documentation, other agencies documentation and other coastal engineers studies that was not included in the Corps' 2008 study and the updated 2010 study.
- * All information about the US Geological Survey's Robert Morton's 2007 and 2008 studies for the Corps' MsCIP study, which state "Historical land-loss trends and engineering records show that progressive increases in land-loss rate correlate with nearly simultaneous deepening of channels dredged across the outer bars" and correlated the land-loss on the Island between 1958 to 2006 and concluded that the Corps maintenance dredging was causing the erosion on Dauphin Island.
- * All Corps' and Port Authority responsibilities to mitigate the erosion to the Island caused by the dredging of the Federally Authorized Mobile Harbor Deep-draft Entrance Channel.
- * All Federal Laws and Corps' manuals for the Corps to mitigate the erosion impacts to the Island,

resulting from Federal Navigation operation and maintenance activities, subject to Federal control and responsibility, on a adjacent shoreline and the interruption of sediment transport to the shoreline.

* The Corps ensuring that the future deepening and widening of the Mobile Harbor Entrance Channel does not block the littoral drift, and cause severe downdrift erosion? The Corps mitigating the erosion to the Island by the Corps placing the sand directly on the shoreline and in the future in a nearshore berm in shallow water in front of the whole Island every time the Corps dredges, as the Corps does in other parts of the Country?

I am asking each of you speak and not to stay silent and to provide your expertise for questions I have not asked, because of my lack of knowledge of the Corps' process or the terms the Corps uses for Federal Project.

Just because a questions was not asked, it does not alleviate the Corps from providing all other truthful information about the Corps' dredging of the Entrance Channel and its past and future erosion effects on Dauphin Island.

Sincerely,

A solid black rectangular redaction box covering the signature area.

Comment #526

From: [REDACTED]
To: [Mobile Harbor GRR](#)
Subject: [Non-DoD Source] FW: Dauphin Island Erosion
Date: Thursday, March 29, 2018 9:00:38 PM

US Army Corps of Engineers:

I am writing to you out of my concern for the ongoing problem with erosion to Dauphin Island. My wife and I have owned properties on Dauphin Island for the past 26 years. Over this period of time, we have grown increasingly concerned as we observed the erosion of the island. We have watched as the shoreline increasingly encroached on beachfront properties leaving some home sites in the water and others perilously close to the shoreline. As a homeowner, this is alarming and disconcerting.

Not only are the properties on Dauphin Island in danger of disappearing, but the coastal communities located in this area of the state are in danger as well. Dauphin Island is the only barrier island for the state of Alabama that provides protection for these communities and their inhabitants. It is imperative that the Corps of Engineers give consideration to the residents presently affected by the erosion problem as well as those in danger if the erosion problem is not remedied.

The Corps admitted during the February 22, 2018 public meeting, 50% of the Outer Bar Channel dredged sands placed in the so-called Sand Island Beneficial Use Area (SIBUA) are accumulating and not being reincorporated into the natural littoral drift system. Since 1999, when the SIBUA began to be used, this has robbed Dauphin Island of at least 7 million cubic yards of beach quality sands, causing significant erosion of the island. This impact will be made worse each time the Outer Bar Channel is dredged in the future. The Corps should cease referring to the SIBUA as a "beneficial use" disposal site because neither Sand nor Dauphin Island benefit from its use. More importantly, the Corps must identify an alternative disposal site to place dredged sands in shallow water less than 20 feet deep to assure dredged beach quality sands are effectively bypassed across the Outer Bar Channel to be reincorporated into the natural littoral drift system. The Corps can accomplish this under the authority provided by Section 302 of the Water Resources Development Act of 1996, with the Mobile Harbor Federal Standard being adjusted accordingly as already directed by Corps higher authority in its May 30, 1997 directive to the Mobile District Federal district.

Federal law, the Council on Environmental Quality's National Environmental Policy Act regulations, and the Corps' own agency policy and regulations require significant adverse project impacts be MITIGATED. Based on the Corps' admission that use of the so-called SIBUA is actually contributing to the erosion of Dauphin Island, the Corps must include in the June Mobile Harbor Draft Report an appropriate MITIGATION PLAN to compensate for at least 7 million cubic yards of beach quality sands that have been removed from the near shore littoral drift system

since 1999, creating an indirect adverse project impact that has significantly contributed to the erosion of both Sand and Dauphin Islands. Further, the Corps' recent admission also gives strong credence to the Corps' 1978 report that first concluded maintenance of the Outer Bar Channel contributed to Dauphin Island's erosion. The Corps has consistently refused to address in the ongoing Mobile Harbor Study the erosion effects resulting from the cumulative removal of around 30 million cubic yards of sand from the littoral drift system since 1980 associated with the maintenance of the Outer Bar Channel. In view of its February 22 admission, the Corps has no credible reason to continue advocating its present position and should begin immediately to investigate MITIGATION REMEDIES in the ongoing Mobile Harbor Study to appropriately respond to this now acknowledged significant "changed condition and adverse project impact" in the Study Area. The existing Mobile Harbor Study provides the Corps with sufficient authority to move forward in MITIGATING the significant adverse erosion impact created by the Mobile Harbor project that the Corps has long refused to acknowledge was occurring.

Sincerely,

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████████████████
████████████████████

Comment #527

From: [REDACTED]
To: [Flakes, Curtis M CIV \(US\)](#); [Mobile Harbor GRR](#); [Newell, David P CIV CESAM CESAD \(US\)](#)
Cc: [DeLapp, James Andrew \(Jim\) COL USARMY CESAM \(US\)](#); [c.david.turner@usace.army.mil](#); [CEIG](#); [Bush, Eric L CIV USARMY CESAD \(US\)](#); [McDonald, Justin S CIV USARMY CESAM \(US\)](#); [lisa.hunter@usace.army.mil](#); [Taylor, Peter F Jr CIV USARMY CESAM \(US\)](#); [d.r.sessions@att.net](#); [bill.hightower@alsenate.gov](#); [Paine, Joseph W CIV USARMY CESAM \(US\)](#); [Boatman, Todd H CIV USARMY CESAM \(US\)](#); [Creswell, Michael W CIV \(US\)](#); [Jacobson, Jennifer L CIV USARMY CESAM \(US\)](#); [Kleinschrodt, Ashley N CIV USARMY CESAM \(US\)](#); [Dyess, Carl E CIV USARMY CESAM \(US\)](#); [eliska.morgan@dcnr.alabama.gov](#); [patti.powell@dcnr.alabama.gov](#); [dcnr.commissioner@dcnr.alabama.gov](#)
Subject: [Non-DoD Source] A Concerned Dauphin Island Citizen re Corps of Engineer Dredging of Mobile Bay and Mobile Pass Channel
Date: Thursday, March 15, 2018 8:58:30 PM

To Whom It May Concern:

My name is [REDACTED] and I am a Dauphin Island property owner of beachfront property which has been in my family for well over 50 years. The reason that I am writing to you is to express my grave concern with what I sincerely believe is the harmful effect that the dredging of Mobile Bay and the Mobile Pass Channel is having on the topography of Dauphin Island – especially shoreline erosion. I have personally witnessed considerable loss of beach area and beautiful, protective sand dunes over these years and am now witnessing what I believe to be an accelerating pace of shoreline erosion. And if interested, I have pictures of the island dating from the 60's to current time which prove such.

A few months ago, upon learning of the Corps of Engineers Public Meeting which was held on February 22 at the Mobile Convention Center, I began preparing myself by reading/researching the considerable amount of available information on possible environmental effects of the Corps' dredging activities – e.g., previous and current on-going Corps-funded studies, academic papers, governmental directives, letters, lawsuits, etc. One document which I found most interesting, and which I did a deep-dive study of, was Channel Dredging and Geomorphic Response at and Adjacent to Mobile Pass, Alabama by Dr. Mark R. Byrnes, et al, dated September 2010. As you know, Dr. Byrnes concluded in that study:

Overall, net sediment transport from east-to-west between 1917/20 and 1986/2002 has been supplying sand quantities necessary to produce net deposition on the islands and shoals of the ebb-tidal delta, infill and nourish storm breaches and wash over surge channels on Dauphin Island, and promote growth of western end of the island, even though channel dredging has been active. Based on all available information, there appears to be no measurable negative impacts to ebb-tidal shoals or Dauphin Island beaches associated with historical channel dredging across the Mobile Pass Outer Bar.

According to dredging records, disposal procedures in recent years have been to place as much of the sand dredged from the outer bar channel as possible in the SIBUA (beneficial sand disposal area. Because there is no guarantee that sand bypassing and transport from the historical offshore disposal site will continue at rates shown in the sediment budget, it is recommended that procedures followed in recent years for disposal of bar channel sand in the SIBUA be continued for the life of the project.

After having over 50-years of first-hand experience in witnessing shoreline erosion of the Island, I found Dr. Byrne's conclusion both misleading and unfounded.

For example, the first underscored statement above states that there's sufficient sand being transported to produce a NET deposition on the Island. While that may be a true statement, it's very misleading. Let me explain. While the Island shoreline has unquestionably eroded over these years, the far west end of the Island has grown thus perhaps creating a NET deposition. Honestly, I'm not concerned with the uninhabited far west end of the Island. What I AM concerned with is the developed shoreline of the Island for which there has been a significant net erosion – not a net deposition!

Another example is the second underscored statement above which recommends that the Corps continue disposal of dredged sand in the current SIBUA area. I find this recommendation to be based on a speculative assumption that the current SIBUA disposal area is beneficial to Island restoration and a key contributor to the 'overall net deposition' claim made above. I couldn't find any hard evidence in Dr. Byrnes report that could substantiate this recommendation.

Being troubled by the conclusions of this report (as was Robert G. Dean's report, also funded by the Corps, wherein he was asked for his opinion on the draft version [2008] of Dr. Byrne's 2010 report, who was likewise troubled, i.e., "my Draft Report review and the review herein have raised valid questions regarding some of the arbitrary methodology applied and findings to the degree that I regard the findings inconclusive with regard to any impact of dredging and channel maintenance of Mobile Bay Entrance. Thus, I respectfully dissent from concurring "that the

Corps' construction, operation and Maintenance Dredging Practices of and at the Channel have not resulted in at least Minimum Measurable Erosion of Dauphin Island's shoreline.)", I reached out to Dr. Byrnes on multiple occasions prior to the February 22 meeting to solicit further information as to how his conclusions were reached. Dr. Byrnes was extremely helpful and cooperative, and we had great discussions surrounding the analyses, assumptions, theories, hypotheses, etc, of his study but in my last discussion with Dr. Byrnes (February 22), Dr. Byrnes stated that it would be more beneficial to Dauphin Island shoreline restoration efforts to place dredged sediment from the bar channel, currently deposited at the disposal site, closer to the island for more direct incorporation into the littoral transport system. Although dredged sediment placed in the Sand Island Beneficial Use Area is expected to be transported toward and onto Dauphin Island, Dr. Byrnes indicated that it may take decades for sufficient quantities of recently dredged sand to make its way to the island from the current disposal area. Dr. Byrnes view above, and my opinion based of the past 50 plus years of observations, seem to have been substantiated by the Corps itself in its revelation at the February 22 meeting that sands disposed at the SIBUA have been found to be accumulating at a rate greater than they are dispersing into the drift system which means that the current disposal location is essentially robbing Dauphin Island of the necessary sand to prevent and/or restore shoreline erosion. In fact, as Dr. Byrnes implies above, the current disposal area is so far South of the Island, and in such deep water, that a limited amount of the disposed sand is making its way to Dauphin Island – and what IS making its way to the Island is mostly to the far west end and not to the middle (i.e., developed) part of the Island where it could contribute to shoreline restoration!

Lastly, it's my understanding that the Water Resources Development Act of 1996 (P.L. 104-303), Section 302, specifically gives authorization to the Mobile District Corps to change disposal of the dredged sand for environmentally acceptable alternatives for beneficial uses of dredged material and environmental restoration." Given this authorization, and in light of previous studies – e.g., the Corps-funded Feasibility Report for Beach Erosion Control and Hurricane Protection dated September 1978 in which it was concluded that if the dredged sand "could be placed directly onshore, or placed [nearshore littoral zone] so it could reenter the littoral drift system where waves and currents would distribute it and thereby contribute to stabilization of the littoral drive system, EROSION COULD BE REDUCED! The report also stated that "Implementation ... is within the existing authority granted by the Congress to the Chief of Engineers for operation and maintenance of the existing Federal navigation project for Mobile Harbor."

In summary, my questions are as follows:

1. Does the Corps acknowledge that it has the authority to take action NOW (please, no more studies) to change the dredged sand disposition approach, including location, and
2. Will the Corps commit to giving serious consideration to the conclusion which Dr. Byrnes himself reached in my discussion with him on February 22 AND to the previous recommendations of Corps-funded studies- to dispose of the dredged sand:
 - a. Directly on-shore at Dauphin Island, and/or
 - b. At a disposal site closer to Dauphin Island, and in shallower water, than the current disposal site?

I am NOT opposed to Mobile Bay and Mobile Pass Channel dredging and understand that it's necessary for the Port of Mobile's competitiveness and future economic viability – BUT ONLY IF DONE IN A MANNER WHICH NOT ONLY PREVENTS FURTHER DAUPHIN ISLAND SHORELINE EROSION BUT ALSO CONTRIBUTES TO SHORELINE RESTORATION. The current dredged sand disposition approach may be beneficial to the Port of Mobile but must be changed if the protection and economic viability of another very important AL/Mobile County asset, Dauphin Island, is of concern to the Corps, the State of Alabama and the County of Mobile!

Sincerely,

██████████

Comment #528

From: [REDACTED]
To: [Flakes, Curtis M CIV \(US\)](#); [Newell, David P CIV CESAM CESAD \(US\)](#); [Paine, Joseph W CIV USARMY CESAM \(US\)](#); justin.s.mcdonald@usace.army.m
Subject: [EXTERNAL] Please read!
Date: Tuesday, January 23, 2018 6:39:15 PM

Dear Mr. Flakes and other Corps' employees:

Since you and the eight other Mobile District employees, who attended the Corps' Dec. 12, 2017 meeting were considered to have special expertise for the Mobile Harbor Channels, the maintenance dredging and its effects on Dauphin Island. As such, each of you have a duty to speak and not to remain silent and to disclose to the public and property owners on the Island, all information of the past erosion impacts caused by Mobile Harbor and Channels and all future erosion impacts to Dauphin Island from the massive expansion to the Mobile Harbor Entrance Channel/Outer Bar Channel for the SEIS/GRR/Mobile Harbor study.

As employees of the US Corps of Engineers, who have taken an oath to the Constitution and to follow the Federal Laws and by each of you having special expertise, I am asking you to disclose all information and not conceal, omit or state any half-truth to me about the erosion to Dauphin Island, concerning:

- All information that the Corps has failed to inform Congress and the public about the erosion on the Island including the 1980 EIS/Mobile Harbor Survey Report failed to comply with the 1935 Rivers and Harbors Act by not studying the erosion impacts to Dauphin Island and the Mobile Entrance Channel for 10 miles on each side?
- An accurate accounting of the sand in SIBUA and exactly where the sand leaving that site goes?
- The massive expansion to the Mobile Harbor Entrance Channel/Outer Bar Channel for the SEIS/GRR/Mobile Harbor study and the future effects to Dauphin Island's shoreline.
- The Corps' Mobile Harbor project contributing to the degradation of the environment and erosion to the shoreline of Dauphin Island.
- All past and future environmental and erosional impacts on Dauphin Island's shoreline from the dredging of the Mobile Harbor Entrance Channel project, including any significant adverse impacts on fish, turtles and wildlife resources on the Island.
- All information about the Corps dredging the Mobile Harbor Entrance Channel/Outer Bar Channel as the cause to the erosion to the shoreline of Dauphin Island, which has been stated in the Corps' own documentation, other agencies documentation and other coastal engineers studies that was not included in the Corps' 2008 study and the updated 2010 study.
- All information about the US Geological Survey's Robert Morton's 2007 and 2008 studies for the Corps' MsCIP study, which state "Historical land-loss trends and engineering records show that progressive increases in land-loss rate correlate with nearly simultaneous deepening of channels dredged across the outer bars" and correlated the land-loss on the Island between 1958 to 2006 and concluded that the Corps maintenance dredging was causing the erosion on Dauphin Island.
- All Corps' and Port Authority responsibilities to mitigate the erosion to the Island caused by the dredging of the Federally Authorized Mobile Harbor Deep-draft Entrance Channel.
- All Federal Laws and Corps' manuals for the Corps to mitigate the erosion impacts to the Island, resulting from Federal Navigation operation and maintenance activities, subject to Federal control and responsibility, on a adjacent shoreline and the interruption of sediment transport to the shoreline.
- The Corps ensuring that the future deepening and widening of the Mobile Harbor Entrance Channel does not block the littoral drift, and cause severe downdrift erosion? The Corps mitigating the erosion to the Island by the Corps placing the sand directly on the shoreline and in the future in a nearshore berm in shallow water in front of the whole Island every time the Corps dredges, as the Corps does in other parts of the Country?

