

Comment 64

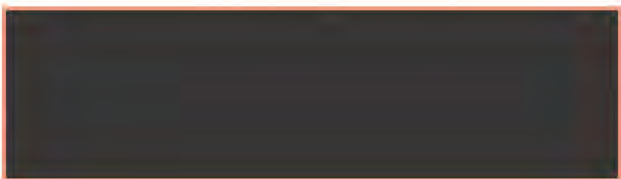
**From:** [redacted] bellsouth.net  
**To:** [Mobile Harbor GRR](#)  
**Cc:** [David Sessions](#); [jcollier@townofdauphinisland.org](mailto:jcollier@townofdauphinisland.org); [Dennis Knizley](#); [chris.blankenship@dcnr.alabama.gov](mailto:chris.blankenship@dcnr.alabama.gov)  
**Subject:** [Non-DoD Source] Update of Comments to Draft GRR/SEIS  
**Date:** Monday, September 17, 2018 11:44:34 AM  
**Attachments:** [2018-09-17 GRR -SEIS update re Suggestion for Mitigation signed.pdf](#)  
[1997-05-30 SAD Memorandum of Approval \(302\).pdf](#)  
[2018-09-17 \(1980-2009\) Mobile Harbor Outer Bar Dredging History.pdf](#)

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This e-mail provides additional public comments to the draft GRR/SEIS Widening and Deepening of the Mobile Navigation Channel that was mailed Friday, September 14th by USPS Priority Mail. Expected delivery is today, Monday, September 17th and based upon tracking, the Priority Package was delivered to the PO Box early this morning. The attached comments provide a mitigation plan that the Corps of Engineers, Mobile District, should implement.

Sincerely,

[redacted]



September 17, 2018

U.S. Army Corps of Engineers  
Mobile District  
ATTN: PD-F  
P.O. Box 2288  
Mobile, AL 36628

Re: Mobile Harbor Draft General Reevaluation  
Report/Supplemental Environmental Impact Statement (Draft  
GRR/SEIS)

To: U.S. Army Corps of Engineers, Mobile District:

This is an amendment to my public comments to the draft GRR/SEIS Widening and Deepening of the Mobile Navigation Channel that was mailed Friday, September 14<sup>th</sup> by USPS Priority Mail. Expected receipt is Monday, September 17<sup>th</sup>. An essential and principal objective of the GRR/SEIS is to identify potential consequences and develop and construct the appropriate mitigation plans to minimize adverse impacts of the Corps of Engineers maintenance dredging of the Outer Bar Channel. To accomplish this objective, I have offered below a mitigation plan that the Corps of Engineers, Mobile District, should implement.

As the Draft GRR/SEIS states, it is the supplement to the original 1980 EIS. As required by Corps Policy and NEPA guidelines, the Draft GRR/SEIS must address past, present and future impacts of the widening and deepening of the Mobile Ship Channel, and should address the historical maintenance dredging from 1980 that removed over 20 million cubic yards (and maybe more) from the littoral system that would have nourished the Dauphin Island shoreline. As I have stated in my initial public comments that the Mobile District will receive Monday, the proposed Tentatively Selected Plan (TSP) does not address past, present and future impacts; it does leave Dauphin Island in a vulnerable and weakened state.

To mitigate for the historic and ongoing erosion of Dauphin Island and the smaller Sand/Pelican Island to the southeast, two separate but related actions are needed;

- During maintenance dredging of the Bar Channel, all dredged sand should be placed in the shallow waters (i.e., between 0 to <15 feet) atop the shoal stretching between Sand Island Lighthouse and the east end of Sand/Pelican Island. Essentially 100% of the sand placed in the shallow waters along the top of the submerged shoal should be rapidly incorporated into the natural littoral drift system and moved to restore Sand/Pelican Island and nourish Dauphin Island's eroding Gulf shoreline. The Mobile District of the Corps already has the necessary Congressional authority to undertake that mitigation action as provided by Section 302 of the Water Resources Development Act of 1996, and has received authority from Headquarters, South Atlantic Division in a May 30, 1997 memorandum, which is attached. Section 302 was specifically enacted to modify the Mobile Harbor project to allow dredged material to be beneficially used and to pursue environmental restoration. All the Mobile District has to do is demonstrate the will to apply that existing Congressional authority to modify current maintenance practices for the Bar Channel. However, this mitigation action would only mitigate for the present and future erosion of Dauphin Island.
- To mitigate the historic shoreline losses of Dauphin Island, a much larger project action is needed. That mitigation measure should move by dredging to the Dauphin Island shoreline the millions of cubic yards of sands the Mobile District has removed from the Bar Channel since 1999 that have accumulated within

the so-called Sand Island Beneficial Use Area (SIBUA). There should be plenty of sand that has accumulated not only in the present SIBUA, but also in the south west extension that was constructed in 2009. See attached Corps of Engineering Dredging Summary. There is at least 20 million cy of sand available, if not more.

Those beach quality sands originally came from the Fort Morgan Peninsula and would have been transported by littoral drift to Dauphin Island if the Mobile District had not intercepted the sands by maintenance dredging of the Bar Channel. The millions of cubic yards of accumulated sands now sit a short distance offshore in waters too deep for them to rejoin the littoral system by natural wave and current action. It is these sands that were removed from the littoral drift system that have contributed to the present "sand starvation" of Dauphin Island. The Town of Dauphin Island developed the design details of a project in 2011 that would use around 4 million cy of these sands at an estimated cost of \$59 million to restore the island's eroded shoreline which could be readily implemented and/or expanded with little further study.

Such a mitigation project could be paid for by either of two viable approaches:

1. According to the Draft GRR/SEIS, the recommended Mobile Harbor deepening project is predicted to generate average net benefits of \$34.5 million per year in excess of cost. Thus, mitigation could be paid for with the benefit stream predicted be generated in just two years of operation of the deepened channel. All the Mobile District has to do is recommend this mitigation measure be included in the project recommendation to deepen Mobile Harbor.
2. Alternatively, the Mobile District could proactively work with the Alabama State Port Authority, the Governor of Alabama and other parties to select for implementation Project ID No. 92 ("West End Beach and Barrier Island Restoration Project") from the list of Alabama Coastal Restoration Suggested Projects being considered by the Alabama Gulf Coast Recovery Council. That approach would allow the mitigation project to be paid for with Deepwater Horizon Oil Spill related monies instead of being charged to the Mobile Harbor Deepening Project.

This is an opportunity for the Corps of Engineers, and specifically the Mobile District to correct a wrong that they have perpetuated for the last 38 years, and continually, by using a faulty 2008 Byrne's study (now a 2010 study) stating that the maintenance dredging is not a reason for the erosion of Dauphin Island's shoreline. In particular, the Corps Mobile District has continued to leave out and not acknowledge for the public a very pertinent fact that was presented in the Final Order for the Settlement of the Corps of Engineers Lawsuit. In the Final Order it is stated:

"On January 10, 2008, as required by the Settlement Agreement, the Final Report was submitted by Dr. Byrnes. The Final Report determined "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." **See Settlement Agreement ¶ 3(f). Plaintiffs' expert, Dr. Dean, dissented and indicated that the Final Report was fundamentally flawed, not reliable and at best inconclusive.** (Emphasis added). Dr. Dean also made this same conclusion in his final review of March 7, 2008: "...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."

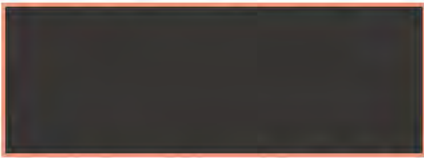
**Dr. Dean also stated: "I conclude that certain critical portions of the Final Report (Dr. Byrnes report) are arbitrary in their methods of analysis and acceptance/interpretation of the available data resulting in uncertainty remaining in the final results.** These issues were documented in my written review of September 30, 2007 of the Draft Final Report and, in accordance with Paragraph 3 (f), of the LSA, the "detailed reasons" are provided again in the following sections with due consideration of the Final Report and responses provided by ACRE to my earlier review of the Draft Report..."



Neither does the GRR/SEIS include important information from other esteemed coastal engineers such as **Robert Morton** who has conducted important studies about the Alabama-Mississippi Barrier Islands. Dr. Morton in **his 2007 Study: Historical Changes in the Mississippi – Alabama Barrier Islands and the Roles of Extreme Storms, Sea Level Rise and Human Activities** stated “The principal causes of barrier island land loss are frequent intense storms, a relative rise in sea level, and a deficit in the sediment budget. The only factor that has a historical trend that coincides with the progressive land loss is the progressive reduction in sand supply associated with the nearly simultaneous deepening of channels dredged across the outer bars of the three tidal inlets maintained for deep-draft shipping....

The Corps of Engineers can correct these errors by the implementation the above suggested mitigation approaches that deals with where to get the sand and how to pay for the cost of the mitigation plan. As I also mentioned, the Town of Dauphin Island has already conducted a study in 2011 by Dr. Scott Douglass, and has submitted a project recommendation, ID No. 92 ("West End Beach and Barrier Island Restoration Project") from the list of Alabama Coastal Restoration Suggested Projects being considered by the Alabama Gulf Coast Recovery Council. That approach would allow the mitigation project to be paid for with Deepwater Horizon Oil Spill related monies instead of being charged to the Mobile Harbor Deepening Project.

I look forward your responsible and considerate review of the publics suggestions to solve the erosion of Dauphin Islands shoreline,



CC: Jeff Collier, Mayor Town of Dauphin Island  
David Sessions, State Representatives  
Christopher M. Blankenship, Commission, ADCNR  
Dennis Knizley, President, Dauphin Island Property Owner's Association





DEPARTMENT OF THE ARMY

U.S. Army Corps of Engineers  
WASHINGTON, D.C. 20314-1000

REPLY TO  
ATTENTION OF:

CECW-P/O

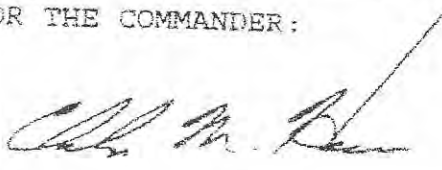
30 MAY 1987

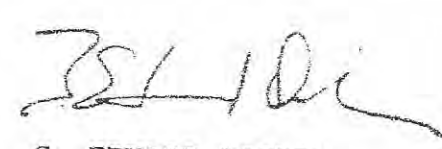
MEMORANDUM FOR Commander, South Atlantic Division

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 directly as well as, authorities under section 204 of WRDA 92, and section 307 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

CESAD-ET-P\O (CECW-P\O\30 May 97) (1105-2-10b) 1st End  
Mr. Barnett\bjg\404-331-4580\Mr. Deveau\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

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



## Mobile Harbor Outer Bar Channel Dredging History (1980-2009)

(Source: U.S. Army Corps of Engineers)

Dredge Date	Gross Quantity Dredged (yd <sup>3</sup> )	Disposal Area Used <sup>1/</sup>
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	Ocean DA
Feb 1989-May 1990	<sup>2/</sup> 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	<sup>3/</sup> 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
<b>Total Dredged from Outer Bar</b>	<b>24,918,514</b>	
<b>Total Placed in Ocean DA</b>	<b>15,328,167</b>	
<b>Total Placed in SIBUA or at Lighthouse</b>	<b>9,600,347</b>	

<sup>1/</sup> Ocean DA – EPA approved open water disposal site in the offshore Gulf of Mexico

SIBUA – Sand Island Beneficial Use Area

<sup>2/</sup> New Work Deepening from 42 to 47 feet

<sup>3/</sup> New Work Deepening from 47 to 49 feet.

Comment 65

**From:** [Judith Adams](#)  
**To:** [Mobile Harbor GRR](#)  
**Cc:** [Larry Merrihew](#); [Newell, David P CIV CESAM CESAD \(US\)](#)  
**Subject:** [Non-DoD Source] GRR comments  
**Date:** Monday, September 17, 2018 11:37:58 AM  
**Attachments:** [CAWA ltr Al St Port Auth.pdf](#)  
[2018 CAWA RESOLUTION TO SUPPORT PORT OF MOBILE CHANNEL HARBOR IMPROVEMENTS.pdf](#)

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Please find attached the Coalition of Alabama Waterways LOS and resolution supporting the Harbor project. Kind regards, Judy

Judith Adams

Vice President, Marketing

Alabama State Port Authority

P.O. Box 1588

Mobile, AL 26622

+1 251-441-7003

jadams@asdd.com <<mailto:jadams@asdd.com>>

Blockedwww.asdd.com <Blockedhttp://www.asdd.com/>



*Coalition of Alabama Waterway Associations, Inc.*

*PO Box 388  
231 Montgomery Street  
Montgomery, AL 36101-0388*

*(334) 165-5744  
cawa@cawia.org*

September 17, 2018

COL Sebastien P. Joly, District Commander  
U.S. Army Corps of Engineers, Mobile District  
P.O. Box 2288  
Mobile, AL 36628-0001

To Whom It May Concern:

Our organization is a non-profit organization formed to represent the five navigable waterways of Alabama, so that we could better serve those interested in navigation of our State's river systems. It continues to work for the system's further development and proper maintenance and has become the principal vehicle for those who wish to work together toward these ends. Our membership is comprised of representatives of the five navigable river associations who work to improve the commercial movement of commerce throughout Alabama, and to continue efforts to make the river systems a viable tool for job promotion in our State, and to promote the use of the Port of Mobile. There are significant new challenges in the years ahead in maintaining the viability of the waterways as industry needs increase, as energy demands grow and as constraints on waterway development continue.

We fully support the Mobile Ship Channel Project, recognizing the critical role of our nation's water resources infrastructure to a robust economy, job creation, public safety and environmental well-being. As a result we would submit the attached resolution in support of the Mobile ship channel project.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Larry Merrihew", is written over a horizontal line.

Larry Merrihew, Chairman



2018

A RESOLUTION TO SUPPORT THE PORT OF MOBILE'S  
PROPOSED CHANNEL & HARBOR IMPROVEMENTS

By the

Coalition of Alabama Waterways Association

WHEREAS, the Coalition of Alabama Waterways Association is a member organization composed of representatives of Alabama's five navigable river systems; and

WHEREAS, the Coalition of Alabama Waterways Association, combine efforts to provide the Port of Mobile with access to 12,000 miles of inland waterways and 26 States; and

WHEREAS, the Alabama State Port Authority of Mobile seeks to improve the Port of Mobile's channel and harbor to serve the larger vessels that now traverse the improved Panama Canal and thereby making the Port of Mobile more attractive as a port of call for larger ships; and

WHEREAS, the proposed channel and harbor improvements of the Port of Mobile would generate net economic benefits in excess of 34 million dollars annually and have a positive impact on capital investment and creation of new jobs; and

WHEREAS, improving the channel and harbor of the Port of Mobile would benefit the 26 states served by the aforementioned waterways and provide additional opportunities for increased commerce; and

WHEREAS, the Port of Mobile is an invaluable asset to the States served by the inland rivers of the United States; Now, therefore

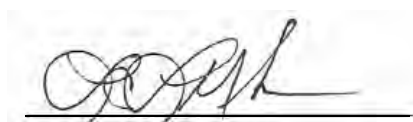
BE IT RESOLVED, that the Coalition of Alabama Waterways Association strongly supports improvements to the channel and harbor of the Port of Mobile; and

BE IT FURTHER RESOLVED, that the Coalition of Alabama Waterways Association encourages the U.S. Army Corps of Engineers to favorably complete the study of improving the channel and harbor for the Port of Mobile and then execute said study; and

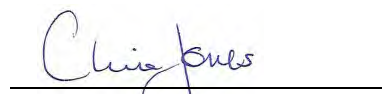
BE IT FURTHER RESOLVED, that a copy of this resolution be spread upon the minutes of the Coalition of Alabama Waterways Association; and

BE IT FURTHER RESOLVED, that copies of this resolution be presented to officials with the U.S. Army Corps of Engineers, the Alabama State Port Authority, and to appropriate members of the United States Congress and other appropriate officials.

IN WITNESS THEREOF, the Coalition of Alabama Waterways Association Board of Directors has instructed us to affix our signatures to this resolution on the 20th day of August, 2018.



Lawrence L Merrihew  
Chairman



Cline Jones  
President

**From:** [David Meyer](#)  
**To:** [Mobile Harbor GRR](#)  
**Subject:** [Non-DoD Source] Dredging of the Bar Channel  
**Date:** Monday, September 17, 2018 11:34:47 AM

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Colonel Sebastien P. Joly,  
  
District Commander  
  
U.S. Army Corps of Engineers, Mobile District  
  
P.O. Box 2288  
  
Mobile, AL 36628-0001

RE: Public Notice: FP15-MH01-10

Dear Colonel Joly:

This letter is submitted 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.

Along with other residents, I have observed the erosion occurring on Dauphin Island with great alarm. For the past ten years, I have watched as the Corps dump dredged sands in the Sand Island Beneficial Use Area (SIBUA) south of the Sand Island lighthouse, 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. We really need 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. At the very least, the disposal site needs to be in shallow waters that will replenish the flow of sand to the Island.

The results of the present disposal policy are clear and stark. The public can no longer accept Dauphin Island being penalized and excluded because of the 2000-2009 lawsuit. The time has come to implement a viable plan to mitigate the sand starvation of Dauphin Island; to do anything less under the circumstances would be highly questionable and totally unacceptable to the people of south Mobile County.

Sincerely,

David Meyer  
Property Owner, Local Businessman and Taxpayer

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David Meyer  
Dauphin Island Beach Rentals, LLC  
Effective Internet Marketing for Vacation Rentals  
Blocked[www.DauphinIslandBeachRentals.com](http://www.DauphinIslandBeachRentals.com) <Blocked<http://www.dauphinislandbeachrentals.com/>>  
(888) 958-4440

## Comment 67

**From:** [REDACTED]  
**To:** [Mobile Harbor GRR](#)  
**Subject:** [Non-DoD Source] Mobile Harbor Deepening and Widening Project  
**Date:** Monday, September 17, 2018 11:30:29 AM

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Attn: Ms. Jennifer L. Jacobsen

Dear Ms. Jacobsen:

I write today in full support of the proposed deepening and widening of the Mobile ship channel.

I have worked in the maritime industry for over 50 years and it saddens me to see the number of ships forced to wait to enter or leave the harbor because of the one way traffic imposed on larger ships. The cost of these delays definitely affects the competitiveness of the Port of Mobile.

Mobile cannot continue to be competitive as ships get larger and deeper unless this project moves forward. The cost of not doing the project will be the loss of jobs and economic value to the region.

Mobile is currently the 10th largest port in the US. The gains in business since 2000 have been fantastic. The port means so much to the regional economy with a \$22.4 billion dollar economic value and creates 135,000 direct and indirect jobs. All of these gains will be endangered if the project does not go forward.

The ROI on this project certainly justifies it. It is my hope that the USACOE will see the tremendous value of the project and render a favorable decision.

Best regards,

[REDACTED]  
Mobile, AL 36608

Sent from my iPad



## Comment 68

**From:** [REDACTED]@ol.com  
**To:** [Mobile Harbor GRR](#)  
**Subject:** [Non-DoD Source] Mobile Ship Channel expansion  
**Date:** Monday, September 17, 2018 11:29:48 AM

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Col. Joly,

Mayor Jeff Collier and other intelligent people have communicated the erosion detriment affecting Dauphin Island and other coastal sites unless the dredging material is placed in appropriate areas. Please consider their recommendations to prevent shoreline erosion by appropriate placement of dredge materials.

Thank you,

[REDACTED]  
Daphne, Alabama 36526

**From:**   
**To:** [Newell, David P CIV CESAM CESAD \(US\)](#)  
**Subject:** [Non-DoD Source] My comments on the Mobile Ship Channel expansion DSEIS  
**Date:** Monday, September 17, 2018 11:29:30 AM

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David Newell,

Dear District Commander,

I am writing to express my concern regarding the Corps' study results indicating no impact on the environment from a major expansion project for the ship channel. The Corps needs to address the following items to ensure the study is comprehensive enough to determine impacts and doesn't underestimate the true impact.

My concerns include:

The study only includes one year of weather data as the base of its water quality models. Given how frequently and drastically these impact Mobile Bay watershed this is inadequate. The Corps must include at least three years of data to show how severe weather impacts the study's results;

The Corps must include studies about how pathogens, harmful algal blooms, and invasive species will enter Mobile Bay through a deeper channel;

The Corps must thoroughly review how the proposed project will generate new growth opportunities associated with the port that could have indirect impacts to our natural resources;

Ship wake analyses must be improved to include more accurate information (realistic ship sizes, weights, etc). The Corps needs to study the impacts on our aquatic life (oysters, seagrasses, etc.) and our shorelines from wave energy;

The Corps must work with scientists to ensure the oyster assessment is more comprehensive. The Corps needs to look at how young oysters move and show how the presence of predators (oyster drills) may increase with changes in salinity;

The Corps needs to more comprehensively investigate impacts into the wetlands, seagrasses, fish, and aquatic resource assessments. For instance, the Corps has not studied how losses to seagrasses from higher salinity will affect the species that rely on them like the West Indian Manatee and waterfowl;

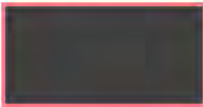
The Corps needs to recognize impacts to low income, minority communities as results show an increase of truck traffic by 25%;

The Corps must, as required by law, acknowledge past impacts on air quality and shoreline erosion since 1980 (the last environmental impact study conducted);

The Corps must consider creating a Dredge Management Plan that includes all proposed projects in the Mobile Bay area;

In conclusion, the Corps' finding of "no impact" on Mobile Bay's sensitive environment is very concerning given the magnitude of the proposed project. Thank you for your consideration and response to each of these comments. By thoroughly studying and developing a comprehensive plan for the port expansion, we can grow responsibly and mitigate any unavoidable impacts to the natural resources that support our economy and quality of life.

Sincerely,





Fairhope , Alabama 36532

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## Comment 70

**From:**   
**To:** [Newell, David P CIV CESAM CESAD \(US\)](#)  
**Subject:** [Non-DoD Source] My comments on the Mobile Ship Channel expansion DSEIS  
**Date:** Monday, September 17, 2018 11:26:00 AM

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David Newell,

Dear District Commander,

I am writing to express my concern regarding the Corps' study results indicating no impact on the environment from a major expansion project for the ship channel. The Corps needs to address the following items to ensure the study is comprehensive enough to determine impacts and doesn't underestimate the true impact.

My concerns include:

The study only includes one year of weather data as the base of its water quality models. Given how frequently and drastically these impact Mobile Bay watershed this is inadequate. The Corps must include at least three years of data to show how severe weather impacts the study's results;

The Corps must include studies about how pathogens, harmful algal blooms, and invasive species will enter Mobile Bay through a deeper channel;

The Corps must thoroughly review how the proposed project will generate new growth opportunities associated with the port that could have indirect impacts to our natural resources;

Ship wake analyses must be improved to include more accurate information (realistic ship sizes, weights, etc). The Corps needs to study the impacts on our aquatic life (oysters, seagrasses, etc.) and our shorelines from wave energy;

The Corps must work with scientists to ensure the oyster assessment is more comprehensive. The Corps needs to look at how young oysters move and show how the presence of predators (oyster drills) may increase with changes in salinity;

The Corps needs to more comprehensively investigate impacts into the wetlands, seagrasses, fish, and aquatic resource assessments. For instance, the Corps has not studied how losses to seagrasses from higher salinity will affect the species that rely on them like the West Indian Manatee and waterfowl;

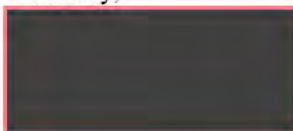
The Corps needs to recognize impacts to low income, minority communities as results show an increase of truck traffic by 25%;

The Corps must, as required by law, acknowledge past impacts on air quality and shoreline erosion since 1980 (the last environmental impact study conducted);

The Corps must consider creating a Dredge Management Plan that includes all proposed projects in the Mobile Bay area;

In conclusion, the Corps' finding of "no impact" on Mobile Bay's sensitive environment is very concerning given the magnitude of the proposed project. Thank you for your consideration and response to each of these comments. By thoroughly studying and developing a comprehensive plan for the port expansion, we can grow responsibly and mitigate any unavoidable impacts to the natural resources that support our economy and quality of life.

Sincerely,





Dauphin Island, AL, Alabama 36528

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**From:** [Natalie Montoya](#)  
**To:** [Newell, David P CIV CESAM CESAD \(US\)](#)  
**Subject:** [Non-DoD Source] My comments on the Mobile Ship Channel expansion DSEIS  
**Date:** Monday, September 17, 2018 11:19:13 AM

---

David Newell,

Dear District Commander,

I am writing to express my concern regarding the Corps' study results indicating no impact on the environment from a major expansion project for the ship channel. The Corps needs to address the following items to ensure the study is comprehensive enough to determine impacts and doesn't underestimate the true impact.

My concerns include:

The study only includes one year of weather data as the base of its water quality models. Given how frequently and drastically these impact Mobile Bay watershed this is inadequate. The Corps must include at least three years of data to show how severe weather impacts the study's results;

The Corps must include studies about how pathogens, harmful algal blooms, and invasive species will enter Mobile Bay through a deeper channel;

The Corps must thoroughly review how the proposed project will generate new growth opportunities associated with the port that could have indirect impacts to our natural resources;

Ship wake analyses must be improved to include more accurate information (realistic ship sizes, weights, etc). The Corps needs to study the impacts on our aquatic life (oysters, seagrasses, etc.) and our shorelines from wave energy;

The Corps must work with scientists to ensure the oyster assessment is more comprehensive. The Corps needs to look at how young oysters move and show how the presence of predators (oyster drills) may increase with changes in salinity;

The Corps needs to more comprehensively investigate impacts into the wetlands, seagrasses, fish, and aquatic resource assessments. For instance, the Corps has not studied how losses to seagrasses from higher salinity will affect the species that rely on them like the West Indian Manatee and waterfowl;

The Corps needs to recognize impacts to low income, minority communities as results show an increase of truck traffic by 25%;

The Corps must, as required by law, acknowledge past impacts on air quality and shoreline erosion since 1980 (the last environmental impact study conducted);

The Corps must consider creating a Dredge Management Plan that includes all proposed projects in the Mobile Bay area;

In conclusion, the Corps' finding of "no impact" on Mobile Bay's sensitive environment is very concerning given the magnitude of the proposed project. Thank you for your consideration and response to each of these comments. By thoroughly studying and developing a comprehensive plan for the port expansion, we can grow responsibly and mitigate any unavoidable impacts to the natural resources that support our economy and quality of life.

Sincerely,

Natalie Montoya  
natalie@healthygulf.org  
1010 Common st

New Orleans , Louisiana 70112

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**From:**   
**To:** [Newell, David P CIV CESAM CESAD \(US\)](#)  
**Subject:** [Non-DoD Source] My comments on the Mobile Ship Channel expansion DSEIS  
**Date:** Monday, September 17, 2018 11:17:10 AM

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David Newell,

Dear District Commander,

I am writing to express my concern regarding the Corps' study results indicating no impact on the environment from a major expansion project for the ship channel. The Corps needs to address the following items to ensure the study is comprehensive enough to determine impacts and doesn't underestimate the true impact.

My concerns include:

The study only includes one year of weather data as the base of its water quality models. Given how frequently and drastically these impact Mobile Bay watershed this is inadequate. The Corps must include at least three years of data to show how severe weather impacts the study's results;

The Corps must include studies about how pathogens, harmful algal blooms, and invasive species will enter Mobile Bay through a deeper channel;

The Corps must thoroughly review how the proposed project will generate new growth opportunities associated with the port that could have indirect impacts to our natural resources;

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The Corps must work with scientists to ensure the oyster assessment is more comprehensive. The Corps needs to look at how young oysters move and show how the presence of predators (oyster drills) may increase with changes in salinity;

The Corps needs to more comprehensively investigate impacts into the wetlands, seagrasses, fish, and aquatic resource assessments. For instance, the Corps has not studied how losses to seagrasses from higher salinity will affect the species that rely on them like the West Indian Manatee and waterfowl;

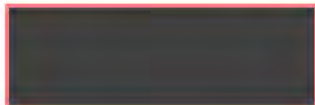
The Corps needs to recognize impacts to low income, minority communities as results show an increase of truck traffic by 25%;

The Corps must, as required by law, acknowledge past impacts on air quality and shoreline erosion since 1980 (the last environmental impact study conducted);

The Corps must consider creating a Dredge Management Plan that includes all proposed projects in the Mobile Bay area;

In conclusion, the Corps' finding of "no impact" on Mobile Bay's sensitive environment is very concerning given the magnitude of the proposed project. Thank you for your consideration and response to each of these comments. By thoroughly studying and developing a comprehensive plan for the port expansion, we can grow responsibly and mitigate any unavoidable impacts to the natural resources that support our economy and quality of life.

Sincerely,

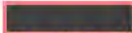




Fairhope, Alabama 36532

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## Comment 73

**From:**   
**To:** [Newell, David P CIV CESAM CESAD \(US\)](#)  
**Subject:** [Non-DoD Source] Mobile Ship Channel Project DSEIS  
**Date:** Monday, September 17, 2018 10:56:57 AM

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David Newell,

Dear Col. Joly,

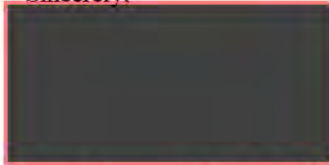
I am writing to express my concern regarding the Corps' study results indicating no impact on the environment from a major expansion project for the ship channel. Being in the engineering business for over 30 years I'm inclined to believe there is more work to be done in regards to studies.

My concerns include:

More water quality studies, potential of algae blooms, what impact on the already fragile oysters in the bay. In addition will this project bring more salt water further up into the delta and cause problems for the existing flora/fauna?

I also would like to see some sort of contingency plan to halt or alter the project if there are negative impacts before project completion.

Sincerely,



Bay Minette, Alabama 36507

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## Comment 74

**From:** [Casey Gay Williams](#)  
**To:** [Mobile Harbor GRR](#)  
**Subject:** [Non-DoD Source] FW: Message from KM\_C308  
**Date:** Monday, September 17, 2018 10:34:55 AM  
**Attachments:** [SKM\\_C30818091710400.pdf](#)

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Please see attachment for letter of support.

From: copier@eschamber.com <copier@eschamber.com>  
Sent: Monday, September 17, 2018 10:41 AM  
To: Casey Gay Williams <cgwilliams@eschamber.com>  
Subject: Message from KM\_C308

# EASTERN SHORE

## CHAMBER OF COMMERCE

327 Fairhope Avenue, Fairhope, AL 36532 · 251.928.6387 · [www.eschamber.com](http://www.eschamber.com) · [office@eschamber.com](mailto:office@eschamber.com)

September 14, 2018

Ms. Jennifer L. Jacobson  
U.S Army Corp of Engineers, Mobile District  
P.O. Box 2288  
Mobile, Alabama 36628

Dear Ms. Jacobson:

The Eastern Shore Chamber of Commerce supports the communities and businesses on the Eastern Shore of Mobile Bay. We support the economic development of Spanish Fort, Daphne and Fairhope, Alabama. As a chamber, we strive to be collaborative partners with all economic development stakeholders in our region.