I am asking each of you speak and not to stay silent and to provide your expertise for questions I have not asked, because of my lack of knowledge of the Corps' process or the terms the Corps uses for Federal Project.

Just because a questions was not asked, it does not alleviate the Corps from providing all other truthful information about the Corps' dredging of the Entrance Channel and its past and future erosion effects on Dauphin Island.

Sincerely,

A large black rectangular redaction box covering the signature area.

Comment #529

From: [REDACTED]
To: [Mobile Harbor GRR](#)
Subject: [Non-DoD Source]
Date: Wednesday, March 28, 2018 4:22:14 PM

The Corps admitted during the February 22, 2018 public meeting, 50% of the Outer Bar Channel dredged sands placed in the so-called Sand Island Beneficial Use Area (SIBUA) are accumulating and not being reincorporated into the natural littoral drift system. Since 1999, when the SIBUA began to be used, this has robbed Dauphin Island of at least 7 million cubic yards of beach quality sands, causing significant erosion of the island. This impact will be made worse each time the Outer Bar Channel is dredged in the future. The Corps should cease referring to the SIBUA as a “beneficial use” disposal site because neither Sand nor Dauphin Island benefit from its use. More importantly, the Corps must identify an alternative disposal site to place dredged sands in shallow water less than 20 feet deep to assure dredged beach quality sands are effectively bypassed across the Outer Bar Channel to be reincorporated into the natural littoral drift system. The Corps can accomplish this under the authority provided by Section 302 of the Water Resources Development Act of 1996, with the Mobile Harbor Federal Standard being adjusted accordingly as already directed by Corps higher authority in its May 30, 1997 directive to the Mobile District.

Federal law, the Council on Environmental Quality's National Environmental Policy Act regulations, and the Corps' own agency policy and regulations require significant adverse project impacts be MITIGATED. Based on the Corps' admission that use of the so-called SIBUA is actually contributing to the erosion of Dauphin Island, the Corps must include in the June Mobile Harbor Draft Report an appropriate MITIGATION PLAN to compensate for at least 7 million cubic yards of beach quality sands that have been removed from the nearshore littoral drift system since 1999, creating an indirect adverse project impact that has significantly contributed to the erosion of both Sand and Dauphin Islands. Further, the Corps' recent admission also gives strong credence to the Corps' 1978 report that first concluded maintenance of the Outer Bar Channel contributed to Dauphin Island's erosion. The Corps has consistently refused to address in the ongoing Mobile Harbor Study the erosion effects resulting from the cumulative removal of around 30 million cubic yards of sand from the littoral drift system since 1980 associated with the maintenance of the Outer Bar Channel. In view of its February 22 admission, the Corps has no credible reason to continue advocating its present position and should begin immediately to investigate MITIGATION REMEDIES in the ongoing Mobile Harbor Study to appropriately respond to this now acknowledged significant “changed condition and adverse project impact” in the Study Area. The existing Mobile Harbor Study provides the Corps with sufficient authority to move forward in MITIGATING the significant adverse erosion impact created by the Mobile Harbor project that the Corps has long refused to acknowledge was occurring.

We really need to get this resolved as the west end of Dauphin Island is suffering severe erosion. It should be a simple matter to find a dumping place for the sand that would feed that end of the island and satisfy all concerned. I personally have three ocean front lots that are unsaleable right now because of beach erosion. We would really appreciate all efforts to resolve this situation as it doesn't seem like a significantly difficult solution.

Best regards,

[Redacted]

[Redacted]

Comment #530

From: [REDACTED]
To: [Mobile Harbor GRR](#)
Subject: [Non-DoD Source] Re: Dauphin Island
Date: Thursday, March 1, 2018 1:54:36 PM

We have owned property on Dauphin Island for 30 years and currently have 3 oceanfront lots in addition to other property. The erosion on Dauphin Island has gone on for a lot of years; and roughly a third of our oceanfront lots have eroded away. The Corp has done very little in the past to help this situation, but it has not only critical to Dauphin Island but Mobile and the bay protected by this island. We really need a sand disposal site close to Dauphin Island that would feed sand to the island that has been dropping into the channel and causing erosion on our island. In future consideration of items that should be addressed please consider the following:

The Corps admitted during the February 22, 2018 public meeting, 50% of the Outer Bar Channel dredged sands placed in the so-called Sand Island Beneficial Use Area (SIBUA) are accumulating and not being reincorporated into the natural littoral drift system. Since 1999, when the SIBUA began to be used, this has robbed Dauphin Island of at least 7 million cubic yards of beach quality sands, causing significant erosion of the island. This impact will be made worse each time the Outer Bar Channel is dredged in the future. The Corps should cease referring to the SIBUA as a “beneficial use” disposal site because neither Sand nor Dauphin Island benefit from its use. More importantly, the Corps must identify an alternative disposal site to place dredged sands in shallow water less than 20 feet deep to assure the sands are effectively bypassed across the Outer Bar Channel to be reincorporated into the natural littoral drift system. The Corps can accomplish this under the authority provided by Section 302 of the Water Resources Development Act of 1996, with the Mobile Harbor Federal Standard being adjusted accordingly as already directed by Corps higher authority in its May 30, 1997 directive to the Mobile District.

* Corps regulations require significant adverse project impacts be mitigated. Based on the Corps’ admission that the so-called SIBUA is failing to meet its intended purpose which is contributing to the erosion of Dauphin Island, the Corps must include in the Mobile Harbor GRR an appropriate mitigation plan to compensate for at least 7 million cubic yards of beach quality sands that, since 1999, have been removed from the littoral drift system, representing an indirect project impact that has significantly contributed to the erosion of both Sand and Dauphin Islands. Further, the Corps’ admission also gives credence to the 1978 Corps report that first concluded maintenance of the Outer Bar Channel contributed to Dauphin Island’s erosion. The Corps has consistently refused to address in the GRR Study the effects of the cumulative removal of around 30 million cubic yards of sand from the littoral drift system that has occurred since 1980 due to maintenance of the Outer Bar Channel. In view of its February 22 admission, the Corps has no credible reason to continue advocating its present position and should begin immediately to investigate appropriate mitigation remedies that should be addressed in the Draft GRR to respond to this now acknowledged significant “changed condition” in the Study Area.

* The Corps is using a computer model in the GRR Study to evaluate the effects of Outer Bar Channel maintenance on sediment transport and water depths on the Mobile Pass ebb-tidal delta shoal. However, to date, the Corps has not extended the modeling efforts to consider the historic erosion of Dauphin Island’s Gulf shoreline. The Corps’ refusal to apply modelling to an evaluation of the historic shoreline erosion issue represents an incomplete investigation of the effects of the project-altered sand transport processes. If the Corps cannot demonstrate the model replicates the island’s observed historic shoreline and topographic erosion losses that have occurred since at least 1999, and preferably back to 1980, along with water depths over the ebb-tidal delta shoal, then the value and believability of the model and its results are called into serious question.

* At the February 22 public meeting, the Corps gave minimal coverage to where and how the increased quantity of dredged material from an enlarged channel will be disposed in Mobile Bay. There are serious environmental impact concerns associated with the return to thin-layer disposal that will directly affect thousands of acres of bay

bottoms ever year, as well as possibility of indirectly affecting other areas if near-bottom plumes of sediment are moved by prevailing currents and wind-induced wave action. Further, the planned construction of a 1200-acre disposal island in the upper bay near large areas of productive grassbeds that are heavily used for commercial and recreational fishing is also a major concern. Section 302 of the Water Resources Development Act of 1996 allows the Corps to return to in-bay disposal only after it can demonstrate such disposal alternatives provide provable beneficial uses, including environmental restoration. So far, the Corps has not made a credible case of the benefits of a return to in-bay disposal.

* The Corps reported modeling of salinity and dissolved oxygen levels projected to occur with an enlarged channel would have no effects on oysters in Mobile Bay. However, existing information indicates oyster production in coastal Alabama has been on the decline for years. Commercial fishermen attending the meeting attribute increased siltation of oyster reefs to be the cause. These fishermen blame the siltation on the open water discharge of dredged material in the bay. The Corps' limited theoretical modeling performed to date of selected water quality variables does not appear to provide a complete picture of the environmental issues being faced by Mobile Bay's oyster reefs. The Corps needs to do more analysis of this important resource to support its claim that an enlarged channel will have "no effect" on oysters, which could represent the "canary in Mobile Bay" to gage the impacts of increased dredged material disposal in the

Thank you,

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Comment #531

From: [REDACTED]
To: [Flakes, Curtis M CIV \(US\)](#); [Newell, David P CIV CESAM CESAD \(US\)](#); [Paine, Joseph W CIV USARMY CESAM \(US\)](#); [McDonald, Justin S CIV USARMY CESAM \(US\)](#); [Boatman, Todd H CIV USARMY CESAM \(US\)](#); [Creswell, Michael W CIV \(US\)](#); [Jacobson, Jennifer L CIV USARMY CESAM \(US\)](#); [Kleinschrodt, Ashley N CIV USARMY CESAM \(US\)](#); [Dyess, Carl E CIV USARMY CESAM \(US\)](#)
Subject: [Non-DoD Source] Re: Dauphin Island report
Date: Thursday, February 1, 2018 2:53:53 PM

Dear Mr. Flakes and other Corps' employees:

I have had property on Dauphin Island for over 25 years, three of my lots are on the beach on the west end and are continuously eroding because of the sand flow that has been cut off. In fact, after the last major hurricane there my lots were 3/4 under water. We definitely need the dredged sand from the canal to be placed in a location which will feed the beaches of the west end. Please help us maintain this barrier island as it is important to Mobile and Mobile Bay as well. Thanks for any consideration you can offer.

Since you and the eight other Mobile District employees, who attended the Corps' Dec. 12, 2017 meeting were considered to have special expertise for the Mobile Harbor Channels, the maintenance dredging and its effects on Dauphin Island. As such, each of you have a duty to speak and not to remain silent and to disclose to the public and property owners on the Island, all information of the past erosion impacts caused by Mobile Harbor and Channels and all future erosion impacts to Dauphin Island from the massive expansion to the Mobile Harbor Entrance Channel/Outer Bar Channel for the SEIS/GRR/Mobile Harbor study.

As employees of the US Corps of Engineers, who have taken an oath to the Constitution and to follow the Federal Laws and by each of you having special expertise, I am asking you to disclose all information and not conceal, omit or state any half-truth to me about the erosion to Dauphin Island, concerning:

- * All information that the Corps has failed to inform Congress and the public about the erosion on the Island including the 1980 EIS/Mobile Harbor Survey Report failed to comply with the 1935 Rivers and Harbors Act by not studying the erosion impacts to Dauphin Island and the Mobile Entrance Channel for 10 miles on each side?
- * An accurate accounting of the sand in SIBUA and exactly where the sand leaving that site goes?
- * The massive expansion to the Mobile Harbor Entrance Channel/Outer Bar Channel for the SEIS/GRR/Mobile Harbor study and the future effects to Dauphin Island's shoreline.
- * The Corps' Mobile Harbor project contributing to the degradation of the environment and erosion to the shoreline of Dauphin Island.
- * All past and future environmental and erosional impacts on Dauphin Island's shoreline from the dredging of the Mobile Harbor Entrance Channel project, including any significant adverse impacts on fish, turtles and wildlife resources on the Island.
- * All information about the Corps dredging the Mobile Harbor Entrance Channel/Outer Bar Channel as the cause to the erosion to the shoreline of Dauphin Island, which has been stated in the Corps' own documentation, other agencies documentation and other coastal engineers studies that was not included in the Corps' 2008 study and the updated 2010 study.
- * All information about the US Geological Survey's Robert Morton's 2007 and 2008 studies for the Corps' MsCIP study, which state "Historical land-loss trends and engineering records show that progressive increases in land-loss rate correlate with nearly simultaneous deepening of channels dredged across the outer bars" and

correlated the land-loss on the Island between 1958 to 2006 and concluded that the Corps maintenance dredging was causing the erosion on Dauphin Island.

* All Corps' and Port Authority responsibilities to mitigate the erosion to the Island caused by the dredging of the Federally Authorized Mobile Harbor Deep-draft Entrance Channel.

* All Federal Laws and Corps' manuals for the Corps to mitigate the erosion impacts to the Island, resulting from Federal Navigation operation and maintenance activities, subject to Federal control and responsibility, on a adjacent shoreline and the interruption of sediment transport to the shoreline.

* The Corps ensuring that the future deepening and widening of the Mobile Harbor Entrance Channel does not block the littoral drift, and cause severe downdrift erosion? The Corps mitigating the erosion to the Island by the Corps placing the sand directly on the shoreline and in the future in a nearshore berm in shallow water in front of the whole Island every time the Corps dredges, as the Corps does in other parts of the Country?

I am asking each of you speak and not to stay silent and to provide your expertise for questions I have not asked, because of my lack of knowledge of the Corps' process or the terms the Corps uses for Federal Project.

Just because a questions was not asked, it does not alleviate the Corps from providing all other truthful information about the Corps' dredging of the Entrance Channel and its past and future erosion effects on Dauphin Island.

Sincerely,

[REDACTED]

[REDACTED]

Comment #532

From: [REDACTED]
To: [Mobile Harbor GRR](#)
Subject: [Non-DoD Source] Mobile Harbor Ship Channel Project & Dauphin Island Protection
Date: Tuesday, March 20, 2018 12:20:57 PM

Please consider these comments as part of your study of deepening and widening the ship channel and determining mitigations.

I have visited Dauphin Island over many years, and have a deep love for the beaches, natural birding areas, and culture of this special place. It pains me to have watched the degradation of the island over the years as beaches are not replenished and the island loses resilience to withstand storms.

I hope that you are troubled as I to recognize that the Corps of Engineers' actions are significantly contributing to this. There is clear evidence, acknowledged by the Corps, that your Ship Channel dredging over many years is robbing Dauphin Island of significant volumes of sand necessary to maintain Alabama's only barrier island. By doing so you are putting properties at great risk of increased potential for damage during storms and due to rising sea levels, as well as damaging a valuable and unique Alabama tourism and recreational resource.

And, you have the opportunity to improve your mitigations as part of your ongoing maintenance of the ship channel to also ensure that Dauphin Island is replenished. It is urgent and right that you do so.

The Corps admitted during the February 22, 2018 public meeting, 50% of the Outer Bar Channel dredged sands placed in the so-called Sand Island Beneficial Use Area (SIBUA) are accumulating and not being reincorporated into the natural littoral drift system. Since 1999, when the SIBUA began to be used, this has robbed Dauphin Island of at least 7 million cubic yards of beach quality sands, causing significant erosion of the island. This impact will be made worse each time the Outer Bar Channel is dredged in the future.

The Corps should cease referring to the SIBUA as a "beneficial use" disposal site because neither Sand nor Dauphin Island benefit from its use. More importantly, the Corps must identify an alternative disposal site to place dredged sands in shallow water less than 20 feet deep to assure dredged beach quality sands are effectively bypassed across the Outer Bar Channel to be reincorporated into the natural littoral drift system. The Corps can accomplish this under the authority provided by Section 302 of the Water Resources Development Act of 1996, with the Mobile Harbor Federal Standard being adjusted accordingly as already directed by Corps higher authority in its May 30, 1997 directive to the Mobile District.

Federal law, the Council on Environmental Quality's National Environmental Policy Act regulations, and the Corps' own agency policy and regulations require significant adverse project impacts be MITIGATED. Based on the Corps' admission that use of the so-called SIBUA is actually contributing to the erosion of Dauphin Island, the Corps must also include in the June Mobile Harbor Draft Report an appropriate MITIGATION PLAN to compensate for at least 7 million cubic yards of beach quality sands that have been removed from the nearshore littoral drift system since 1999, creating an indirect adverse project impact that has significantly contributed to the erosion of both Sand and Dauphin Islands.

Further, the Corps' recent admission also gives strong credence to the Corps' 1978 report that first concluded maintenance of the Outer Bar Channel contributed to Dauphin Island's erosion. The Corps has consistently refused to address in the ongoing Mobile Harbor Study the erosion effects resulting from the cumulative removal of around 30 million cubic yards of sand from the littoral drift system since 1980 associated with the maintenance of the Outer Bar Channel. In view of its February 22 admission, the Corps has no credible reason to continue advocating its present position and should begin immediately to investigate MITIGATION REMEDIES in the ongoing Mobile Harbor Study to appropriately respond to this now acknowledged significant "changed condition and adverse project impact" in the Study Area.

The existing Mobile Harbor Study provides the Corps with sufficient authority to move forward in MITIGATING the significant adverse erosion impact created by the Mobile Harbor project that the Corps has long refused to acknowledge was occurring.

Sincerely,

A small black rectangular redaction box covering the first line of the signature.A large black rectangular redaction box covering the entire signature block, including the name and title.

Comment #533

From: [Audubon Place](#)
To: [Mobile Harbor GRR](#)
Subject: [Non-DoD Source] Dauphin Island Erosion
Date: Thursday, March 22, 2018 10:30:13 AM

To whom it may concern:

The Corps admitted during the February 22, 2018 public meeting, 50% of the Outer Bar Channel dredged sands placed in the so-called Sand Island Beneficial Use Area (SIBUA) are accumulating and not being reincorporated into the natural littoral drift system. Since 1999, when the SIBUA began to be used, this has robbed Dauphin Island of at least 7 million cubic yards of beach quality sands, causing significant erosion of the island. This impact will be made worse each time the Outer Bar Channel is dredged in the future. The Corps should cease referring to the SIBUA as a “beneficial use” disposal site because neither Sand nor Dauphin Island benefit from its use. More importantly, the Corps must identify an alternative disposal site to place dredged sands in shallow water less than 20 feet deep to assure dredged beach quality sands are effectively bypassed across the Outer Bar Channel to be reincorporated into the natural littoral drift system. The Corps can accomplish this under the authority provided by Section 302 of the Water Resources Development Act of 1996, with the Mobile Harbor Federal Standard being adjusted accordingly as already directed by Corps higher authority in its May 30, 1997 directive to the Mobile District.

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Audubon Place Property Owners Association

Comment #534

From: [REDACTED]
To: [Mobile Harbor GRR](#)
Subject: [Non-DoD Source] erosion on Dauphin Island caused by dredging
Date: Monday, February 26, 2018 4:39:30 PM

Dear Corps of Engineers:

I attended the meeting at the Mobile Convention Center concerning dredging of Mobile Bay and deepening of the channel. Please consider the following comments from this meeting:

The Corps admitted during the February 22, 2018 public meeting, 50% of the Outer Bar Channel dredged sands placed in the so-called Sand Island Beneficial Use Area (SIBUA) are accumulating and not being reincorporated into the natural littoral drift system. Since 1999, when the SIBUA began to be used, this has robbed Dauphin Island of at least 7 million cubic yards of beach quality sands, causing significant erosion of the island. This impact will be made worse each time the Outer Bar Channel is dredged in the future. The Corps should cease referring to the SIBUA as a "beneficial use" disposal site because neither Sand nor Dauphin Island benefit from its use. More importantly, the Corps must identify an alternative disposal site to place dredged sands in shallow water less than 20 feet deep to assure the sands are effectively bypassed across the Outer Bar Channel to be reincorporated into the natural littoral drift system. The Corps can accomplish this under the authority provided by Section 302 of the Water Resources Development Act of 1996, with the Mobile Harbor Federal Standard being adjusted accordingly as already directed by Corps higher authority in its May 30, 1997 directive to the Mobile District.

Corps regulations require significant adverse project impacts be mitigated. Based on the Corps' admission that the so-called SIBUA is failing to meet its intended purpose which is contributing to the erosion of Dauphin Island, the Corps must include in the Mobile Harbor GRR an appropriate mitigation plan to compensate for at least 7 million cubic yards of beach quality sands that, since 1999, have been removed from the littoral drift system, representing an indirect project impact that has significantly contributed to the erosion of both Sand and Dauphin Islands. Further, the Corps' admission also gives credence to the 1978 Corps report that first concluded maintenance of the Outer Bar Channel contributed to Dauphin Island's erosion. The Corps has consistently refused to address in the GRR Study the effects of the cumulative removal of around 30 million cubic yards of sand from the littoral drift system that has occurred since 1980 due to maintenance of the Outer Bar Channel. In view of its February 22 admission, the Corps has no credible reason to continue advocating its present position and should begin immediately to investigate appropriate mitigation remedies that should be addressed in the Draft GRR to respond to this now acknowledged significant "changed condition" in the Study Area.

The Corps is using a computer model in the GRR Study to evaluate the effects of Outer Bar Channel maintenance on sediment transport and water depths on the Mobile Pass ebb-tidal delta shoal. However, to date, the Corps has not extended the modeling efforts to consider the historic erosion of Dauphin Island's Gulf shoreline. The Corps' refusal to apply modelling to an evaluation of the historic shoreline erosion issue represents an incomplete investigation of the effects of the project-altered sand transport processes. If the Corps cannot demonstrate the model replicates the island's observed historic shoreline and topographic erosion losses that have occurred since at least 1999, and preferably back to 1980, along with water depths over the ebb-tidal delta shoal, then the value and believability of the model and its results are called into serious question.

At the February 22 public meeting, the Corps gave minimal coverage to where and how the increased quantity of dredged material from an enlarged channel will be disposed in Mobile Bay. There are serious environmental impact concerns associated with the return to thin-layer disposal that will directly affect thousands of acres of bay bottoms ever year, as well as possibility of indirectly affecting other areas if near-bottom plumes of sediment are moved by prevailing currents and wind-induced wave action. Further, the planned construction of a 1200-acre disposal island in the upper bay near large areas of productive grassbeds that are heavily used for commercial and recreational fishing is also a major concern. Section 302 of the Water Resources Development Act of 1996 allows the Corps to return to in-bay disposal only after it can demonstrate such disposal alternatives provide provable beneficial uses, including environmental restoration. So far, the Corps has not made a credible case of the benefits of a return to in-bay disposal.

The Corps reported modeling of salinity and dissolved oxygen levels projected to occur with an enlarged channel would have no effects on oysters in Mobile Bay. However, existing information indicates oyster production in coastal Alabama has been on the decline for years. Commercial fishermen attending the meeting attribute increased siltation of oyster reefs to be the cause. These fishermen blame the siltation on the open water discharge of dredged material in the bay. The Corps' limited theoretical modeling performed to date of selected water quality variables does not appear to provide a complete picture of the environmental issues being faced by Mobile Bay's oyster reefs. The Corps needs to do more analysis of this important resource to support its claim that an enlarged channel will have "no effect" on oysters, which could represent the "canary in Mobile Bay" to gage the impacts of increased dredged material disposal in the bay.

Sincerely,

[REDACTED]

[REDACTED]

Comment #535

From: [REDACTED]
To: [Newell, David P CIV CESAM CESAD \(US\)](#)
Subject: [EXTERNAL] DAUPHIN ISLAND, AL
Date: Thursday, January 25, 2018 9:15:22 AM

January 25, 2018

Dear Mr. Flakes and other Corps' employees:

Since you and the eight other Mobile District employees, who attended the Corps' Dec. 12, 2017 meeting were considered to have special expertise for the Mobile Harbor Channels, the maintenance dredging and its effects on Dauphin Island. As such, each of you have a duty to speak and not to remain silent and to disclose to the public and property owners on the Island, all information of the past erosion impacts caused by Mobile Harbor and Channels and all future erosion impacts to Dauphin Island from the massive expansion to the Mobile Harbor Entrance Channel/Outer Bar Channel for the SEIS/GRR/Mobile Harbor study.

As employees of the US Corps of Engineers, who have taken an oath to the Constitution and to follow the Federal Laws and by each of you having special expertise, I am asking you to disclose all information and not conceal, omit or state any half-truth to me about the erosion to Dauphin Island, concerning:

- * All information that the Corps has failed to inform Congress and the public about the erosion on the Island including the 1980 EIS/Mobile Harbor Survey Report failed to comply with the 1935 Rivers and Harbors Act by not studying the erosion impacts to Dauphin Island and the Mobile Entrance Channel for 10 miles on each side?
- * An accurate accounting of the sand in SIBUA and exactly where the sand leaving that site goes?
- * The massive expansion to the Mobile Harbor Entrance Channel/Outer Bar Channel for the SEIS/GRR/Mobile Harbor study and the future effects to Dauphin Island's shoreline.
- * The Corps' Mobile Harbor project contributing to the degradation of the environment and erosion to the shoreline of Dauphin Island.
- * All past and future environmental and erosional impacts on Dauphin Island's shoreline from the dredging of the Mobile Harbor Entrance Channel project, including any significant adverse impacts on fish, turtles and wildlife resources on the Island.
- * All information about the Corps dredging the Mobile Harbor Entrance Channel/Outer Bar Channel as the cause to the erosion to the shoreline of Dauphin Island, which has been stated in the Corps' own documentation, other agencies documentation and other coastal engineers studies that was not included in the Corps' 2008 study and the updated 2010 study.
- * All information about the US Geological Survey's Robert Morton's 2007 and 2008 studies for the Corps' MsCIP study, which state "Historical land-loss trends and engineering records show that progressive increases in land-loss rate correlate with nearly simultaneous deepening of channels dredged across the outer bars" and correlated the land-loss on the Island between 1958 to 2006 and concluded that the Corps maintenance dredging was causing the erosion on Dauphin Island.
- * All Corps' and Port Authority responsibilities to mitigate the erosion to the Island caused by the dredging of the Federally Authorized Mobile Harbor Deep-draft Entrance Channel.
- * All Federal Laws and Corps' manuals for the Corps to mitigate the erosion impacts to the Island, resulting from Federal Navigation operation and maintenance activities, subject to Federal control and responsibility, on a adjacent shoreline and the interruption of sediment transport to the shoreline.
- * The Corps ensuring that the future deepening and widening of the Mobile Harbor Entrance Channel does not block the littoral drift, and cause severe downdrift erosion? The Corps mitigating the erosion to the Island by the Corps placing the sand directly on the shoreline and in the future in a nearshore berm in shallow water in front of the whole Island every time the Corps dredges, as the Corps does in other parts of the Country?

I am asking each of you speak and not to stay silent and to provide your expertise for questions I have not asked, because of my lack of knowledge of the Corps' process or the terms the Corps uses for Federal Project.

Just because a questions was not asked, it does not alleviate the Corps from providing all other truthful information about the Corps' dredging of the Entrance Channel and its past and future erosion effects on Dauphin Island.

Respectfully yours,

[Redacted signature]

[Redacted name]

Comment #536

From: [REDACTED]
To: [Mobile Harbor GRR](mailto:MobileHarborGRR@gmail.com)
Cc: jcollier@townofdauphinisland.org; board@dipoa.org; congressman.byrne@mail.house.gov; mayorstimpson@cityofmobile.org; district3web@mobile-county.net; bill.hightower@alsenate.gov
Subject: [Non-DoD Source] Erosion of Dauphin Island
Date: Saturday, April 7, 2018 2:11:08 PM

Dear US Army Corp of Engineers,

I am writing you about the erosion of the shore lines on Dauphin Island and Mobile Bay. When my friends and I sailed catamarans back in the 80s, we launched our boats on the beach in between the jetties on the south side of Fort Gaines. Until they were removed, those jetties stood out in the gulf as islands, reminding us how much the east end had eroded. Just down the beach west of the bird sanctuary there lies a subdivision that has an entire street waiting to be consumed by the gulf, with one house halfway in the water. Many of the roads on the gulf side of Bienville Boulevard that were once full of beach houses have been reduced to a single house due to the thinning of the island's west end. When I was growing up, there was Peavy Island on the south side of the old Dauphin Island draw bridge that was covered in campers. Now that island is merely a sand bar covered by shallow water.

These are only a few examples of the changes that have taken place in my lifetime. I have seen enough storms to realize that some of the changes are due to them. But storms are one time events, and the changes they cause are fairly obvious. What is not as obvious is the slow destruction caused by erosion. I can not imagine how anyone can say that every effort should not be made to protect our islands and coastline from this problem. The science is quite clear that sand travels westward along the coast, falls in the Mobile Ship Channel between Fort Gaines and Fort Morgan, is dredged up, and dumped too far out in the gulf for it to naturally make its way to the shoreline. Because of this man made problem, man should be required to do everything he can to fix it. I realize that it will cost more to put the sand closer to Dauphin Island to ensure that it makes it to the beaches. If the Corp of Engineers have their hands tied by law to dispose of the sand the cheapest way possible, then shame on our political leaders for allowing this to continue. Believe me, I am all for less government spending, but in my opinion this would be one of the last expenses I would ever consider cutting. Any American who has any awareness of the level of taxpayer money consumed by waste and fraud would agree that the added expense could be offset in a thousand different ways.

Now that the government wants to dredge an even wider channel in between the forts, this should be a wake up call to anyone who is not concerned, or unaware of this problem. This is not a bridge to nowhere, this is not a pork barrel project, this is doing the right thing to restore part of what has been lost. Depositing dredged sand closer to Dauphin Island would help to partly right a wrong that has been taking place since the ship channel was created. Don't get me wrong, I am all about balancing the need for jobs and the environment. I work for a local industry that relies on the ship channel. But just like the money grab for the BP oil spill funds, many times the most pressing environmental needs and political needs become separated like oil and water.

Sincerely,

[REDACTED]

[REDACTED]

Comment #537

From: [REDACTED]
To: [Mobile Harbor GRR](#)
Cc: [Newell, David P CIV CESAM CESAD \(US\)](#); [Flakes, Curtis M CIV \(US\)](#); [Boatman, Todd H CIV USARMY CESAM \(US\)](#); [Taylor, Peter F Jr CIV USARMY CESAM \(US\)](#); [DeLapp, James Andrew \(Jim\) COL USARMY CESAM \(US\)](#)
Subject: [Non-DoD Source] Response required to May 31, 2017 letter of comment on Mobile Harbor GRR Study March 16 Public Meeting
Date: Monday, July 24, 2017 5:46:44 PM
Attachments: [2017-5-31 - G. Coffee Comments following 3-16-2017 Public Meeting.pdf](#)

To David Newell:

Following the July 19 meeting between the District Staff and the Sierra Club, you told me that if I had any comments on the Mobile Harbor GRR Study I should submit them via this email address on the Study Website. So, I am going to give that approach a try with this message to see how it works since the Mobile District appears to no longer attempt to comply with the goal when I worked there of responding to all written correspondence within 30 days of their receipt.

By the attached letter of May 31, I submitted four comments based on my examination of the posters used and my discussions with District staff at the March 16 public open house meeting. My letter also requested that I be provided with responses to my comments because I want to know how the District intends to consider my comments. Specifically, if Todd Boatman (Chief of PD-F) had answered my elemental plan formulation questions at the meeting, it is possible that I may not have felt the need to send my letter of comment. It is now going on 60 days since I sent the attached letter without receiving a reply. I hope this approach finally generates the response that I originally requested.