As President of the Eastern Shore Chamber of Commerce, and on behalf of our Board of Directors and over 1,000 members, I would like to express our support for the U.S. Corp of Engineers' project to increase the depth and width of the Mobile Harbor Channel.

The Port of Mobile has always been critical to the economic welfare of the Coastal Alabama Region, the State of Alabama and beyond. Keeping the port competitive and relevant allows continued growth in the import/export arena. As the fastest growing container port in North America, the widening and deepening of the harbor channel will increase our competitiveness on a global level, create jobs and opportunities for economic development throughout Alabama.

I appreciate the opportunity to provide input and encourage the Corps of Engineers to approve the widening and deepening of the Mobile Harbor Channel so that the Port of Mobile can be a driving force to elevate the economy of our state and our nation.

Sincerely



Casey Gay Williams  
President





**From:**   
**To:** [Mobile Harbor GRR](#)  
**Subject:** [Non-DoD Source] Mobile Ship Channel Widening Project currently under review  
**Date:** Monday, September 17, 2018 9:49:47 AM

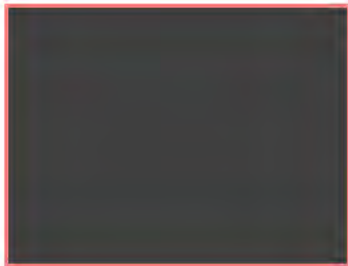
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To mitigate for the historic and ongoing erosion of Dauphin Island and the smaller Sand/Pelican Island to the southeast, two separate but related actions are needed;

- \* During maintenance dredging of the Bar Channel, all dredged sand should be placed in the shallow waters (i.e., between 0 to <15 feet) atop the shoal stretching between Sand Island Lighthouse and the east end of Sand/Pelican Island. Essentially 100% of the sand placed in the shallow waters along the top of the submerged shoal should be rapidly incorporated into the natural littoral drift system and moved to restore Sand/Pelican Island and nourish Dauphin Island's eroding Gulf shoreline. The Mobile District of the Corps already has the necessary Congressional authority to undertake that mitigation action as provided by Section 302 of the Water Resources Development Act of 1996. Section 302 was specifically enacted to modify the Mobile Harbor project to allow dredged material to be beneficially used and to pursue environmental restoration. All the Mobile District has to do is demonstrate the will to apply that existing Congressional authority to modify current maintenance practices for the Bar Channel. However, this mitigation action would only mitigate for the present and future erosion of Dauphin Island.
  
- \* To mitigate the historic shoreline losses of Dauphin Island, a much larger project action is needed. That mitigation measure should move by dredging to the Dauphin Island shoreline the millions of cubic yards of sands the Mobile District has removed from the Bar Channel since 1999 that have accumulated within the so-called Sand Island Beneficial Use Area (SIBUA). Those beach quality sands originally came from the Fort Morgan Peninsula and would have been transported by littoral drift to Dauphin Island if the Mobile District had not intercepted the sands by maintenance dredging of the Bar Channel. The millions of cubic yards of accumulated sands now sit a short distance offshore in waters too deep for them to rejoin the littoral system by natural wave and current action. It is these sands that were removed from the littoral drift system that have contributed to the present "sand starvation" of Dauphin Island. The Town of Dauphin Island developed the design details of a project in 2011 that would use around 4 million cy of these sands at an estimated cost of \$59 million to restore the island's eroded shoreline which could be readily implemented and/or expanded with little further study.

Such a mitigation project could be paid for by either of two viable approaches:

1. According to the Draft GRR/SEIS, the recommended Mobile Harbor deepening project is predicted to generate average net benefits of \$34.5 million per year in excess of cost. Thus, mitigation could be paid for with the benefit stream predicted be generated in just two years of operation of the deepened channel. All the Mobile District has to do is recommend this mitigation measure be included in the project recommendation to deepen Mobile Harbor.
2. Alternatively, the Mobile District could proactively work with the Alabama State Port Authority, the Governor of Alabama and other parties to select for implementation Project ID No. 92 ("West End Beach and Barrier Island Restoration Project") from the list of Alabama Coastal Restoration Suggested Projects being considered by the Alabama Gulf Coast Recovery Council. That approach would allow the mitigation project to be paid for with Deepwater Horizon Oil Spill related monies instead of being charged to the Mobile Harbor Deepening Project.





Dauphin Island, AL

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**From:**   
**To:** [Newell, David P CIV CESAM CESAD \(US\)](#)  
**Subject:** [Non-DoD Source] My comments on the Mobile Ship Channel expansion DSEIS  
**Date:** Monday, September 17, 2018 9:45:17 AM

---

David Newell,

Dear District Commander,

If the events in Houston, North Carolina, South Carolina, and many other locations in the wake of hurricanes and typhoons will tell you, we need to respect Mother Nature and how we develop. The communities surrounding Mobile Bay deserve better than this!

It's not only the impacts of dredging that are a concern, but the impact of the industries these politicians and corporations want to promote. They are not only harmful to the environment, but also public health.

I am writing to express my concern regarding the Corps' study results indicating no impact on the environment from a major expansion project for the ship channel. The Corps needs to address the following items to ensure the study is comprehensive enough to determine impacts and doesn't underestimate the true impact.

My concerns include:

The study only includes one year of weather data as the base of its water quality models. Given how frequently and drastically these impact Mobile Bay watershed this is inadequate. The Corps must include at least three years of data to show how severe weather impacts the study's results;

The Corps must include studies about how pathogens, harmful algal blooms, and invasive species will enter Mobile Bay through a deeper channel;

The Corps must thoroughly review how the proposed project will generate new growth opportunities associated with the port that could have indirect impacts to our natural resources;

Ship wake analyses must be improved to include more accurate information (realistic ship sizes, weights, etc). The Corps needs to study the impacts on our aquatic life (oysters, seagrasses, etc.) and our shorelines from wave energy;

The Corps must work with scientists to ensure the oyster assessment is more comprehensive. The Corps needs to look at how young oysters move and show how the presence of predators (oyster drills) may increase with changes in salinity;

The Corps needs to more comprehensively investigate impacts into the wetlands, seagrasses, fish, and aquatic resource assessments. For instance, the Corps has not studied how losses to seagrasses from higher salinity will affect the species that rely on them like the West Indian Manatee and waterfowl;

The Corps needs to recognize impacts to low income, minority communities as results show an increase of truck traffic by 25%;

The Corps must, as required by law, acknowledge past impacts on air quality and shoreline erosion since 1980 (the last environmental impact study conducted);

The Corps must consider creating a Dredge Management Plan that includes all proposed projects in the Mobile Bay area;

In conclusion, the Corps' finding of "no impact" on Mobile Bay's sensitive environment is very concerning given the magnitude of the proposed project. Thank you for your consideration and response to each of these comments. By thoroughly studying and developing a comprehensive plan for the port expansion, we can grow responsibly and

mitigate any unavoidable impacts to the natural resources that support our economy and quality of life.

Sincerely,



Fairhope, Alabama 36532

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**From:** [Wes Williams](#)  
**To:** [Mobile Harbor GRR](#)  
**Subject:** [Non-DoD Source] Mobile Bay Ship Channel  
**Date:** Monday, September 17, 2018 9:28:41 AM

---

Colonel Joly,

As a resident of Dauphin Island, AL (DI) and an attendee of the Feb 22, 2018 public meeting I feel compelled to send you an email addressing the project mentioned in my subject line. I have watched the erosion of DI beaches and shore line. It appears that simply depositing the dredged sands in shallower waters closer to the gulf beaches would allow the sand to replenish the beach and shoreline. If your group would follow this practice and actually do so it would gain the confidence in the public to not fight the widening of the ship channel. I am aware that you have just taken over the post in June 2018 and may not be as familiar with the impacts since 1980 of the dredging practices of the Corp. As a business owner I am all for progress and improvements to enhance our port. The public needs reassurance of that you will be the leader to see the correct practice of depositing sands from the ship channel to the correct locations so to not continue the erosion of our beaches and shoreline.

Truly,

Wes Williams  
President  
Wiltew-LEW  
2650 Schillinger Rd. N  
Semmes, AL 36575  
251-661-9770  
251-661-8707 fax  
w.williams@wiltew.com <<mailto:w.williams@wiltew.com>>

ASME Fabrication - Repair, Metal and Pipe Fabrication & Welding, Structural Steel & Plant Maintenance  
Blocked<http://www.wiltew.com/> <Blocked<http://www.wiltew.com/>>

Wiltew holds ASME U, S, R, and NB code stamps for the manufacture and repair of Tanks, Boilers, Heat exchangers, and Pressure vessels; furthermore, we are experienced in field installation and repair work. We look forward to partnering with you in the future.

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September 7, 2018

U.S. Army Corps of Engineers  
ATTN: PD-F  
P.O. Box 2288  
Mobile, AL 36628

To Whom It May Concern:

As President and CEO of the Birmingham Business Alliance (BBA), I am writing to express my support of the work of the Alabama State Port Authority in its efforts to widen and deepen the Port of Mobile's shipping channel.

The BBA is the economic development organization for the seven-county Birmingham region. We work to promote the region's economic development and business prosperity through increasing job growth and capital investment. The BBA advocates for policies and issues that will positively impact the business climate of our region, and one of our top priorities critical to economic development success is increasing Alabama's public investment in infrastructure.

An infrastructure asset important to the Birmingham region is Port Birmingham. Located in Jefferson County, the inland port connects the waterways in Central Alabama to the Port of Mobile. Expansion of the Port of Mobile will positively impact Port Birmingham's ability to increase business development and industrial operations to ultimately promote economic growth in our region and state.

On behalf of the BBA, I thank you for your time and careful consideration of this project.

Sincerely,

A handwritten signature in blue ink, appearing to read "Brian Hilson".

Brian Hilson  
President and CEO  
Birmingham Business Alliance



**From:**   
**To:** [Newell, David P CIV CESAM CESAD \(US\)](#)  
**Subject:** [Non-DoD Source] My comments on the Mobile Ship Channel expansion DSEIS  
**Date:** Monday, September 17, 2018 8:39:08 AM

---

David Newell,

Dear District Commander,

I am writing to express my concern regarding the Corps' study results indicating no impact on the environment from a major expansion project for the ship channel. The Corps needs to address the following items to ensure the study is comprehensive enough to determine impacts and doesn't underestimate the true impact.

My concerns include:

The study only includes one year of weather data as the base of its water quality models. Given how frequently and drastically these impact Mobile Bay watershed this is inadequate. The Corps must include at least three years of data to show how severe weather impacts the study's results;

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The Corps must thoroughly review how the proposed project will generate new growth opportunities associated with the port that could have indirect impacts to our natural resources;

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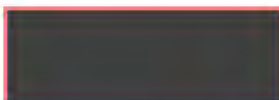
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The Corps must, as required by law, acknowledge past impacts on air quality and shoreline erosion since 1980 (the last environmental impact study conducted);

The Corps must consider creating a Dredge Management Plan that includes all proposed projects in the Mobile Bay area;

In conclusion, the Corps' finding of "no impact" on Mobile Bay's sensitive environment is very concerning given the magnitude of the proposed project. Thank you for your consideration and response to each of these comments. By thoroughly studying and developing a comprehensive plan for the port expansion, we can grow responsibly and mitigate any unavoidable impacts to the natural resources that support our economy and quality of life.

Sincerely,



New Orleans, Louisiana 70130

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**From:**   
**To:** [Newell, David P CIV CESAM CESAD \(US\)](#)  
**Subject:** [Non-DoD Source] My comments on the Mobile Ship Channel expansion DSEIS  
**Date:** Monday, September 17, 2018 8:01:46 AM

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David Newell,

Dear District Commander,

I am writing to express my concern regarding the Corps' study results indicating no impact on the environment from a major expansion project for the ship channel. The Corps needs to address the following items to ensure the study is comprehensive enough to determine impacts and doesn't underestimate the true impact.

My concerns include:

The study only includes one year of weather data as the base of its water quality models. Given how frequently and drastically these impact Mobile Bay watershed this is inadequate. The Corps must include at least three years of data to show how severe weather impacts the study's results;

The Corps must include studies about how pathogens, harmful algal blooms, and invasive species will enter Mobile Bay through a

The Corps must thoroughly review how the proposed project will generate new growth opportunities associated with the port that could have indirect impacts to our natural resources;

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The Corps must work with scientists to ensure the oyster assessment is more comprehensive. The Corps needs to look at how young oysters move and show how the presence of predators (oyster drills) may increase with changes in salinity;

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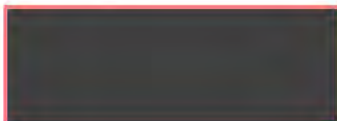
The Corps needs to recognize impacts to low income, minority communities as results show an increase of truck traffic by 25%;

The Corps must, as required by law, acknowledge past impacts on air quality and shoreline erosion since 1980 (the last environmental impact study conducted);

The Corps must consider creating a Dredge Management Plan that includes all proposed projects in the Mobile Bay area;

In conclusion, the Corps' finding of "no impact" on Mobile Bay's sensitive environment is very concerning given the magnitude of the proposed project. Thank you for your consideration and response to each of these comments. By thoroughly studying and developing a comprehensive plan for the port expansion, we can grow responsibly and mitigate any unavoidable impacts to the natural resources that support our economy and quality of life.

Sincerely,

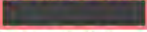


Mobile, Alabama 36604

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## Comment 81

**From:** [Joe Hughey](#)  
**To:** [Mobile Harbor GRR](#)  
**Cc:**   
**Subject:** [Non-DoD Source] Comments on Mobile Harbor Project GRR/SEIS  
**Date:** Monday, September 17, 2018 7:49:29 AM  
**Attachments:** [ATTACHMENT 09-17-2018.docx](#)

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Attached are comments on the Mobile Harbor Deepening Project.

Joe M. Hughey

Member, Mobile Bay Oyster Alliance

251-459-3440



COMMENTS AND QUESTIONS: 17 September 2018

REFERENCE: ATTACHMENT A-4 [Vessel Generated Wave Energy (VGWE) Report by Richard Allen]

1. The VGWE Report reaches conclusions that are not supported by the calculations and statements in the report. Reading the report leads to a different conclusion than the one that is stated. Look at the data as follows:
  - a. Table 3 – shows the bigger the vessel the larger the VGWE.
  - b. Table 4 – shows the larger the vessel draft the larger the VGWE.
  - c. Table 5 – shows inbound vessels produce larger VGWE than outbound vessels. Factors to consider are vessel draft and channel currents.
  - d. Table 6 – shows the greater the vessel speed the larger the VGWE.
  - e. Tables 9 and 10 – show an increase in the number of vessels calling on the port from 2944 (year 2025) to 3232 (year 2035). The projection shows larger vessels calling the port at the rate of 10/day by year 2035.
  - f. Formula (13) - shows each increase in speed raises the VGWE by a factor of 2.4. A one knot increase in speed increases the wave energy 240 percent. Therefore, three knots increases wave energy 1380 percent.
  - g. Figure 30 – you assume average speed of 10 knots which is not supported by the graphs. May be a way to make the calculations uniform but should not be used as a conclusion that the VGWE will not increase.
  - h. Figure 31 – shows vessel speed increases the further South the ship is in the channel. In the Lower Bay channel the speed exceeds 13 knots even for the larger vessels.

The above data in your report does not support the statement in the Executive Summary of the GRR (see Comment #13 below) that reducing the number of vessels will cause less VGWE, and there will be no significant change in the total VGWE. On the contrary there will be more and larger vessels in the port by 2035 than there are now. In 2014 (reference Table in Appendix C) shows 1017 vessels called the port in year 2014. Compare that to the projected 1711 vessels by year 2035 (a seventy percent increase).

My conclusion is that the number and size of vessels (both) will increase and the total amount of VGWE will increase with or without the project. In addition, it's not total VGWE but speed and width of the vessels (which will be getting larger) that cause the impact to the shoreline. The study should show projected increases in VGWE due to projected growth, and should not make mis-leading statements based on comparisons of with/without project.

2. Wave energy is generated by acceleration of the water produced by the bow of the ship. If the ship is travelling against a current the wave will be larger than the wave produced by a ship going the same speed in knots travelling with the current. What is the channel current? The assumption of 10 knots for calculating VGWE is very low and should be reconsidered.
3. Report uses an average speed of 10.57 knots and an average draft of 8.96 meters to calculate VGWE. AIS Data sheets show larger vessels transiting mid-channel over 13 knots which I have verified using the MarineTraffic app. The calculations are based on a formula that calculates energy in a deepwater environment. Actual wave energy due to ship being in a trench will be increased, I assume, due to bottom and channel sides effect. This effect needs to be studied and the wave impacts to the shoreline stated in your final report.
4. Waves increase in height as they enter shallow water and break usually near the shore. This causes bottom disturbance and sedimentation to enter the water column. One ship causes several waves on each passing. Ship waves are larger and have more energy than the normal wind generated waves. The effect is an almost continuous disturbing of the shoreline making it unsuitable for plants. This effect has been occurring since ships have been transiting the Bay, but most of the impact of the ship waves appear to have occurred due to deepening of the channel over the last 80 years. For the USACE to assume this project will show minimum impact to the environment (based on the position that there will

be no more total VGWE) needs to be explained. The wave impact has been occurring for decades.

5. Tables 11 thru 14: Clarify how the number of vessels arriving in a year can differ from the number departing.
6. Tables 9 and 10 and Tables 11 thru 14: Why are the numbers of classes of vessels different between Tables 9 and 10 versus Tables 11 thru 14?
7. The Field Data was gathered over a short period of time during the drier months with river discharge at lower amounts. I assume channel current will be higher during wetter months.
8. Reference Appendix B: Why are the numbers of vessels (by class) different for Vessels Arriving versus Vessels Departing? Total number by class should be the same, just a difference in draft. The error occurs in Table B-3 thru Table B-8.
9. Reference Appendix C, Paragraph 2.2.3.1: There is an incorrect statement on the wave height as "0.02 ft to 0.15 ft". VGWE is not expressed in feet. The VGWE Report does not convert VGWE to wave height.
10. General Comment: The USACE is responsible for construction of the ship channel but does not appear to have any authority for establishing speed limits for ships transiting the channel. Is there a design speed that would cause damage to the channel due to propeller and water movement over the channel sides?
11. General Comment: It appears this project will straighten two bends in the main channel which can result in a possible increase in ship speed resulting in larger waves (VGWE).
12. General Comment: Mitigation measures should be implemented to reduce the ship wave impacts, especially to the shore. This could include vessel speed reduction. Large parts of the shore line are already bulkheaded to protect from erosion. Bulkheads hardly existed along the Bay shore until the 1970's, about the time the vegetation disappeared.

13. General Comment: The following statements are included in the Executive Summary Of the GRR/SEIS:

"Results of the wave climate assessments indicate that implementation of the project would result in negligible changes to the general wave climate. Additionally, the results of the analysis conducted for vessel generated waves show that there would actually be a reduction in ship generated wave energy when compared between the future With- and Without-Project conditions. This is because fewer vessels will be expected to call on the port in the future with implementation of the TSP, which results in less vessel generated wave energy affecting the study area."

The conclusion stated above assumes the same amount of shipping would be maintained With or Without the project. More likely, if the project were not built, the shipping industry could determine that another Port could be more cost effective and move the ships out of the Mobile Port, thus decreasing the number of ships in the future. The stated conclusion on wave climate is not based on any type economic analysis, should not be considered a factual result of a Vessel Generated Wave Energy Report, and should be removed from the Executive Summary.

Another possible conclusion is that a deeper, wider channel will result in more Port visits – as is currently predicted – and will result in more and larger VGWE in Mobile Bay. Data shows the number of ships will increase from average of 5/day in year 2014 to 10/day in year 2035.

USACE needs to do further studies before reaching conclusions that cannot be verified and supported. The conclusion above is in direct conflict with the projected increase in Port calls that, in other parts of the GRR/SEIS, are used to justify the project Benefit Cost Ratio (BCR). How can the number of ships double by year 2035 but the total VGWE not increase - if the project is constructed? Explain the logic used in the conclusion made in the Executive Summary.

14. General Comment: The GRR/SEIS should study coordinated operation of the Port with the Ship Channel operation. Has the USACE consulted with the Port Authority and Bar Pilots and studied the most efficient ways to operate the Mobile Harbor coordinating movement of ships thru the channel to eliminate loss of time? The USACE should study ways to minimize the wait time when ship berths are vacant while waiting for ships to transit the 27



miles of channel to arrive at the berth, and include results in the Channel Design. To put a passing lane at the Southern end of the channel does not appear to be the proper place to have ships pass to minimize berth waiting times. If a ship could transit the channel before the berth is vacated, stop in a location near the North end of the channel until the leaving vessel passes, then enter the Harbor, appears to be a more efficient way to operate. And the vessel speed up the channel would not be on the critical path for the most efficient operation of the Port's berths. A benefit would be the ability to limit vessel speed (to reduce waves) without increasing the cost to this project.

15. General Comment: One of the major effects of ship waves is the repetitive disturbance of water on a regular basis resulting in the inability of the oyster spat to attach to an object during a critical time of the oyster development. By year 2035 ten ships per day visiting the Port equals twenty sets of waves (ten arriving and ten departing) which means almost no period of calm in the shore environment (a constant storm). The SEIS should address the effect of ship's waves on oyster spat (and oyster reefs) in the expected environment - ships transiting the Bay on almost an hourly basis.

16. What is the relationship between ship size and wake size/energy/harm? How does speed (7, 10, 13 knots) affect this relationship? Draft?

17. What calculations were used as basis that recreational boat wakes are more damaging to Mobile Bay than wakes from ships? How was this this conclusion tested and where?

18. What is the magnitude (area) and duration of sediment plumes stirred from ship wakes? How does sediment plume affect SAV beneficial shore flora?

19. Which ships, that regularly transit Mobile Bay, generate the largest wakes from standard calculations?

20. Can vessel transit records be used to determine cumulative wake energy generated for individual ships and the impacts over past year or 5 years? Other periods?

21. What are speed limits or speed reduction programs for ships at other ports? Why are similar programs not being considered for Mobile Bay?

22. What is maximum speed of ships that does not create harmful wakes? How much additional time would be required to transit length of bay at no wake speed?

22. How much does a speed reduction cost?  
What are the financial benefits such as fuel savings, engine wear?  
What are ecological benefits?

23. How much have shorelines receded horizontally and vertically since 2000 or other periods (annual rate of loss)?  
How much have ship wakes contributed shoreline erosion?

24. How much spoil has been removed from bay and transported to gulf for maintenance and expansion projects? (This robs sand from our shore indirectly)

25. Could spoil (either maintenance or from deepening/widening) be placed between channel and shore to produce a berm to diminish wave energy? What would be cost and impacts (beneficial and harmful)?  
Where would be ideal placement and configuration?

26. What are other measures to mitigate ship wake harm?

27. Can property owners be compensated for beach erosion caused by wakes or deficits from spoil transport to gulf.

28. What percent of Mobile Bay shore is armored by vertical walls/rock?

29. What is the effect of ship speed in the channel related to damages to sides of the channel due caused by the ship propulsion system (prop wash)? Are maintenance dredging costs increased? The Corps is aware that the channel slopes are changing and causing an overall deepening of the Bay, possibly affecting the shorelines. With miles of shoreline armored or bulkheaded to prevent erosion to property along the shoreline, is the result a deeper Bay and increase in the erosion rate at marsh and unprotected shoreline?


30. Is increased VGWE good for the Bay environment?

31. The ship channel was deepened to 35 ft. in the 1940's. Grasses along much of the shoreline had disappeared by the 1960's. The Bay was also mined for oyster shells for the Interstate Highway during the 1960's and 1970's. Can the effects of these events be evaluated to determine damages that may have been caused to the vegetation on the shoreline?

32. Gilliard Island was created from the construction of the Deer River Channel. When a ship passes the East side of Gilliard Island headed South the wave energy gathers and rolls off toward the Western Shoreline. What is the increase in VGWE due to the Gilliard Island effect? Can this effect be eliminated either by slowing the ships or construction of a barrier in the Bay as a part of this project, possibly using dredged material?

33. Restoration of natural shoreline grasses has been successful in Tampa Bay. The restoration effort includes projects with MacDill Air Force Base to restore oyster reefs. Can lessons learned from Tampa Bay be used in Mobile Bay to increase shoreline grasses and oyster habitat? Can these lessons be incorporated into the Harbor Deepening Project without causing significant cost increase but resulting in environmental improvements? As a minimum can the Corps include measures in the Harbor Deepening Project to stop further damage to shorelines?

34. Ship waves cause increased turbidity at the shoreline. Does the Corps disagree with this statement?

**From:**   
**To:** [Mobile Harbor GRR; Joly, Sebastien P COL USARMY CESAM \(US\)](#)  
**Subject:** [Non-DoD Source] Comments on Proposed Mobile Harbor Deepening Project  
**Date:** Monday, September 17, 2018 7:24:18 AM

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COL Joly,

I attended the Mobile Harbor GRR public meeting on September 11, and I have a few comments to make about the proposed project.

My main concern is about the economics of the project, and whether you are actually including the entire scope of the project in your considerations for environmental effects that will result. My understanding of the National Environmental Policy Act (NEPA) is that all direct effects of the proposal, as well as any reasonable foreseeable indirect impacts from connected actions, must be considered when conducting an environmental impact statement. This would include any expected cumulative impacts on air quality from increased truck traffic which will happen as a direct result of the project, and which will affect nearby EJ communities.

But here is the confusing part...the economist from the Corps said that you did not consider increased activity through the Port when developing your study. You assumed that demand was going to cause increased activity whether you widen and deepen the ship channel or not, so that increased throughput was not considered part of the project scope. I believe that this is a flawed way to look at the economics of what will happen. Yes, demand may result in some increase in activity, but just imagine how much more activity can be supported when ships can come in more fully loaded and can pass side by side in the ship channel. This doesn't just allow for increased efficiencies for shippers, but also makes the Port more desirable, which will in turn drive up business. The Port becomes more competitive.

Being more competitive is not a bad thing, but I believe that ALL of the externalities of the resulting increase in traffic must be considered to satisfy NEPA requirements, the primary one being the increase in truck traffic to handle the increase in tonnage through the Port. This increase in truck traffic will directly affect EJ communities near the Cochrane Africatown bridge. How much? Well, under the current set up, we will never know because the nearest monitor is in Chickasaw! This project should require that air quality monitoring be established at the Port of Mobile, specifically concentrating on things such as diesel soot from transportation and emissions from petrochemical tank storage, preferably as soon as possible, so that baseline measurement of air quality can be determined before the proposed expansion gets under way. Once that is established, then future effects on air quality can be determined and hopefully mitigated...because you will actually be able to measure what is happening as a result of this project.

You made clear in your environmental charts that you have decided not to include the effects on EJ communities as a result of the 25% increase in truck traffic associated with the new container terminal being built because, you say, plans for the container terminal were already under way before this project was considered. I feel that that is a naïve position to take, serving only to allow you to exclude that increase in pollution from diesel engines from your environmental impact analysis. I believe that this widening and deepening project is pretty much a "done deal," and the business people who decided to build/increase the container terminal knew that as well, so it made economic sense to go ahead with expanding the terminal ahead of the ship channel enlargement, especially since that would allow them to separate that project from the channel project. I can't prove it, of course, but it only makes sense.

There are many other issues that should be addressed, including (without going into detail, because I know that others are providing that):

\*

Explain the loss of millions of cubic yards of beach quality sands due to unwise channel disposal practices, dating from at least 1980, that has and continues to adversely affect Dauphin Island.

\*

Require that all dredged sands placed in the SIBUA expansion be deposited at water depths much shallower



than 15 feet MHW (mean high water) to ensure that the erosion problem is not perpetuated.

\*

Explain why the Corps and EPA found it necessary to pursue a massive (500%) expansion of the Ocean Dredged Material Disposal Site (ODMDS) in the Gulf of Mexico when the Corps plans to use the existing open water thin layer disposal sites as much as possible to receive future maintenance material.

\*

Obtain detailed information from independent studies and literature to validate the Corps allegation that thin layer disposal is beneficial for Mobile Bay, and add it to the report.

\*

Provide information as to how the Corps and the Alabama State Port Authority plan to satisfy the future dredged material disposal needs of the TSP after the initial 20 years of maintenance. The potential adverse impacts to Mobile Bay from future dredged material disposal practices are too significant for the report to ignore the importance of the dredged material disposal capacity deficit problem the TSP will experience over the total 50-year period of analysis.

\*

Recognize and account for the fact that increased ship wake can cause greater shoreline erosion and threats to grass beds and sea life.

Thank you,



Mobile, AL 36695

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<Blockedhttps://mail.yahoo.com/neo/launch?.src=ym&reason=myc&soc\_src=mail&soc\_trk=ma#DAB4FAD8-2DD7-40BB-A1B8-4E2AA1F9FDF2>

**From:** [REDACTED]  
**To:** [Mobile Harbor GRR](#)  
**Cc:** [REDACTED]@ol.com; [REDACTED]@ellsouth.net  
**Subject:** [Non-DoD Source] Comments Regarding Deepening of Mobile Bay Shipping Channel  
**Date:** Monday, September 17, 2018 6:54:39 AM  
**Attachments:** [Army Corp Of Engineers Letter for Dauphin Island 9 17 18.docx](#)

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Please consider my comments in the attached letter (as well as snapshotted below) regarding the planned deepening of the Mobile Bay shipping channel.

COL Sebastien P. Joly, District Commander

U.S. Army Corps of Engineers, Mobile District

P.O. Box 2288

Mobile, AL 36628-0001

Dear Sir:

As a longtime property owner of Dauphin Island I am writing regarding my concerns of the planned deepening of the Mobile Shipping Channel.

The original 1980 report/EIS that originally recommended the ship channel be deepened was deficient because it completely ignored Dauphin Island's erosion problem. The GRR/SEIS is supposed to update the original 1980 report/EIS by analyzing changed conditions. The tremendous amount of erosion of the Sand/Pelican Island complex and Dauphin Island that has occurred since the 1980 report represents a significant "changed condition" in not only the Study Area, but also the immediate Project Area since the Sand Island Beneficial Use Area (SIBUA) is the Corps' only designated disposal area to maintain the Bar Channel and is intended to bypass littoral drift sands to the west side of the channel to nourish Dauphin Island. Despite numerous public inquiries during the planning process, the Corps has never explained its refusal to address the enormous amount of erosion that has occurred to these islands. Instead, the Corps has chosen to ignore the 38 years of past shoreline erosion impacts that have produced today's significantly weakened Dauphin Island. The GRR/SEIS MUST address the 38 years of erosion that has occurred since 1980.