In the old days, when the Corps held public meetings and workshops, we made conscientious attempts to answer all public questions. We never outright refused to a question asked by the public as I experienced at the March 16 meeting and as documented in Comment No. 4 in my attached letter. If the District staff does not intend to answer the public's questions, why even go through the farce of holding a public meeting. In the three interactions I have had with COL DeLapp to date, in my view, he has repeatedly given the impression that he has already made up his mind to oppose and dismiss a point of contention raised by the informed public without being willing to seriously consider the issues involved, if the point of contention has the potential to require the District to possibly deviate from what increasingly appears to be the "preconceived" direction intended for this Study. It would certainly be reassuring to those members of the public most involved and knowledgeable if they believed their views actually were subjected to real consideration instead of just being "blown off" as the senior staff appears to have decided to do -- at least in their dealings with me (while being diplomatically polite in my presence. As one whose taxes are helping to fund this Study and the District staff's salaries, I am becoming increasingly frustrated with the District's behavior and lack of regard for the public. I'll bet the District would not let a letter from Jimmy Lyons of the ASPA go unanswered for almost 60 days. So, why would the District not expect the general public wanting to receive the same courtesy and respect, and a timely response.

I want to make it perfectly clear that the comments offered in the attached letter represent my views alone as a private taxpaying citizen. As a result, my letter should not be construed as representing the views of any other individual or organizations with which I am a member.

Again, a timely reply would be greatly appreciated in view of the excessive time that has already passed since my attached letter was sent.

Thanks



May 31, 2017

COL James A. DeLapp, District Commander
US Army Corps of Engineers
Mobile District
P.O. Box 2288
Mobile, AL 36628-0001

Dear COL DeLapp:

During your May 11 meeting at Stan and Caroline Graves' Dauphin Island home, you said the public should send the Mobile District comments related to the March 16 Mobile Harbor GRR Study In-progress Public Meeting. Accordingly, this letter submits my four comments. I would appreciate receiving responses in a timely manner.

1. The Mobile District has provided no information to date explaining how the public comments submitted during the January-February 2016 Scoping Process are being considered in the Study. ***The District should provide an explanation at the next In-progress Public Meeting identifying the public comments that will be addressed in the Study, while explaining why other comments will not be considered. Deferring such an explanation until the Draft SEIS is too late and puts the concerned public at a distinct disadvantage if they disagree with the District's decision relative to certain comments.***
2. The "Key Scoping Comments" Poster contained the statement: "2005 Lawsuit Settlement led to mutually agreed upon neutral investigation by Byrnes *et al.*" That wording could lead one to incorrectly assume there was "mutual agreement" relative to acceptance of the results of the Byrnes *et al* investigation. Since I was a member of the Dauphin Island Property Owners Association POA Board of Directors during the time the lawsuit was settled, I am intimately familiar with the factual issues surrounding the lawsuit. It is true the Government and the Plaintiff Class agreed in the 2005 First Settlement Agreement for the Government to contract for a "neutral investigation" to analyze the relationship between maintenance of the Outer Bar Channel and the erosion of Dauphin Island. However, that is where the "mutual agreement" ended. In the subsequent 2009 Settlement Agreement ending the lawsuit, ***the Plaintiff Class did not agree to accept the findings of the 2008 Byrnes et al report.*** Instead, both parties agreed to settle the 2000-2009 lawsuit in the following manner: The Plaintiff Class agreed to never sue the Government again over the erosion issue in return for the Government paying \$1.5 million to the DIPOA to be applied toward seeking a solution to the island's erosion problem. The original erosion allegation was never adjudicated to a conclusion. ***The wording on the poster could be erroneously interpreted to imply the Plaintiff Class also agreed to the findings of the Byrnes et al 2008 report which is not the case. The statement should be reworded to eliminate the potential for a misleading interpretation to occur as to the extent of the "mutual agreement".***
3. The "Key Scoping Comments" poster also contained the statement: "1978 Feasibility Report superseded by the 2010 Byrnes Report which found no measurable negative impacts

associated with channel dredging”. The 2010 Byrnes *et al* report is essentially a rework of the original Byrnes *et al* 2008 lawsuit report that concluded “there appears to be no measurable negative [erosion] impacts...associated with historical channel dredging across the Mobile Pass Outer Bar”. The poster should be revised to clarify that the referenced statement is the Corps’ opinion only. Many other entities disagree with the report’s conclusion and the resulting Corps’ position on the erosion issue. ***IN OTHER WORDS, THE SCIENCE ON THIS EROSION ISSUE HAS NOT BEEN SETTLED TO THE SATISFACTION OF ALL PARTIES.*** For example:

- The Corps has yet to produce a point-by-point analysis explaining why the methodology used, findings and conclusion of its 1978 report are wrong and the 2010 Byrnes *et al* report is correct.
- The Mobile District has not disclosed to the public the results of Dr. Robert Dean’s (regarded as the “Father of Coastal Engineering”) two Corps-funded, independent reviews of the precursor Byrnes *et al* 2008 report that disagreed with that report’s conclusion which was repeated by Byrnes *et al* in their subsequent 2010 report. Dr. Dean’s reviews were completed on September 30, 2007 and March 7, 2008. Dr. Dean’s 2008 report concluded that his two reviews:

“...raised valid questions regarding some of the arbitrary methodology applied and findings to the degree that I regard the [i.e., Byrnes et al 2008 report] findings inconclusive regarding any impact of dredging and channel maintenance of Mobile Bay Entrance. Thus, ***I respectfully dissent from concurring ‘that the Corps’ construction, operation and Maintenance Dredging Practices of and at the Channel have not resulted in at least Minimum Measurable Erosion of Dauphin Island’s shoreline*** [emphasis added]”.
- The 2010 Byrnes *et al* report’s conclusion directly conflicts with the extensive body of scientific study that shows when dredging and disposal operations in coastal inlets interrupt natural littoral drift processes, downdrift shorelines universally experience erosion. This typical cause-effect phenomenon associated with maintenance of navigation projects around the nation contributed to the Corps’ Engineering Research and Development Center’s creation of the Coastal Inlet Research Program to assist Corps districts better manage that universal problem. The 2010 report provides no explanation as to why the Mobile Pass Inlet represents a significant anomaly to the erosion situation that is typically observed to occur in other coastal inlets through which navigation channels are located and maintained.
- There is no evidence to indicate the 2010 report has been subjected to a refereed review by a qualified team of independent professional scientists and coastal engineers which are experts in the hydrodynamic and sediment behavior of coastal inlets which typically occurs with the publication of professionally published papers.
- Lastly, on March 25, and August 9, 2016 a diverse group of local citizens met with Mobile District staff to discuss 11 major comments submitted by the public during

the Scoping Process and how the Corps planned to address those comments in the Mobile Harbor GRR Study. Included among those comments, were several dealing with the Byrnes *et al* 2010 report. After receiving inadequate responses from the District to the 11 public comments, Mr. Graves sent you a September 23, 2016 letter that provided well documented, in-depth rebuttals to each of the District's generally dismissive responses. As of the date of this letter, the Mobile District still has not responded to any of the rebuttals provided over 8 months ago by Mr. Graves' September 23, 2016 letter. The absence of a Mobile District response to the rebuttal comments reinforces the increasingly held view by the public that the District does not intend to seriously consider the views and concerns of the public, while appearing to be focused solely on satisfying the desires of the Alabama State Port Authority relative to the Mobile Harbor ship channel. The rebuttal comments to the Byrnes *et al* 2010 report are again attached to this letter, with the request that the District thoroughly address them.

Thus, despite the above, the Mobile District continues to attempt to force upon the public its unyielding position that the Byrnes *et al* 2010 report represents accepted scientific fact that maintenance of the Outer Bar Channel has no influence on the erosion of Dauphin Island, while refusing to acknowledge that legitimate questions exist with that report. The Corps and the Alabama State Port Authority are the only known entities that unquestioningly support the 2010 report. ***Of great importance, we have been told by the Mobile District staff on more than one occasions that all parties have decided to await the eventual findings of the separate ongoing Alabama Barrier Island Assessment regarding the relationship of channel maintenance to the Dauphin Island erosion issue. Given that fact, it would be appropriate for the Poster wording to be revised to state that situation instead of the above referenced wording on the poster used at the March 16 In-progress Public Meeting.***

4. The Mobile District advertises the In-progress Public Meetings as forums to educate the public on the status of the Mobile Harbor GRR Study. However, during my extended conversation with Mr. Todd Boatman (Chief of the District's Plan Formulation Branch), he refused to answer the following specific questions dealing with the very foundation of the Study that should have been very easy for him to answer (see Poster 2 and 3 on the Study website):
 - 1) Did the initial investigation of the problems and needs of the Study Area identify the historic and ongoing erosion of Dauphin Island as a "problem and opportunity?"
 - 2) Has a "planning objective" been developed to address Dauphin Island's erosion problem; and has the "opportunity" been identified to positively address the erosion problem using dredged material from the Outer Bar Channel?
 - 3) Has (or will) an alternative been formulated under the specific authority provided by Section 302 of the WRDA of 1996 to beneficially use dredged sands from the Outer Bar Channel to "restore" Dauphin Island's eroding shoreline?
 - 4) If the answer to any of the above three questions is "No", please explain why not?

The only response Mr. Boatman would give me to these questions was: "it is too early for the District to develop alternatives until the results of the benefit analyses are complete". Based

on my thorough understanding of how the Corps' "6-step planning process" is supposed to work, I do not believe Mr. Boatman was being honest with me since work on the Study Area's "problems and needs and opportunities" and "planning objectives" was completed several months ago. This is supported by information contained in the Study's April 4, 2017 Study Biweekly Report posted on the Study website only three weeks after March 16 In-progress Public Meeting. That Biweekly Report clearly indicates that the preliminary array of alternatives was developed some time back – which means answers to my four above questions could in fact have been provided by Mr. Boatman at the March 16 Public Meeting. That begs the question: Why did Mr. Boatman feel he could not provide those answers?

I fear the reason Mr. Boatman refused to answer my questions is because the Mobile District has decided to again ignore the Dauphin Island erosion problem, as it originally did when the 1980 Survey Report was prepared. That means in the current GRR Study: if Dauphin Island's severe erosion is NOT identified as a problem in the Study Area, it follows that the opportunity to positively address the erosion issue with dredged material will NOT be considered and a Study planning objective will NOT be developed to address the erosion problem; with the ultimate result being that a plan to address the erosion problem will NOT be included within at least the initial array of alternatives formulated. If that scenario does indeed reflect what the Corps has NOT done relative to considering the Dauphin Island erosion problem, then the Mobile District is not fully complying with the following provisions of the Corps' planning guidance ER 1105-2-100:

- 2-3a(1) Problems and opportunities statements will be framed in terms of the Federal objective and the specific study planning objectives. Problems and opportunities should be defined in a manner that ***does not preclude the consideration of all potential alternatives*** to solve the problems and achieve the opportunities.

NOTE: 2-2a of ER1105-2-100 specifies: "Principles and Guidelines state that the Federal objective of water and related land resources planning is to contribute to national economic development (NED) consistent with protecting the Nation's environment, in accordance with national environmental statutes, applicable executive orders, and other Federal planning requirements...Protection of the Nation's environment is achieved when damage to the environment is eliminated or avoided and important cultural and natural aspects of our nation's heritage are preserved. Various environmental statutes and executive orders assist in ensuring that water resources planning is consistent with protection.

- 2-3a(2) Properly defined, statements of problems and opportunities will reflect the priorities and preferences of the Federal Government, the non-Federal sponsors and ***other groups participating in the study process; thus, active participation of all stakeholders in this process is strongly recommended.*** Proper identification of problems and opportunities is the ***foundation for scoping the planning process.*** This problem identification step, and/or "scoping", should begin as soon as practicable after the decision to initiate a planning study.

- 2-3a(4) Once the problems and opportunities are properly defined, the next task is to define the study planning objectives and the constraints that will ***guide efforts to solve these problems and achieve these opportunities.***

- 2-3b. The second step of the planning process is to develop an inventory and forecast of critical resources (physical, demographic, economic, social, etc.) relevant to the problems and opportunities under consideration in the planning area [***In the case of the current GRR Study, it is logical to assume the “etc.” should include Dauphin Island’s severe erosion problem in the “inventory and forecast of critical resources” occurring in the Study Area.***]. This information is used to further define and characterize the problems and opportunities. A quantitative and qualitative description of these resources is made, for both current and future conditions, and is used to define existing and future without-project conditions.

- 2-3c(1) Alternative plans shall be formulated to identify specific ways to achieve planning objectives within constraints, so as to solve the problems and realize the opportunities that were identified in step 1...Additional alternative plans may be identified at any time during the process. [***This certainly could involve formulating an alternative under the Corps’ discretionary authority provided by Section 302 Of the WRDA of 1996.***].

The Mobile District cannot legitimately state it does not have the authority to consider the erosion of Dauphin Island in the GRR Study since Section 302 of the WRDA of 1996 provides the Corps the specific discretionary authority to “...consider alternatives to disposal of such material in the Gulf of Mexico, including environmentally acceptable alternatives for beneficial uses of dredged material and environmental restoration”. What is lacking is the “***WILL***” by the Mobile District to evaluate an alternative in the Study that would beneficially use Outer Bar Channel dredged sands to positively address Dauphin Island’s erosion problem. Instead, it appears the District has decided not to evaluate an alternative under Section 302 because the Alabama State Port Authority is opposed to evaluating such an alternative. Thus, the Mobile District appears to have decided to ignore the requests submitted by numerous “public stakeholders” during the Scoping Process to formulate such an alternative. That approach is in contravention to the above referenced 2-3a(2) in the Corps’ ER 1105-2-100. The outcome of that approach makes a mockery of the Study’s Scoping Process and In-progress Public Meetings if the Mobile District remains unwilling to answer basic questions asked about the Study that are not be proprietary in nature. It is time the Mobile District decided to have an honest and open discussion with the public regarding the scope of alternatives being investigated in the Study, to include those plans that will not be considered and the reasons why not. Accordingly, I hereby ask again that answers be provided to the above four questions I asked of Mr. Boatman at the March 16 In-progress Meeting.

At your May 11 meeting at Mr. and Mrs. Graves’ home, you stated your dislike for lengthy letters. As you will note by now, this letter is “long”. It is long because the Mobile District staff continues to either refuse to answer questions about the Study or provides misleading information that must be clarified for the record. Once the District becomes more responsive,

open, and honest in its dealings with the “public stakeholders”, I can assure you the number of letters the District receives will become fewer and briefer. I look forward to receiving answers to my above four questions and responses to the enclosed rebuttal comments on the Byrnes *et al* 2010 report.

Sincerely,

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Encl

Rebuttal of Mobile District Responses to Major Comments Received in the Public Scoping Meeting Process and Discussed at the August 9, 2016 Meeting

Major Public Comment Summaries Provided: August 9, 2016

Mobile District Responses Provided: August 31, 2016

Rebuttals to Mobile District Responses Provided: September 23, 2016

Public Comment 5: During the over 36 years since the Corps' 1980 report was completed, maintenance of the Outer Bar Channel has continued, further contributing to the erosion of Dauphin Island. Between 1974 to 2000 alone, Corps records show that over 20,000,000 cubic yards of dredged beach quality sand was deposited in the open Gulf and permanently lost from the littoral drift system. Since the 1980 report did not address this loss of sand, the new GRR Study must address the impact of the historical sand deficit to Dauphin Island caused by maintenance of the Outer Bar Channel. The Corps' Elizabeth Godsey and Justin McDonald stated at the Scoping Meeting the Study will not address the historic sand losses caused by the Corps maintenance dredging practices of the Outer Bar Channel. How can the Corps justify ignoring this significant sand loss and its effect on the erosion of Dauphin Island as a key feature of the "Without Project" condition? The loss of sand must be addressed and mitigation measures identified to replenish both the historic and future project losses for both "Without" and "With" project conditions, whether the channel is deepened and widened or not.