The public does not accept the results of the Corps numerical modeling study results that allege maintenance of the Bar Channel does not contribute to the erosion of Dauphin Island. The rejection is based on the clear fact the model results do not match with the actual observed shoreline losses that have occurred since the early 1970s. The Corps admitted at the February 22, 2018 public meeting that the use of the Sand Island Beneficial Use Area (SIBUA) was preventing at least half of the sands that would naturally been carried to Dauphin Island from reaching the island. In addition, Corps dredging records also indicate that as much as 72% of the sands dredged from the Bar Channel since

1980 have been lost from the nearshore littoral drift system because the Corps practice of disposing of the valuable beach sands in deeper Gulf waters. These facts indicate the loss of millions of cubic yards of beach quality sands due to unwise channel disposal practices has and continues to adversely affected Dauphin Island.

In addition to the harmful effects on Dauphin Island, erosion of Mobile Bay's western shoreline is a serious continuing issue. Long-term bayfront property owners have repeatedly stated they have observed large waves created by passing ships. Instead of giving credence to the validity of landowner statements, the Corps has relied entirely upon in the results of computerized modeling to conclude ship wakes do not represent a serious issue. Because of the public's concern over ship generated waves the Corps, Coast Guard, and Port Authority should evaluate imposing speed limits on the larger deep draft ships, particularly if fully loaded, to reduce the magnitude of bow waves from passing vessels.

Wildlife that depend upon a healthy bay and island habitat are also being adversely impacted. Oysters are a major "indicator species" of the overall health of Mobile Bay. Historical NOAA catch data for Alabama from 1950 through 2016 show the total annual oyster harvests from Alabama waters have experienced a significant continuing decline during the last 10 years. To provide a true representation of the existing quality of oyster resources within the Study Area, the report should clarify that the recent four years (2013, 2014, 2015, and 2016) selected to develop the Study Baseline represents a significant low point in both oyster production and reef condition over the past 66 years. It is worth noting that the decline in oyster production, which is centered around Mobile Bay, coincides with the Corps return to open water disposal of dredged material in the bay in 2014. The report should devote more discussion to the current deteriorated condition of Mobile Bay's oyster resources, including additional modeling work dealing spat movements, effects on salinity regimes, predation, etc.

The impacts of shoreline erosion on sea turtle nesting should be discussed. Section 5.9.1 should be expanded to acknowledge that a consequence of the progressive erosion of Dauphin Island's Gulf Shoreline is the low success rate of sea turtle nesting on the island. The low percentage of successful nests on Dauphin Island compared to Baldwin County's beaches is believed to be associated with the deteriorated shoreline conditions attributable to erosion. This issue warrants coverage in the report because of the Endangered Species Act connection and because Dauphin Island provides a substantial portion of Alabama's total Gulf shoreline used for nesting by sea turtles. It is possible that a "taking" type situation may exist as an indirect impact of the Bar Channel maintenance program and the Mobile Harbor project's role in contributing to the erosion of Dauphin Island and the lowered turtle nest success rates compared to other northern Gulf beaches.

To mitigate for the historic and ongoing erosion of Dauphin Island and the smaller Sand/Pelican Island to the southeast, two separate but related actions are needed;

1. During maintenance dredging of the Bar Channel, all dredged sand should be placed in the shallow waters (i.e., between 0 to <15 feet) atop the shoal stretching between Sand Island Lighthouse and the east end of Sand/Pelican Island. Essentially 100% of the sand placed in the shallow waters along the top of the submerged shoal should be rapidly incorporated into the natural littoral drift system and moved to restore Sand/Pelican Island and nourish Dauphin Island's eroding Gulf shoreline. The Mobile District of the Corps already has the necessary Congressional authority to undertake that mitigation action as provided by Section 302 of the Water Resources Development Act of 1996. Section 302 was specifically enacted to modify the Mobile Harbor project to allow dredged material to be beneficially used and pursue environmental restoration. All the Mobile District has to do is demonstrate the will to apply that existing Congressional authority to modify current maintenance practices for the Bar Channel. However, this mitigation action would only mitigate for the present and future erosion of Dauphin Island.
2. To mitigate the historic shoreline losses of Dauphin Island, a much larger project action is needed. That

mitigation measure should move by dredging to the Dauphin Island shoreline the millions of cubic yards of sands the Mobile District has removed from the Bar Channel since 1999 that have accumulated within the so-called Sand Island Beneficial Use Area (SIBUA). Those beach quality sands originally came from the Fort Morgan Peninsula and would have been transported by littoral drift to Dauphin Island if the Mobile District had not intercepted the sands by maintenance dredging of the Bar Channel. The millions of cubic yards of accumulated sands now sit a short distance offshore in waters too deep for them to rejoin the littoral system by natural wave and current action. It is these sands that were removed from the littoral drift system that have contributed to the present "sand starvation" of Dauphin Island. The Town of Dauphin Island developed the design details of a project in 2011 that would use around 4 million cy of these sands at an estimated cost of \$59 million to restore the island's eroded shoreline which could be readily implemented and/or expanded with little further study.

Such a mitigation project could be paid for by either of two viable approaches:

1. According to the Draft GRR/SEIS, the recommended Mobile Harbor deepening project is predicted to generate average net benefits of \$34.5 million per year in excess of cost. Thus, mitigation could be paid for with the benefit stream predicted be generated in just two years of operation of the deepened channel. All the Mobile District has to do is recommend this mitigation measure be included in the project recommendation to deepen Mobile Harbor.
2. Alternatively, the Mobile District could proactively work with the Alabama State Port Authority, the Governor of Alabama and other parties to select for implementation Project ID No. 92 ("West End Beach and Barrier Island Restoration Project") from the list of Alabama Coastal Restoration Suggested Projects being considered by the Alabama Gulf Coast Recovery Council. That approach would allow the mitigation project to be paid for with Deepwater Horizon Oil Spill related monies instead of being charged to the Mobile Harbor Deepening Project.

Sincerely,



Dauphin Island, Alabama



September 17, 2018

COL Sebastien P. Joly, District Commander  
U.S. Army Corps of Engineers, Mobile District  
P.O. Box 2288  
Mobile, AL 36628-0001

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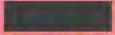
paid for with Deepwater Horizon Oil Spill related monies instead of being charged to the Mobile Harbor Deepening Project.

Sincerely,



Dauphin Island, Alabama

## Comment 84

**From:**   
**To:** [Newell, David P CIV CESAM CESAD \(US\)](#)  
**Subject:** [Non-DoD Source] Comments on the Mobile Ship Channel expansion DSEIS  
**Date:** Monday, September 17, 2018 6:08:41 AM

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David Newell,

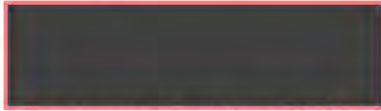
Dear District Commander,

I am writing to express my concern regarding the Corps' study results indicating no impacts.

Being from Louisiana, we know the costly importance of wetlands. They play such a huge role in the environment that once lost, humans, wildlife and climate change are affected. Wetlands filter toxins and absorb storm water keeping the waterways clean.

By thoroughly studying and developing a comprehensive plan for the port expansion, we can grow responsibly and mitigate any unavoidable impacts to the natural resources that support our economy and quality of life.

Sincerely,



Ponchatoula , Louisiana 70454

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**From:**   
**To:** [Newell, David P CIV CESAM CESAD \(US\)](#)  
**Subject:** [Non-DoD Source] My comments on the Mobile Ship Channel expansion DSEIS  
**Date:** Monday, September 17, 2018 12:09:34 AM

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David Newell,

Dear District Commander,

I am writing to express my concern regarding the Corps' study results indicating no impact on the environment from a major expansion project for the ship channel. The Corps needs to address the following items to ensure the study is comprehensive enough to determine impacts and doesn't underestimate the true impact.

My concerns include:

The study only includes one year of weather data as the base of its water quality models. Given how frequently and drastically these impact Mobile Bay watershed this is inadequate. The Corps must include at least three years of data to show how severe weather impacts the study's results;

The Corps must include studies about how pathogens, harmful algal blooms, and invasive species will enter Mobile Bay through a deeper channel;

The Corps must thoroughly review how the proposed project will generate new growth opportunities associated with the port that could have indirect impacts to our natural resources;

Ship wake analyses must be improved to include more accurate information (realistic ship sizes, weights, etc). The Corps needs to study the impacts on our aquatic life (oysters, seagrasses, etc.) and our shorelines from wave energy;

The Corps must work with scientists to ensure the oyster assessment is more comprehensive. The Corps needs to look at how young oysters move and show how the presence of predators (oyster drills) may increase with changes in salinity;

The Corps needs to more comprehensively investigate impacts into the wetlands, seagrasses, fish, and aquatic resource assessments. For instance, the Corps has not studied how losses to seagrasses from higher salinity will affect the species that rely on them like the West Indian Manatee and waterfowl;

The Corps needs to recognize impacts to low income, minority communities as results show an increase of truck traffic by 25%;

The Corps must, as required by law, acknowledge past impacts on air quality and shoreline erosion since 1980 (the last environmental impact study conducted);

The Corps must consider creating a Dredge Management Plan that includes all proposed projects in the Mobile Bay area;

In conclusion, the Corps' finding of "no impact" on Mobile Bay's sensitive environment is very concerning given the magnitude of the proposed project. Thank you for your consideration and response to each of these comments. By thoroughly studying and developing a comprehensive plan for the port expansion, we can grow responsibly and mitigate any unavoidable impacts to the natural resources that support our economy and quality of life.

Sincerely,

  
Fairhope

Fairhope , Alabama 36532

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**From:**   
**To:** [Newell, David P CIV CESAM CESAD \(US\)](#)  
**Subject:** [Non-DoD Source] My comments on the Mobile Ship Channel expansion DSEIS  
**Date:** Sunday, September 16, 2018 11:55:53 PM

---

David Newell,

Dear District Commander,

I am writing to express my concern regarding the Corps' study results indicating no impact on the environment from a major expansion project for the ship channel. The Corps needs to address the following items to ensure the study is comprehensive enough to determine impacts and doesn't underestimate the true impact.

My concerns include:

The study only includes one year of weather data as the base of its water quality models. Given how frequently and drastically these impact Mobile Bay watershed this is inadequate. The Corps must include at least three years of data to show how severe weather impacts the study's results;

The Corps must include studies about how pathogens, harmful algal blooms, and invasive species will enter Mobile Bay through a deeper channel;

The Corps must thoroughly review how the proposed project will generate new growth opportunities associated with the port that could have indirect impacts to our natural resources;

Ship wake analyses must be improved to include more accurate information (realistic ship sizes, weights, etc). The Corps needs to study the impacts on our aquatic life (oysters, seagrasses, etc.) and our shorelines from wave energy;

The Corps must work with scientists to ensure the oyster assessment is more comprehensive. The Corps needs to look at how young oysters move and show how the presence of predators (oyster drills) may increase with changes in salinity;

The Corps needs to more comprehensively investigate impacts into the wetlands, seagrasses, fish, and aquatic resource assessments. For instance, the Corps has not studied how losses to seagrasses from higher salinity will affect the species that rely on them like the West Indian Manatee and waterfowl;

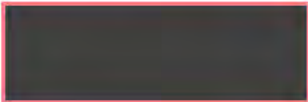
The Corps needs to recognize impacts to low income, minority communities as results show an increase of truck traffic by 25%;

The Corps must, as required by law, acknowledge past impacts on air quality and shoreline erosion since 1980 (the last environmental impact study conducted);

The Corps must consider creating a Dredge Management Plan that includes all proposed projects in the Mobile Bay area;

In conclusion, the Corps' finding of "no impact" on Mobile Bay's sensitive environment is very concerning given the magnitude of the proposed project. Thank you for your consideration and response to each of these comments. By thoroughly studying and developing a comprehensive plan for the port expansion, we can grow responsibly and mitigate any unavoidable impacts to the natural resources that support our economy and quality of life.

Sincerely,



Mobile, Alabama 36663

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**From:**   
**To:** [Newell, David P CIV CESAM CESAD \(US\)](#)  
**Subject:** [Non-DoD Source] My comments on the Mobile Ship Channel expansion DSEIS  
**Date:** Sunday, September 16, 2018 11:21:45 PM

---

David Newell,

Dear District Commander,

I am writing to express my concern regarding the Corps' study results indicating no impact on the environment from a major expansion project for the ship channel. The Corps needs to address the following items to ensure the study is comprehensive enough to determine impacts and doesn't underestimate the true impact.

My concerns include:

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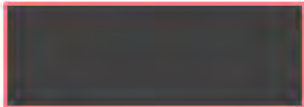
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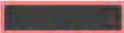
Sincerely,





Mobile , Alabama 36604

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**From:**   
**To:** [Newell, David P CIV CESAM CESAD \(US\)](#)  
**Subject:** [Non-DoD Source] GRN Comments Mobile Ship Channel expansion DSEIS  
**Date:** Sunday, September 16, 2018 11:06:15 PM

---

David Newell,

Dear District Commander,

I am writing to express my concern regarding the Corps' study results indicating no impact on the environment from a major expansion project for the ship channel. The Corps needs to address the following items to ensure the study is comprehensive enough to determine impacts and doesn't underestimate the true impact.

I reserve the right to rely on other comments.

My concerns include:

The study only includes one year of weather data as the base of its water quality models. Given how frequently and drastically these impact Mobile Bay watershed this is inadequate. The Corps must include at least three years of data to show how severe weather impacts the study's results;

The Corps must study increased surge heights from channel deepening;

The Corps must study, with sediment transport modelling, the changes in sediment transport from the increase in the tidal prism from channel deepening;

The Corps must include the latest estimates of sea level rise in its efforts, and include a "worst case" sea level rise scenario among the modelling scenarios'

The Corps must study the interruption of sand transport from the ship channel as part of sediment transport modelling, and mitigate the sand removed from the transport, which will shrink Dauphin Island; we encourage the Corps to work with the State of Alabama and the Port Authority to find RESTORE funds that will facilitate a restoration of these islands, critical to storm surge dampening and habitat.

The Corps must include studies about how pathogens, harmful algal blooms, and invasive species will enter Mobile Bay through a deeper channel;

The Corps must thoroughly review how the proposed project will generate new growth opportunities associated with the port that could have indirect impacts to our natural resources;

Ship wake analyses must be improved to include more accurate information (realistic ship sizes, weights, etc). The Corps needs to study the impacts on our aquatic life (oysters, seagrasses, etc.) and our shorelines from wave energy;

The Corps must work with scientists to ensure the oyster assessment is more comprehensive. The Corps needs to look at how young oysters move and show how the presence of predators (oyster drills) may increase with changes in salinity;

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last environmental impact study conducted);

The Corps must consider creating a Dredge Management Plan that includes all proposed projects in the Mobile Bay area;

In conclusion, the Corps' finding of "no impact" on Mobile Bay's sensitive environment is very concerning given the magnitude of the proposed project. Thank you for your consideration and response to each of these comments. By thoroughly studying and developing a comprehensive plan for the port expansion, we can grow responsibly and mitigate any unavoidable impacts to the natural resources that support our economy and quality of life.

Sincerely,



new orleans, Louisiana 70122

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**From:**   
**To:** [Newell, David P CIV CESAM CESAD \(US\)](#)  
**Subject:** [Non-DoD Source] My comments on the Mobile Ship Channel expansion DSEIS  
**Date:** Sunday, September 16, 2018 9:04:29 PM

---

David Newell,

Dear District Commander,

I am writing to express my concern regarding the Corps' study results indicating no impact on the environment from a major expansion project for the ship channel. The Corps needs to address the following items to ensure the study is comprehensive enough to determine impacts and doesn't underestimate the true impact.

My concerns include:

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The Corps must thoroughly review how the proposed project will generate new growth opportunities associated with the port that could have indirect impacts to our natural resources;

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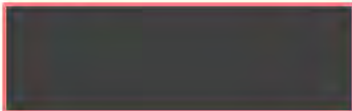
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In conclusion, the Corps' finding of "no impact" on Mobile Bay's sensitive environment is very concerning given the magnitude of the proposed project. Thank you for your consideration and response to each of these comments. By thoroughly studying and developing a comprehensive plan for the port expansion, we can grow responsibly and mitigate any unavoidable impacts to the natural resources that support our economy and quality of life.

Sincerely,




Mobile , Alabama 36603

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## Comment 90

**From:**   
**To:** [Mobile Harbor GRR](#)  
**Subject:** [Non-DoD Source] Dauphin Island  
**Date:** Sunday, September 16, 2018 8:44:14 PM

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Good evening!

I would like to add my voice to the others you have heard - about the erosion problem on Dauphin Island.

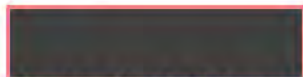
Our little barrier island is like a mini paradise to many of us - it represents a time gone by - the pace is slow, the people are friendly, and no stop lights and only one fast food place! We love going there. There is something so primitive and satisfying about walking the beach and looking out to the horizon. I actually count the days from one visit to another!

So - it is important to us that you adopt practices that will minimize the erosion of the Dauphin Island beach. I cannot express it better than this:

During maintenance dredging of the Bar Channel, all dredged sand should be placed in the shallow waters (i.e., between 0 to <15 feet) atop the shoal stretching between Sand Island Lighthouse and the east end of Sand/Pelican Island. Essentially 100% of the sand placed in the shallow waters along the top of the submerged shoal should be rapidly incorporated into the natural littoral drift system and moved to restore Sand/Pelican Island and nourish Dauphin Island's eroding Gulf shoreline. The Mobile District of the Corps already has the necessary Congressional authority to undertake that mitigation action as provided by Section 302 of the Water Resources Development Act of 1996. Section 302 was specifically enacted to modify the Mobile Harbor project to allow dredged material to be beneficially used and to pursue environmental restoration. All the Mobile District has to do is demonstrate the will to apply that existing Congressional authority to modify current maintenance practices for the Bar Channel.

Please hear all of us that love Dauphin Island!

Sincerely,



Dauphin Island, Alabama

## Comment 91

**From:** [REDACTED]  
**To:** [Newell, David P CIV CESAM CESAD \(US\)](#)  
**Subject:** [Non-DoD Source] My comments on the Mobile Ship Channel expansion DSEIS  
**Date:** Sunday, September 16, 2018 7:21:21 PM

---

David Newell,

Dear District Commander,

I am writing to express my concern regarding the Corps' study results indicating no impact on the environment from a major expansion project for the ship channel. The Corps needs to address the following items to ensure the study is comprehensive enough to determine impacts and doesn't underestimate the true impact.

My concerns include:

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The Corps must thoroughly review how the proposed project will generate new growth opportunities associated with the port that could have indirect impacts to our natural resources;

Ship wake analyses must be improved to include more accurate information (realistic ship sizes, weights, etc). The Corps needs to study the impacts on our aquatic life (oysters, seagrasses, etc.) and our shorelines from wave energy;

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The Corps must consider creating a Dredge Management Plan that includes all proposed projects in the Mobile Bay area;

In conclusion, the Corps' finding of "no impact" on Mobile Bay's sensitive environment is very concerning given the magnitude of the proposed project. Thank you for your consideration and response to each of these comments. By thoroughly studying and developing a comprehensive plan for the port expansion, we can grow responsibly and mitigate any unavoidable impacts to the natural resources that support our economy and quality of life.

Our Mobile Bay has not recovered from the BP Spill. Fish life is not what it was BEFORE the BP Spill. The Mobile Bay does NOT need any changes

Sincerely,

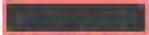
[REDACTED]



Daphne, Alabama 36526

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**From:**   
**To:** [Newell, David P CIV CESAM CESAD \(US\)](#)  
**Subject:** [Non-DoD Source] My comments on the Mobile Ship Channel expansion DSEIS  
**Date:** Sunday, September 16, 2018 7:21:08 PM

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David Newell,

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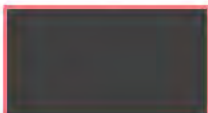
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Sincerely,



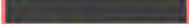


Lucedale, Mississippi 39452

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Comment 93

**From:**   
**To:** [Newell, David P CIV CESAM CESAD \(US\)](#)  
**Subject:** [Non-DoD Source] My comments on the Mobile Ship Channel expansion DSEIS  
**Date:** Sunday, September 16, 2018 6:37:28 PM

---

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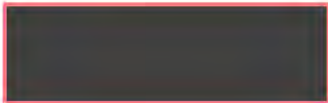
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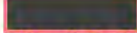
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Sincerely,



Mobile, Alabama 36608

<Blocked[https://u1584542.ct.sendgrid.net/mpss/o/2AA/ni0YAA/t.2kx/hcxg6O4fSjynjC65m\\_2l9w/o.gif](https://u1584542.ct.sendgrid.net/mpss/o/2AA/ni0YAA/t.2kx/hcxg6O4fSjynjC65m_2l9w/o.gif)>

**From:**   
**To:** [Newell, David P CIV CESAM CESAD \(US\)](#)  
**Subject:** [Non-DoD Source] My comments on the Mobile Ship Channel expansion DSEIS  
**Date:** Sunday, September 16, 2018 5:50:54 PM

---

David Newell,

Dear District Commander,

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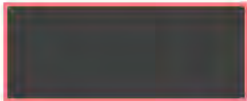
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Sincerely,



Fairhope, Alabama 36532

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**From:**   
**To:** [Newell, David P CIV CESAM CESAD \(US\)](#)  
**Subject:** [Non-DoD Source] My comments on the Mobile Ship Channel expansion DSEIS  
**Date:** Sunday, September 16, 2018 3:52:13 PM

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David Newell,

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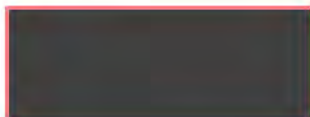
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Sincerely,





Mobile, Alabama 36606

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## Comment 96

**From:** [REDACTED]  
**To:** [Mobile Harbor GRR](#)  
**Subject:** [Non-DoD Source] Comments regarding the deepening of the Mobile Harbor ship channel  
**Date:** Sunday, September 16, 2018 3:05:04 PM

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To Whom It May Concern:

The plan to deepen the Mobile Harbor ship channel 5 more feet needs to be changed. The long-term impacts of this proposed massive dredging project on Mobile Bay and the western gulf coastline of Alabama will be very detrimental. Dauphin Island will suffer from increasing loss of its sand that should be naturally occurring, not losing it by man-made methods. Mobile Bay and the neighboring barrier islands in Mississippi will also be adversely impacted. A different plan to solve the problem should be made. The sands of the dredging should be used to help replace what Dauphin Island has been losing and will continue to lose.

Please rethink your decisions and come up with a better solution.

Thank you,

[REDACTED]

**From:**   
**To:** [Newell, David P CIV CESAM CESAD \(US\)](#)  
**Subject:** [Non-DoD Source] My comments on the Mobile Ship Channel expansion DSEIS  
**Date:** Sunday, September 16, 2018 1:56:48 PM

---

David Newell,

Dear District Commander,

I am writing to express my concern regarding the Corps' study conclusion that there would be no impacts resulting from deepening the Mobile Ship channel. The Corps needs to address the following items to ensure the study is comprehensive enough to determine its environmental impacts and doesn't underestimate the true impact.

My concerns include:

The study only includes one year of weather data as the base of its water quality models. Given how frequently and drastically these impact Mobile Bay watershed this is inadequate. The Corps must include at least three years of data to show how severe weather impacts the study's results;

The Corps must include studies about how pathogens, harmful algal blooms, and invasive species will enter Mobile Bay through a deeper channel;

The Corps must thoroughly review how the proposed project will generate new growth opportunities associated with the port that could have indirect impacts to our natural resources;

Ship wake analyses must be improved to include more accurate information (realistic ship sizes, weights, etc). The Corps needs to study the impacts on our aquatic life (oysters, seagrasses, etc.) and our shorelines from wave energy;

The Corps must work with scientists to ensure the oyster assessment is more comprehensive. The Corps needs to look at how young oysters move and show how the presence of predators (oyster drills) may increase with changes in salinity;

The Corps needs to more comprehensively investigate impacts into the wetlands, seagrasses, fish, and aquatic resource assessments. For instance, the Corps has not studied how losses to seagrasses from higher salinity will affect the species that rely on them like the West Indian Manatee and waterfowl;

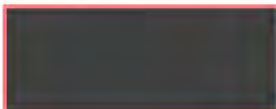
The Corps needs to recognize impacts to low income, minority communities as results show an increase of truck traffic by 25%;

The Corps must, as required by law, acknowledge past impacts on air quality and shoreline erosion since 1980 (the last environmental impact study conducted);

The Corps must consider creating a Dredge Management Plan that includes all proposed projects in the Mobile Bay area;

In conclusion, the Corps' finding of "no impact" on Mobile Bay's sensitive environment is very concerning given the magnitude of the proposed project. Thank you for your consideration and response to each of these comments. By thoroughly studying and developing a comprehensive plan for the port expansion, we can grow responsibly and mitigate any unavoidable impacts to the natural resources that support our economy and quality of life.

Sincerely,



Mobile, Alabama 36608

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Comment 98

**From:** [REDACTED]  
**To:** [Mobile Harbor GRR](#)  
**Cc:** [REDACTED] [gmail.com](#)  
**Subject:** [Non-DoD Source] Mobile Ship Channel  
**Date:** Sunday, September 16, 2018 11:53:34 AM

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Please address the concerns raised by numerous individuals and organizations as you proceed with enhancing the Channel. In particular, I endorse the views of Mayor Collier. This is an opportunity, and it may well be the last one, to address shoreline erosion, particularly on Dauphin Island. Please take advantage of the opportunity. The need to do so is compelling.

[REDACTED]



**From:**   
**To:** [Newell, David P CIV CESAM CESAD \(US\)](#)  
**Subject:** [Non-DoD Source] My comments on the Mobile Ship Channel expansion DSEIS  
**Date:** Sunday, September 16, 2018 10:45:01 AM

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David Newell,

Dear District Commander,

I am writing to express my concern regarding the Corps' study results indicating no impact on the environment from a major expansion project for the ship channel. The Corps needs to address the following items to ensure the study is comprehensive enough to determine impacts and doesn't underestimate the true impact.

My concerns include:

The study only includes one year of weather data as the base of its water quality models. Given how frequently and drastically these impact Mobile Bay watershed this is inadequate. The Corps must include at least three years of data to show how severe weather impacts the study's results;

The Corps must include studies about how pathogens, harmful algal blooms, and invasive species will enter Mobile Bay through a deeper channel;

The Corps must thoroughly review how the proposed project will generate new growth opportunities associated with the port that could have indirect impacts to our natural resources;

Ship wake analyses must be improved to include more accurate information (realistic ship sizes, weights, etc). The Corps needs to study the impacts on our aquatic life (oysters, seagrasses, etc.) and our shorelines from wave energy;

The Corps must work with scientists to ensure the oyster assessment is more comprehensive. The Corps needs to look at how young oysters move and show how the presence of predators (oyster drills) may increase with changes in salinity;

The Corps needs to more comprehensively investigate impacts into the wetlands, seagrasses, fish, and aquatic resource assessments. For instance, the Corps has not studied how losses to seagrasses from higher salinity will affect the species that rely on them like the West Indian Manatee and waterfowl;

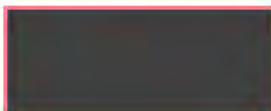
The Corps needs to recognize impacts to low income, minority communities as results show an increase of truck traffic by 25%;

The Corps must, as required by law, acknowledge past impacts on air quality and shoreline erosion since 1980 (the last environmental impact study conducted);

The Corps must consider creating a Dredge Management Plan that includes all proposed projects in the Mobile Bay area;

In conclusion, the Corps' finding of "no impact" on Mobile Bay's sensitive environment is very concerning given the magnitude of the proposed project. Thank you for your consideration and response to each of these comments. By thoroughly studying and developing a comprehensive plan for the port expansion, we can grow responsibly and mitigate any unavoidable impacts to the natural resources that support our economy and quality of life.

Sincerely,



Fairhope, Alabama 36532

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Comment 100

**From:** [Redacted]  
**To:** [Newell, David P CIV CESAM CESAD \(US\)](#)  
**Subject:** [Non-DoD Source] My comments on the Mobile Ship Channel expansion DSEIS  
**Date:** Sunday, September 16, 2018 10:32:37 AM

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David Newell,

Start digging without delay.

In conclusion, the Corps' finding of "no impact" on Mobile Bay's sensitive environment is very correct.

Sincerely,

[Redacted]  
Fairhope, Alabama 36533

<Blocked<https://u1584542.ct.sendgrid.net/mpss/o/DgE/ni0YAA/t.2kx/BsP9o-fJR7iBkwZhkGObsA/o.gif>>



**From:**   
**To:** [Newell, David P CIV CESAM CESAD \(US\)](#)  
**Subject:** [Non-DoD Source] My comments on the Mobile Ship Channel expansion DSEIS  
**Date:** Sunday, September 16, 2018 9:55:05 AM

---

David Newell,

Dear District Commander,

I am writing to express my concern regarding the Corps' study results indicating no impact on the environment from a major expansion project for the ship channel. The Corps needs to address the following items to ensure the study is comprehensive enough to determine impacts and doesn't underestimate the true impact.

My concerns include:

The study only includes one year of weather data as the base of its water quality models. Given how frequently and drastically these impact Mobile Bay watershed this is inadequate. The Corps must include at least three years of data to show how severe weather impacts the study's results;

The Corps must include studies about how pathogens, harmful algal blooms, and invasive species will enter Mobile Bay through a deeper channel;

The Corps must thoroughly review how the proposed project will generate new growth opportunities associated with the port that could have indirect impacts to our natural resources;

Ship wake analyses must be improved to include more accurate information (realistic ship sizes, weights, etc). The Corps needs to study the impacts on our aquatic life (oysters, seagrasses, etc.) and our shorelines from wave energy;

The Corps must work with scientists to ensure the oyster assessment is more comprehensive. The Corps needs to look at how young oysters move and show how the presence of predators (oyster drills) may increase with changes in salinity;

The Corps needs to more comprehensively investigate impacts into the wetlands, seagrasses, fish, and aquatic resource assessments. For instance, the Corps has not studied how losses to seagrasses from higher salinity will affect the species that rely on them like the West Indian Manatee and waterfowl;

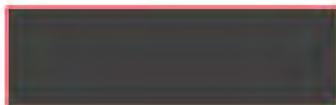
The Corps needs to recognize impacts to low income, minority communities as results show an increase of truck traffic by 25%;

The Corps must, as required by law, acknowledge past impacts on air quality and shoreline erosion since 1980 (the last environmental impact study conducted);

The Corps must consider creating a Dredge Management Plan that includes all proposed projects in the Mobile Bay area;

In conclusion, the Corps' finding of "no impact" on Mobile Bay's sensitive environment is very concerning given the magnitude of the proposed project. Thank you for your consideration and response to each of these comments. By thoroughly studying and developing a comprehensive plan for the port expansion, we can grow responsibly and mitigate any unavoidable impacts to the natural resources that support our economy and quality of life.