Mobile District Response 5: *The Corps position is that dredging and placement practices associated with operation and maintenance of the Mobile Harbor Channel have not had a measurable impact on Dauphin Island. This view is supported by Byrnes et al. (2010). Byrnes et al. (2010) evaluated the impact of construction and maintenance dredging in the Mobile Outer Bar Channel on the ebb tidal shoal and Dauphin Island shorelines. Byrnes et al. (2010) concluded the following: "Based on all available information, there appears to be no measurable negative impacts to ebb-tidal shoals or Dauphin Island beaches associated with historical channel dredging across the Mobile Pass Outer Bar" (pg. 206). The GRR will address potential effects of proposed channel improvements to the existing navigation project. See response to question 6 for discussion on the without project condition.*

Rebuttal 5: The Mobile District's position that maintenance of the Outer Bar Channel has had no measurable impact on Dauphin Island is supported by only two reports prepared under contract in 2008 and 2010 -- both by Byrnes *et al.* Those two reports propose a sediment budget calculated for the Mobile Pass Inlet and Dauphin Island based upon bathymetric mapping and dredging records for the period 1920 through 2002. The contents and findings of the two reports are essentially identical, with the major difference being a slight refinement in the data considered in the 2010 report that resulted in minor adjustments to the proposed sediment budget. ***In accepting the conclusions contained in the two Byrnes et al reports, the Mobile District has selectively ignored the counter views expressed by other credible sources, including the 1978 report prepared by the Mobile District and the 2007 and 2008 reviews by Dr. Robert Dean on Byrnes et al's original 2008 report, as well as an independent US Geological Survey report published in 2007 (Morton, 2007).*** Hopefully, the results of the ongoing Alabama Barrier Island Restoration Assessment will finally put this longstanding

issue to rest.

Our review of the 2010 Byrnes *et al* report raised the following concerns and questions with their proposed sediment budget upon which the report's conclusion summarized above is based:

- “Sediment erosion and accretion volumes were quantified for the period 1917/20 to 1986/2002 by comparing (differencing) bathymetric survey data.” That means the estimated sediment volume differences for the areas studied were determined by comparing bathymetric maps produced in specific years over the 82-year period considered. Since the hydrographic survey technology employed to produce bottom depth maps has vastly improved over the course of the 82-year period considered, the accuracy of the depth data obtained from maps produced in the early portion of this period compared to the depth data on maps prepared in recent years is unknown. It should be acknowledged by the Corps and the report's authors that even a slight error in the quality of the mapping can significantly affect estimated sediment erosion and accretion volumes for specific areas studied. The potential for such errors to influence the reliability of depth comparisons between specific periods of time and the resulting conclusions reached from such comparisons over the 82-year period considered is neither quantitatively nor qualitatively addressed in the report. This concern was also raised by Dr. Dean in his reviews of Byrnes *et al*'s 2008 report that was a precursor to their 2010 report.
- The 2010 Byrnes *et al* report asserts that Dauphin Island's continued expansion to the west at a relatively consistent rate over the 82-year period is evidence indicating the sand supply to the island has not been reduced by maintenance of the Outer Bar Channel. That assertion ignores other factors that may also have contributed to the acknowledged westward expansion of Dauphin Island over the period considered. For example:
 - The proposed sand budget does not consider the loss of sand from a generalized reduction in the topographic relief of Dauphin Island's West End that has occurred since the 1970s that may have enabled in part the observed westward expansion to occur. While periodic storm created breaches and washover surge channels have indeed healed through littoral drift processes, there has been an overall diminishment in the island's western topographic elevations that have not been restored and not considered in the sand budget. Instead of being fed by a “robust sand supply” as asserted by Byrnes *et al* (2010), the observed westward expansion of Dauphin Island may in fact be due more to a combination of the cannibalistic erosion of the Sand-Pelican Island shoals, erosion of Dauphin Island's Gulf beaches west of the fishing pier, and to the generalized decrease in the topographic relief of the island's populated West End where washover has become more commonplace during minor storm events in recent years.

- The findings of Morton's 2007 report on the Mississippi-Alabama barrier island system also raises a question as to the validity of Byrnes *et al*'s assertion that the continued westward lengthening of Dauphin Island over the 82-year period considered in their report indicates the supply of sand to the island has not been reduced by maintenance of the Outer Bar Channel. Morton provides evidence showing Dauphin Island experienced a loss of 11 percent of its surface area over the 159-year period between 1847 and 2006 as summarized in the following:

“...The [surface] area of Dauphin Island increased between 1847 and 1958 at an average rate of 1.8 ha/yr as a result of spit accretion on the western end of the island (Fig. 2, Table 2) [see below]. **But after 1958 the island entered a net erosional phase that has persisted and recently accelerated** [emphasis added]. Rates of land loss between 1958 and 1996 averaged 6.1 ha/yr and between 1996 and 2006 averaged 12.9 ha/yr. The most recent high rates of loss are somewhat biased because Hurricane Katrina formed a breach approximately 2 km wide, removing a 40 ha segment of the barrier [island].”

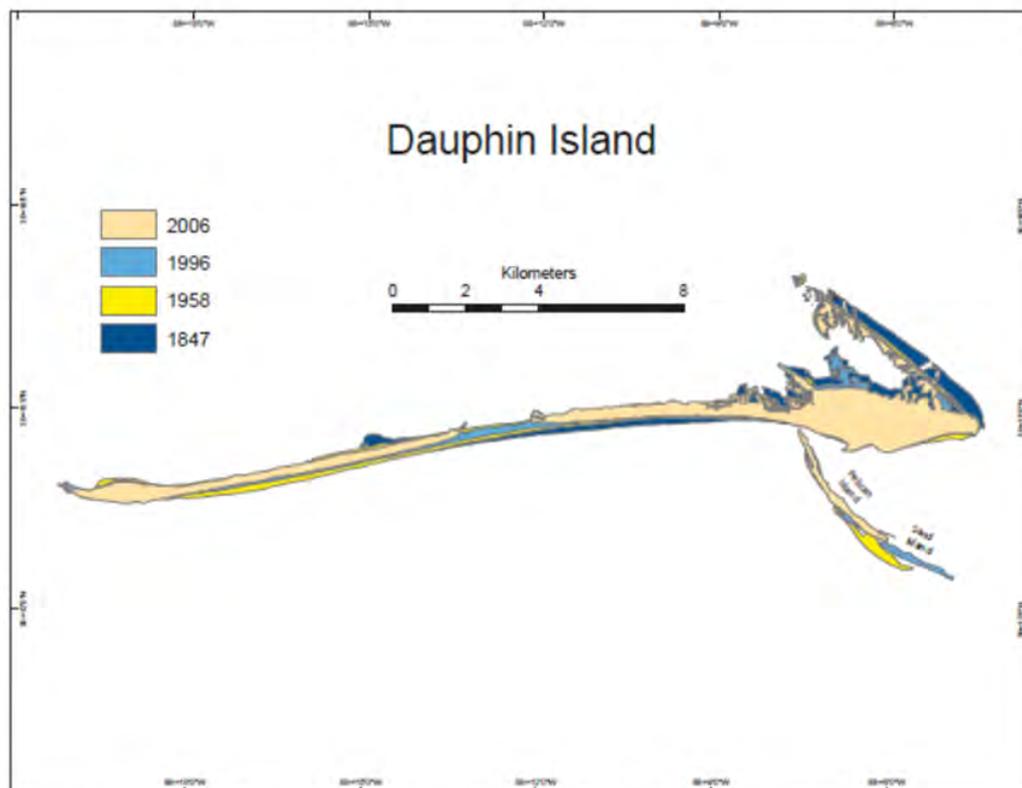


Figure 2. Morphological changes in Dauphin Island between 1847 and 2006.

(from Morton, 2007)

Table 2. Percent changes in land area of the Mississippi-Alabama barrier islands between the late 1840s and 2005. Areas are in hectares.

Island	1840s area	2005 area	% Loss
Dauphin	1429	1266	11
Horn	1616	1230	24
Cat	1192	724	39
Petit Bois	836	366	56
Ship	604	216	64

(from Morton, 2007)

- In developing the proposed sand budget, Byrnes *et al* (2008 and 2010) do not address the change in Dauphin Island’s overall size (including a general narrowing of the island’s West End) that began to occur in the latter half of the 82-year period they considered [i.e., after 1958]. As stated above, Morton (2007) showed that “...after 1958 the [Dauphin] island entered into a net erosional phase that has persisted and most recently accelerated.” Morton identified three factors as potentially contributing to Dauphin Island’s loss of land: (1) frequent intense storms; (2) sea level rise; and (3) a reduction in sand supply. Land losses on Dauphin Island and its sister barrier islands to the west have consistently

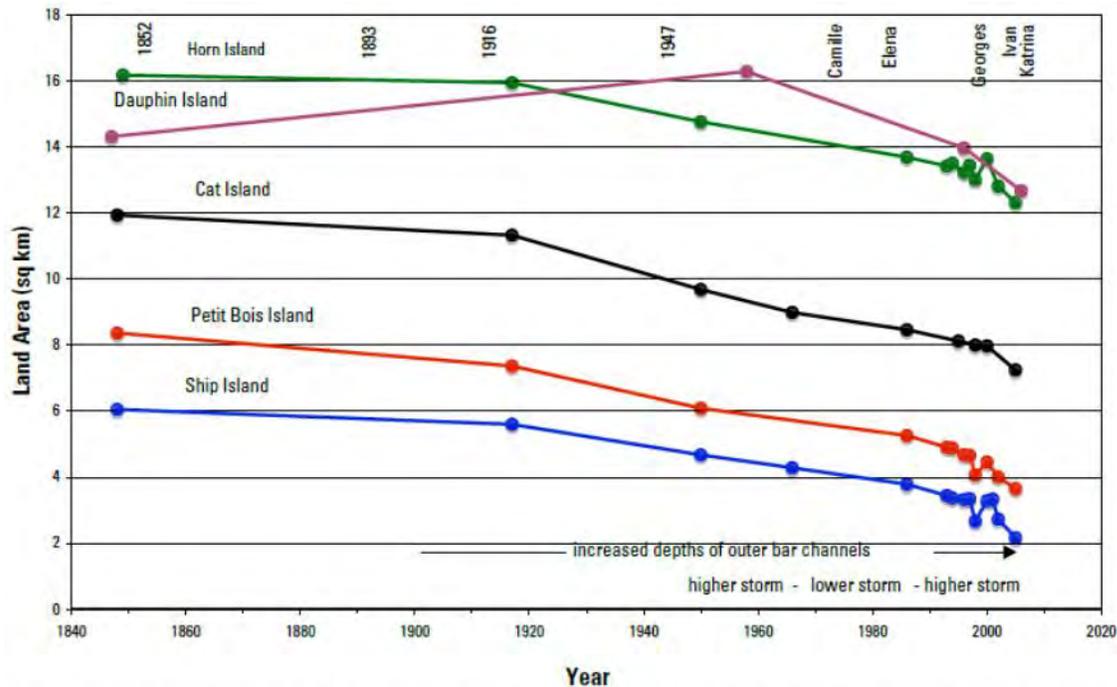


Figure 7. Historical land loss trends for the Mississippi-Alabama barrier islands relative to the timing of major hurricanes and human activities that impacted the islands.

(from Morton, 2007)

occurred since the 1970s even during periods of low storm activity. Tide gauge records do not demonstrate that sea level rise accelerated during this same period. This information led Morton to conclude:

“Considering the three primary causes of land loss, the one that experienced the greatest change in historical time was the reduction in sand supply related to dredging the navigation channels through the outer bars of the tidal inlets. Sand supply is also the only factor where the historical trend of the factor (progressively increased reduction in sand supply attendant with increased dredging depths) temporally matches the trend of progressively increased land loss. The other two primary factors also contribute to island loss, but their temporal trends are either constant (sea level rise) or cyclical (storm activity) and therefore they do not easily explain the accelerated rates of land loss observed.”

Morton further observed:

“Conventional disposal of material dredged from the MS-AL shipping channels typically has been by placement in designated confined or unconfined sites along the margins of the channels or in unconfined open-water disposal sites offshore of the barrier islands. These practices conducted around the tidal inlets between the barrier islands permanently removed large volumes of beach quality sands from the littoral sediment transport system that otherwise would have nourished the adjacent barrier islands and mitigated sand losses.”

In the case of Mobile Harbor, the Outer Bar Channel acts as a sediment sink, trapping sand that normally would have bypassed around the ebb-tidal delta and nourished Dauphin Island and the downdrift Mississippi barrier islands. This means the natural sand transport system is being disrupted by dredging that removes the sand from the system and disposes of it in deeper water where it cannot be recaptured in its totality back into the system.

Thus, maintenance of the Outer Bar Channel has an indirect influence on Dauphin Island’s historical shoreline changes through induced erosion. Morton contends that such indirect impacts are sometimes more significant than direct impacts because they remain undetected for long periods of time. His view is supported by the casual recollections of locals who first noticed the beginning of erosion of the Sand-Pelican Island shoals in the early 1970s, that were followed in subsequent years by the sustained erosion now affecting Dauphin Island’s entire Gulf shoreline.

- The average annual volume of dredged material considered in the Byrnes *et al* 2010 report to develop their proposed sand budget for the Mobile Pass Inlet was

inadequate, using an unrealistic smaller dredging volume that had the net result of diminishing the effects of the modern Outer Bar Channel maintenance program on the littoral drift system. In their proposed sand budget, Byrnes *et al* (2010) averaged maintenance annual dredging records between 1920 and 2002 to arrive at 287,000 cy/yr of sand being "...extracted from the channel and disposed of offshore." That amount represents a slight increase in the 274,000 cy/year contained in their 2008 report. The problem with their approach is actual dredging volumes have not remained constant over the entire 82-year period as depicted in the below figure excerpted from Byrnes *et al* (2010).

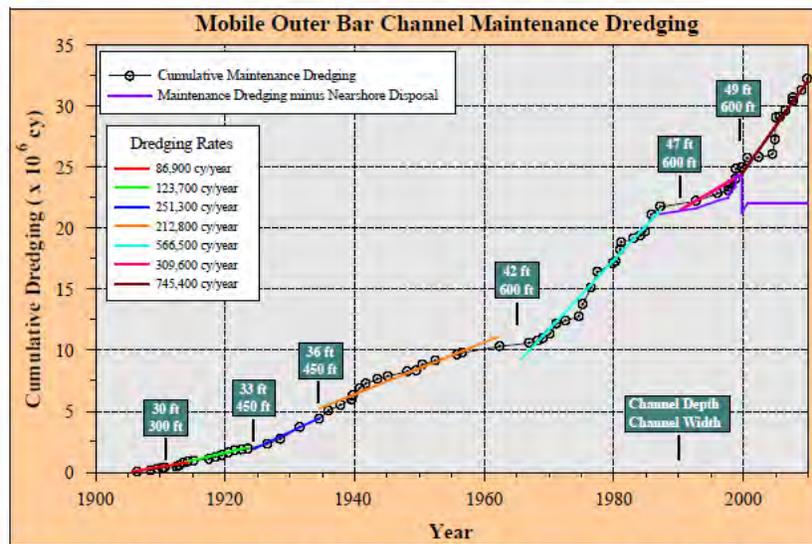


Figure 1-24. Maintenance dredging volumes extracted from the Mobile Outer Bar Channel between 1904 and 2009. Sand extraction rates were determined using linear regression analysis on segments of the curve reflecting changes in channel dimensions with time (data available in Appendix B).