Sincerely,



Daphne, Alabama 36526

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**From:**   
**To:** [Newell, David P CIV CESAM CESAD \(US\)](#)  
**Subject:** [Non-DoD Source] My comments on the Mobile Ship Channel expansion DSEIS  
**Date:** Sunday, September 16, 2018 9:32:29 AM

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David Newell,

Dear District Commander,

I am writing to express my concern regarding the Corps' study results indicating no impact on the environment from a major expansion project for the ship channel. The Corps needs to address the following items to ensure the study is comprehensive enough to determine impacts and doesn't underestimate the true impact.

My concerns include:

The study only includes one year of weather data as the base of its water quality models. Given how frequently and drastically these impact Mobile Bay watershed this is inadequate. The Corps must include at least three years of data to show how severe weather impacts the study's results;

The Corps must include studies about how pathogens, harmful algal blooms, and invasive species will enter Mobile Bay through a deeper channel;

The Corps must thoroughly review how the proposed project will generate new growth opportunities associated with the port that could have indirect impacts to our natural resources;

Ship wake analyses must be improved to include more accurate information (realistic ship sizes, weights, etc). The Corps needs to study the impacts on our aquatic life (oysters, seagrasses, etc.) and our shorelines from wave energy;

The Corps must work with scientists to ensure the oyster assessment is more comprehensive. The Corps needs to look at how young oysters move and show how the presence of predators (oyster drills) may increase with changes in salinity;

The Corps needs to more comprehensively investigate impacts into the wetlands, seagrasses, fish, and aquatic resource assessments. For instance, the Corps has not studied how losses to seagrasses from higher salinity will affect the species that rely on them like the West Indian Manatee and waterfowl;

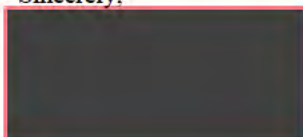
The Corps needs to recognize impacts to low income, minority communities as results show an increase of truck traffic by 25%;

The Corps must, as required by law, acknowledge past impacts on air quality and shoreline erosion since 1980 (the last environmental impact study conducted);

The Corps must consider creating a Dredge Management Plan that includes all proposed projects in the Mobile Bay area;

In conclusion, the Corps' finding of "no impact" on Mobile Bay's sensitive environment is very concerning given the magnitude of the proposed project. Thank you for your consideration and response to each of these comments. By thoroughly studying and developing a comprehensive plan for the port expansion, we can grow responsibly and mitigate any unavoidable impacts to the natural resources that support our economy and quality of life.

Sincerely,





Mobile, Alabama 36605

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**From:** [REDACTED]  
**To:** [Newell, David P CIV CESAM CESAD \(US\)](#)  
**Subject:** [Non-DoD Source] My comments on the Mobile Ship Channel expansion DSEIS  
**Date:** Sunday, September 16, 2018 9:13:15 AM

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David Newell,

Dear District Commander,

I am writing to express my concern regarding the Corps' study results indicating no impact on the environment from a major expansion project for the ship channel. The Corps needs to address the following items to ensure the study is comprehensive enough to determine impacts and doesn't underestimate the true impact.

My concerns include:deepening the Channel will impact the oyster beds, fish and sea life in the bay. There seems that this would only have adverse effects on the ecology of Mobile Bay. It would have a negative effect on oystermen and fishermen in our area. More study is required before this important decision is made.

The study only includes one year of weather data as the base of its water quality models. Given how frequently and drastically these impact Mobile Bay watershed this is inadequate. The Corps must include at least three years of data to show how severe weather impacts the study's results;

The Corps must include studies about how pathogens, harmful algal blooms, and invasive species will enter Mobile Bay through a deeper channel;

The Corps must thoroughly review how the proposed project will generate new growth opportunities associated with the port that could have indirect impacts to our natural resources;

Ship wake analyses must be improved to include more accurate information (realistic ship sizes, weights, etc). The Corps needs to study the impacts on our aquatic life (oysters, seagrasses, etc.) and our shorelines from wave energy;

The Corps must work with scientists to ensure the oyster assessment is more comprehensive. The Corps needs to look at how young oysters move and show how the presence of predators (oyster drills) may increase with changes in salinity;

The Corps needs to more comprehensively investigate impacts into the wetlands, seagrasses, fish, and aquatic resource assessments. For instance, the Corps has not studied how losses to seagrasses from higher salinity will affect the species that rely on them like the West Indian Manatee and waterfowl;

The Corps needs to recognize impacts to low income, minority communities as results show an increase of truck traffic by 25%;

The Corps must, as required by law, acknowledge past impacts on air quality and shoreline erosion since 1980 (the last environmental impact study conducted);

The Corps must consider creating a Dredge Management Plan that includes all proposed projects in the Mobile Bay area;

In conclusion, the Corps' finding of "no impact" on Mobile Bay's sensitive environment is very concerning given the magnitude of the proposed project. Thank you for your consideration and response to each of these comments. By thoroughly studying and developing a comprehensive plan for the port expansion, we can grow responsibly and mitigate any unavoidable impacts to the natural resources that support our economy and quality of life.

Sincerely,

[REDACTED]



Montrose , Alabama 36559

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**From:**   
**To:** [Newell, David P CIV CESAM CESAD \(US\)](#)  
**Subject:** [Non-DoD Source] My comments on the Mobile Ship Channel expansion DSEIS  
**Date:** Sunday, September 16, 2018 9:12:16 AM

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David Newell,

Dear District Commander,

I have fished the rivers, inlets, and the bay all my life. I have listen to story after story from guys that remember when the water ways around mobile use to be clear and much more beautiful than they currently are. Deepening and widening the channels will only dig up the old muds, sands, and oils from the decades past of the IP, Paper mills, and factories that one dumped waste into the water ways. Once dug up and moved then it contaminates the area its moved too. Just like when the Panama Canal was first attempted it fail because of the diseases dug up that they had no medicines to fight it. This to me is the same thing you dig up something that has been covered and "sealed" for a few decades you are bound to unearth something that will cause a huge effect to the very fragile eco system in the bay. So when it comes to make it more convent for corporate company's to use larger ships, dig up my bay and effect the eco system of an area that to me is still recovering from a massive oil spill where just now the fish population is starting to show less effect from that oil spill. Plus these corporate company's that want to dig up the bay....Has any of them offered to help add reefs or fish havens in the bay. Has any of them offered up to help with groups such as Alabama Marine Resources Division, any of the artificial reef programs or to just help improve the resources and the livelihood of the people that make a living not from the ships and what they hold but the water ways these company wish to change to their benefit. I say no take your ships somewhere else and leave the bay alone if that's not the first part of any plan to change the bay or its channels as they are.

  
satsuma, Alabama 36572

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**From:** [REDACTED]  
**To:** [Newell, David P CIV CESAM CESAD \(US\)](#)  
**Subject:** [Non-DoD Source] Concerned citizens comments on the Mobile Ship Channel expansion DSEIS  
**Date:** Sunday, September 16, 2018 8:35:00 AM

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David Newell,

Dear District Commander,

I am writing to express my concern regarding the Corps' study results indicating no impact on the environment from a major expansion project for the ship channel. I respectfully ask that the Corps address the following items to ensure the study is comprehensive enough to determine impacts and doesn't underestimate the true long-term and irreversible impacts.

My concerns include:

The study only includes one year of weather data as the base of its water quality models. Given how frequently and drastically these impact Mobile Bay watershed this is inadequate. The Corps must include at least three years of data to show how severe weather impacts the study's results;

The Corps must include studies about how pathogens, harmful algal blooms, and invasive species will enter Mobile Bay through a deeper channel;

The Corps must thoroughly review how the proposed project will generate new growth opportunities associated with the port that could have indirect impacts to our natural resources;

Ship wake analyses must be improved to include more accurate information (realistic ship sizes, weights, etc). The Corps needs to study the impacts on our aquatic life (oysters, seagrasses, etc.) and our shorelines from wave energy;

The Corps must work with scientists to ensure the oyster assessment is more comprehensive. The Corps needs to look at how young oysters move and show how the presence of predators (oyster drills) may increase with changes in salinity;

The Corps needs to more comprehensively investigate impacts into the wetlands, seagrasses, fish, and aquatic resource assessments. For instance, the Corps has not studied how losses to seagrasses from higher salinity will affect the species that rely on them like the West Indian Manatee and waterfowl;

The Corps needs to recognize impacts to low income, minority communities as results show an increase of truck traffic by 25%;

The Corps must, as required by law, acknowledge past impacts on air quality and shoreline erosion since 1980 (the last environmental impact study conducted);

The Corps must consider creating a Dredge Management Plan that includes all proposed projects in the Mobile Bay area;

In conclusion, the Corps' finding of "no impact" on Mobile Bay's sensitive environment is very concerning given the magnitude of the proposed project. Thank you for your consideration and response to each of these comments. By thoroughly studying and developing a comprehensive plan for the port expansion, we can grow responsibly and mitigate any unavoidable impacts to the natural resources that support our economy and quality of life.

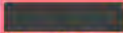
Sincerely,

[REDACTED]



Austin, Texas 78703

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**From:**   
**To:** [Newell, David P CIV CESAM CESAD \(US\)](#)  
**Subject:** [Non-DoD Source] My comments on the Mobile Ship Channel expansion DSEIS  
**Date:** Sunday, September 16, 2018 8:31:17 AM

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David Newell,

Dear District Commander,

I am writing to express my concern regarding the Corps' study results indicating no impact on the environment from a major expansion project for the ship channel. The Corps needs to address the following items to ensure the study is comprehensive enough to determine impacts and doesn't underestimate the true impact.

My concerns include:

The study only includes one year of weather data as the base of its water quality models. Given how frequently and drastically these impact Mobile Bay watershed this is inadequate. The Corps must include at least three years of data to show how severe weather impacts the study's results;

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The Corps must thoroughly review how the proposed project will generate new growth opportunities associated with the port that could have indirect impacts to our natural resources;

Ship wake analyses must be improved to include more accurate information (realistic ship sizes, weights, etc). The Corps needs to study the impacts on our aquatic life (oysters, seagrasses, etc.) and our shorelines from wave energy;

The Corps must work with scientists to ensure the oyster assessment is more comprehensive. The Corps needs to look at how young oysters move and show how the presence of predators (oyster drills) may increase with changes in salinity;

The Corps needs to more comprehensively investigate impacts into the wetlands, seagrasses, fish, and aquatic resource assessments. For instance, the Corps has not studied how losses to seagrasses from higher salinity will affect the species that rely on them like the West Indian Manatee and waterfowl;

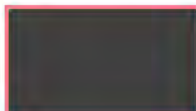
The Corps needs to recognize impacts to low income, minority communities as results show an increase of truck traffic by 25%;

The Corps must, as required by law, acknowledge past impacts on air quality and shoreline erosion since 1980 (the last environmental impact study conducted);

The Corps must consider creating a Dredge Management Plan that includes all proposed projects in the Mobile Bay area;

In conclusion, the Corps' finding of "no impact" on Mobile Bay's sensitive environment is very concerning given the magnitude of the proposed project. Thank you for your consideration and response to each of these comments. By thoroughly studying and developing a comprehensive plan for the port expansion, we can grow responsibly and mitigate any unavoidable impacts to the natural resources that support our economy and quality of life.

Sincerely,






Mobile, Alabama 36604

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**From:**   
**To:** [Mobile Harbor GRR](#); [Joly, Sebastien P COL USARMY CESAM \(US\)](#); [Holliman.Daniel@epa.gov](mailto:Holliman.Daniel@epa.gov); [Bush, Eric L CIV USARMY CESAD \(US\)](#); [Diana M. Holland BG](#)  
**Subject:** [Non-DoD Source] Sand Island Beneficial Use  
**Date:** Sunday, September 16, 2018 8:26:43 AM

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Hello, I am writing to request that the Corps commit to implementing a solution that will ensure that sand displaced from Mobile Channel dredging ultimately reaches the southern, far eastern, and far western shorelines of Dauphin Island. More specifically, I request that the Corps:

1. Guarantee use of the SIBUA Northwest Extension for the life of the project and monitor the SIBUA Northwest Extension to make sure the sand is actually reaching the shoreline of Dauphin Island.
2. Guarantee use of the SIBUA Northwest Extension every time the channel is dredged.
3. If after a year, the monitoring does not show the sand reaching the island and the properties, then the Corps will change the location of the dumping of the dredged sand to a better location and guarantee that the sand would reach all properties on the southern shoreline on the island.
4. Continue monitoring all locations of the SIBUA Northwest Extensions and any other future locations and provide the documentation to the public.
5. Ensure the depth of the location to be at 15 feet or less, which is consistent with Corps documentation and requirements for the rest of the Country.

Thank you for your time and consideration,



**From:** [REBECCA DOMANGUE](#)  
**To:** [Newell, David P CIV CESAM CESAD \(US\)](#)  
**Subject:** [Non-DoD Source] My comments on the Mobile Ship Channel expansion DSEIS  
**Date:** Sunday, September 16, 2018 8:13:22 AM

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David Newell,

Dear District Commander,

I am writing to express my concern regarding the Corps' study results indicating no impact on the environment from a major expansion project for the ship channel. The Corps needs to address the following items to ensure the study is comprehensive enough to determine impacts and doesn't underestimate the true impact.

My concerns include:

The study only includes one year of weather data as the base of its water quality models. Given how frequently and drastically these impact Mobile Bay watershed this is inadequate. The Corps must include at least three years of data to show how severe weather impacts the study's results;

The Corps must include studies about how pathogens, harmful algal blooms, and invasive species will enter Mobile Bay through a deeper channel;

The Corps must thoroughly review how the proposed project will generate new growth opportunities associated with the port that could have indirect impacts to our natural resources;

Ship wake analyses must be improved to include more accurate information (realistic ship sizes, weights, etc). The Corps needs to study the impacts on our aquatic life (oysters, seagrasses, etc.) and our shorelines from wave energy;

The Corps must work with scientists to ensure the oyster assessment is more comprehensive. The Corps needs to look at how young oysters move and show how the presence of predators (oyster drills) may increase with changes in salinity;

The Corps needs to more comprehensively investigate impacts into the wetlands, seagrasses, fish, and aquatic resource assessments. For instance, the Corps has not studied how losses to seagrasses from higher salinity will affect the species that rely on them like the West Indian Manatee and waterfowl;

The Corps needs to recognize impacts to low income, minority communities as results show an increase of truck traffic by 25%;

The Corps must, as required by law, acknowledge past impacts on air quality and shoreline erosion since 1980 (the last environmental impact study conducted);

The Corps must consider creating a Dredge Management Plan that includes all proposed projects in the Mobile Bay area;

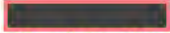
In conclusion, the Corps' finding of "no impact" on Mobile Bay's sensitive environment is very concerning given the magnitude of the proposed project. Thank you for your consideration and response to each of these comments. By thoroughly studying and developing a comprehensive plan for the port expansion, we can grow responsibly and mitigate any unavoidable impacts to the natural resources that support our economy and quality of life.

I would also highly recommend a speed limit on the ship channel to better reduce the large wake impacts on the bay turbidity and the shoreline.

Sincerely,  
Rebecca Domangue

REBECCA DOMANGUE  
rdomangue@mobilebaykeeper.org  
6151 Marina Drive South Apt 306  
MOBILE, Alabama 36605

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**From:**   
**To:** [Newell, David P CIV CESAM CESAD \(US\)](#)  
**Subject:** [Non-DoD Source] My comments on the Mobile Ship Channel expansion DSEIS  
**Date:** Sunday, September 16, 2018 8:00:14 AM

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David Newell,

Dear District Commander,

I am writing to express my concern regarding the Corps' study results indicating no impact on the environment from a major expansion project for the ship channel. The Corps needs to address the following items to ensure the study is comprehensive enough to determine impacts and doesn't underestimate the true impact.

My concerns include:

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The Corps must include studies about how pathogens, harmful algal blooms, and invasive species will enter Mobile Bay through a deeper channel;

The Corps must thoroughly review how the proposed project will generate new growth opportunities associated with the port that could have indirect impacts to our natural resources;

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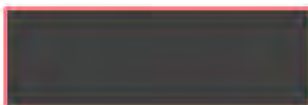
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The Corps must, as required by law, acknowledge past impacts on air quality and shoreline erosion since 1980 (the last environmental impact study conducted);

The Corps must consider creating a Dredge Management Plan that includes all proposed projects in the Mobile Bay area;

In conclusion, the Corps' finding of "no impact" on Mobile Bay's sensitive environment is very concerning given the magnitude of the proposed project. Thank you for your consideration and response to each of these comments. By thoroughly studying and developing a comprehensive plan for the port expansion, we can grow responsibly and mitigate any unavoidable impacts to the natural resources that support our economy and quality of life.

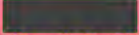
Sincerely,





Mobile, Alabama 36608

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**From:**   
**To:** [Newell, David P CIV CESAM CESAD \(US\)](#)  
**Subject:** [Non-DoD Source] My comments on the Mobile Ship Channel expansion DSEIS  
**Date:** Sunday, September 16, 2018 7:47:05 AM

---

David Newell,

Dear District Commander,

I am writing to express my concern regarding the Corps' study results indicating no impact on the environment from a major expansion project for the ship channel. The Corps needs to address the following items to ensure the study is comprehensive enough to determine impacts and doesn't underestimate the true impact.

My concerns include:

The study only includes one year of weather data as the base of its water quality models. Given how frequently and drastically these impact Mobile Bay watershed this is inadequate. The Corps must include at least three years of data to show how severe weather impacts the study's results;

The Corps must include studies about how pathogens, harmful algal blooms, and invasive species will enter Mobile Bay through a deeper channel;

The Corps must thoroughly review how the proposed project will generate new growth opportunities associated with the port that could have indirect impacts to our natural resources;

Ship wake analyses must be improved to include more accurate information (realistic ship sizes, weights, etc). The Corps needs to study the impacts on our aquatic life (oysters, seagrasses, etc.) and our shorelines from wave energy;

The Corps must work with scientists to ensure the oyster assessment is more comprehensive. The Corps needs to look at how young oysters move and show how the presence of predators (oyster drills) may increase with changes in salinity;

The Corps needs to more comprehensively investigate impacts into the wetlands, seagrasses, fish, and aquatic resource assessments. For instance, the Corps has not studied how losses to seagrasses from higher salinity will affect the species that rely on them like the West Indian Manatee and waterfowl;

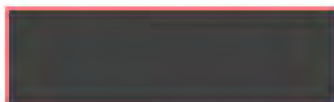
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Sincerely,



Theodore, al 36582

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**From:**   
**To:** [Newell, David P CIV CESAM CESAD \(US\)](#)  
**Subject:** [Non-DoD Source] My comments on the Mobile Ship Channel expansion DSEIS  
**Date:** Sunday, September 16, 2018 7:40:25 AM

---

David Newell,

Dear District Commander,

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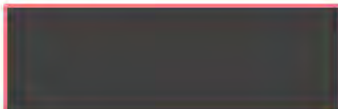
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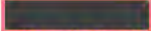
Sincerely,





Millry , Alabama 36558

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**From:**   
**To:** [Newell, David P CIV CESAM CESAD \(US\)](#)  
**Subject:** [Non-DoD Source] My comments on the Mobile Ship Channel expansion DSEIS  
**Date:** Sunday, September 16, 2018 6:26:45 AM

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David Newell,

Dear District Commander,

I am writing to express my concern regarding the Corps' study results indicating no impact on the environment from a major expansion project for the ship channel. The Corps needs to address the following items to ensure the study is comprehensive enough to determine impacts and doesn't underestimate the true impact.

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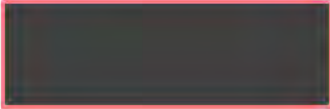
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Sincerely,



Mobile , Alabama AL

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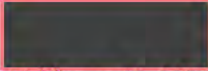
## Comment 113

**From:**   
**To:** [Mobile Harbor GRR](#)  
**Subject:** [Non-DoD Source] Mobile Bay Ship Channel Expansion  
**Date:** Saturday, September 15, 2018 10:51:19 PM

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I am concerned about the proposal for expanding the ship channel in Mobile Bay. The Corps finding of "no significant impact" resulting over the many miles of the project, the tons of sediment involved and the history of past dredging, suggests either an incomplete, or totally inaccurate assessment. I am concerned not only about the continued, significant erosion of Dauphin Island, but also the effects of turbidity on aquatic vegetation and marine life and it's effect on the seafood and tourist industry.

If the channel is to be widened and deepened for the benefit of some, it should not be at the expense of others. I believe a more thorough analysis of dredging practices is needed to protect the quality of water in the bay as well as its shorelines. Appropriate placement of beach sand should also be a requirement if this project moves forward, so that not only is the erosion stopped, but previous loses are recovered.

  
Fairhope, AL 36532



**From:** [REDACTED]  
**To:** [Mobile Harbor GRR](#); [Joly, Sebastien P COL USARMY CESAM \(US\)](#); [Diana M. Holland BG](#); [Semonite, Todd T LTG USARMY HODA OCE \(US\)](#)  
**Cc:** [Bush, Eric L CIV USARMY CESAD \(US\)](#); [CEIG](#); [holliman.daniel@epa.gov](mailto:holliman.daniel@epa.gov)  
**Subject:** [Non-DoD Source] Susan Rees' testimony to a Federal Judge and his reliance on the procedures the Corps would follow & Inadequate draft statement  
**Date:** Saturday, September 15, 2018 10:35:20 PM

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Dear LG. Semonite, BG Holland, Col. Joly,

For the last 45 years, the US Corps of Engineers has not been able solve Dauphin Island's erosion problem, all the while, the Chinese are building new islands in the China Seas for military bases.

Now the Corps is deepening and widening the Mobile Harbor to bring in Billions of dollars of Chinese goods into America that will put millions of Americans out of work.

I thought the US Army and the US Army Corps of Engineers were to protect America's property. BUT the Corps seems to be more interested in protecting the foreign shipping companies and elites, than protecting the people of Dauphin Island.

#### Inadequate draft statement

The Mobile Harbor is one of the deepest ports in the Country and is the entrance to the second largest inland waterway in the Country.

HOWEVER the Mobile District Corps still cannot solve the erosion problem caused by the Corps dredging of the Channel on the adjacent shoreline of Dauphin Island. AND the Corps doesn't seem capable to follow the Federal Laws and Corps' manuals that govern the prevention or mitigation of damage to shores and beaches is attributable to Federal navigation projects or other Federal activities

When the Corps does a SEIS/GRR, they have to publicly present all studies and reports used as their justification to deepen and widen the channel. They cannot hide the studies from the public.

The Corps has a duty to speak and not remain silent during this process.

The Corps intentional deletion of any impacts to Dauphin Island in the 1980 EIS/Mobile Harbor study proves 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 Mobile District concealment of the impacts is so obvious; it questions the Corps reliability to oversee any investigations concerning Dauphin Island. This involves immense concealment within the Mobile District for the passed 37 years.

The Mobile District cannot just take a contradicted old Lawsuit study as justification to not doing any other studies on Dauphin Island. The Corps needs to make sure that the enlargement of the shipping channel will not have irreparable damage to the surrounding areas, especially to Dauphin Island's adjacent shoreline.

The Mobile District not only has to follow the 1935 Federal Law, but they have to follow all other Laws and Corps' manuals since that time, to make sure they do not cause harm to the Island's adjacent shoreline from the new project.

The Mobile District needs to provide all studies or reports about the projects and its potential harm to Dauphin Island for the SEIS/GRR. Unless, the Corps did not do any studies.

#### Susan Rees' testimony

Where are the studies and the details since the 1980s, for the cost of dredging and the placement of dredge material and the changes in the environment for the GRR that Susan Rees stated to the Federal Judge that the Corps would have to do?

Susan Rees testified in 2009, that for a general re-evaluation report, if the Channel was deepened, the Corps would have to go back to the late 1980s, and take into consideration the different economics, the cost of dredging and the placement of dredge material and the changes in the environment. She stated that the Corps "would have to take into consideration all of those aspects in preparing that general re-evaluation report" and "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".

Susan Rees testified that the supplement to the environmental impact statement would "definitely" examine the impacts on Dauphin Island of any expansion

Susan Rees testified that the Mobile District has a Coastal Environment Section of Planning Division, which the duties of that section are to ensure the environmental compliance of all of the federally authorized projects that are undertaken by the district. Where are all of the environmental documents about Dauphin Island that were done by the Coastal Environment Section of Planning Division?

"If you take Mobile Harbor was originally authorized based on of the economics at whether the specifically, it 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."

After Susan Rees testimony in 2009 revealing the Corps would have to go back to the 1980s to study the placement of dredge material and the environment in the GRR, how can the Mobile District refuse to disclose all environmental impacts caused by their dredging to Dauphin Island from 1980 to 2016 in the SEIS/GRR.

By the Corps limiting the investigation of Dauphin Island, the Mobile District is denying any responsibility of Susan Rees' testimony to a Federal Judge and his reliance on the procedures the Corps would follow, if the Corps decided to increase the depth of the Channel.

"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."

The Mobile District cannot have it both ways, either Susan Rees was not telling the truth to a Federal Judge or the Mobile District is now denying Dauphin Island the studies that the Corps expert, Rees, said the Mobile District would follow.

Meaning the Corps would study the past placement of dredge material and past environment aspects the Mobile Harbor on Dauphin Island.

This stops the Mobile District's employees, from officially making false assertions that the Corps can limit the scope of the investigation for Dauphin Island.

It is undisputed that the Corps' 1978 Dauphin Island study stated that the Corps dredging of the Bar Channel was causing the erosion on Dauphin Island. The Corps has tried to conceal the Corps' erosion of the island from 1978 until now.

It is undisputed that the Corps intentionally left out all environmental and erosion impacts to Dauphin Island in the 1980 Environmental Impacts Statement (EIS) for the Mobile Harbor and the Mobile District has concealed that fact and the consequences of that act, for the past 38 years.

How can you supplement a flawed 1980 EIS document that left out the environment and erosion impact?

How 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?

The Mobile District needs to disclose all known errors and inaccuracies in the Byrnes 2008 Final Report and the updated 2010 version about Dauphin Island, before proceeding with the final SEIS/GRR.

In the scoping meeting in 2016, the Corps put Potential Impacts to Dauphin Island under Other Consideration. Now the Corps states there are no past, present or future impacts to Dauphin Island.

The Corps failed to reveal the laws that governed the protection of Dauphin Island and the environmental 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.

The Corps failed to show that sand in SIBUA was getting to Dauphin Island, instead they covered-up those facts in the SEIS/GRR and stated that the SIBUA was full.

For the last 22 years, the Corps failed to disclose to the people of Dauphin Island, the WRDA 1996, section 302 specifically states that the Corps could use alternatives disposal of the dredged material for environmental restoration for the Mobile Harbor.

The 2018 draft SEIS/GRR statement is so inadequate as to preclude meaningful analysis and the Corps should prepare and circulate a revised draft of the appropriate portion.

§ 1502.9 Draft, final, and supplemental statements which states:

“The draft statement must fulfill and satisfy to the fullest extent possible the requirements established for final statements in section 102(2)(C) of the Act. If a draft statement is so inadequate as to preclude meaningful analysis, the agency shall prepare and circulate a revised draft of the appropriate portion. The agency shall make every effort to disclose and discuss at appropriate points in the draft statement all major points of view on the environmental impacts of the alternatives including the proposed action.”

The Mobile District has failed to disclose and discuss all major points of view on the environmental impacts on Dauphin Island and any alternatives including the proposed action.

- \* The Corps has failed 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 Corps has failed to disclose 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 Corps has failed the severity, duration, or geographical scope of the past deletions of impacts to Dauphin Island associated with the proposed action warrant special attention.
- \* The Corps has failed 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 Corps has failed to disclose that 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 Island and the environment.
- \* The Corps has failed to disclose any additional information, data, analyses, or discussions, which should be fully disclosed about impacts to the Island and they should be documented and included in the final SEIS.
- \* The Corps refusal to identify all past significant environmental impacts to Dauphin Island in the 1980 EIS, therefore all past, present and future 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 past Corps statements about SIBUA underwater berm beneficial effects of adding sand directly to the beaches including the western side of Dauphin Island, because of the statements the Corps made to the Federal Judge, DOJ and the public that were included in the settlement of the 2009 trial.

The Corps must disclose all past mitigation efforts 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 for 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 and future actions has violated or will violate 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.

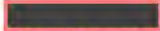
- \* The Corps needs to disclose all documentation of efforts to manipulate the scientific findings to prevent any study that might run counter to the Corps agenda.
- \* The Corps needs to disclose all evidence that the Corps often imposes restrictions on what scientists and the employees can say or write about the dredging impacts on Dauphin Island.
- \* The Corps needs to disclose all suppression of evidence, and misrepresentation of the impacts to Dauphin Island.
- \* The Corps needs to disclose all incidences and 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.
- \* The Corps needs to disclose 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.
- \* The Corps needs to disclose all employees that have not complied with the Federal Environmental Laws to protect Dauphin Island.
- \* The Corps needs to disclose all employees that have been involved with producing false studies and making false statements about Dauphin Island.



I hope the Mobile District will mitigate the shoreline erosion to Dauphin Island by putting the dredge sand parallel to the entire shoreline and during yearly dredging, placing the sand in an area, the Corps can guarantee the sand will re-nourish the shoreline of Dauphin Island.

Sincerely,

A black rectangular redaction box covering the signature.

**From:**   
**To:** [Newell, David P CIV CESAM CESAD \(US\)](#)  
**Subject:** [Non-DoD Source] My comments on the Mobile Ship Channel expansion DSEIS  
**Date:** Saturday, September 15, 2018 10:23:14 PM

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David Newell,

Dear District Commander,

I am writing to express my concern regarding the Corps' study results indicating no impact on the environment from a major expansion project for the ship channel. The Corps needs to address the following items to ensure the study is comprehensive enough to determine impacts and doesn't underestimate the true impact.

My concerns include:

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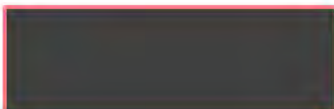
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In conclusion, the Corps' finding of "no impact" on Mobile Bay's sensitive environment is very concerning given the magnitude of the proposed project. Thank you for your consideration and response to each of these comments. By thoroughly studying and developing a comprehensive plan for the port expansion, we can grow responsibly and mitigate any unavoidable impacts to the natural resources that support our economy and quality of life.