(from Byrne *et al*, 2010)

Average annual dredging volumes have actually increased dramatically over the 82-year period considered as depicted in the above figure. Initial shallow dredging of the Mobile Harbor Outer Bar Channel in the early 1900s had minimal effects on the transport of littoral sediments across the Mobile Pass Inlet when navigation depth requirements were much less compared to the much wider and deeper channel dimensions required and maintained today. Byrnes *et al* (2010) point out "...between 1956 and 1965, major changes were made to channel width and depth (36' deep by 450' wide prior to 1956 and 42' by 600' wide after 1965), resulting in a 2.5 to 3-fold increase in maintenance dredging quantities." The timeframe within which the "major changes were made to channel width and depth (Byrnes *et al*, 2010)" corresponds closely with the finding reported by Morton (2007) that "...after 1958 [Dauphin] island entered into a net erosional phase that has persisted and most recently accelerated". It should also be pointed out that the dataset considered in the Mobile District's 1978

report that concluded maintenance of the Outer Bar Channel contributed to the erosion of Dauphin Island also included these years. ***It is worth noting here that the Mobile District's 1980 report neither investigated the influence of maintaining the then existing Outer Bar Channel dimensions on the erosion of Dauphin Island, nor the potential effects of the recommended increased channel depth and width to further influence erosion of the island.***

Consideration of the average annual volume actually dredged today will provide a more realistic view of how maintenance of the current Outer Bar Channel dimensions influences the sand budget for the Mobile Pass Inlet and Dauphin Island. Actual maintenance dredged volumes for the Outer Bar Channel for the 30-year period between 1980 and 2009 are listed in the table on the following page. During the 30-year period considered, the channel depth was increased on three separate occasions: beginning with 42 feet (originally constructed in 1965), 47 feet (constructed between 1989-90), and the present 49 feet (deepened in 1999). Thus, for this more recent 30-year period of increased channel depth, the average annual volume of sand dredged and carried offshore for disposal is approximately 503,000 cy/yr. That volume is almost twice the 287,000 cy/yr used by Byrnes et al. (2010) to represent the amount of annually dredged sands considered in their sand budget model. Byrnes *et al* (2010) should have considered the larger average annual volume to analyze the effects of maintaining today's Outer Bar Channel dimensions on the proposed sand budget model. Instead, in using the much smaller 287,000 cy/yr volume selected by Byrnes *et al* (2010) for analysis, the potential effects of channel maintenance on the proposed sand budget would be expected to be less than the effects resulting from the more realistic 503,000 cy/yr. In addition to the larger average annual 503,000 cy/yr maintenance volumes, Byrnes *et al* (2010) should also have analyzed the effects on the sand budget associated with the dredging of an additional total of almost 10 million cy of "new work" sediments to deepen the Outer Bar Channel on two separate occasions (i.e., 1989-90 and 1999), since the "new work" dredged sediments were also carried offshore for disposal and permanently removed from the nearshore littoral drift system.

- The Byrnes et al 2010 sand budget indicates 50,000 cy/yr of sand "cross" the Outer Bar Channel from the east. Since the channel is dredged on a one or two-year cycle to provide the existing 49-foot depth, shoaling rarely reduces effective navigation depths. The maintained channel depth of 49 feet exceeds the depth of the natural 20-foot channel that formerly crossed the bar by almost 30 feet. Because of this great depth, Byrnes et al (2008) refers to the maintained navigation channel as a "gorge". The sand budget distinguishes the 50,000 cy/yr alleged to cross the channel from the Fort Morgan Peninsula from the 161,000 cy/year hypothesized (see below bullet) alleged to be transported landward to the ebb tidal delta from the Sand Island Beneficial Use Site

(SIBUA) that includes depths below the prevailing -30-foot contour. The sand budget does explain the physical process responsible for transporting 50,000 cy/yr of sand from the east to the west across the channel “gorge”. In short, how do we know in fact that 50,000 cy/yr actually crosses the channel in the manner suggested by Byrnes et al (2010)? What information supports their assumption?

Mobile Harbor Outer Bar Channel Dredging History (1980-2009)
(Source: USACE annual maintenance quantities)

Dredge Date	Gross Quantity Dredged (yd ³)	Disposal Area Used ^{1/}
Feb-Dec 1980	1,129,337	ODMDS
Jan-Mar 1981	610,623	ODMDS
Dec 1982-Jan 1983	312,408	ODMDS
Jan-Nov 1984	559,607	ODMDS
Aug-Oct 1985	1,386,536	ODMDS
Jan-Feb 1987	656,089	Nearshore Feeder Berm
Feb 1989-May 1990	^{2/} 6,755,352	ODMDS
Aug-Sep 1992	466,607	ODMDS
Nov-Dec 1995	621,172	ODMDS
Aug-Dec 1997	710,996	ODMDS
Sep-Oct 1998	1,279,780	ODMDS
Aug-Sep 1999	71,380	ODMDS
	54,600	SIBUA
May-Sep 1999	^{3/} 3,061,598	SIBUA
Apr-Jul 2000	758,280	ODMDS
Mar 2002-May 2002	92,820	SIBUA
Jun 2004	230,110	SIBUA
Oct 2004-Nov 2004	1,184,817	SIBUA
Oct 2004-Jan 2005	1,808,765	SIBUA and at Lighthouse
Aug 2005	67,555	SIBUA
Apr-Jun 2006	487,975	SIBUA
Aug 2007	1,083,860	SIBUA
Nov-Dec 2008	585,430	SIBUA
Sept-Nov 2009	942,817	SIBUA
Total Dredged from Outer Bar Channel	24,918,514	For 30 years 1980-2016
Total Placed in Ocean DA	14,672,078	For 30 years 1980-2016
Total Placed at Nearshore Feeder Berm	656,089	For 1987 only
Total Placed in SIBUA or at Lighthouse	9,600,347	For 30 years 1980-2016
Average Annual Maintenance Dredging Volume	^{4/} 503,000	For 30 years 1980-2016

ODMDS – EPA approved open water Ocean Dredged Material Disposal Site

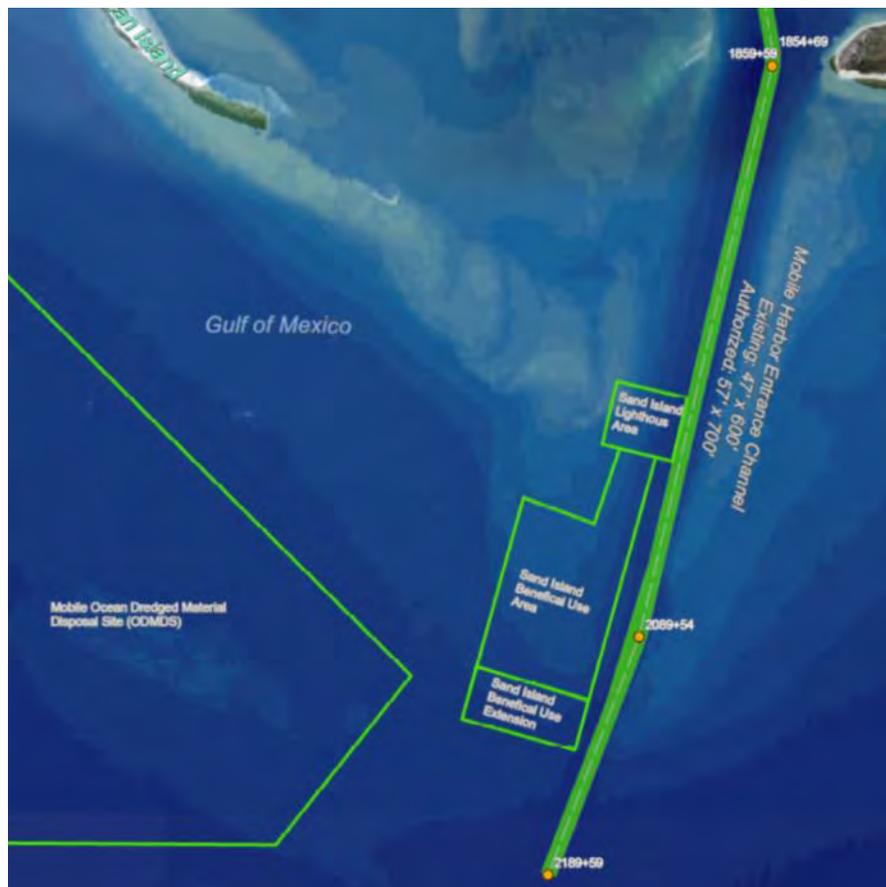
SIBUA – Sand Island Beneficial Use Area

^{2/} New work deepening from 42 to 47 feet

^{3/} New work deepening from 47 to 49 feet.

^{4/} Excludes new work deepening volumes in 1989-1990 and 1999

- The preceding table shows the Mobile District began in 1999 to place maintenance dredged sands almost exclusively within the SIBUA, with the intended goal being to keep "...sand removed from the bar channel in the local littoral drift system." The location of the SIBUA is depicted on the following illustration taken from a Mobile District January 12, 2016 Public Scoping Meeting display. The illustration also shows the relationship of the SIBUA to the Outer Bar Channel, the shallow waters of the Mobile Pass ebb tidal delta above the -30-foot bottom contour, and the offshore Ocean Dredged Material Disposal Site (ODMDS).



SIBUA and Mobile Harbor ODMDS
(from USACE Mobile District, 2016)

After just 10 years of consistent use, in 2008, the Corps had to add 207 acres to the SIBUA by extending its southern boundary by 2000 feet. The Corps' Public Notice stated the disposal area needed to be expanded to "...provide sufficient depths for access of the dredge equipment...due to site depths changing" (USACE, 2008). The Public Notice language implies expansion of the SIBUA was needed because depths were decreasing in the disposal area because a significant volume of the placed dredged sands had actually accumulated within the site instead of being incorporated

into the littoral drift system and transported toward Dauphin Island as the Corps alleged would occur. This fact is supported by Figure 4-11 in the Byrnes *et al.* 2010 report (excerpted below). Figure 4-11 graphically depicts the accumulated sands in dark blue that existed in the SIBUA as of 2002, six years before the Corps sought to expand the disposal site due to the unexpected accumulations of the placed sands that had occurred within the site. It is important to note that the sand accumulations depicted in Figure 4-11 represent the observed conditions after the SIBUA had been used for just three years between 1999 and 2002. The sand accumulations observed in the SIBUA in 2002 and considered in the Byrnes et al (2010) proposed sand budget should be compared with today's site conditions to determine if the deposited dredged sands are continuing to accumulate within the SIBUA instead of being reincorporated into the littoral drift system to nourish Dauphin Island as the Corps has alleged for years would be the case. Such a comparison is mandatory to verify if the proposed sand budget accurately reflects this component of the littoral drift system across the Mobile Pass Inlet.

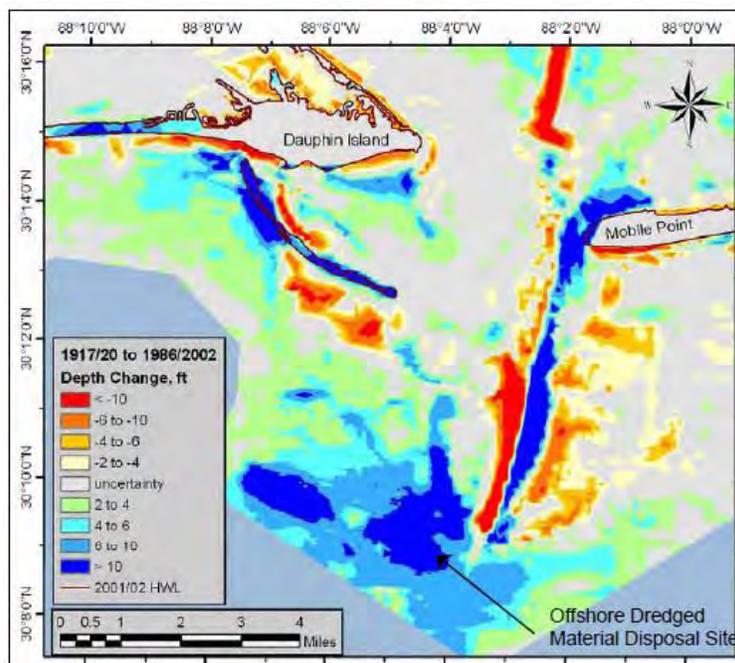


Figure 4-11. Bathymetric change on the Mobile ebb-tidal delta, 1917/20 to 1986/2002. Deposition zones seaward and west of the navigation channel were last surveyed in 1991. The deposition area farthest to the west is the Mobile Outer Mound. The irregular polygon just west of the outer mouth bar channel is believed to mark the historical location of dredged material disposal from the outer bar channel.

(from Byrnes et al, 2010)

The Corps' 2008 southward expansion of the SIBUA, will farther remove placed dredged sands from the ebb tidal delta, which should show an increased tendency for the sand to remain (i.e., accumulate) at that location *in lieu* of being reincorporated into the littoral drift system as intended. Between 1999 and 2009, a total of 9,600,347 cy of maintenance dredged sands had been placed in the SIBUA. The total volume placed within this site has continued to increase in the over seven subsequent years between 2000 and 2017.

- Byrnes *et al* (2010) suggests in their proposed sand budget that over the 82-year period considered between 1920 and 2002, an average of 161,000 cy/yr is transported annually from the offshore area within which the SIBUA is located landward to the ebb tidal delta's eastern lobe. The 161,000 cy/yr volume estimate is questioned for the following reasons:
 - As shown in the above table, dredged material had only been placed in the SIBUA during the last three years of the 82-year period considered by Byrnes *et al* (2010). That means the 161,000 cy/yr estimate is based on only three years of data. As important as the issue of how much of the dredged sand placed in the SIBUA is actually returned to the littoral drift system, it is difficult to understand how the proposed 161,000 cy/yr volume can be based upon only three years of dredged material disposal data and bathymetric conditions in the SIBUA out of an 82-year period of record.
 - The 161,000 cy/yr volume, if correct, represents around 48% of the 337,000 cy/yr estimated to be naturally transported from eastern lobe of the ebb tidal delta into the Outer Bar Channel, 85% of which is subsequently dredged and carried offshore for disposal. Further, considering the average of 287,000 cy/yr the sand budget proposes is dredged annually, 161,000 cy/yr would mean that around 56% of the dredged sands deposited offshore are transported landward to the ebb tidal delta's eastern lobe to be reincorporated into the littoral drift system. These are very large percentages which conflict with the observed fact that Dauphin Island's Gulf shoreline is eroding, and has been since the early 1970s, because the island is suffering from an overall deficit of sand (Morton, 2007).

Thus, this component of the proposed sand budget does nothing to explain why Dauphin Island is suffering from a general deficit of sand. As such the 161,000 cy/yr estimate is questionable and requires further investigation and analysis.

- As stated in the above bullet, if the 161,000 cy/yr volume estimate is correct, that would mean 56% of the average maintenance volume of 287,000 cy/yr dredged from

the Outer Bar Channel and carried offshore for disposal in the SIBUA each year is returned to the ebb tidal delta and eventually transported by natural nearshore hydrodynamic forces to nourish Dauphin Island's eroding shoreline. Even if that assumption is correct, it is logical to expect that the cumulative year-in and year-out loss of the remaining 44% of the dredged sands that appear to be accumulating in the SIBUA and effectively lost from the littoral drift system to eventually begin to adversely affect Mobile Pass' natural sand budget. That logic is being borne out by the steady ongoing erosion and disappearance of the Sand-Pelican Island shoal and Dauphin Island's Gulf shoreline. Further, if the 161,000 cy/yr return estimate in the proposed sand budget is correct and the modern dredging average of 503,000 cy/yr is considered, that would mean the amount of sand projected to be returned to the ebb tidal delta should decrease from the proposed 56% (Byrnes *et al*, 2010) total dredged and carried offshore for disposal each year to 32%, representing a reduction that would be expected to adversely affect Byrnes *et al*'s proposed sand budget.

The proposed sand budget should be updated to reflect "modern" and conditions within the SIBUA as they exist today after the site has experienced at least 15 years of receiving the more realistic modern average annual dredging volume of 503,000 cy/yr. Further, the GRR Study should also include a comprehensive analysis of the potential effects of the considered increases in channel width and depth to determine if enlarging the channel could further affect the natural sand budget for the Mobile Pass Inlet and Dauphin Island.

- The 2010 Byrnes *et al*. report concludes that "...based on all available information, there appears to be no measurable negative impacts to ebb-tidal shoals or Dauphin Island beaches associated with historical channel dredging across the Mobile Pass Outer Bar." ***If that conclusion is to be accepted by all parties, which it currently is not, the central question that must be answered is: What is causing the severe erosion of the Sand-Pelican Island shoal and Dauphin Island that began to occur in the latter half of the 20th century, and why has that erosion occurred coincidental with increased dredging of the Outer Bar Channel in the absence of any other changes to the Mobile Inlet Pass?***

The above Mobile District Response misses the point made by the comment: ***Since the 1980 Survey Report failed to investigate the Dauphin Island erosion issue (as the Mobile District Engineer committed would occur in several 1975 letters), during the intervening 37 years to the present, the island has continued to erode with no corrective remedy being identified.*** The Mobile District Response states "...the GRR will address ***potential effects of proposed channel improvements to the existing navigation project*** [emphasis added]". That extremely narrow study objective implies the Mobile District plans to conduct the

GRR Study in a manner that will not only violate the Corps' ER 1105-2-100 and other planning policy and guidance, but also the provisions of the Council on Environmental Quality's NEPA regulations. Under the current Mobile District approach, whatever erosion losses the Dauphin Island experienced between 1980 and the Study's base year would remain and not be investigated in the GRR Study, even if the Study was to eventually determine the Outer Bar Channel maintenance program has in fact contributed to those losses. The Study would only investigate the island's incremental additional erosion losses projected to occur over the 50-year future period considered in the Study. What is needed, and expected by the concerned public, is for the GRR Study to include efforts directed at **thoroughly investigating** the effects of the Outer Bar Channel (since 1980) on the erosion of Dauphin Island. In short, the GRR Study should not be allowed to ignore the erosion issue as the Mobile District did when it prepared the 1980 Survey Report.

As pointed out numerous times to the Mobile District staff, the 1980 Corps report is seriously flawed in that it completely ignored the Dauphin Island erosion issue, failed to comply with Section 5 of the Rivers and Harbors Act of 1935, ignored the findings of the 1978 Corps report, and did not honor written commitment made by the Mobile District Engineer in 1975 to investigate the Dauphin Island erosion problem. If the GRR Study does not address the historic sand losses that have occurred due to maintenance of the Outer Bar Channel interrupting the littoral drift system, **what the Mobile District and the Alabama State Port Authority are in essence conveying to the concerned stakeholders is: "Dauphin Island must continue to accept, bear, and endure the adverse consequences and economic hardships resulting from the island's erosion, while the Port of Mobile and the Theodore Industrial Port continue to profit from the transportation benefits of the channel without having to pay the "full cost of doing business" (i.e., mitigation of the channel's adverse environmental effects).**

Considering information contained in various reports produced by both the Mobile District and the US Geological Survey, maintenance of the Outer Bar Channel has interrupted the littoral transport of sand across the Mobile Pass Inlet dating back to 1939. Based upon those reports, it is possible to select and to individually build a case to support any one of the following years as the baseline from which to address the historic sand losses: 1939, 1958, 1966, 1969, 1978, 1980 and 1986. However, 1980 appears to represent the most defensible year to consider for the GRR Study because that is the year in which the Mobile Harbor Survey Report was completed.

Since the 1980 report did not address the effects of channel deepening on the littoral drift system, that report has a significant outstanding technical, scientific, and logic deficiency that must be corrected in the GRR Study. The GRR Study must address the impacts of the historical sand deficit on Dauphin Island attributable to maintenance of the Outer Bar Channel

dating back to at least 1980. During the 37 years since the 1980 report was completed, maintenance of the Outer Bar Channel has continued, further contributing to the erosion of Dauphin Island. For example, the significance of the amount of beach quality sands removed from the littoral drift system between 1980 and 2009 alone is presented depicted in the above table. Over that period, a total of 24,918,514 cy of were removed by a combination of new work and maintenance dredging, with 14,672,078 cy being disposed of in deep Gulf waters and permanently lost from the littoral drift system. The remaining 10,256,436 cy was placed in the SIBUA or in its general vicinity. Based on a modern average annual maintenance volume of 503,000 cy/yr as discussed, would mean an additional 3,523,698 cy of sand could also have been dredged between 2009 and 2016 and placed in the SIBUA.

These historic sand losses that have occurred since 1980 should be addressed in the GRR Study. To ignore them would be an irresponsible action on the part of the Mobile District. The GRR Study must also consider appropriate mitigation measures to restore the historic and future sand losses attributable to maintenance of the Outer Bar Channel for both the "Without Project" and the "With Project" conditions. To do otherwise, would apply an entirely different standard to the evaluation of the Dauphin Island erosion issue than the Mobile District's used in its recently completed Mississippi Barrier Island Restoration Plan SEIS where it recommended selected islands be restored to the pre-Hurricane Camille conditions of 1969. ***Compliance with NEPA requires that the impacts of past actions of an existing project being studied for further improvement must be considered if those historic impacts have not been addressed in a previous NEPA document and if those impacts are relevant to the improvements being considered.***

Given the longstanding nature and critical importance of the erosion issue, it is not acceptable for the Mobile District to base its entire position that "...dredging and placement practices associated with operation and maintenance of the Mobile Harbor Channel have not had a measurable impact on Dauphin Island" on just two contractor reports prepared by the same authors (i.e., Byrnes *et al*, 2008 and 2010). The earlier report was prepared in connection with a lawsuit against the Corps, with the 2010 report essentially representing a "refinement" of the data considered in the 2008 report. Neither of these reports have been submitted for exterior professional peer review required by the Corps' review process; satisfied all upward Corps reporting and review requirements; and been subjected to appropriate agency and public scrutiny. The Dauphin Island erosion issue can only be resolved by conducting a thorough, objective, and transparent analysis of all applicable data that genuinely seeks to gain the trust of the concerned and affected stakeholders is gained.

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Byrnes, M.R., S.F. Griffee, and M.S. Osler. January 2008. *Evaluation of Channel Dredging on Shoreline Response at and Adjacent to Mobile Pass, Alabama*. U.S. Army Corps of Engineers, Mobile Engineer District.

Mobile, Alabama.

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Dean, R.G. March 7, 2008. Review of Final Report by Applied Coastal Research and Engineering: “Evaluation of Channel Dredging on Shoreline Response at and Adjacent to Mobile Bay Entrance, Alabama”. Prepared for U. S. Army Corps of Engineers, Mobile Engineer District, Mobile, Alabama.

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Comment #538

From: [MEJAC](#)
To: [Mobile Harbor GRR](#)
Subject: [Non-DoD Source] Earth Day Environmental Justice petition
Date: Friday, May 11, 2018 11:25:24 AM
Attachments: [Signed USACE EJ petition.pdf](#)

Hello USACE,

Please find a petition signed by 101 local concerned citizens attached as a PDF file.

It reads:

Earth Day
April 21, 2018

Col. James A. DeLapp
U.S. Army Corps of Engineers, Mobile District
109 Saint Joseph Street
Mobile, Alabama 36602

Dear Col. DeLapp,

We are very concerned about the sincerity of the Corps' adherence to its mission of responding to environmental justice concerns from residents who are directly affected by federal infrastructure projects.

For over two years, the Mobile Environmental Justice Action Coalition has been raising alarm bells about the Corps' Draft General Reevaluation Review process in studying and responding to the environmental justice impacts Mobile Harbor Ship Channel enlargement and the corresponding increase in Port of Mobile traffic by sea, rail, and road.

Now, with just a couple of months left before the Draft GRR is published, some communities of environmental justice concern like Orange Grove and Down the Bay have yet to be engaged directly despite promises from the Corps that EJ Focus Groups would be convened to capture any potential concerns from their residents about the Corps' Tentatively Selected Plan to depend and widen the Ship Channel to allow an increase in Port traffic.

It would be extremely disappointing to know that our Mobile District office is disinterested in directly engaging with communities who have borne some of the greatest burdens of the Mobile District's past decisions in the Port infrastructure area.

The National Environmental Policy Act process requires federal agencies to assess the environmental effects of their proposed actions prior to making decisions. Using NEPA, federal agencies evaluate the environmental and related social and economic effects of their proposed actions. Agencies also provide opportunities for public review and comment on those evaluations.

Executive Order 12898 was published in 59 FR 7629 on February 16, 1994 to "address environmental justice in minority populations and low-income populations". As the EPA has made abundantly clear, the order directs federal agencies "to develop a strategy for implementing environmental justice. The order is also intended to promote nondiscrimination in federal programs that affect human health and the environment, as well as provide minority and low-income communities access to public information and public participation."

We would like to see the Corps' Mobile District live up to its neighborly potential by ensuring that the GRR's NEPA process and its corresponding EO 12898 obligations are implemented responsibly by engaging in concerted EJ community outreach to the Down the Bay and Orange Grove communities in a timely manner, because we know that NEPA and EJ programs make projects better and build confidence in agency decisions. They are also the law.

Sincerely,
[101 local concerned citizens]

We are depending on y'all to do right by our most vulnerable port neighbors. Please do the right thing and, at the very least, meet with these communities as y'all have promised.

--

Ramsey Sprague
President, Mobile Environmental Justice Action Coalition
251.308.5872
infomejac@gmail.com <<mailto:infomejac@gmail.com>>

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Sincerely,

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March 31, 2018

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Dear COL DeLapp;

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The Corps has now admitted that half of the dredged sands placed in the Sand Island Beneficial Use Area (SIBUA) are accumulating instead of rejoining the natural littoral drift system to nourish Dauphin Island as the Corps consistently promised would occur over the past 20 years. That means, since 1999 when the SIBUA began to be used, Dauphin Island has been robbed of at least 7 million cubic yards of beach quality sands, causing significant erosion of the island. **If that volume of sands was spread 3 feet deep, it would cover an area 852 feet wide along the entire 14-mile length of the island.** The Corps' admission supports the observed erosion of the island and the Corps' own 1978 report, the National Park Service's 2006 report, and the US Geological Survey's 2007 report – all identifying the Mobile Harbor project as a contributor to the erosion of Dauphin Island and the Alabama-Mississippi barrier island system.

The Draft GRR will present the Corps' Tentatively Selected Plan (TSP) to deepen and widen Mobile Harbor. To comply with all federal laws and regulations, the TSP **MUST** include a Mitigation Plan to both halt future erosion and to restore Dauphin Island's historically eroded shoreline. The Mitigation Plan should consist of two features: (1) all future sands dredged from the Outer Bar Channel should be disposed in shallow waters to assure 100% of the sands are returned to the littoral drift system; and (2) the historic Gulf shoreline of Dauphin Island must be restored to at least the conditions that existed in 1999 before the Corps began use of the SIBUA.

In Section 302 of the Water Resources Development Act of 1996, Congress provided the Corps the specific authority to use Mobile Harbor dredged material to accomplish environmental restoration. It is time the Corps finally did the right thing and tell the Alabama State Port Authority that together they must develop and implement an acceptable Mitigation Plan to correct the adverse effects the Mobile Harbor project is having on the erosion of Dauphin Island – Alabama's only barrier island. The impending Draft GRR is the appropriate vehicle to take that important step.

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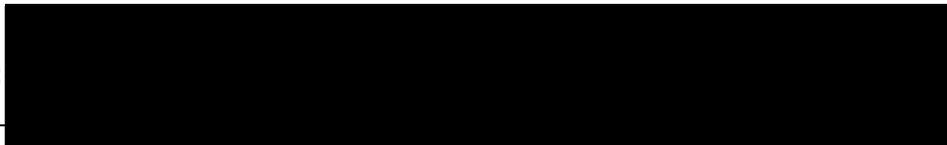
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March 31, 2018