Sincerely,



Mobile, Alabama 36618

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## Comment 116

**From:** [REDACTED]  
**To:** [Mobile Harbor GRR](#)  
**Subject:** [Non-DoD Source] Dauphin Island Erosion  
**Date:** Saturday, September 15, 2018 9:05:25 PM

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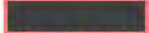
I have owned a house on Dauphin Island since 1969 and have watched continued erosion that I agree with other property owners is caused by placement of sand incorrectly after dredging the ship channel. I would wish that is as important to you as it is to me to protect our beautiful barrier island. Please consider our request.

Sincerely,

[REDACTED]

Sent from my iPhone



**From:**   
**To:** [Newell, David P CIV CESAM CESAD \(US\)](#)  
**Subject:** [Non-DoD Source] My comments on the Mobile Ship Channel expansion DSEIS  
**Date:** Saturday, September 15, 2018 5:59:55 PM

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David Newell,

Dear District Commander,

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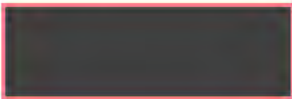
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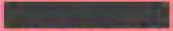
In conclusion, the Corps' finding of "no impact" on Mobile Bay's sensitive environment is very concerning given the magnitude of the proposed project. Thank you for your consideration and response to each of these comments. By thoroughly studying and developing a comprehensive plan for the port expansion, we can grow responsibly and mitigate any unavoidable impacts to the natural resources that support our economy and quality of life.

Sincerely,



Vestavia Hills, Al., Alabama 35216

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**From:**   
**To:** [Newell, David P CIV CESAM CESAD \(US\)](#)  
**Subject:** [Non-DoD Source] My comments on the Mobile Ship Channel expansion DSEIS  
**Date:** Saturday, September 15, 2018 4:28:16 PM

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David Newell,

Dear District Commander,

I am writing to express my concern regarding the Corps' study results indicating no impact on the environment from a major expansion project for the ship channel. The Corps needs to address the following items to ensure the study is comprehensive enough to determine impacts and doesn't underestimate the true impact.

My concerns include:

The study only includes one year of weather data as the base of its water quality models. Given how frequently and drastically these impact Mobile Bay watershed this is inadequate. The Corps must include at least three years of data to show how severe weather impacts the study's results;

The Corps must include studies about how pathogens, harmful algal blooms, and invasive species will enter Mobile Bay through a deeper channel;

The Corps must thoroughly review how the proposed project will generate new growth opportunities associated with the port that could have indirect impacts to our natural resources;

Ship wake analyses must be improved to include more accurate information (realistic ship sizes, weights, etc). The Corps needs to study the impacts on our aquatic life (oysters, seagrasses, etc.) and our shorelines from wave energy;

The Corps must work with scientists to ensure the oyster assessment is more comprehensive. The Corps needs to look at how young oysters move and show how the presence of predators (oyster drills) may increase with changes in salinity;

The Corps needs to more comprehensively investigate impacts into the wetlands, seagrasses, fish, and aquatic resource assessments. For instance, the Corps has not studied how losses to seagrasses from higher salinity will affect the species that rely on them like the West Indian Manatee and waterfowl;

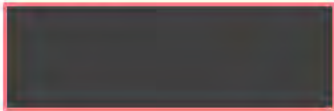
The Corps needs to recognize impacts to low income, minority communities as results show an increase of truck traffic by 25%;

The Corps must, as required by law, acknowledge past impacts on air quality and shoreline erosion since 1980 (the last environmental impact study conducted);

The Corps must consider creating a Dredge Management Plan that includes all proposed projects in the Mobile Bay area;

In conclusion, the Corps' finding of "no impact" on Mobile Bay's sensitive environment is very concerning given the magnitude of the proposed project. Thank you for your consideration and response to each of these comments. By thoroughly studying and developing a comprehensive plan for the port expansion, we can grow responsibly and mitigate any unavoidable impacts to the natural resources that support our economy and quality of life.

Sincerely,



Mobile, Alabama 36604

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**From:**   
**To:** [Newell, David P CIV CESAM CESAD \(US\)](#)  
**Subject:** [Non-DoD Source] My comments on the Mobile Ship Channel expansion DSEIS  
**Date:** Saturday, September 15, 2018 2:21:54 PM

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David Newell,

Dear District Commander,

I am writing to express my concern regarding the Corps' study results indicating no impact on the environment from a major expansion project for the ship channel. The Corps needs to address the following items to ensure the study is comprehensive enough to determine impacts and doesn't underestimate the true impact.

My concerns include:

The study only includes one year of weather data as the base of its water quality models. Given how frequently and drastically these impact Mobile Bay watershed this is inadequate. The Corps must include at least three years of data to show how severe weather impacts the study's results;

The Corps must include studies about how pathogens, harmful algal blooms, and invasive species will enter Mobile Bay through a deeper channel;

The Corps must thoroughly review how the proposed project will generate new growth opportunities associated with the port that could have indirect impacts to our natural resources;

Ship wake analyses must be improved to include more accurate information (realistic ship sizes, weights, etc). The Corps needs to study the impacts on our aquatic life (oysters, seagrasses, etc.) and our shorelines from wave energy;

The Corps must work with scientists to ensure the oyster assessment is more comprehensive. The Corps needs to look at how young oysters move and show how the presence of predators (oyster drills) may increase with changes in salinity;

The Corps needs to more comprehensively investigate impacts into the wetlands, seagrasses, fish, and aquatic resource assessments. For instance, the Corps has not studied how losses to seagrasses from higher salinity will affect the species that rely on them like the West Indian Manatee and waterfowl;

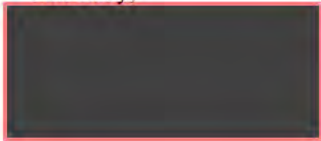
The Corps needs to recognize impacts to low income, minority communities as results show an increase of truck traffic by 25%;

The Corps must, as required by law, acknowledge past impacts on air quality and shoreline erosion since 1980 (the last environmental impact study conducted);

The Corps must consider creating a Dredge Management Plan that includes all proposed projects in the Mobile Bay area;

In conclusion, the Corps' finding of "no impact" on Mobile Bay's sensitive environment is very concerning given the magnitude of the proposed project. Thank you for your consideration and response to each of these comments. By thoroughly studying and developing a comprehensive plan for the port expansion, we can grow responsibly and mitigate any unavoidable impacts to the natural resources that support our economy and quality of life.

Sincerely,







Daphne, Alabama 36526

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**From:** [REDACTED]  
**To:** [Mobile Harbor GRR](#)  
**Subject:** [Non-DoD Source] What do we want the Corps to do to mitigate for the erosion of Dauphin Island?  
**Date:** Saturday, September 15, 2018 1:36:34 PM

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COL Sebastien P. Joly, District Commander  
U.S. Army Corps of Engineers, Mobile District  
P.O. Box 2288  
Mobile, AL 36628-0001

To mitigate for the historic and ongoing erosion of Dauphin Island and the smaller Sand/Pelican Island to the southeast, two separate but related actions are needed;

\* During maintenance dredging of the Bar Channel, all dredged sand should be placed in the shallow waters (i.e., between 0 to <15 feet) atop the shoal stretching between Sand Island Lighthouse and the east end of Sand/Pelican Island. Essentially 100% of the sand placed in the shallow waters along the top of the submerged shoal should be rapidly incorporated into the natural littoral drift system and moved to restore Sand/Pelican Island and nourish Dauphin Island's eroding Gulf shoreline. The Mobile District of the Corps already has the necessary Congressional authority to undertake that mitigation action as provided by Section 302 of the Water Resources Development Act of 1996. Section 302 was specifically enacted to modify the Mobile Harbor project to allow dredged material to be beneficially used and to pursue environmental restoration. All the Mobile District has to do is demonstrate the will to apply that existing Congressional authority to modify current maintenance practices for the Bar Channel. However, this mitigation action would only mitigate for the present and future erosion of Dauphin Island.

\* To mitigate the historic shoreline losses of Dauphin Island, a much larger project action is needed. That mitigation measure should move by dredging to the Dauphin Island shoreline the millions of cubic yards of sands the Mobile District has removed from the Bar Channel since 1999 that have accumulated within the so-called Sand Island Beneficial Use Area (SIBUA). Those beach quality sands originally came from the Fort Morgan Peninsula and would have been transported by littoral drift to Dauphin Island if the Mobile District had not intercepted the sands by maintenance dredging of the Bar Channel. The millions of cubic yards of accumulated sands now sit a short distance offshore in waters too deep for them to rejoin the littoral system by natural wave and current action. It is these sands that were removed from the littoral drift system that have contributed to the present "sand starvation" of Dauphin Island. The Town of Dauphin Island developed the design details of a project in 2011 that would use around 4 million cy of these sands at an estimated cost of \$59 million to restore the island's eroded shoreline which could be readily implemented and/or expanded with little further study.

Such a mitigation project could be paid for by either of two viable approaches:

1. According to the Draft GRR/SEIS, the recommended Mobile Harbor deepening project is predicted to generate average net benefits of \$34.5 million per year in excess of cost. Thus, mitigation could be paid for with the benefit stream predicted to be generated in just two years of operation of the deepened channel. All the Mobile District has to do is recommend this mitigation measure be included in the project recommendation to deepen Mobile Harbor.
2. Alternatively, the Mobile District could proactively work with the Alabama State Port Authority, the Governor of Alabama and other parties to select for implementation Project ID No. 92 ("West End Beach and Barrier Island Restoration Project") from the list of Alabama Coastal Restoration Suggested Projects being considered by the Alabama Gulf Coast Recovery Council. That approach would allow the mitigation project to be paid for with Deepwater Horizon Oil Spill related monies instead of being charged to the Mobile Harbor Deepening Project.



Property Owner

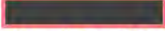
## Comment 121

**From:** [REDACTED]  
**To:** [Mobile Harbor GRR](#)  
**Subject:** [Non-DoD Source] project to widen the mobile river to acomodate more commercial  
**Date:** Saturday, September 15, 2018 11:47:04 AM

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activity in the port of mobile, al: as a native new orleanian, i have been transplanted to mobile for the last 11 yrs, want i am vehemently opposed to this proposed project. the MRGO (mississippi river gulf outlet) project sucessfully widened the path from the gulf to the port of new orleans, destroying the wetlands and even eliminating some barrier islands, creating a great "hurricane alley" thereafter. i do not trust the corp of engineer's methodology nor it's environmental priorities- i have been very disappointed in the corps. eisenhower warned us after world war two, to be distrustful of the " military industrial complex" , such as the corp of engineers, who would want to perpetuate their jobs with needless or worse projects. we do not need this! without downtown mobile the city is nothing and this will surely increase flooding downtown when there's bad weather and greater damage to all of mobile when it's laid more open to violent weather in the gulf. this proposed project would surely do more than good, if it's allowed to proceed. sincerely [REDACTED] a resident of downtown mobile  
This message was sent from my mobile device, typos and all....



**From:**   
**To:** [Newell, David P CIV CESAM CESAD \(US\)](#)  
**Subject:** [Non-DoD Source] My comments on the Mobile Ship Channel expansion DSEIS  
**Date:** Saturday, September 15, 2018 11:40:59 AM

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David Newell,

Dear District Commander,

I am writing to express my concern regarding the Corps' study results indicating no impact on the environment from a major expansion project for the ship channel. The Corps needs to address the following items to ensure the study is comprehensive enough to determine impacts and doesn't underestimate the true impact.

My concerns include:

The study only includes one year of weather data as the base of its water quality models. Given how frequently and drastically these impact Mobile Bay watershed this is inadequate. The Corps must include at least three years of data to show how severe weather impacts the study's results;

The Corps must include studies about how pathogens, harmful algal blooms, and invasive species will enter Mobile Bay through a deeper channel;

The Corps must thoroughly review how the proposed project will generate new growth opportunities associated with the port that could have indirect impacts to our natural resources;

Ship wake analyses must be improved to include more accurate information (realistic ship sizes, weights, etc). The Corps needs to study the impacts on our aquatic life (oysters, seagrasses, etc.) and our shorelines from wave energy;

The Corps must work with scientists to ensure the oyster assessment is more comprehensive. The Corps needs to look at how young oysters move and show how the presence of predators (oyster drills) may increase with changes in salinity;

The Corps needs to more comprehensively investigate impacts into the wetlands, seagrasses, fish, and aquatic resource assessments. For instance, the Corps has not studied how losses to seagrasses from higher salinity will affect the species that rely on them like the West Indian Manatee and waterfowl;

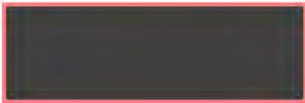
The Corps needs to recognize impacts to low income, minority communities as results show an increase of truck traffic by 25%;

The Corps must, as required by law, acknowledge past impacts on air quality and shoreline erosion since 1980 (the last environmental impact study conducted);

The Corps must consider creating a Dredge Management Plan that includes all proposed projects in the Mobile Bay area;

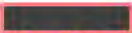
In conclusion, the Corps' finding of "no impact" on Mobile Bay's sensitive environment is very concerning given the magnitude of the proposed project. Thank you for your consideration and response to each of these comments. By thoroughly studying and developing a comprehensive plan for the port expansion, we can grow responsibly and mitigate any unavoidable impacts to the natural resources that support our economy and quality of life.

Sincerely,



Pekin, Illinois 61554

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**From:**   
**To:** [Newell, David P CIV CESAM CESAD \(US\)](#)  
**Subject:** [Non-DoD Source] My comments on the Mobile Ship Channel expansion DSEIS  
**Date:** Saturday, September 15, 2018 11:38:14 AM

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David Newell,

Dear District Commander,

I am writing to express my concern regarding the Corps' study results indicating no impact on the environment from a major expansion project for the ship channel. The Corps needs to address the following items to ensure the study is comprehensive enough to determine impacts and doesn't underestimate the true impact.

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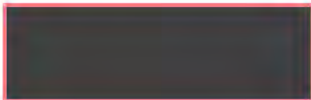
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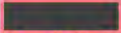
Sincerely,



Pekin, Illinois 61554

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**From:**   
**To:** [Newell, David P CIV CESAM CESAD \(US\)](#)  
**Subject:** [Non-DoD Source] My comments on the Mobile Ship Channel expansion DSEIS  
**Date:** Saturday, September 15, 2018 11:36:57 AM

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David Newell,

Dear District Commander,

I am writing to express my concern regarding the Corps' study results indicating no impact on the environment from a major expansion project for the ship channel. The Corps needs to address the following items to ensure the study is comprehensive enough to determine impacts and doesn't underestimate the true impact.

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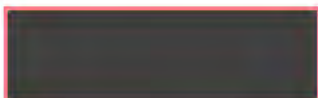
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Sincerely,



dauphin island, Alabama 36528

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**From:** [Meg McGovern](#)  
**To:** [Mobile Harbor GRR](#)  
**Subject:** [Non-DoD Source] Dredging Mobile Bay  
**Date:** Saturday, September 15, 2018 11:21:47 AM

---

I am in favor of the dredging. What will happen with the spoils?

Meg McGovern

REALTOR

Roberts Brothers, Inc.

559 North Section Street

Fairhope, AL 36532

251-422-1556

ALERT! Roberts Brothers, Inc., will never send you wiring information via email or request that you send us personal financial information by email. If you receive an email message like this concerning any transaction involving Roberts Brothers, do not respond to the email and immediately contact your agent via phone.

**From:** [REDACTED]  
**To:** [Mobile Harbor GRR](#)  
**Subject:** [Non-DoD Source] Mobile Bay Dredging Project  
**Date:** Saturday, September 15, 2018 10:45:20 AM

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Commander Col. Jolly,

I know you are receiving a lot of feedback from various interest groups regarding the proposed impact of the Mobile Bay dredging on the barrier islands.

We are property owners on Dauphin Island, having invested quite a bit to build our house on this beautiful but vulnerable island. I know you may say.... hey you knew the risks so "Buyer Beware". That's true, we knew the risks and can come to terms if a natural disaster wipes us out. That's something we can live with, but the risk imposed by man-made disaster is something that we can and should control.

The barrier islands are a natural and economic resource for Alabama and the Gulf Coast. Once lost they are irretrievable. YOU and the CORP have the ability to lessen significantly the impact on these areas buy looking at the results of the past dredging and dumping projects.

I'm not the sharpest knife in the drawer but as my grandmother used to say... hell it ain't "Rocket Surgery" to know that your sand dumping is too far out in the Gulf and too deep.

Your Corp representatives have stated in public meetings that the current project has only moved 1/2 of the sand back into the Littoral Drift than was projected and expected.

PLEASE, PLEASE, PLEASE listen to the folks and look at the various analysis that say if you move the sand dumping into more shallow water and further North and West of the present area, that the drift will begin to replenish the island.....as it has for 100s of years. Man has caused this current dilemma, not nature.

PLEASE HELP US PRESERVE THIS BEAUTIFUL ISLAND. COME DOWN AND I WILL BE GLAD TO TAKE YOU ON A TOUR.

THINK ABOUT HOW YOUR DECISION WOULD AFFECT YOUR FAMILY IF YOUR MOTHER AND FATHER HAD A HOUSE HERE?

Sincerely,

[REDACTED]



**From:** [redacted]  
**To:** [Mobile Harbor GRR](#)  
**Cc:** [redacted] [bellsouth.net](#) [redacted]  
**Subject:** [Non-DoD Source] Ship Channel Modifications  
**Date:** Saturday, September 15, 2018 9:31:27 AM

---

Dear District Commander,

As a resident of Dauphin Island for only the past ten years, in that short period of time, I have seen the beaches on the East and West Ends of the Island further erode. It is my belief that the ship channel dredging and increased ship traffic changes the natural flow of sand that would replenish our beaches. I am concerned that further widening and deepening will only lead to a greater loss of our shorelines.

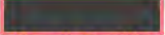
I am not opposed to the widening and deepening if the environmental impact on our beaches can be negated. I believe that the Port's goals and the goals of homeowners on Dauphin Island can both be accomplished by doing the two simple steps below:

- (1) The Corps should place future dredged material in the shallow waters (i.e., from 0 to <15 feet atop the shoal that stretches between Sand Island Lighthouse and Sand/Pelican Island. Sand placed at that location will be fairly quickly moved to nourish Dauphin Island.
- (2) The sands that have accumulated within the Sand Island Beneficial Use Area (because they have been diverted from the littoral drift system since 1999 by the Corps) should be dredged from that location and placed on the island's Gulf beach to restore that severely eroded shoreline. The Town has already designed the details of such a project that the Corps could readily implement with very little further study. That mitigation could be accomplished under Section 302 of the Water Resources Development Act of 1996 that specifically applies to the Mobile Harbor project to beneficially use dredged material and to pursue environmental restoration with the dredged material.

Thank you for your consideration of those of us who live here and are greatly impacted by any changes the Corps makes in the Ship Channel. Feel free to contact me regarding these comments.

Sincerely,

[redacted]

**From:**   
**To:** [Newell, David P CIV CESAM CESAD \(US\)](#)  
**Subject:** [Non-DoD Source] My comments on the Mobile Ship Channel expansion DSEIS  
**Date:** Saturday, September 15, 2018 9:29:34 AM

---

David Newell,

Dear District Commander,

Very important! I pray that you truly listen to our concerns not just the noise please.

I am writing to express my concern regarding the Corps' study results indicating no impact on the environment from a major expansion project for the ship channel. The Corps needs to address the following items to ensure the study is comprehensive enough to determine impacts and doesn't underestimate the true impact.

My concerns include:

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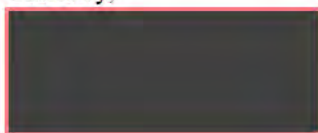
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Sincerely,



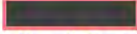


Theodore, Alabama 36582

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## Comment 129

**From:**   
**To:** [Newell, David P CIV CESAM CESAD \(US\)](#)  
**Subject:** [Non-DoD Source] My comments on the Mobile Ship Channel expansion DSEIS  
**Date:** Saturday, September 15, 2018 9:16:10 AM

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David Newell,

Dear District Commander,

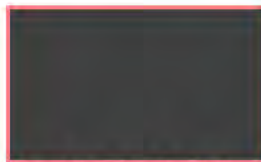
As a resident of Dauphin Island for only the past ten years, I have seen the beaches on the East and West Ends of the Island continue to erode. It is my belief that the ship channel dredging changes the natural flow of sand that would replenish our beaches. I am concerned that further widening and deepening will only lead to a greater loss of our shorelines.

I am not opposed to the widening and deepening if the environmental impact on our beaches can be negated. I believe by doing the following that the Ports goals and the goals of homeowners on Dauphin Island can both be accomplished by doing the two simple steps below:

(1) The Corps should place all future dredged material in the shallow waters (i.e., from 0 to s Gulf beach to restore that severely eroded shoreline. The Town has already designed the details of such a project that the Corps could readily implement with very little further study. That mitigation could be accomplished under Section 302 of the Water Resources Development Act of 1996 that specifically applies to the Mobile Harbor project to beneficially use dredged material and to pursue environmental restoration wit the dredged material.

Thank you for your consideration of those of us who live here and are greatly impacted by the changes the Corps makes in the Ship Channel.


Sincerely,



Dauphin Island, Alabama 36528

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**From:**   
**To:** [Mobile Harbor GRR](#)  
**Subject:** [Non-DoD Source] Mobile Harbor Widening Project Comments  
**Date:** Saturday, September 15, 2018 9:16:04 AM

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Dear Sir or Madam,

As a full time resident of Dauphin Island, please see our comments and concerns below around the Mobile Harbor Widening Project.

The Draft GRR/SEIS does not fully comply with §1508.25 of CEQ's NEPA Regulations because of Corps' practice of "segmenting" Mobile Harbor Project by preparing multiple separate NEPA documents. The Corps needs to develop a Master Plan and associated Environmental Impact Statement that would identify all work required to expand and maintain Mobile Harbor for at least the next 20 years. Such a plan should include all existing, recommended, and proposed future disposal sites so the complete impact of the Mobile Harbor project is disclosed to the public as required by NEPA.

The original 1980 report/EIS that originally recommended the ship channel be deepened was deficient because it completely ignored Dauphin Island's erosion problem. The GRR/SEIS is supposed to update the original 1980 report/EIS by analyzing changed conditions. The tremendous amount of erosion of the Sand/Pelican Island complex and Dauphin Island that has occurred since the 1980 report represents a significant "changed condition" in not only the Study Area, but also the immediate Project Area since the Sand Island Beneficial Use Area (SIBUA) is the Corps' only designated disposal area to maintain the Bar Channel and is intended to bypass littoral drift sands to the west side of the channel to nourish Dauphin Island. Despite numerous public inquiries during the planning process, the Corps has never explained its refusal to address the enormous amount of erosion that has occurred to these islands. Instead, the Corps has chosen to ignore the 38 years of past shoreline erosion impacts that have produced today's significantly weakened Dauphin Island. The GRR/SEIS MUST address the 38 years of erosion that has occurred since 1980.

The failure of the Draft GRR/SEIS to sufficiently identify the availability of maintenance disposal capacity for the Tentatively Selected Plan (TSP) for the next 50 years is a major concern. Since the report does not adequately analyze the disposal capacity deficit issue, the future environmental impacts resulting from maintaining the channel also cannot be adequately identified and evaluated. Therefore, the Supplemental Environmental Impact Statement component of the report does not fully comply with the National Environmental Policy Act for the full 50-year period of analysis identified in the report.

Erosion of Mobile Bay's western shoreline is a serious continuing issue. Long-term bayfront property owners have repeatedly stated they have observed large waves created by passing ships. Instead of giving credence to the validity of landowner statements, the Corps has relied entirely upon the results of computerized modeling to conclude ship wakes do not represent a serious issue. Because of the public's concern over ship generated waves the Corps, Coast Guard, and Port Authority should evaluate imposing speed limits on the larger deep draft ships, particularly if fully loaded, to reduce the magnitude of bow waves from passing vessels.

Why has the Corps and EPA found it necessary to pursue a massive expansion of the Ocean Dredged material Disposal Site (ODMDS) in the Gulf of Mexico? Figure 4-7 shows the proposed expansion would increase the size of the ODMDS by 500%, from the current 4,017 acres to the proposed 20,341 acres. The report should explain why it is necessary to expand the ODMDS by 500% since the Corps plans to use the existing open water thin layer disposal sites as much as possible to receive future maintenance material.

The report states the Tentatively Selected Plan (TSP) has a Benefit-to-Cost Ratio of 3.0 and will annually produce over \$34.5 million of Excess Benefits over Costs. A portion of the Excess Benefits should be directed to beneficially use dredged material to pursue various restoration projects. Example projects could include improving Mobile Bay's oyster resources and pursuing measures to prepare other important environmental resources (such as marsh areas) to better withstand the future effects of Sea Level Rise.

Thin layer disposal of material dredged from the Bay Channel affects thousands of acres of Mobile Bay bottoms each year. The report's Tentatively Selected Plan (TSP) to deepen the channel recommends the additional maintenance dredged material also be disposed in the bay over the next 50 years. But the report provides no adequate scientific information to support the Corps contention that thin layer disposal benefits Mobile Bay's environment. Instead, it appears open water disposal within the bay is really being driven by the intent to reduce project costs by no longer having to transport the material offshore for disposal in the Gulf. The entire return to thin layer disposal in the bay is based upon two unsubstantiated, extremely sketchy statements contained in the July 2014 Environmental Assessment entitled "Modification to Mobile Harbor Operations and Maintenance Addition of a Long-Term Open Bay Thin-Layer Disposal Option". Detailed information from independent studies and literature to validate the Corps allegation that thin layer disposal is beneficial for Mobile Bay must be added to the report.

Oysters are a major "indicator species" of the overall health of Mobile Bay. Historical NOAA catch data for Alabama from 1950 through 2016 show the total annual oyster harvests from Alabama waters have experienced a significant continuing decline during the last 10 years. To provide a true representation of the existing quality of oyster resources within the Study Area, the report should clarify that the recent four years (2013, 2014, 2015, and 2016) selected to develop the Study Baseline represents a significant low point in both oyster production and reef condition over the past 66 years. It is worth noting that the decline in oyster production, which is centered around Mobile Bay, coincides with the Corps return to open water disposal of dredged material in the bay in 2014. The report should devote more discussion to the current deteriorated condition of Mobile Bay's oyster resources, including additional modeling work dealing spat movements, effects on salinity regimes, predation, etc.

The primary reason given for filling the relic shell mining holes located in the midportion of Mobile Bay is that these areas experience periods of low oxygen. However, during periods of extreme winter cold, when portions of the bay have been known to freeze and cause winter fish kills, these deep areas also provide temperature refugia that benefit fish fleeing the lethal colder shallow waters. However, the document does not address the potential refugia benefit that would be foregone if the areas are filled with dredged sediments.

The report should explain how dredged material disposal capacity needs for the Tentatively Selected Plan (TSP) will be satisfied over the entire 50-year economic life of the project. Table 4-5 shows the remaining annual disposal capacity for the open water thin layer disposal sites in Mobile Bay (Figure 4-6) to be 59,594,000 cy after 20 years of use. Assuming the average annual dredging volume for the Bay Channel TSP consistently remains at 4,500,000 cy/year during the final 30 years of the project's 50-year economic life, a total of 135,000,000 cy will have to be dredged. Subtracting the remaining disposal site capacity of 59,594,000 cy from the projected total dredging requirement of 135,000,000 for the final 30-year period shows the Bay Channel segment will suffer from a disposal capacity deficit of 75,406,000 cy that will become increasingly more difficult to overcome and will likely increase

the future cost of the maintenance program. The report provides no information as to how the Corps and the Alabama State Port Authority plan to satisfy the future dredged material disposal needs of the TSP after the initial 20 years of maintenance. The potential adverse impacts to Mobile Bay from future dredged material disposal practices are too significant for the report to ignore the significant importance of the dredged material disposal capacity deficit problem the TSP will experience over the total 50-year period of analysis.

Figure 4-9 must be revised to include the 1,200-acre dredged material disposal island planned for the Upper Bay south of the Causeway. The island project was approved for funding on December 9, 2015 by the federal Gulf Coast Ecosystem Restoration Council at a cost of \$2.5 million. Initiation of the study has now been delayed 2-3/4 years, without any explanation being provided. The Corps and the Alabama State Port Authority were actively pursuing the proposed island project until the public began asking questions about the proposal and whether it would truly represent a beneficial use of dredged material. By failing to include the 1,200-acre island on Figure 4-9 and discussing it in the report, it appears the Corps is attempting to prevent the public from being made more aware of the proposal to construct the island. The public is concerned the Corps is simply delaying starting the dredged material island study until after the current report to deepen the ship channel is finalized.

The water quality modeling analysis must be reconsidered to evaluate a multi-year drought condition to adequately determine if the Tentatively Selected Plan (TSP) will alter salinity regimes within Mobile Bay to the point that oysters, submerged aquatic vegetation, and other specific environmental resources could be adversely affected. The greatest prolonged changes in salinity in Mobile Bay occur during periods of sustained low flow that are experienced during multi-year drought events affecting significant portions of the Mobile Drainage Basin. The water quality model must be rerun to generate the projected “worst case” salinity regimes that could reasonably be expected to occur in the foreseeable future under the TSP during a multi-year drought. That approach is necessary if the potential effects of the TSP on salinity levels, SAV, oyster drills, oysters, and other key environmental resources in Mobile Bay are to be adequately disclosed in the report.

The report does not explain why disposing of maintenance dredged material in open water over thousands of acres of Mobile Bay bottoms over extended periods of time during dredging operations will not increase turbidity values (i.e., a measure of how muddy the water is) above ambient levels. On page 5-14, the statement is made that “... there would be no expected increase in the concentrations of the turbidity as a result of the implementation of the TSP.” Given the magnitude of the annual maintenance dredging operations and the fine-grained nature of the sediments dredged, this impact statement does not make sense. The report should be expanded to better explain why turbidity levels in Mobile Bay will not be increased during sustained periods of open water disposal of dredged materia

The public does not accept the results of the Corps numerical modeling study results that allege maintenance of the Bar Channel does not contribute to the erosion of Dauphin Island. The rejection is based on the clear fact the model results do not match with the actual observed shoreline losses that have occurred since the early 1970s. The Corps admitted at the February 22, 2018 public meeting that the use of the Sand Island Beneficial Use Area (SIBUA) was preventing at least half of the sands that would naturally been carried to Dauphin Island from reaching the island. In addition, Corps dredging records also indicate that as much as 72% of the sands dredged from the Bar Channel since 1980 have been lost from the nearshore littoral drift system because the Corps practice of disposing of the valuable beach sands in deeper Gulf waters. These facts indicate the loss of millions of cubic yards of beach quality sands due to unwise channel disposal practices has and continues to adversely affected Dauphin Island.