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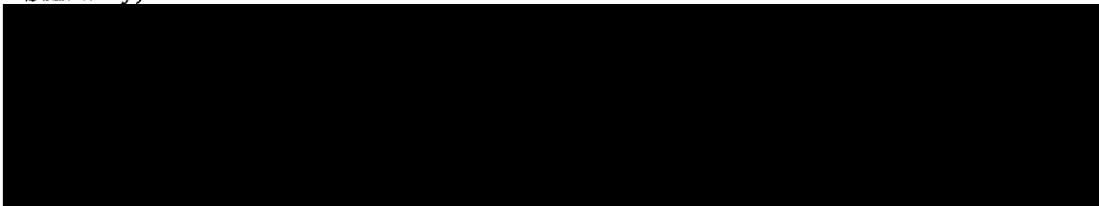
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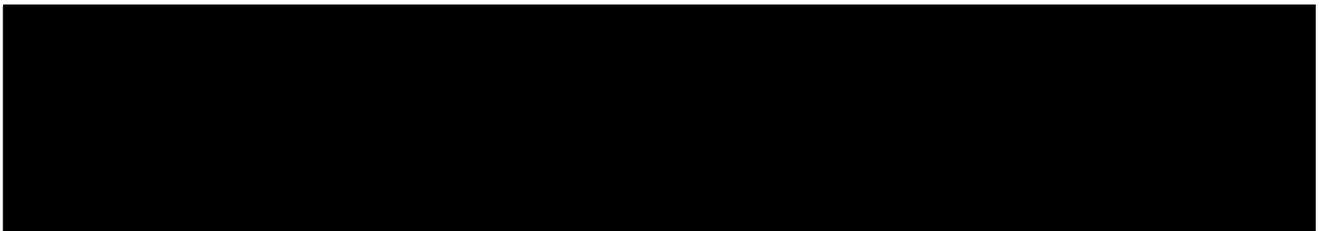
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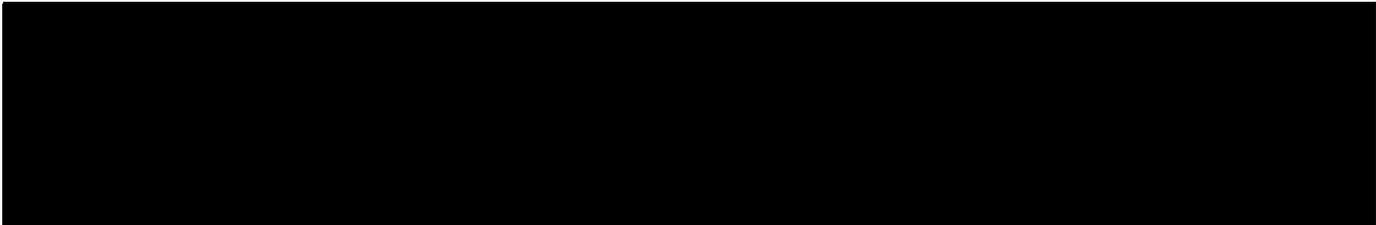
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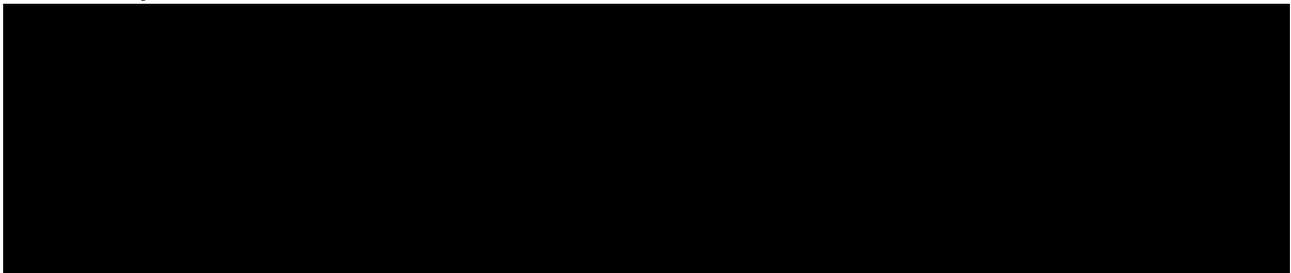
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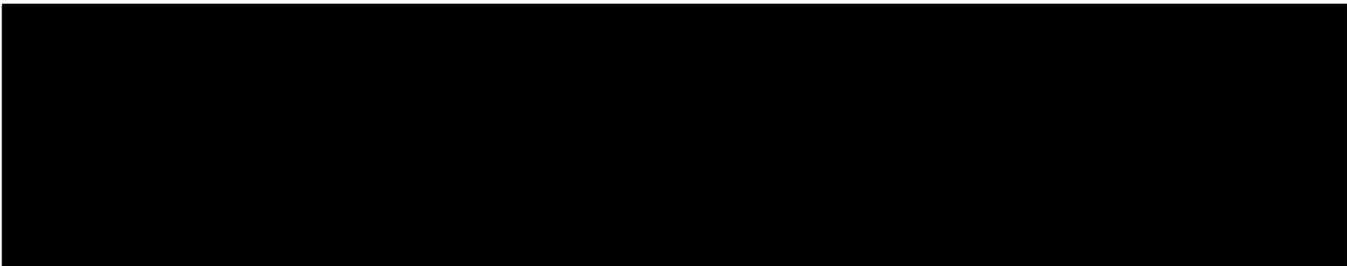
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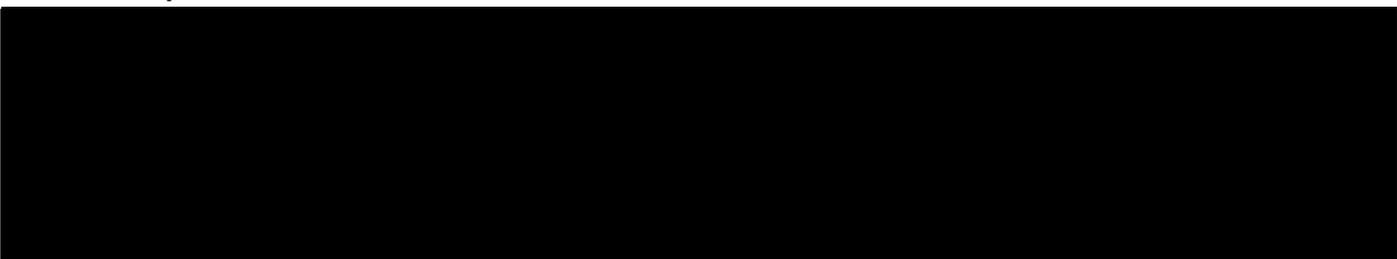
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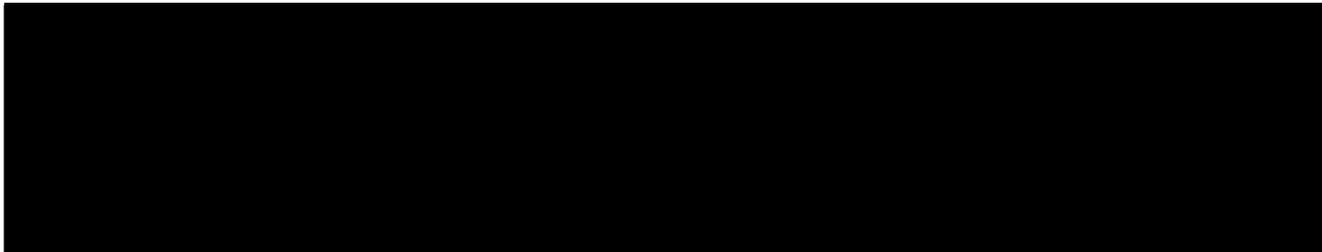
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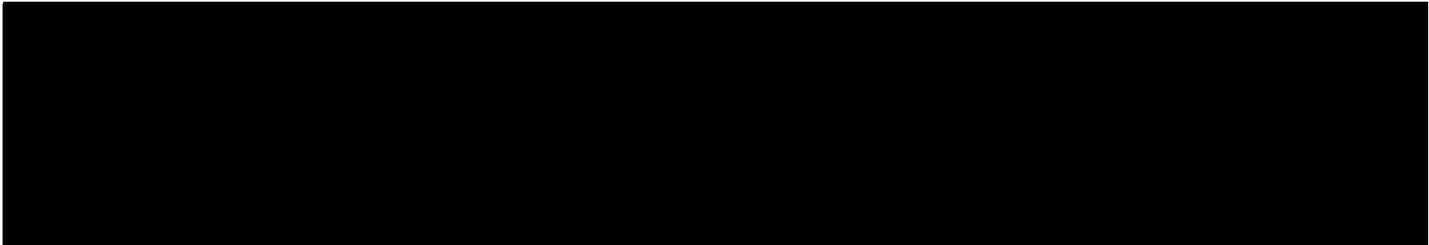
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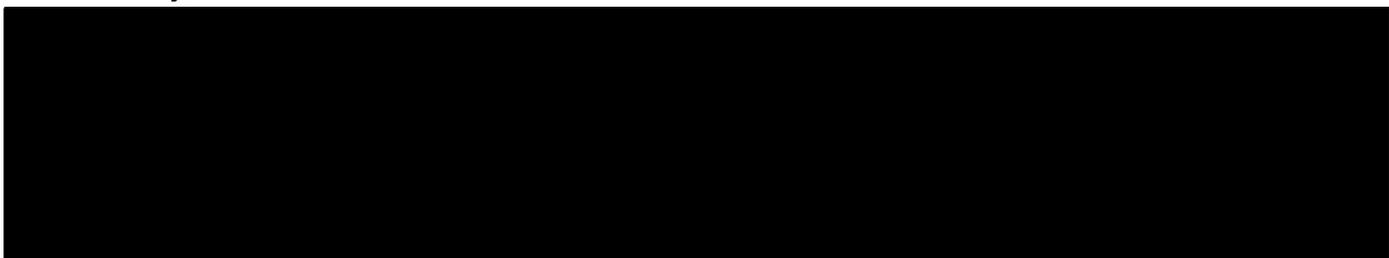
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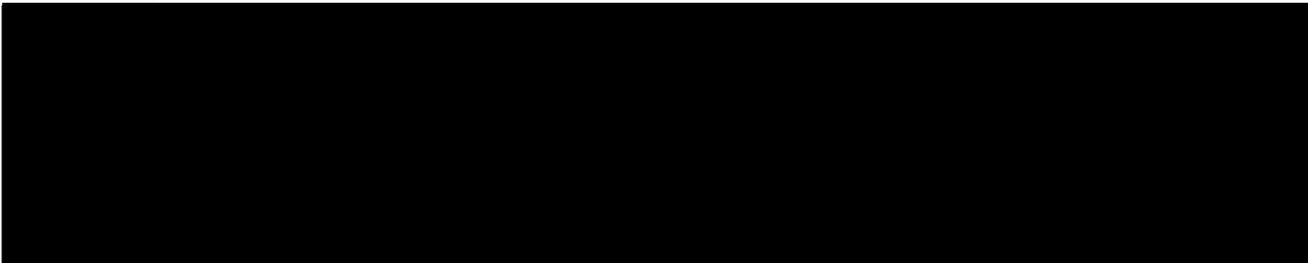
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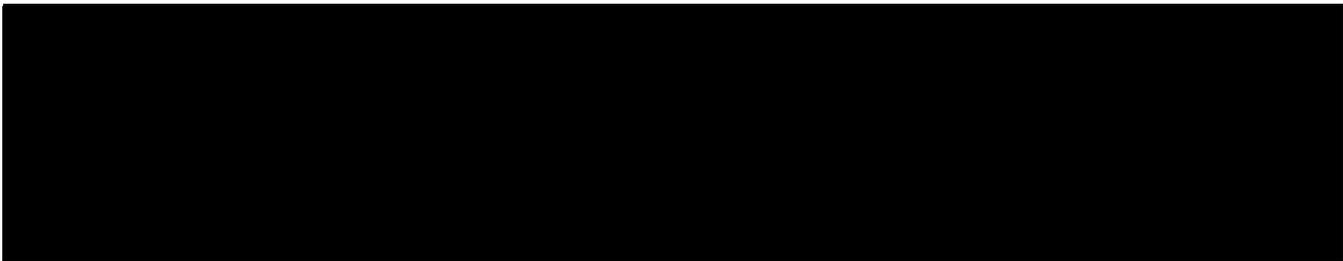
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The Draft GRR will present the Corps' Tentatively Selected Plan (TSP) to deepen and widen Mobile Harbor. To comply with all federal laws and regulations, the TSP **MUST** include a Mitigation Plan to both halt future erosion and to restore Dauphin Island's historically eroded shoreline. The Mitigation Plan should consist of two features: (1) all future sands dredged from the Outer Bar Channel should be disposed in shallow waters to assure 100% of the sands are returned to the littoral drift system; and (2) the historic Gulf shoreline of Dauphin Island must be restored to at least the conditions that existed in 1999 before the Corps began use of the SIBUA.

In Section 302 of the Water Resources Development Act of 1996, Congress provided the Corps the specific authority to use Mobile Harbor dredged material to accomplish environmental restoration. It is time the Corps finally did the right thing and tell the Alabama State Port Authority that together they must develop and implement an acceptable Mitigation Plan to correct the adverse effects the Mobile Harbor project is having on the erosion of Dauphin Island – Alabama's only barrier island. The impending Draft GRR is the appropriate vehicle to take that important step.

Sincerely,



March 31, 2018

COL James A. DeLapp
U.S. Army Corps of Engineers, Mobile District
109 Saint Joseph Street
Mobile, AL 36602

Dear COL DeLapp;

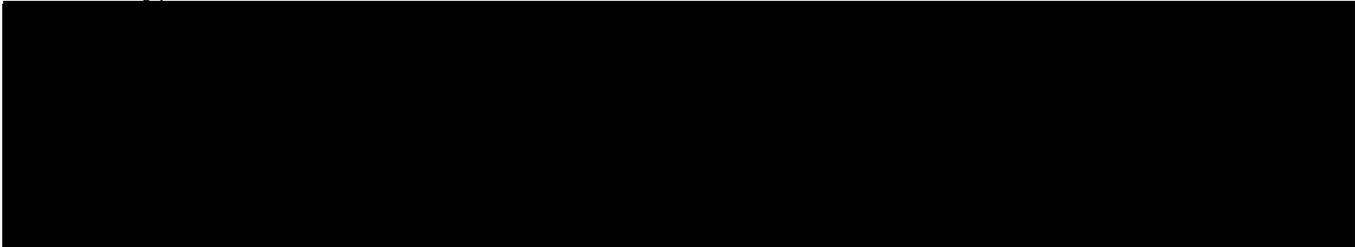
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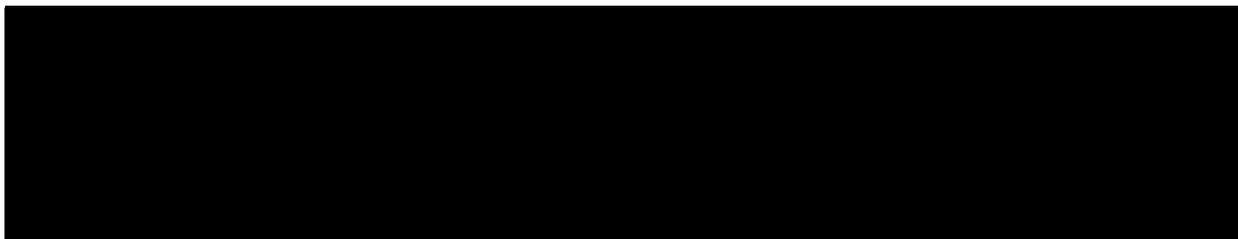
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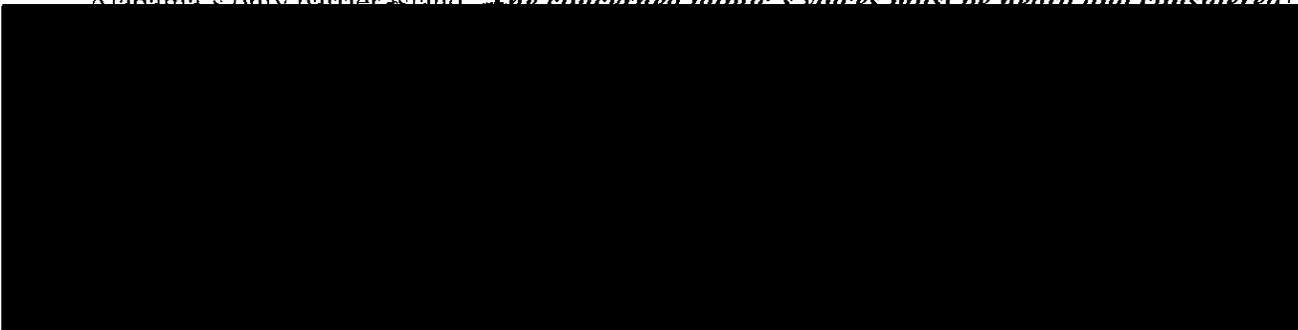
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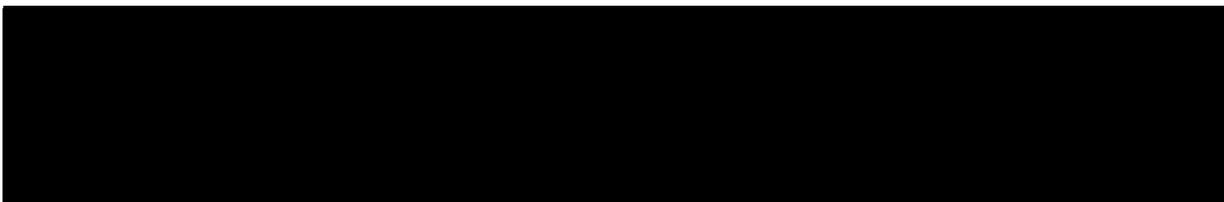
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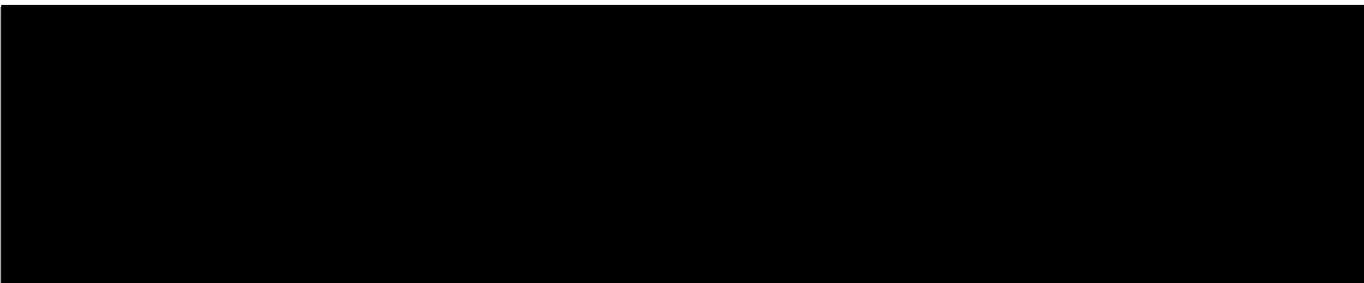
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April 24, 2018

Attn: PD-F
P.O. Box 2288
Mobile, AL 36628

Re: Corp EJ Deliberation Access

To PD-F of the U.S. Army Corp of Engineers Mobile District:

The members of the Down the Bay Block Club submit this letter of request for an opportunity to share with the U.S. Corp of Engineers District of Mobile our concerns related to the environmental impact of the proposed enlargement of the Mobile Harbor Ship Channel on the residents of our community.

The Down the Bay Block Club, is an organization incorporated in 1973 to ensure the community residents a voice in issues impacting their quality of life. Because of the proximity of our residences to the Port of Mobile ship channel, we feel that we deserve an opportunity to have our concerns and opinions heard. We also welcome your explanations and facts related to the expansion of the ship channel which may alleviate our environmental concerns,

In 2010 the Metropolitan Planning Organization for the City of Mobile provided a 2035 Executive Summary which referenced concerns about Air Quality Conformity as defined by the EPA. The report stated that in January 2010 the EPA's recommended new standard for ozone would place Mobile in a non-attainment status. This report was issued before the introduction of the ship channel enlargement and container terminal proposal.

Our community is currently facing the impending environmental impacts of the I-10 bridge construction, expansion of the State Docks coal handling facility, increased truck traffic to support the container terminal and enlargement of the Mobile Harbor Ship Channel. We find it difficult to believe the cumulative air quality offenses will not have a negative impact on our environmental quality of life. We support economic expansion and smart growth but not at the expense of our health and welfare.

A response to our letter of concern before a final decision regarding the issue of the proposed ship channel enlargement is reached will be appreciated.

Sincerely,



Beverly Crandall
President, Down the Bay Block Club