The 2009 Settlement Agreement that ended the Dauphin Island POA erosion lawsuit required the Corps to begin

disposing of dredged sands in the Sand Island Beneficial Use Area (SIBUA). However, the Corps knew even as early as 2009 that sands were accumulating in the SIBUA instead of moving toward Dauphin Island as promised. Until the Corps can provide substantive proof the proposed SIBUA expansion will allow most of the placed sands to return to the littoral drift system to nourish Dauphin Island, the Corps could be violating the spirit and intent of the terms of the Settlement Agreement. Thus, one or more of the 1,700 Class members may be within their rights to challenge the Corps in court for failing to comply with the terms of the 2009 Lawsuit Settlement Agreement since the Corps failed to disclose to the Class that it knew in advance about the sand accumulation problem in the SIBUA.

The public is withholding support for the proposed Sand Island Beneficial Use Area (SIBUA) expansion to the northwest until the Corps provides conclusive information assuring upwards to 100% of the littoral drift sands intercepted by channel dredging and placed in the SIBUA expansion area will return to the littoral drift system to nourish Dauphin Island. After 20 years of use, the Corps' promises about the beneficial functioning of the existing SIBUA have all been proven to be wrong while Dauphin Island continued to erode. The public will no longer accept the Corps' verbal promises alone that the new site will function as suggested without being provided substantiated proof to support the promise. Figure 8 on page ES-17 should be modified to clearly show water depths within the proposed SIBUA expansion. Also, the report should state that all dredged sands placed in the SIBUA expansion will be deposited at water depths much shallower than 15 feet MHW (mean high water). If the Corps is unwilling to make that disposal commitment, it is unlikely the outcome of use of the proposed expansion will be any different than the original SIBUA in countering the erosion problem. Because of that concern, a detailed risk and uncertainty analyses of the Corps projections about the effectiveness of the proposed SIBUA expansion should be conducted by an independent third party to assess the effectiveness of the new site to accomplish its intended purpose.

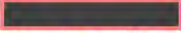
The impacts of shoreline erosion on sea turtle nesting should be discussed. Section 5.9.1 should be expanded to acknowledge that a consequence of the progressive erosion of Dauphin Island's Gulf Shoreline is the low success rate of sea turtle nesting on the island. The low percentage of successful nests on Dauphin Island compared to Baldwin County's beaches is believed to be associated with the deteriorated shoreline conditions attributable to erosion. This issue warrants coverage in the report because of the Endangered Species Act connection and because Dauphin Island provides a substantial portion of Alabama's total Gulf shoreline used for nesting by sea turtles. It is possible that a "taking" type situation may exist as an indirect impact of the Bar Channel maintenance program and the Mobile Harbor project's role in contributing to the erosion of Dauphin Island and the lowered turtle nest success rates compared to other northern Gulf beaches.

Thank you for your attention to this matter.

  
Dauphin Island, AL 36528





**From:**   
**To:** [Newell, David P CIV CESAM CESAD \(US\)](#)  
**Subject:** [Non-DoD Source] My comments on the Mobile Ship Channel expansion DSEIS  
**Date:** Saturday, September 15, 2018 8:51:26 AM

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David Newell,

Dear District Commander,

I am writing to express my concern regarding the Corps' study results indicating no impact on the environment from a major expansion project for the ship channel. The Corps needs to address the following items to ensure the study is comprehensive enough to determine impacts and doesn't underestimate the true impact.

My concerns include:

My strongest concern is the presence of heavy metals in the dredged spoil. With the history of industry in the Mobile River Watershed primarily the industry in McIntosh, AL and into Mobile's pulp and paper industry. This material is loaded with toxic chemicals that, if disturbed will destroy all sea life in Mobile Bay or at least render it toxic.

The study only includes one year of weather data as the base of its water quality models. Given how frequently and drastically these impact Mobile Bay watershed this is inadequate. The Corps must include at least three years of data to show how severe weather impacts the study's results;

The Corps must include studies about how pathogens, harmful algal blooms, and invasive species will enter Mobile Bay through a deeper channel;

The Corps must thoroughly review how the proposed project will generate new growth opportunities associated with the port that could have indirect impacts to our natural resources;

Ship wake analyses must be improved to include more accurate information (realistic ship sizes, weights, etc). The Corps needs to study the impacts on our aquatic life (oysters, seagrasses, etc.) and our shorelines from wave energy;

The Corps must work with scientists to ensure the oyster assessment is more comprehensive. The Corps needs to look at how young oysters move and show how the presence of predators (oyster drills) may increase with changes in salinity;

The Corps needs to more comprehensively investigate impacts into the wetlands, seagrasses, fish, and aquatic resource assessments. For instance, the Corps has not studied how losses to seagrasses from higher salinity will affect the species that rely on them like the West Indian Manatee and waterfowl;

The Corps needs to recognize impacts to low income, minority communities as results show an increase of truck traffic by 25%;

The Corps must, as required by law, acknowledge past impacts on air quality and shoreline erosion since 1980 (the last environmental impact study conducted);

The Corps must consider creating a Dredge Management Plan that includes all proposed projects in the Mobile Bay area;

In conclusion, the Corps' finding of "no impact" on Mobile Bay's sensitive environment is very concerning given the magnitude of the proposed project. Thank you for your consideration and response to each of these comments. By thoroughly studying and developing a comprehensive plan for the port expansion, we can grow responsibly and mitigate any unavoidable impacts to the natural resources that support our economy and quality of life.


Sincerely,



Fairhope, Alabama 36532

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**From:**   
**To:** [Newell, David P CIV CESAM CESAD \(US\)](#)  
**Subject:** [Non-DoD Source] My comments on the Mobile Ship Channel expansion DSEIS  
**Date:** Saturday, September 15, 2018 8:47:36 AM

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David Newell,

Dear District Commander,

I am writing to express my concern regarding the Corps' study results indicating no impact on the environment from a major expansion project for the ship channel. The Corps needs to address the following items to ensure the study is comprehensive enough to determine impacts and doesn't underestimate the true impact.

My concerns include:

The study only includes one year of weather data as the base of its water quality models. Given how frequently and drastically these impact Mobile Bay watershed this is inadequate. The Corps must include at least three years of data to show how severe weather impacts the study's results;

The Corps must include studies about how pathogens, harmful algal blooms, and invasive species will enter Mobile Bay through a deeper channel;

The Corps must thoroughly review how the proposed project will generate new growth opportunities associated with the port that could have indirect impacts to our natural resources;

Ship wake analyses must be improved to include more accurate information (realistic ship sizes, weights, etc). The Corps needs to study the impacts on our aquatic life (oysters, seagrasses, etc.) and our shorelines from wave energy;

The Corps must work with scientists to ensure the oyster assessment is more comprehensive. The Corps needs to look at how young oysters move and show how the presence of predators (oyster drills) may increase with changes in salinity;

The Corps needs to more comprehensively investigate impacts into the wetlands, seagrasses, fish, and aquatic resource assessments. For instance, the Corps has not studied how losses to seagrasses from higher salinity will affect the species that rely on them like the West Indian Manatee and waterfowl;

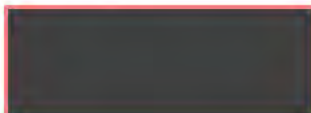
The Corps needs to recognize impacts to low income, minority communities as results show an increase of truck traffic by 25%;

The Corps must, as required by law, acknowledge past impacts on air quality and shoreline erosion since 1980 (the last environmental impact study conducted);

The Corps must consider creating a Dredge Management Plan that includes all proposed projects in the Mobile Bay area;

In conclusion, the Corps' finding of "no impact" on Mobile Bay's sensitive environment is very concerning given the magnitude of the proposed project. Thank you for your consideration and response to each of these comments. By thoroughly studying and developing a comprehensive plan for the port expansion, we can grow responsibly and mitigate any unavoidable impacts to the natural resources that support our economy and quality of life.

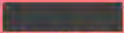
Sincerely,



Silverhill, Alabama 36576

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**From:**   
**To:** [Newell, David P CIV CESAM CESAD \(US\)](#)  
**Subject:** [Non-DoD Source] Mobile Ship Channel expansion  
**Date:** Saturday, September 15, 2018 8:38:05 AM

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David Newell,

Dear Sir:

Thank you for your help and support in getting new measures solidly in place that we all hope will be of help to Dauphin Island. The property owners of the island recently received specific suggestions (copied in part below) from an organisation named "Mobile Baykeeper" and I agree with their suggestions. I hope that you will support these and other ideas for the long term health and sustainability of the island. The points I hope we can all support are:

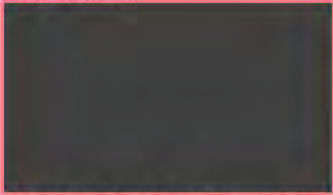
- concern regarding the Corps' study results indicating no impact on the environment from a major expansion project for the ship channel.
- ... the Corps' finding of "no impact" on Mobile Bay's sensitive environment is very concerning given the magnitude of the proposed project.

Their suggestions were much more specific than this but I am sure you are aware of that.

Thank you for your service and for your thoughtful consideration of these suggestions.

Best regards,


Paul Watson



Dauphin Island, Alabama 36528

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## Comment 134

**From:**   
**To:** [Mobile Harbor GRR](#); [Joly, Sebastien P COL USARMY CESAM \(US\)](#); [Holliman.Daniel@epa.gov](mailto:Holliman.Daniel@epa.gov); [Bush, Eric L CIV USARMY CESAD \(US\)](#); [Diana M. Holland BG](#)  
**Subject:** [Non-DoD Source] Sand Island Beneficial Use underwater berm  
**Date:** Saturday, September 15, 2018 8:28:27 AM

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Thank you for your help and support in getting new measures solidly in place that we all hope will be of help to Dauphin Island. The property owners of the island recently received specific suggestions (copied below) from a politically active Dauphin Island resident and I agree with her suggestions. I hope that you will support these and other ideas for the long term health and sustainability of the island. The points I specifically support are:

...I explained to him that the Corps need signs a document:

1. Guaranteeing that they will use the SIBUA Northwest Extension for the life of the project and monitor the SIBUA Northwest Extension to make sure the sand was actually reaching the shoreline of Dauphin Island, especially, on both sides of the island where people's properties are underwater.
2. The Corps needs to guarantee that they will use the SIBUA Northwest Extension every time they dredged the channel.
3. If after a year, the monitoring does not show the sand reaching the island and the properties, then the Corps will change the location of the dumping of the dredged sand, to a better location and guarantee that the sand would reach all properties on the southern shoreline on the island.
4. The Corps needs to continue monitoring all locations of the SIBUA Northwest Extensions and any other future locations and provide the documentation to the public.

The depth of the location has to be at 15 feet or less according to Corps documentation for the rest of the Country

Thank you for your service and for your thoughtful consideration of these suggestions.

Best regards,



Dauphin Island, AL

**From:** [REDACTED]  
**To:** [Newell, David P CIV CESAM CESAD \(US\)](#)  
**Subject:** [Non-DoD Source] My comments on the Mobile Ship Channel expansion DSEIS  
**Date:** Saturday, September 15, 2018 8:26:46 AM

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David Newell,

Dear District Commander,

I am writing to express my concern regarding the Corps' study results indicating no impact on the environment from a major expansion project for the ship channel. The Corps needs to address the following items to ensure the study is comprehensive enough to determine impacts and doesn't underestimate the true impact.

My concerns include:

The study only includes one year of weather data as the base of its water quality models. Given how frequently and drastically these impact Mobile Bay watershed this is inadequate. The Corps must include at least three years of data to show how severe weather impacts the study's results;

The Corps must include studies about how pathogens, harmful algal blooms, and invasive species will enter Mobile Bay through a deeper channel;

The Corps must thoroughly review how the proposed project will generate new growth opportunities associated with the port that could have indirect impacts to our natural resources;

Ship wake analyses must be improved to include more accurate information (realistic ship sizes, weights, etc). The Corps needs to study the impacts on our aquatic life (oysters, seagrasses, etc.) and our shorelines from wave energy;

The Corps must work with scientists to ensure the oyster assessment is more comprehensive. The Corps needs to look at how young oysters move and show how the presence of predators (oyster drills) may increase with changes in salinity;

The Corps needs to more comprehensively investigate impacts into the wetlands, seagrasses, fish, and aquatic resource assessments. For instance, the Corps has not studied how losses to seagrasses from higher salinity will affect the species that rely on them like the West Indian Manatee and waterfowl;

The Corps needs to recognize impacts to low income, minority communities as results show an increase of truck traffic by 25%;

The Corps must, as required by law, acknowledge past impacts on air quality and shoreline erosion since 1980 (the last environmental impact study conducted);

The Corps must consider creating a Dredge Management Plan that includes all proposed projects in the Mobile Bay area;

In conclusion, the Corps' finding of "no impact" on Mobile Bay's sensitive environment is very concerning given the magnitude of the proposed project. Thank you for your consideration and response to each of these comments. By thoroughly studying and developing a comprehensive plan for the port expansion, we can grow responsibly and mitigate any unavoidable impacts to the natural resources that support our economy and quality of life.


Sincerely [REDACTED]

[REDACTED]



Semmes, Alabama 36575

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**From:**   
**To:** [Newell, David P CIV CESAM CESAD \(US\)](#)  
**Subject:** [Non-DoD Source] My comments on the Mobile Ship Channel expansion DSEIS  
**Date:** Saturday, September 15, 2018 8:10:29 AM

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David Newell,

Dear District Commander,

I am writing to express my concern regarding the Corps' study results indicating no impact on the environment from a major expansion project for the ship channel. The Corps needs to address the following items to ensure the study is comprehensive enough to determine impacts and doesn't underestimate the true impact.

My concerns include:

The study only includes one year of weather data as the base of its water quality models. Given how frequently and drastically these impact Mobile Bay watershed this is inadequate. The Corps must include at least three years of data to show how severe weather impacts the study's results;

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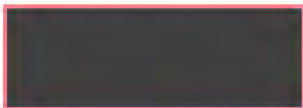
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The Corps must consider creating a Dredge Management Plan that includes all proposed projects in the Mobile Bay area;

In conclusion, the Corps' finding of "no impact" on Mobile Bay's sensitive environment is very concerning given the magnitude of the proposed project. Thank you for your consideration and response to each of these comments. By thoroughly studying and developing a comprehensive plan for the port expansion, we can grow responsibly and mitigate any unavoidable impacts to the natural resources that support our economy and quality of life.

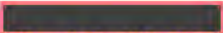
Sincerely,





Fairhope, Alabama 36532

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**From:**   
**To:** [Newell, David P CIV CESAM CESAD \(US\)](#)  
**Subject:** [Non-DoD Source] Comments on the Mobile Ship Channel expansion DSEIS  
**Date:** Saturday, September 15, 2018 8:05:29 AM

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David Newell,

Dear District Commander,

I am writing to express my concern regarding the Corps' study results indicating no impact on the environment from a major expansion project for the ship channel. The Corps needs to address the following items to ensure the study is comprehensive enough to determine impacts and doesn't underestimate the true impact.

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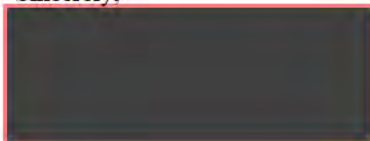
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The Corps must, as required by law, acknowledge past impacts on air quality and shoreline erosion since 1980 (the last environmental impact study conducted);

The Corps must consider creating a Dredge Management Plan that includes all proposed projects in the Mobile Bay area;

In conclusion, the Corps' finding of "no impact" on Mobile Bay's sensitive environment is very concerning given the magnitude of the proposed project. Thank you for your consideration and response to each of these comments. By thoroughly studying and developing a comprehensive plan for the port expansion, we can grow responsibly and mitigate any unavoidable impacts to the natural resources that support our economy and quality of life.

Sincerely,







Mobile, Alabama 36604-1335

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**From:**   
**To:** [Newell, David P CIV CESAM CESAD \(US\)](#)  
**Subject:** [Non-DoD Source] My comments on the Mobile Ship Channel expansion DSEIS  
**Date:** Saturday, September 15, 2018 7:32:48 AM

---

David Newell,

Dear District Commander,

I am writing to express my concern regarding the Corps' study results indicating no impact on the environment from a major expansion project for the ship channel. The Corps needs to address the following items to ensure the study is comprehensive enough to determine impacts and doesn't underestimate the true impact.

My concerns include:

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The Corps needs to more comprehensively investigate impacts into the wetlands, seagrasses, fish, and aquatic resource assessments. For instance, the Corps has not studied how losses to seagrasses from higher salinity will affect the species that rely on them like the West Indian Manatee and waterfowl;

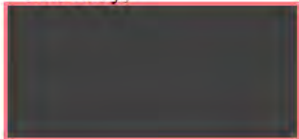
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Sincerely,





Mobile, Alabama 36607

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## Comment 139

**From:** [REDACTED]  
**To:** [Mobile Harbor GRR; Joly, Sebastien P COL USARMY CESAM \(US\)](#)  
**Subject:** [Non-DoD Source] Save Dauphin Island Sand  
**Date:** Saturday, September 15, 2018 7:10:56 AM

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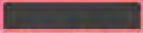
SAVE OUR SAND  
PLEASE

require Corps to use SIBUA for sand disposal  
force monitoring sand reach Dauphin Island  
Guarantee sand will always reach the island

Your assistance is desperately needed the entire island and its inhabitants are at risk.

[REDACTED]  
Dauphin Island, AL



**From:**   
**To:** [Newell, David P CIV CESAM CESAD \(US\)](#)  
**Subject:** [Non-DoD Source] My comments on the Mobile Ship Channel expansion DSEIS  
**Date:** Saturday, September 15, 2018 6:52:46 AM

---

David Newell,

Dear District Commander,

I am writing to express my concern regarding the Corps' study results indicating no impact on the environment from a major expansion project for the ship channel. The Corps needs to address the following items to ensure the study is comprehensive enough to determine impacts and doesn't underestimate the true impact.

My concerns include:

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The Corps must include studies about how pathogens, harmful algal blooms, and invasive species will enter Mobile Bay through a deeper channel;

The Corps must thoroughly review how the proposed project will generate new growth opportunities associated with the port that could have indirect impacts to our natural resources;

Ship wake analyses must be improved to include more accurate information (realistic ship sizes, weights, etc). The Corps needs to study the impacts on our aquatic life (oysters, seagrasses, etc.) and our shorelines from wave energy;

The Corps must work with scientists to ensure the oyster assessment is more comprehensive. The Corps needs to look at how young oysters move and show how the presence of predators (oyster drills) may increase with changes in salinity;

The Corps needs to more comprehensively investigate impacts into the wetlands, seagrasses, fish, and aquatic resource assessments. For instance, the Corps has not studied how losses to seagrasses from higher salinity will affect the species that rely on them like the West Indian Manatee and waterfowl;

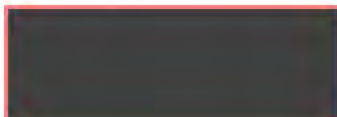
The Corps needs to recognize impacts to low income, minority communities as results show an increase of truck traffic by 25%;

The Corps must, as required by law, acknowledge past impacts on air quality and shoreline erosion since 1980 (the last environmental impact study conducted);

The Corps must consider creating a Dredge Management Plan that includes all proposed projects in the Mobile Bay area;

In conclusion, the Corps' finding of "no impact" on Mobile Bay's sensitive environment is very concerning given the magnitude of the proposed project. Thank you for your consideration and response to each of these comments. By thoroughly studying and developing a comprehensive plan for the port expansion, we can grow responsibly and mitigate any unavoidable impacts to the natural resources that support our economy and quality of life.

Sincerely,



Mobile, Alabama 36605

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## Comment 141

**From:** [REDACTED]  
**To:** [Mobile Harbor GRR](#)  
**Subject:** [Non-DoD Source] Mobile Ship Channel Project  
**Date:** Saturday, September 15, 2018 6:39:35 AM

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Dear Sirs,

As a current property owner of Dauphin Island Alabama I find it appalling that the Corps is still under the impression that the modeling studies done do not take into account the loss from erosion due to the dredging of the Mobile Ship Channel. I am not a scientist but do see the effects that are happening on almost a daily basis. Why the Corps chooses to ignore the actual facts that a "walk on the beach" would clearly show the practice of what has been done is not working. It is past time for studies and open house meetings and time to mitigate what has been for years been neglected. I do hope that it is not too late for our beloved island.

Sincerely,

[REDACTED]

Dauphin Island, Alabama

**From:** [REDACTED]  
**To:** [Mobile Harbor GRR](#); [Joly, Sebastien P COL USARMY CESAM \(US\)](#); [Holliman.Daniel@epa.gov](mailto:Holliman.Daniel@epa.gov); [Bush, Eric L CIV USARMY CESAD \(US\)](#); [Diana M. Holland BG](#)  
**Subject:** [Non-DoD Source] Important for Dauphin Island  
**Date:** Saturday, September 15, 2018 6:37:24 AM

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At the Corps' meeting on Sept. 11, David Newell showed me the Extension to the Sand Island Beneficial Use underwater berm.

I explained to him that the Corps need signs a document:

1. Guaranteeing that they will use the SIBUA Northwest Extension for the life of the project and monitor the SIBUA Northwest Extension to make sure the sand was actually reaching the shoreline of Dauphin Island, especially, the western side of the island where people's properties are underwater.
2. The Corps needs to guarantee that they will use the SIBUA Northwest Extension every time they dredged the channel.
3. If after a year, the monitoring does not show the sand reaching the island and the properties, then the Corps will change the location of the dumping of the dredged sand, to a better location and guarantee that the sand would reach all properties on the southern shoreline on the island.
4. The Corps needs to continue monitoring all locations of the SIBUA Northwest Extensions and any other future locations and provide the documentation to the public.
5. The depth of the location has to be at 15 feet or less according to Corps documentation for the rest of the Country.

[REDACTED]



**From:**   
**To:** [Newell, David P CIV CESAM CESAD \(US\)](#)  
**Subject:** [Non-DoD Source] My comments on the Mobile Ship Channel expansion DSEIS  
**Date:** Saturday, September 15, 2018 6:32:48 AM

---

David Newell,

Dear District Commander,

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The Corps must work with scientists to ensure the oyster assessment is more comprehensive. The Corps needs to look at how young oysters move and show how the presence of predators (oyster drills) may increase with changes in salinity;

The Corps needs to more comprehensively investigate impacts into the wetlands, seagrasses, fish, and aquatic resource assessments. For instance, the Corps has not studied how losses to seagrasses from higher salinity will affect the species that rely on them like the West Indian Manatee and waterfowl;

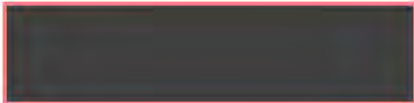
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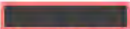
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Sincerely,



MOBILE, Alabama 36605

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**From:**   
**To:** [Newell, David P CIV CESAM CESAD \(US\)](#)  
**Subject:** [Non-DoD Source] My comments on the Mobile Ship Channel expansion DSEIS  
**Date:** Saturday, September 15, 2018 6:01:50 AM

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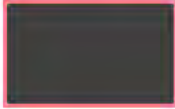
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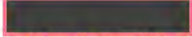




Dauphin Island, Alabama 36528

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**From:**   
**To:** [Newell, David P CIV CESAM CESAD \(US\)](#)  
**Subject:** [Non-DoD Source] My comments on the Mobile Ship Channel expansion DSEIS  
**Date:** Saturday, September 15, 2018 5:59:08 AM

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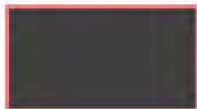
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**From:**   
**To:** [Newell, David P CIV CESAM CESAD \(US\)](#)  
**Subject:** [Non-DoD Source] My comments on the Mobile Ship Channel expansion DSEIS  
**Date:** Saturday, September 15, 2018 5:32:28 AM

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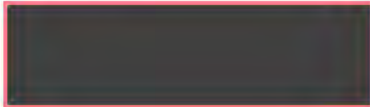
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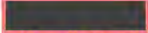
Sincerely,



Huntsville, Alabama 35806

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**From:**   
**To:** [Newell, David P CIV CESAM CESAD \(US\)](#)  
**Subject:** [Non-DoD Source] My comments on the Mobile Ship Channel expansion DSEIS  
**Date:** Saturday, September 15, 2018 3:56:27 AM

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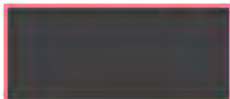
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Dauphin Island , Alabama 36528

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**From:**   
**To:** [Newell, David P CIV CESAM CESAD \(US\)](#)  
**Subject:** [Non-DoD Source] My comments on the Mobile Ship Channel expansion DSEIS  
**Date:** Saturday, September 15, 2018 3:15:34 AM

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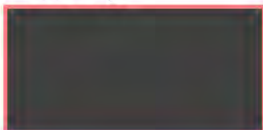
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Mobile, Alabama 36608

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**From:**   
**To:** [Newell, David P CIV CESAM CESAD \(US\)](#)  
**Subject:** [Non-DoD Source] My comments on the Mobile Ship Channel expansion DSEIS  
**Date:** Saturday, September 15, 2018 1:28:27 AM

---

David Newell,

Dear District Commander,

I am writing to express my concern regarding the Corps' study results indicating no impact on the environment from a major expansion project for the ship channel. The Corps needs to address the following items to ensure the study is comprehensive enough to determine impacts and doesn't underestimate the true impact.

My concerns include:

I grew up on bay front rd. I have been exposed to the bay and ship traffic since 1984. I have never seen a traffic jam of ships trying to navigate the channel. I think the widening is stupid and a waste of money. I encourage everyone in favor to drive out to The diog river bridge or anywhere that has a good view and actually count the number of ships coming in. If the captains or bar pilots cant navigate that volume then they are morons. We have no traffic. Someone needs to go sit by the dock of the bay and count some ships. I have,

The study only includes one year of weather data as the base of its water quality models. Given how frequently and drastically these impact Mobile Bay watershed this is inadequate. The Corps must include at least three years of data to show how severe weather impacts the study's results;

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The Corps needs to more comprehensively investigate impacts into the wetlands, seagrasses, fish, and aquatic resource assessments. For instance, the Corps has not studied how losses to seagrasses from higher salinity will affect the species that rely on them like the West Indian Manatee and waterfowl;

The Corps needs to recognize impacts to low income, minority communities as results show an increase of truck traffic by 25%;

The Corps must, as required by law, acknowledge past impacts on air quality and shoreline erosion since 1980 (the last environmental impact study conducted);

The Corps must consider creating a Dredge Management Plan that includes all proposed projects in the Mobile Bay area;

In conclusion, the Corps' finding of "no impact" on Mobile Bay's sensitive environment is very concerning given the magnitude of the proposed project. Thank you for your consideration and response to each of these comments. By thoroughly studying and developing a comprehensive plan for the port expansion, we can grow responsibly and mitigate any unavoidable impacts to the natural resources that support our economy and quality of life.

Sincerely,



Mobile , Alabama 36605

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**From:** [REDACTED]  
**To:** [Mobile Harbor GRR](#); [Joly, Sebastien P COL USARMY CESAM \(US\)](#); [Diana M. Holland BG](#); [Semonite, Todd T LTG USARMY HODA OCE \(US\)](#)  
**Cc:** [Bush, Eric L CIV USARMY CESAD \(US\)](#); [CEIG](#); [holliman.daniel@epa.gov](mailto:holliman.daniel@epa.gov)  
**Subject:** [Non-DoD Source] Corps' Environmental Failure of Nine Berms  
**Date:** Saturday, September 15, 2018 12:49:09 AM  
**Attachments:** [Corps' Environmental Failure of Nine Berms .pdf](#)

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Dear LG. Semonite, BG Holland, Col. Joly,

This is an email and attachment about the Corps' Environmental Failures of Nine Berms to protect the erosion to Dauphin Island.

It is undisputed that the Mobile Harbor Outer Bar channel stops the natural littoral processes, and the Corps' dredging removes sand that would sustain the adjacent shoreline of Dauphin Island.

Now it is undisputed that the Corps produced nine separate locations for berms, as a ploy, to put the sand in a closer location under the term, Beneficial Use, as fancy name for getting rid of dredged material inexpensively.

But as the Corps does across the Country, of putting the berm parallel to the shoreline, the Mobile District Corps puts the berms in areas either to far away and in water that is too deep for the sand to move to the shoreline.

The Mobile District even convinces the DOJ attorneys, the Judge and the Plaintiff's attorney to rely on two of the berms as evidence that the sand was getting to Dauphin Island, during the Corps lawsuit.

During the 2018 SEIS/GRR process, the Corps fails to inform the public, all erosion and environmental impacts stated in the Corps 1978 study, were left out in the original 1980 EIS/Mobile Harbor study, including suppressing the impacts from Congress when requesting funds for the Mobile Harbor project. The Mobile District has failed to inform the public during this process that the original 1980 EIS/Mobile Harbor study was flawed, because of their failure to include the impacts.

But the Mobile District tries to prevent the flawed 1980 study from becoming known, by making a decision not to study the past sand/land losses to Dauphin Island. It seems very convenient that the Corps can make-up their own rules, as a way to conceal their past failures of destroying the shoreline and properties on Dauphin Island.

My attachment is 23 pages documenting the location of the Nine Berms.

Sincerely,

[REDACTED]



## Corps' Environmental Failure of Nine Berms

Once again in 2018, contrary to undisputed evidence, the Corps is still trying to conceal their dredging is the cause of the erosion on Dauphin Island.

In the 2018 draft SIES/GRR study for the Mobile Harbor,

“Impacts of channel dredging on Dauphin Island remains a controversial issue. The modeling results presented in this study **indicate minimal differences** in morphologic change in the nearshore areas of Dauphin Island and Pelican Island **as a result of the channel modifications.**”

This is inconsistent with coastal engineers worldwide, and all of the Corps' manuals and Federal Laws starting in the 1935.

Did this study or any other study in the 2018 draft SIES/GRR investigate the past sand/ land losses on Dauphin Island from the Corps dredging? The past, present and future erosion and environmental impacts to Dauphin Island are not identified in the 2018 SEIS/GRR Mobile Harbor Study.

The Corps refuses to acknowledge the past, present and future Cumulative effects, including the past sand/land loss to Dauphin Island.

The only solution the Corps offered in the GRR study was to put the dredged sand in a Northwest Extension to SIBUA and there is no mention that this location would help Dauphin Island's erosion.

“As such, the USACE, Mobile District is pursuing modifications to extend the site beyond the existing SIBUA boundaries to provide sufficient movement of material and capacity for maintenance material. Expansion of the SIBUA will extend its boundaries to include areas within the Sand Island-Pelican Island complex. The proposed SIBUA northwest extension ***is being conducted under O&M and not as part of this study.***”

**BUT** the SIBUA's extension berm ***“is not part of the study, but under O&M”***, which is the operation and maintenance of the Channel. The Corps is putting berm under O&M, so that the Corp can change the location at anytime, as they have done many times in the past.

The Corps is using “selective information” from the Alabama Barrier Island Assessment and the Alabama Coastal Comprehensive Plan to put into the GRR/SEIS, even before the two studies are complete. ***The Corps is the manager of the Alabama studies*** and they are not completing those Dauphin Island studies until after the GRR/SEIS ***is final***. If the GRR/SEIS is final before the other Corps studies are finished, it would mean that any facts in the other studies would not be a part of the GRR/SEIS and no public comments. There is nothing the public can do.

That would be against the Federal Laws.

### § 1502.9 Draft, final, and supplemental statements which states:

“The draft statement must fulfill and satisfy to the fullest extent possible the requirements established for final statements in section 102(2)(C) of the Act. **If a draft statement is so inadequate as to preclude meaningful analysis, the agency shall prepare and circulate a revised draft of the appropriate portion.** The agency shall make every effort **to disclose and discuss** at appropriate points in the draft statement **all major points of view on the environmental impacts of the alternatives including the proposed action.**”



## **SELECTIVE USE OF DATA FROM A SINGLE STUDY AND SUPPRESSION OF ALL OTHER EVIDENCE.**

The Mobile District's dishonesty and deceit is shown by **selective use of data and evidence** and the **rejection of material adverse to the Corps' stated point of view.**

The Corps is basing the entire 2019 GRR/SEIS studies on the **single** paid-for-by-the-Corps-lawsuit study, Byrnes 2008 and the update 2010 version, which stated that the Corps is not the cause of the erosion on Dauphin Island. All of the Corps' new studies for the GRR/SEIS by USGS and others are required to be based on facts presented in the Byrnes 2008-2010 and no opposing studies that contradict the Byrnes' studies were used.

This proves the Corps is willing to suppress evidence and manipulate information in the 2018-2019 GRR/SEIS by ignore significant data in other reputable studies by experts that expose the Corps' dredging **is** the cause of the erosion on Dauphin Island.

The Corps actions demonstrate their willingness to harm anybody or anything that gets in its way, including all of the people of Dauphin Island.

Just a few of the renowned scientist and coastal engineers whose studies are being suppressed by the Mobile District Corps of Engineers, to conceal that the Corps' erosion on Dauphin Island.

The total suppression of evidence and exclusion of all of Robert Dean's lawsuit documents that refutes the Byrnes 2008-2010 study. The Byrnes 2008 lawsuit study was contradicted by the eminent coastal engineer, Dr. Robert Dean, who "indicated that the [Byrnes' 2008] Final Report was fundamentally flawed, not reliable and at best inconclusive." And Dean concluded, ***"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 Mobile District fails to disclose the contradiction in Dean's study and that the Dean's study is still apart of the LAWSUIT.

The exclusion of facts presented in the **1978 Feasibility Report for Beach Erosion Control and Hurricane Protection Mobile County, Alabama Including Dauphin Island.** In the report, the Corps admitted they were the cause of the erosion to Dauphin Island. In a meeting in January 2017, for the SEIS/GRR, EPA advised the Corps that previous **reports prepared by the Corps such as the 1978 report referenced in public comment letters should be acknowledged.**

The concealment and exclusion of facts presented by renowned coastal engineer, Scott Douglass' 30 years of erosion studies on Dauphin Island and his conclusion that the Corps' dredging is responsible for the erosion on Dauphin Island. The Corps has been quoting and agreeing with the facts presented in Dr. Douglass studies for the past three decades and now not one word about his conclusion, the Corps' dredging is the caused of the erosion to Dauphin Island. I feel, 30 years of studies just on Dauphin Island's erosion, is more comprehensive than a single Corps study that had to averaged the dredged amounts over 100 years just to have justifiable results that the Corps was not causing the erosion to Dauphin Island.

The Corps exclusion of all studies by USGS's distinguished scientist Robert Morton that contradicts Byrnes studies. The Corps suppressed all facts presented in all of the Morton's studies that revealed the dredging of the Mobile Harbor Outer Bar channel is causing erosion and land-loss on Dauphin Island

The lack of Morton's studies in the GRR/SEIS, show the Corps' deceitful actions. The Corps used the same Morton's studies in their 2009 MsCIP documents showing the Corps' dredging caused erosion to the Miss/AL barrier islands, **to get over a half Billion dollars** for the Corps' MsCIP project.

## **CORPS NINE BERMS**

### **How can we trust the Corps' future BERM to help Dauphin Island?**

Since 1978, The Mobile District Corps' has recommended **nine** different berms location for to offset their erosion on Dauphin Island. During that time, the Corps lied to the Mayor, Senators, Congressmen, State of Alabama, ADEM, and the public in letters and with false statements in Federal Documents.

The Corps is recommending another Berm location, the Northwest Extension of the SIBUA berm in the Corps' 2018 Public Notice No. FP18-MH01-09:

Under the Proposed Action, the USACE, Mobile District is proposing to further expand the existing SIBUA by approximately 3,305 acres (to the west towards Dauphin Island) for the continued placement of Mobile Harbor Federal Navigation Channel O&M material as shown in Figure 2. This action would provide for the continued return of sediment into the littoral system

***In 1993***, the Corps presented ***the identical Berm*** to Senator Shelby and Congressman Bevill as a way to protect Dauphin Island.

The Corps never planned to use the 1993 location, because of the stipulations to the Dredger, ***"give the option to put the sand in the closer location"*** and ***"not requiring the dredger to do it"***

How do the people of Dauphin Island know the Corps will not do the same thing with the 2018 berm, just giving the option to dump the sand at that location BUT not requiring the contractor to do it?

### **The deception of the Corps' Nine Berms**

The Corps recommended **nine** different areas for the berms to help erosion to Dauphin Island shoreline from 1978 to 1999. During the time, the Corps stated that the underwater Berms would replenished the sand to the shoreline. Either the Berms did not help the Island or they were too far away, in too deep water or the Corps never used the Berms, including the Corps even trying to confuse the locations of the berms in public notices. Promising one thing, but delivering another, thus avoiding the objective of public notices and public comments.

In one of the Corps documents, Scott Douglass stated, "Results of monitoring programs of the fate of nearshore placed sands throughout the US ...indicate that **30 feet is too deep to expect significant onshore migration**"

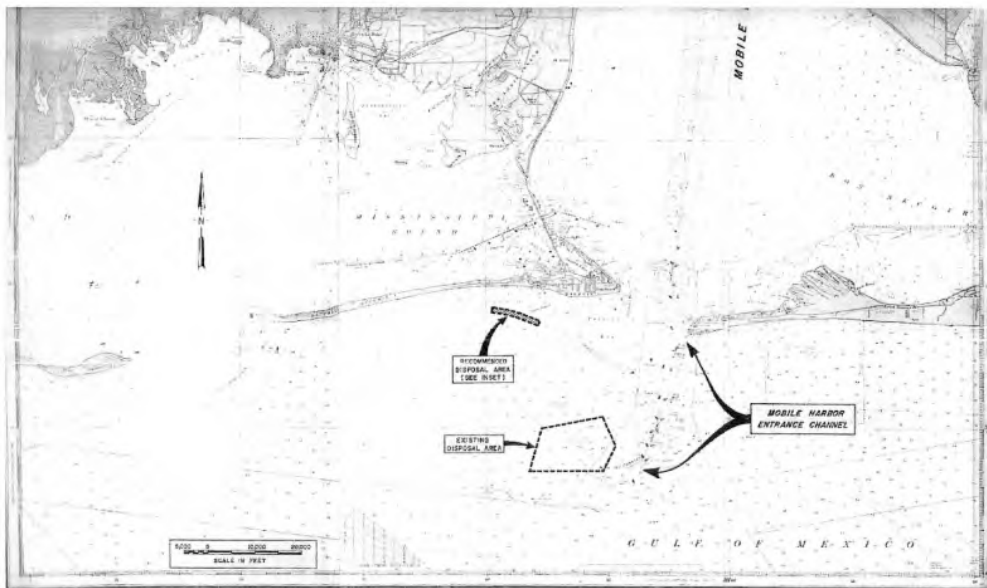
### According to the Corps' 1975 At the Workshop Meeting Beach Erosion:

Col. Drake Wilson stated :

- "We think, that perhaps the best solution for the beach erosion problems along the Island shores is quite apparent to us. We come off the shore about every year-and-a-half to two years and dredge with our hopper dredge, on what we call the bar, which is mostly a sand material. It is a little out from the entrance to the harbor.
- "We take this material out to sea about 10 to 15 miles and dump it. We have in inventory some equipment that can take this material out and pump it onto the beach approximately there near Fort Gaines, and our studies thus far indicate that the littoral drift, that is the drift of the current, would generally carry that material on down along the island. **This solution appeals to us because it costs nothing.**
- *That is, we have to dredge the harbor anyway - - we pay for that under the maintenance of the harbor expenditures and **we can pump it out and put it onto the beach for just about the same price that we could take it out into the Gulf and dump it** ... We think this is a pretty good solution for Dauphin Island.*

### First Berm in 1978

The Corps 1978 study about the erosion on Dauphin Island. In 1978, the Corps produced a study about Dauphin Island stating that the Corps dredging of the Mobile Outer Bar Channel had caused **over 119 feet of erosion** on the western 11 miles of shoreline of Dauphin Island, since that time the erosion has been more extensive. The Corps predicted if nothing was done to protect the island, **the future dredging of the channel would erode away over 10 feet per year of beachfront property a year.** The Corps recommended bypassing the dredged sand in a berm in front of the western beaches on the Island as shown below. **The 1978 nearshore berm was never done.**



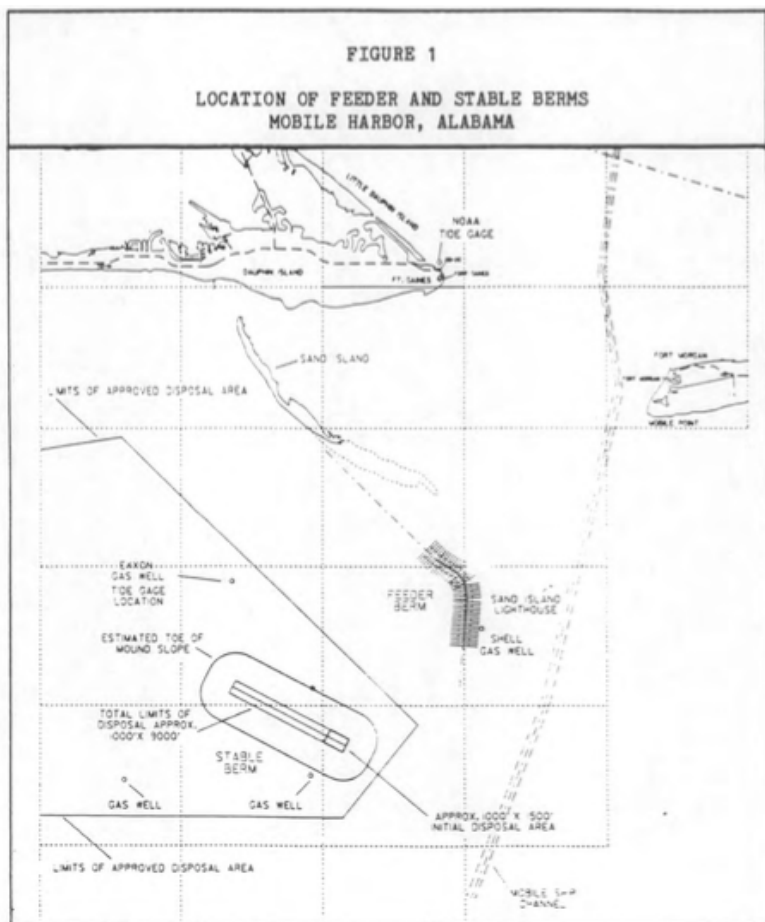
**First Berm** 1978 nearshore berm was never done

## Second Berm Feeder Berm

1986 September 1 MSC Fact Sheet Demonstration of Underwater Berm.pdf  
by SAMPD-N

*As this sand is deposited in a navigation channel, the customary practice is to remove the sand by hopper dredge and transport it to an approved deep water outside the littoral zone.*

Disposal within the littoral zone (**feeder placement**) of sandy dredged material removed from the entrance portion of a deep-draft channel would utilize natural processes **to nourish the beach**.



## Second Berm 1987 Feeder Berm



#### **1987 April 1 MFR Dauphin Island Property Owners Assn Meeting.pdf**

On April 4, 1987, Mr. Mathew Laws (Chief, PD-FC) and Mr. Jim Baxter (Chief, OP-ON) spoke to the Dauphin Island Property Owners Association..... brief those in attendance ***on erosion prevention at the east end and western portion of the Island.***

Mr. Laws ...briefly described the "Mobile County, Alabama (Including Dauphin Island) Feasibility Study for Beach Erosion Control and Hurricane Protection" completed in September 1978.

Laws remarks were concluded with the statement **that solutions to the problem on the western 11 miles of the Island were tied to maintenance of the Mobile Ship Channel bar crossing.**

Mr. Laws introduced Mr. Baxter who then discussed the "**Feeder Berm**" the Corps has constructed just off Sand Island in about 18 feet of water. Mr. Laws and Mr. Baxter held up a map of the Island and berm area, and described the purpose of the "Feeder Berm".

Mr. Baxter also stressed that the current berm ***would not completely solve the erosion problems of the Island,*** but if monitoring of the sand movement continued to yield favorable results **that the Corps would continue to provide feeder sand berms.**

#### **1987 October 16 MFR Impact of Proposed Mobile Bay Ship Channel Deepening on the Littoral Drift System.pdf** (Mr. Escoffier is retired Corps expert.)

Mr. Escoffier was then given a general overview of the submerged berm concept... It was pointed out that the basic premise behind the ***feeder berm*** concept **was to resupply the area with the materials, which were being blocked by the channel.**

#### **1990 MSC National Berm Demonstration Project.pdf**

##### **Nearshore Mound Construction Using Dredged Material**

T. Neil McLellan

With the advent of ***shallow draft split-hulled hopper dredges*** in the mid to late 1970's, the feasibility of using conventional dredging and placement practices ***for berm construction began to become a reality.*** The relatively shallow draft, 6.7 m or less, and rapid placement technique of the split hull, less than five minutes.. ***allows the dredge to place material*** accurately and safely ***in the active littoral system.***

**13 shallow draft split-hulled hopper dredges..**operating in the United States on a routine basis.

**1990 National Berm Demonstration Program** Langan and Rees state, "Since the haul distance to the 'feeder' location was about the same as to the historical disposal site, **construction of the berm was at no extra cost**"

#### **1990 Massive Expansion to the Mobile Harbor Out Bar Channel with only the feeder berm mitigating the impacts to the Island.**

1990 Phase I, of the 1986 WRDA was completed and the Mobile Outer Bar Channel was deepened **from 42 feet deep to 47 feet deep by 600 feet wide.**

The Corps places ***6,755,352 million cubic yards*** dredge from the channel and the ***sand placed in Feeder Berm per ERDC report*** according to the Corps Mobile Bar History Summary.

## 1990 December RPT Results of Monitoring the Disposal Berm at Sand Island.pdf

Considering all factors, the material was placed along the 19-ft contour about 1.5 to 2 miles west of the entrance channel. It was calculated that **this placement location** could result in a **10- to 15-percent cost savings** in hopper dredge travel time **compared with placement at the conventional site**

The dredging and placement were conducted with two split-hull shallow-draft hopper dredges, the Atchafalaya and Mermentau.

## Severe Erosion Started Happening on Dauphin Island, after the 1990 Expansion

### Third Berm 1993

After the severe erosion started after the 1990 expansion, the Senator and Congressman became involved. The Corps sent pictures to the Senator Shelby and Congressman Bevill of the placement of a new underwater berm to off-set the erosion to the Island.

**BUT** The Corps' **internal documents** for the berm expose otherwise. **The Corps would only give the option** to the dredging contractor to put the sand in closer location, **HOWEVER** the **Corps was not requiring the dredger to do it**.

Did the Corps mislead the Senator and the Congressman into believing that the Corps was going to put sand in the large underwater berm along Sand Island to protect Dauphin Island? According to Corps' documents, the Corps never used the 1993 Berm.

Letter to Congressman Bevill from the District Colonel

### 1992 May 20 LTR to Rep Bevill.pdf

There is no question that the shoreline on **the island is undergoing severe erosion at two locations**. One is at the east end of the island near Fort Gaines and the other is about three miles west at the public use area with the fishing pier. There is no clear indication of the cause, however.

**Dr. Scott Douglass**, at the University of South Alabama, has recently completed a report for the Alabama Department of Economic and Community Affairs, **Coastal Processes Of Dauphin Island, Alabama**, covering studies he made.

His report attributes the cause of long-term erosion on the island, at least in part, **to past disposal practice for maintenance dredged material** from the Mobile Harbor ship channel.

Sand Island has again migrated northward, affecting the shoreline of the main island. This migration is probably **the direct cause for the erosion at the public park with the fishing pier**.

### 1992 May 21 LTR to Senator Shelby.pdf

from Dennis W. Heuer Major, Corps of Engineers Acting District Engineer

In the case of the Mobile Harbor Entrance Channel, **we intend to add littoral zone disposal south of Sand Island as an option in all future maintenance contracts**.

Actual use of that area will depend on the contractor and the size of the dredge, which executes the contract.

**The Corps *internal document* about the Berm.**

**1993 January 4 MEM Bar Channel.pdf**

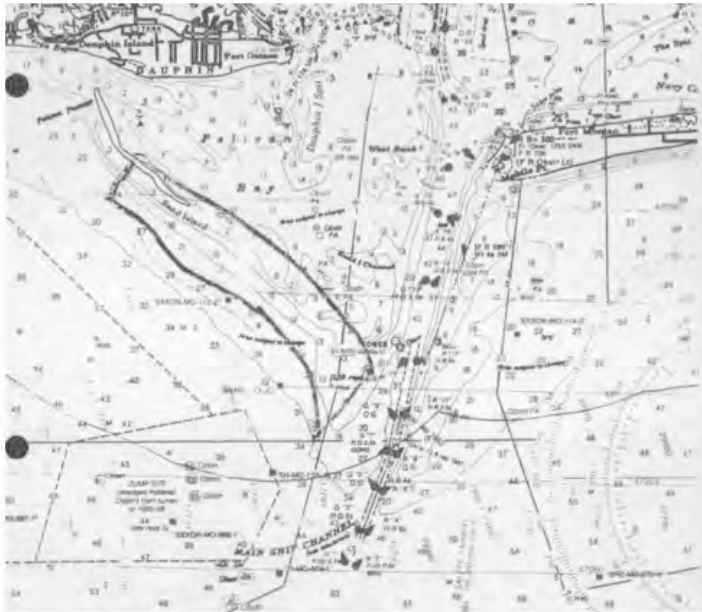
Memorandum Thru OP-0 For FO-MO

Subject: D/A, Mobile Harbor

1. Reference your memo to this office dated 8 Dec 92 regarding subject above. A copy is attached
2. We have coordinated the following answers to your questions with PD-EC (Susan Rees) and PD-F (Walt Burdin).
  - a) **The District has committed to making the "near shore" or littoral zone disposal area available as an option. *We would not require the contractor to use the site, simply make it available to him.***

**Third Berm picture**

2. "a presentation was made recently (*included Mr. Bevil*) indicating that when the Corps dredges the Mobile Bar (maintenance) in the future both the "off shore" and "near shore" berms would be offered in our contract as disposal areas. ***This does not mean we would direct the Contractor to use one over the other but, rather give him that choice.***"
- "Please confirm this."***



**Third Berm 1993 berm**

**The picture for the 1993 underwater berm looks identical to the 2018 GRR/SEIS Northwest Extension of SIBUA Berm**

After the severe erosion continues on Dauphin Island, the Corps immediately starts their denial process and worrying about ADEM's Water Quality Certification.

Feeder Berm was monitored for 5 years

**1994 May 17 MSC Presentation Shoreward Movement.pdf**

By 1991 the SIB had broken into **three segments**.

The northernmost segment **migrated northeastward**.

The middle segment gradually **lost volume and disappeared**.

The southern segment continued **to lose sand from the gulfward tip** throughout the full 56-month monitoring period.

**1995 December 1 MFR Mobile Harbor Water Quality Certification.pdf**

We have sent **ADEM** the manuscript of the public hearing, and **they are** formulating a letter **basically requesting a more environmentally beneficial disposal option**. We feel this request is due to their continued fear of a lawsuit.

We have received a memo from Joan Pope that basically states **that "As good stewards of the environment, we should place the bar channel material into the littoral zone."** (Joan Pope is an expert with the Corps)

Results of the monitoring showed [feeder berm] that over time the 'structure' **melled into the Sand Island shoal** so that it was no longer identifiable.

**Lies by the Corps about the equipment and the cost involved with the feeder berm.**

**Dec. 1, 1995 Fact sheet**

Shallow draft split-hull dredges can perform the required activities, **however there are only 2 in operation in the U.S.**

**Increase in costs** over that currently expended for this part of the channel **would be approximately \$294,000.00**.

Many of the participants urged the Corps to place the material on the Sand Island shoals even **though they understood that this would not 'fix' the erosion problems**.

**would not provide** immediate (or possibly even long term) **relief to the erosive areas** on the eastern end of the island.

Based on the results of the feeder berm demonstration, **the non-Federal entity would be responsible** for approximately **\$147,000 per dredging cycle** for the placement of material on the Sand Island shoal

**To refute the Corps lies in the above document.**

The Corps stated in 1987, **there were 13 Shallow** draft split-hull dredges in the U.S. **not 2** as stated above.

The Corps also stated in 1987, "Since the haul distance to the 'feeder' location was about the same as to the historical disposal site, **construction of the berm was at no extra cost.**" **Not \$294,000**

In 1990, "it was calculated that this placement location **could result in a 10 to 15 percent cost savings** in hopper dredge travel time compared with placement at the conventional site.



In 1976, 1983, 1984, 1985, 1999, 2002, 2004 and 2006 the Mobile Corps used these shallow split-hull dredges for the outer bar channel according to the Corps' dredging records. Why would the Mobile Corps lie about the costs of these shallow hull dredges and use them to put sand in deeper areas?

## The start of the Feeder Berm changing to Sand Island Beneficial Use Area, SIBUA

### 1996 October 3 MSC Authorities.pdf

#### Lists the Federal Laws that relate to the Corps dredging a Federal project.

The first law presented was,

Section 111, River & Harbor Act of 1968, as amended - Authorizes study, design and construction of work for ***prevention and mitigation of damages to both non-Federal, public and privately owned shores to extent that damages are directly attributed to a Federal navigation project.***

***Degree of mitigation is the reduction of erosion to level which would have existed without influence of the navigation works at the time such navigation works were accepted as a Federal responsibility*** (not to restore to historic shoreline dimensions).

Local Cooperation - ***Non-Federal responsibility to maintain the project. Cost sharing for implementation will be shared at - the same proportion as implementation cost for the navigation project.***

Sec. 207 . Beneficial Uses Of Dredged Materials . Directs that in carrying out navigation projects, the secretary may select a disposal method ***that is not the least cost option*** if the incremental costs are reasonable in relation to the environmental benefits including creation of wetlands and shoreline erosion control.

The Corps also presented the laws under the **WRDA 1996**, **BUT** left out the one specifically for Mobile Harbor Section 302 that the Corps could change its disposal of dredged sand for environment and restoration.

The Corps reveals the reason why they switch from the Feeder Berm to the Sand Island Beneficial Use Area (SIBUA) **was to save the Port Authority money, not protecting the people of Dauphin Island.**

***Potential opportunities for sand placement on Dauphin Island Bar  
Bar Maintenance to Feeder Berm Location***

***Presently \$73 k share by locals*** (estimated/yr).

Evaluate expanding the feeder berm location with ***potential of decreasing haul distance and greater depths*** for equipment suitability.

Potential for significantly ***reducing the local cost share*** and could ***eliminate it.***

## **Fourth Berm 1997**

### **1997 Public Notice, states a false location in a Federal Document**

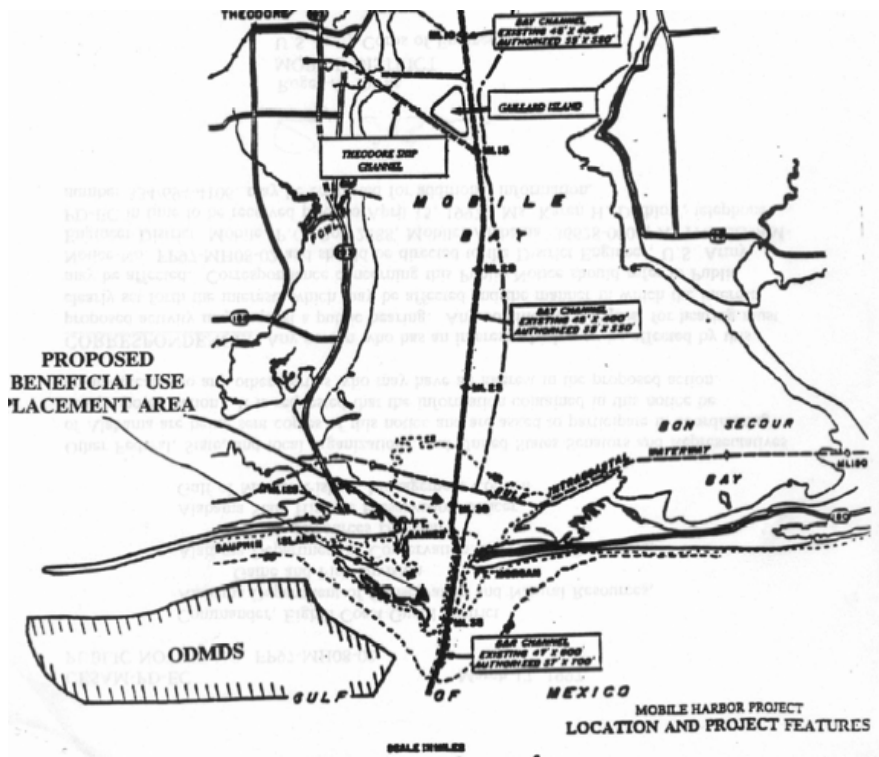
The Corps changes the name and location of the berm in the 1997 Public Notice and stating they are putting the dredge sand between Dauphin Island and Little Sand Island.

With the statements that “Erosion has occurred in the vicinity of Dauphin Island” and this location “would aid in beach nourishment”

### **1997 March 17 MSC Modification of Joint Public Notice.pdf**

Public Notice No.FT97-MH08-2 **Sand Island Beneficial Use Area**

*Sand Island Beneficial Use Area.* The proposed beneficial use area would be located on the west side adjacent to the southern portion of the Mobile Harbor Ship Channel ***between Dauphin Island and Little Sand Island*** (Figure 1). ***Erosion has occurred in the vicinity of Dauphin Island*** and suitable material placed in the proposed Sand Island Beneficial Use Area ***would aid in beach nourishment*** through the littoral transport process.



### **Fourth Berm in 1997**

Even Scott Douglass, who is one of the most renowned Coastal Engineers in the Country and specializes in the erosion on Dauphin Island for the last 30 years, **questions the location** of the Corps' dredged sand placements under the Public Notice.

**1997 June 23 MEM Response to Comments on Beneficial Use Area.pdf**

May 14, 1997 Scott L. Douglass letter to Brad Gane, ADEM about the Corps public notice

I cannot comment on the specific location unless it is identified more clearly. The specific location of the proposed **Sand Island Beneficial Use Area is not clearly marked on either document** and the two documents show very different locations. The verbal description and map shown in the public notice indicate that the area will be "between Dauphin Island and Little Sand Island." Little Sand Island is not identified in the public notice and ***I don't know where it is. You have told me that the location description in the public notice is not correct.*** The 1996 survey "Mobile Bar Special Survey" you provided does not identify any area as the "Sand Island Beneficial Use Area." There are many miles of ocean floor "west of the 30 ft. contour" and there are several such contours in the vicinity.

**First of all, the implied depths are too deep.**

Coastal engineering research **indicates that depths of 30 feet are too deep** to expect sand to migrate landward at a reasonable rate. The rate of migration of sand features placed in the nearshore appears to be extremely dependent on depth.

### **Fifth Berm 1997-used one time**

The Corps is concerned about getting the Water Quality Certification from ADEM and is telling ADEM that unless the Corps put the sand in that site, it will ***lessening the benefits to Dauphin Island***.

### **Under 1998 November 4 LTR to ADEM.pdf**

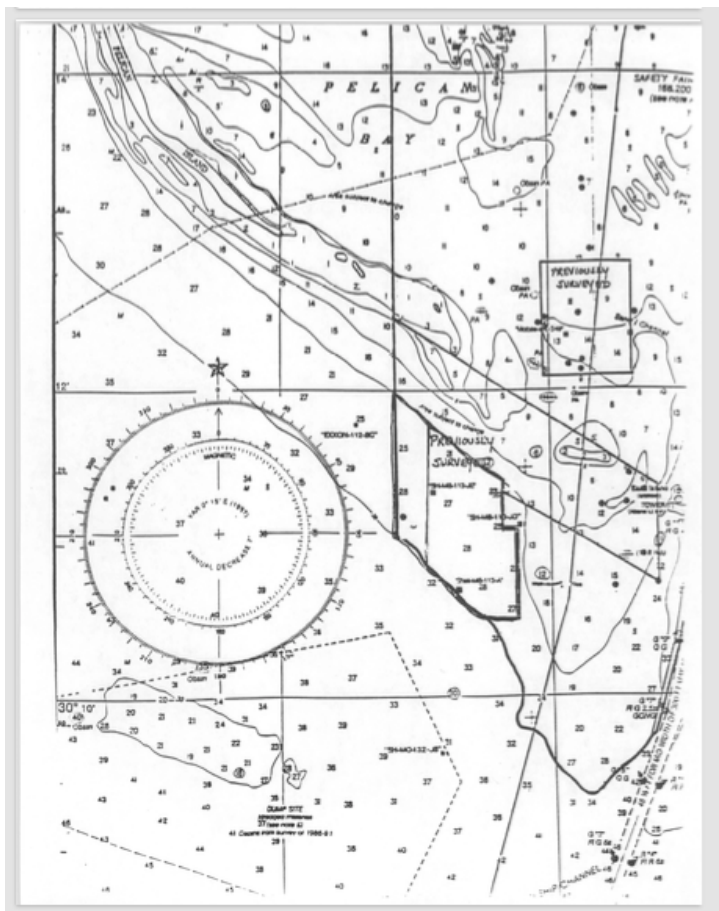
August 5, 1997 Mr. Gane letter from the Corps  
Dear Mr. Gane:

“concerning Joint Public Notice No. FP97-MH08-02, Maintenance Dredging and Placement Activities, Mobile Harbor Navigation Project, Sand Island Beneficial Use Area and the possibility of receiving **Water Quality Certification** and Coastal Consistency for the use of a small portion of the beneficial use site (attached Figure).”

“would like to be able to place this material on the Sand Island shoals in lieu of placement in the ocean dredged material disposal site.”

***“is very close to the previously used Sand Island Feeder Berm site.”***

“Material will necessarily have to be placed in deeper waters and ***thereby lessening the benefit to Dauphin Island***”



***Fifth site used in 1997***



### **Sixth Berm 1998 showing the more accurate site for SIBUA**

Now the Corps starts putting the sand further away from Dauphin Island and in 30 feet of water. Is this the site that would save the Non-Federal Sponsor \$73,000 dollars.

Now, the Corps is using it as a mixed material site.

How is this site environmental beneficial for shoreline erosion to Dauphin Island?

### **1998 January 6 MSC Fact Sheet Dauphin Island Erosion Issues.pdf**

In consultation with the Alabama Department of Environmental Management, the District has recently proposed the designation of a large area of the subtidal delta as the Sand Island Beneficial Use Area.

This area would be utilized ***for the placement of materials dredged*** from the entrance channel ***when requirements shallow enough to transit the area safely,***

Regarding the physical quality of the material to be placed in the site, there may be opportunities ***to place 'mixed' materials***, i.e. ***dredged materials with >50% sand*** but containing quantities of silts and clays in the beneficial use area.

It is the opinion of the District and ADEM that placement ***of such material in the beneficial use area*** may be appropriate. We are currently coordinating with the Waterways Experiment Station the conduct of research on the ***placement of 'mixed' materials*** under the Dredging Operations and Environmental Research (DOER) program at Mobile.

## Sixth berm

This location is much further away from Dauphin Island, than any of the other sites and ***it is in too deep of water to help restore the dredged sand to Dauphin Island's shoreline.***

### 1998 February MSC Presentations from First Annual Coast Issues Symposium Beach Erosion.pdf

Dredging of the Mobile Bay Channels by Susan Ivester Rees, Corps of Engineers, Mobile District

The characteristics of this area are similar to those of the 'feeder berm' site and ***therefore material placed within this area should augment the littoral drift system of Sand - Pelican Islands as well as western Dauphin Island.***

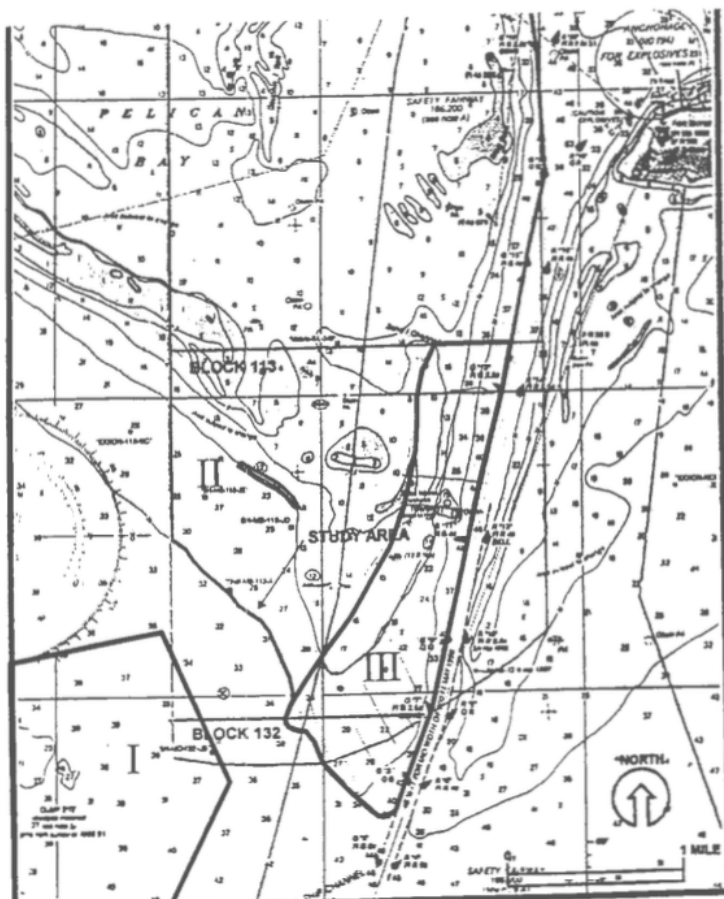


Figure 2. Section of NOAA Nautical Chart 11378 showing Sand Island Beneficial Use Area and oil and gas lease block designations.

*Sand Island Beneficial Use Area Literature Search*

3

15

**Sixth Berm 1998 site SIBUA marked III.**

### **1998 July 5 MEM Monitoring Nearshore Placement.pdf**

Memorandum For Commander, District, Mobile, ATTN: CESAM-PM (Mr. Jamie B. Hildreth)

SUBJECT: ***Monitoring Nearshore Placement of Dredged Material*** at the Entrance to Mobile Bay

2. Under the Dredging Operation and Environmental Research (DOER) Program, WES will conduct field monitoring of dredged ***material placed nearshore with the intent that the sands within the material would migrate shoreward*** while the fine-grained portion would diffuse away from the site. Similar data sets on nearshore dredged-material mounds have been collected previously by WES and the Mobile District. The unique character of the proposed data set is that it will have a high percentage (up to 70%) of fine-grained sediments. The data will be used to verify existing models and models that are currently under development in the DOER program.

3. The WES researchers have discussed dredged material characteristics and preliminary dredging schedules with Mobile District personnel (Ms. Susan Rees and Messrs. Pat Langan, Paul Bradley, and Carl Dyess) and have decided that the Mobile District offers the best opportunity *to conduct a long-term study of a nearshore, mixed-sediment, dredged-material mound. The monitoring effort may begin as early as July 1998 and continue through FY00.*

**1999 Major expansion of the Mobile Harbor 1999 deepening the channel from 47' to 49' and widening part of the Channel to 700'**

### **1999 October 4 MSC Fact Sheet Dauphin Island Erosion Issues.pdf**

c. *Sand Island Beneficial Use Area.* In 1997, This area would be utilized for the placement of materials dredged from the entrance channel when suitable equipment, i.e. hopper dredge with draft requirements shallow enough to transit the area safely, were being utilized for the maintenance of the Mobile Ship Channel.

During the public notice advertisement period, concerns were raised ...*also about less than pure sand being placed in the site.*

'mixed' materials, i.e. **dredged materials with >50% sand but containing quantities of silts and clays in the beneficial use area.**

g. *Northern Gulf Regional Sediment Management Initiative:*

"also included the use of the SIBUA for material to be dredged from the entrance channel."

Approximately **3 million cubic yards** of predominately sandy material was placed in the site by shallow draft hopper dredge between May and September 1999.

**Based on the initiative, we developed an extensive monitoring program aimed at describing the evolution of this material.**

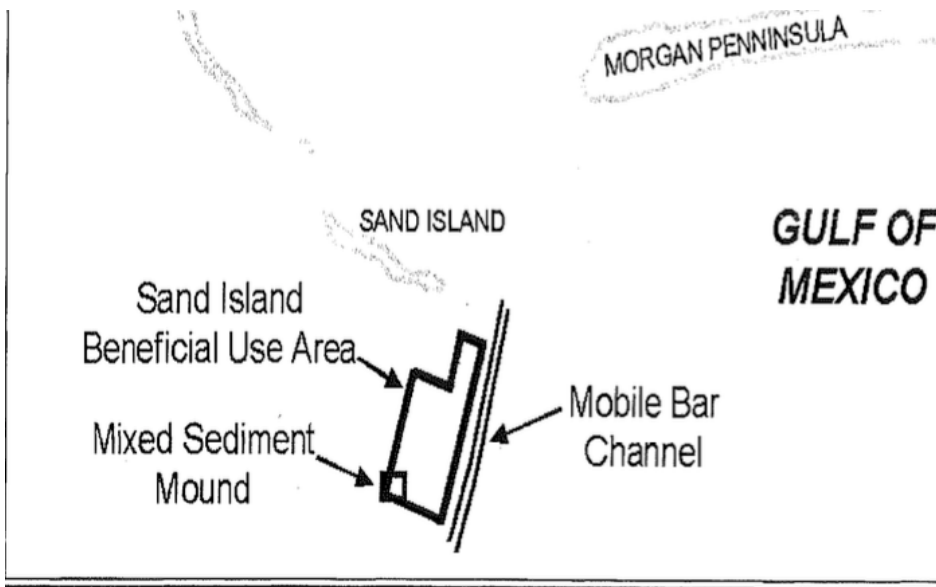


Figure 2. Location of the Mobile Bar Channel and Sand Island Beneficial Use Area (SIBUA)

### Seventh Berm 1998

#### Seventh Berm     *SIBUA as it exists today.*

The following document states that the sand in Sand Island Beneficial Use Area (SIBUA) has **not moved** very far. Monitoring according to above 1998 document was between 1998 to 2000.

#### 2001 Chpt-4b.pdf

**Dredge disposal material from the Mobile bar channel was composed of fine sand material** and was placed on the upper part of the **SIBUA** above the -7.6-m (-25-ft) contour.

**There is little evidence that this material moved very far from the placement site based on the bathymetric changes and grain-size analysis.**

This document states the EBB tidal flow does not transport the sand in SIBUA.

#### Chpt-4d-Ref.pdf

On ebb, the flow is to the southwest out of the bay entrance. As the tide changes from ebb to flood and from flood to ebb, the flow rotates from the south to the north and back again in a westerly direction. From the data, the strongest flow is close to the surface and the bottom flows are low in the vicinity of the mound over most all of the tidal cycle. **Little sediment transport at the mound is expected from tidal flows under normal conditions.**



## Eighth Berm

2004 the Corps adds a *eighth* disposal site **around the Sand Island Lighthouse**, as a modification of the SIBUA and dumps 1,808,765 cys of dredged sand from the Outer Bar channel.

2004 October 26, 2004 - January 13, 2005 Contractor's dredge Padre Island operated in the Mobile Outer Bar Channel maintaining the authorized project dimensions of 49 feet deep by 600 feet wide.  
Sand Island Lighthouse disposal area. 1,808,765 cys

PUBLIC NOTICE NO. FP08-MH14-05  
CESAM-PD-EC

5 Deceml

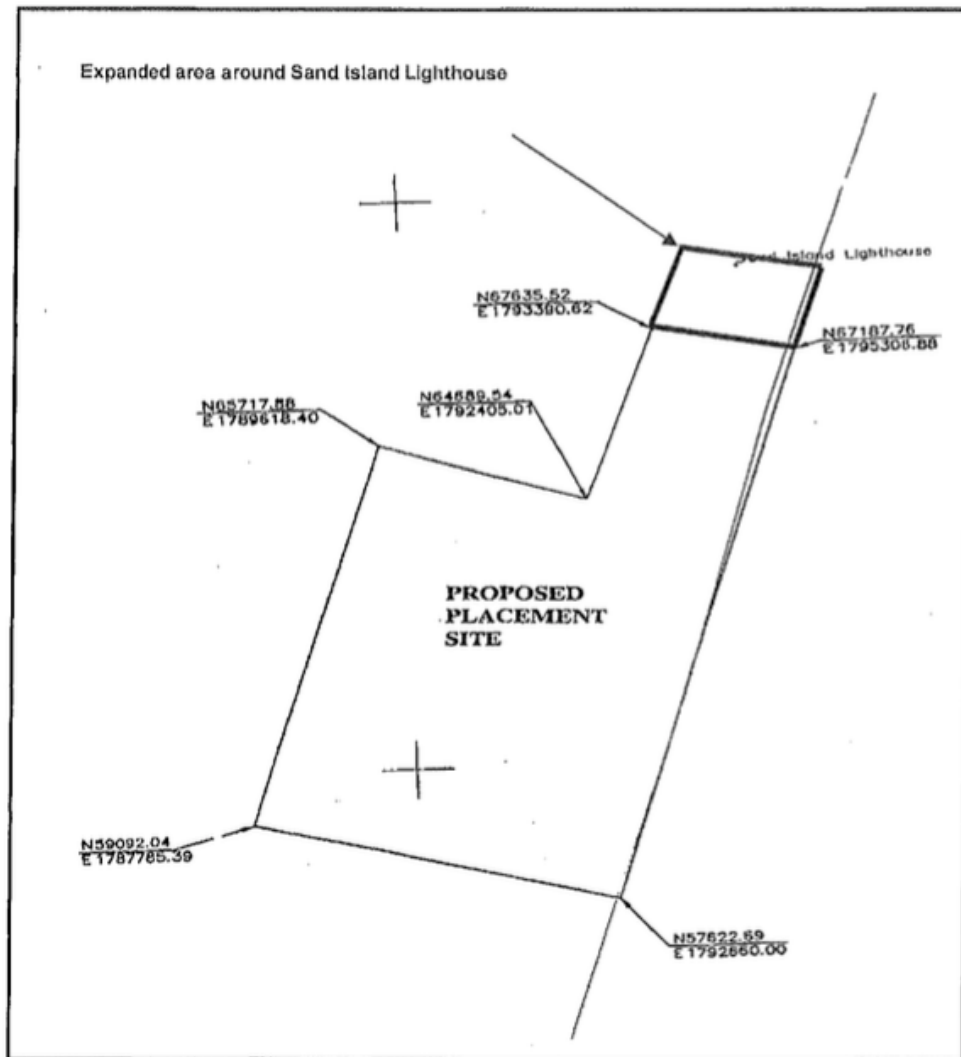


Figure 3. Previous expansion of SIBUA to include the area around Sand Island Lighthouse

**Eighth Berm 2004**

## **Ninth Berm Corps moves SIBUA 2000 ft. further away to the south**

2008 The Corps is moving the dump site ½ of a mile further away further away from Dauphin Island.

Now the Corps doesn't even mention this site helping Dauphin Island's shoreline, in the notice.

**FP08-MH14-05.pdf**

The beneficial use area is located west of the navigation channel and **is intended to keep valuable sand removed from the bar channel in the local littoral system.**

In order to continue beneficial use practices and to accommodate the dredges used for placing the material within the SIBUA, the Corps is requesting further expansion of the SIBUA due to the site depths changing. **The proposed expansion consists of extending the 4,500-foot wide southern boundary approximately 2,000 feet to the south** as illustrated in Figure 4.

This expanded area will provide sufficient depths for access of the dredge equipment while **continuing to place material from the bar**

Placement activities are typically accomplished using hopper dredges; however, hopper barges or **hydraulic pipeline dredges** may be used as necessary. **The quality of the sediment being placed in the SIBUA ranges from sand to silty sandy material.**

PUBLIC NOTICE NO. FP08-MH14-05  
CESAM-PD-EC

5 December 2008

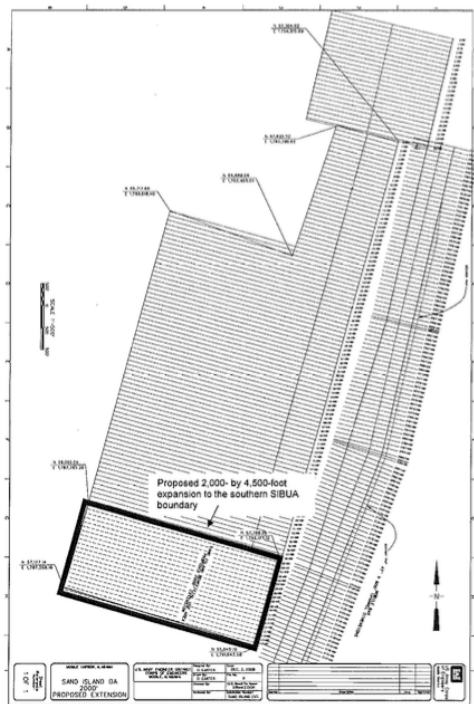


Figure 4. Proposed expansion area for the SIBUA

## **Ninth Berm**

SIBUA ½ mile further away from Dauphin Island.

## Berms and False information given for Lawsuit settlement

As part of the 2009 lawsuit settlement agreement, the property owners were told in 2005 that the Corps was **"to deposit material dredged from the Channel into the shallowest alternate site currently available"**. The property owners were led to believe the Corps was putting the sand into "Sand Island Beneficial Use Area" SIBUA or the FEEDER berm, and it would be transported to the beaches of Dauphin Island.

Per the Joint Notice of the Proposed Settlement... Dated July 15, 2005 guarantee the following: In this original documentation under III Settlement Agreement Terms, page 5 & 6 (starts bottom of page 5), it states "Concomitant with the initiation of these studies, and in addition to the above, the Corps agrees to certain dredging and disposal practices. Specifically, the Corps agrees to conduct its ongoing Channel maintenance operations **to deposit material dredged from the Channel into the shallowest alternate site** currently available.... Such practices will continue even if the case were dismissed."

This was one of the primary reasons for the property owners to give up their future rights to sue the Corps, because they were assured the shallower sites of SIBUA and FEEDER BERM sand would stop the erosion on the island.

According to the plaintiff attorney's brief to the Judge:

"On January 21, 2009, Mr. Davis briefed Jim Hartman regarding the settlement possibility. Mr. Hartman. He stated that he would be "open" to such a settlement, subject to assurances on how the money would be spent and **on the United States' renewed commitment to dispose of dredged material in the nearer-shore disposal sites.**"

**BUT** that does not make sense.

The Corps stopped putting the dredge sand into the ***Feeder Berm in 1987.***

That means during the lawsuit from 2000 to 2009, the Corps only put sand into the Sand Island Beneficial Use Area (SIBUA).

Furthermore, the Corps knew from their documentation **in 2001 that sand in SIBUA did not move from that site and SIBUA was not providing sand to Dauphin Island shoreline.**

[2001 Chpt-4b.pdf document under seventh berm]

According to Susan Rees' 2009 testimony, the two sites the Corps used were the Sand Island Beneficial Use Area (SIBUA) and the FEEDER berm, and that both sites transported the dredge sand to the beaches of Dauphin Island.

How could the lawsuit be based on dumping the dredged sand in these two sites between 2005-2009?

In 2009, Susan Rees testified:

1. The Corps ***put a restriction on the Feeder berm site*** after only using the site one time, in 1987. Susan Rees testified, “It basically showed that the sand was incorporated into the littoral drift system and ultimately would get to Dauphin Island”.

**How did the Feeder Berm become a part of the lawsuit, if the Feeder Berm site wasn't used between 2005-2009**

2. Susan Rees testified, that SIBUA was “in the same general area of the feeder berm site and was intended to accomplish the same purpose” and SIBUA was “Transporting sand to Dauphin Island”.

BUT in a Corps' 2001 report, the Corps knew ***there was no evidence the sand in SIBUA moved from the site.*** That means the Corps knew the sand dumped into SIBUA would not help the erosion on Dauphin Island.

**How did SIBUA become part of the lawsuit settlement, if the Corps knew as early as 2001 that the sand does not move from that site?**

***So, what was the shallowest alternate site that the Corps uses between 2005 to 2009 to prevent erosion on Dauphin Island?***

In 2008 the Corps move the dumpsite ½ of a mile further away from Dauphin Island, so that site was not in shallow water and didn't supply sand to Dauphin Island.

In 2009, Dept. of Justice Attorney even emphasis the Corps' re-affirming its commitment to mitigate and prevention of further erosion on Dauphin Island, in his brief to the Judge and that SIBUA would prevent further erosion to Dauphin Island:

Approval Op. at 6. (“***[T]he entire island will benefit from the mitigation and prevention of further erosion.***”). To that aim, in addition to providing money to advance a beach nourishment project, the Second Addendum re-affirms the Corps' commitment to deposit dredged material in the beneficial use areas designated originally under the LSA. Moreover, these legally binding commitments are consonant entirely with the ***Corps' “national policy for both beneficial use and regional sediment management that stresses that [the Corps] identify areas that . . . can keep the sediment in[] the system as much as possible.”*** Tr. at 148:11- 14 (Rees).

***Did the Mobile District Corps' lie to the Court, the DOJ attorneys, and the people of Dauphin Island about the Corps putting the dredge sand into SIBUA would mitigate and prevent further erosion on Dauphin Island, even though a Corps' 2001 report states the opposite?***



Since 2009 the Corps put over 14 million cubic yards of sand in SIBUA and the Corps has refused to answer any questions about how much sand was reaching Dauphin Island.

The people of Dauphin Island are not stupid; they know the sand is not getting to the Island, if the Island is still eroding after the Corps puts 14 million cubic yds of sand into SIBUA.

In 2014 "Pat Robbins, a spokesman for the Army Corps of Engineers district office in Mobile, said the agency does in fact place dredged sand in a "beneficial use area" south and east of Dauphin Island, where it can migrate through currents to sand-starved beaches. But the Army Corps has no formal **monitoring program to ensure that the sand is reaching its intended targets**".

In a December 2017 meeting, the Corps staff 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.***

In February 2018 meeting, the Corps admitted for the first time in a public setting that its maintenance practices since 1999 for the Outer Bar Channel, only 50% of the sand has moved from that site. **The Corps did not say the sand went to Dauphin Island. The Corps did not say where the sand went.** Considering the total volume of beach quality sands dredged from that channel since 1999 that means around 14 million cubic yards of sand has been prevented from reaching and nourishing Dauphin Island over the last 19 years.

That is a tremendous **past cumulative impacts** and loss of beach quality sands over that period, which resulted in the sand-starved nature of Dauphin Island.

The Corp's admission also supports the findings and conclusions of the 2007 US Geological Survey report that stated maintenance of the Mobile Harbor channel since 1958 was contributing to the erosion and land loss of Dauphin Island.

In 2018, as part of the GRR study, analysis found that SIBUA material moves out at a slower rate than needed to ensure adequate placement capacity for maintenance material from the Bar Channel. An analysis was conducted to determine the location and size to ensure future capacity in the site.

1. The Corps does not have any documentation to back up their statements in the 2018 draft GRR/SEIS
2. The Corps does not show any facts or studies to back up their claim that any sand from SIBUA gets to the Island, especially since Pat Robbins stated in 2014 that the Corps does not monitor SIBUA and the Corps admitted in the December 2017 they don't know where the sand goes.

Now the Corps is recommending putting the dredged sand into the **SIBUA Northwest Extension** to help Dauphin Island and there is not one statement in the document that the dumped sand would restore the beaches to the Island.

We now know the Mobile District Corps' statements about Dauphin Island in any document, cannot be trusted.

For the SIBUA Northwest Extension, the Corps need sign a document:

1. **Guaranteeing** that they will use the SIBUA Northwest Extension for the life of the project and monitor the SIBUA Northwest Extension to make sure the sand was actually reaching the entire shoreline of Dauphin Island, especially, both sides of the island where people's properties are underwater.
2. The Corps needs to guarantee that they will use the SIBUA Northwest Extension every time they dredged the channel.
3. If after a year, the monitoring does not show the sand reaching the island and the properties, then the Corps will change the location of the dredged sand dumping, to a better location and guarantee that the sand in the new location would reach all properties on the southern shoreline on the island.
4. The Corps needs to continue monitoring all locations of the SIBUA Northwest Extensions and any other future locations and provide the documentation to the public.
5. The depth of the location has to be at 15 feet or less, according to Corps' documentation for the rest of the Country.

The Corps must sign a document that they would use this location and provide documentation that this site will restore the sand to the Beaches of Dauphin Island.

If the Corps is unwilling to make this commitment, then we will know the Corps is willing to severely damage Dauphin Island to conceal all of the Corps' past BAD ACTS.

The Corps has led the public through a tangled web of Berms, and statements to conceal the Mobile District Corps' Environmental Failures and dishonest actions.

**The Corps has lied about everything connected with its dredging and the erosion to Dauphin Island.**

**In the 2018-2019 SEIS/GRR, the Mobile District Corps has a duty to speak and not to remain silent; the Corps has to provide evidence and prove that they are not doing harm to the Island. In addition, the study needs to provide evidence that the Corps will do no future environmental and erosional harm to Dauphin Island.**

Sincerely,  
Caroline Graves  
cmgraves2010@gmail.com

Comment 151

**From:**   
**To:** [Newell, David P CIV CESAM CESAD \(US\)](#)  
**Subject:** [Non-DoD Source] My comments on the Mobile Ship Channel expansion DSEIS  
**Date:** Friday, September 14, 2018 11:22:11 PM

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David Newell,

Dear District Commander,

I am writing to express my concern regarding the Corps' study results indicating no impact on the environment from a major expansion project for the ship channel. The Corps needs to address the following items to ensure the study is comprehensive enough to determine impacts and doesn't underestimate the true impact.

My concerns include:

The study only includes one year of weather data as the base of its water quality models. Given how frequently and drastically these impact Mobile Bay watershed this is inadequate. The Corps must include at least three years of data to show how severe weather impacts the study's results;

The Corps must include studies about how pathogens, harmful algal blooms, and invasive species will enter Mobile Bay through a deeper channel;

The Corps must thoroughly review how the proposed project will generate new growth opportunities associated with the port that could have indirect impacts to our natural resources;

Ship wake analyses must be improved to include more accurate information (realistic ship sizes, weights, etc). The Corps needs to study the impacts on our aquatic life (oysters, seagrasses, etc.) and our shorelines from wave energy;

The Corps must work with scientists to ensure the oyster assessment is more comprehensive. The Corps needs to look at how young oysters move and show how the presence of predators (oyster drills) may increase with changes in salinity;

The Corps needs to more comprehensively investigate impacts into the wetlands, seagrasses, fish, and aquatic resource assessments. For instance, the Corps has not studied how losses to seagrasses from higher salinity will affect the species that rely on them like the West Indian Manatee and waterfowl;

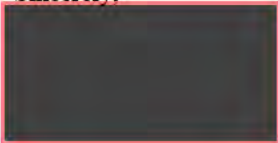
The Corps needs to recognize impacts to low income, minority communities as results show an increase of truck traffic by 25%;


The Corps must, as required by law, acknowledge past impacts on air quality and shoreline erosion since 1980 (the last environmental impact study conducted);

The Corps must consider creating a Dredge Management Plan that includes all proposed projects in the Mobile Bay area;

In conclusion, the Corps' finding of "no impact" on Mobile Bay's sensitive environment is very concerning given the magnitude of the proposed project. Thank you for your consideration and response to each of these comments. By thoroughly studying and developing a comprehensive plan for the port expansion, we can grow responsibly and mitigate any unavoidable impacts to the natural resources that support our economy and quality of life.

Sincerely,



  
Mobile, Alabama 36608

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**From:**   
**To:** [Newell, David P CIV CESAM CESAD \(US\)](#)  
**Subject:** [Non-DoD Source] My comments on the Mobile Ship Channel expansion DSEIS  
**Date:** Friday, September 14, 2018 10:05:09 PM

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David Newell,

Dear District Commander,

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The Corps must work with scientists to ensure the oyster assessment is more comprehensive. The Corps needs to look at how young oysters move and show how the presence of predators (oyster drills) may increase with changes in salinity;

The Corps needs to more comprehensively investigate impacts into the wetlands, seagrasses, fish, and aquatic resource assessments. For instance, the Corps has not studied how losses to seagrasses from higher salinity will affect the species that rely on them like the West Indian Manatee and waterfowl;

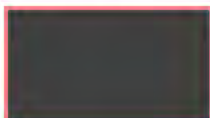
The Corps needs to recognize impacts to low income, minority communities as results show an increase of truck traffic by 25%;

The Corps must, as required by law, acknowledge past impacts on air quality and shoreline erosion since 1980 (the last environmental impact study conducted);

The Corps must consider creating a Dredge Management Plan that includes all proposed projects in the Mobile Bay area;

In conclusion, the Corps' finding of "no impact" on Mobile Bay's sensitive environment is very concerning given the magnitude of the proposed project. Thank you for your consideration and response to each of these comments. By thoroughly studying and developing a comprehensive plan for the port expansion, we can grow responsibly and mitigate any unavoidable impacts to the natural resources that support our economy and quality of life.

Sincerely,





Mobile, Alabama 36608

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**From:**   
**To:** [Newell, David P CIV CESAM CESAD \(US\)](#)  
**Subject:** [Non-DoD Source] My comments on the Mobile Ship Channel expansion DSEIS  
**Date:** Friday, September 14, 2018 9:35:41 PM

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David Newell,

Dear District Commander,

I am writing to express my concern regarding the Corps' study results indicating no impact on the environment from a major expansion project for the ship channel. The Corps needs to address the following items to ensure the study is comprehensive enough to determine impacts and doesn't underestimate the true impact.

My concerns include:

The study only includes one year of weather data as the base of its water quality models. Given how frequently and drastically these impact Mobile Bay watershed this is inadequate. The Corps must include at least three years of data to show how severe weather impacts the study's results;

The Corps must include studies about how pathogens, harmful algal blooms, and invasive species will enter Mobile Bay through a deeper channel;

The Corps must thoroughly review how the proposed project will generate new growth opportunities associated with the port that could have indirect impacts to our natural resources;

Ship wake analyses must be improved to include more accurate information (realistic ship sizes, weights, etc). The Corps needs to study the impacts on our aquatic life (oysters, seagrasses, etc.) and our shorelines from wave energy;

The Corps must work with scientists to ensure the oyster assessment is more comprehensive. The Corps needs to look at how young oysters move and show how the presence of predators (oyster drills) may increase with changes in salinity;

The Corps needs to more comprehensively investigate impacts into the wetlands, seagrasses, fish, and aquatic resource assessments. For instance, the Corps has not studied how losses to seagrasses from higher salinity will affect the species that rely on them like the West Indian Manatee and waterfowl;

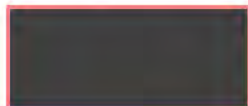
The Corps needs to recognize impacts to low income, minority communities as results show an increase of truck traffic by 25%;

The Corps must, as required by law, acknowledge past impacts on air quality and shoreline erosion since 1980 (the last environmental impact study conducted);

The Corps must consider creating a Dredge Management Plan that includes all proposed projects in the Mobile Bay area;

In conclusion, the Corps' finding of "no impact" on Mobile Bay's sensitive environment is very concerning given the magnitude of the proposed project. Thank you for your consideration and response to each of these comments. By thoroughly studying and developing a comprehensive plan for the port expansion, we can grow responsibly and mitigate any unavoidable impacts to the natural resources that support our economy and quality of life.

Sincerely,



Fairhope, Alabama 36532

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**From:** [REDACTED]  
**To:** [Newell, David P CIV CESAM CESAD \(US\)](#)  
**Subject:** [Non-DoD Source] Mobile ship channel  
**Date:** Friday, September 14, 2018 9:18:51 PM

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David Newell,

Dear District Commander,

First and foremost, let's do it! But let's do it in the right way... for everyone.

I am writing to express my concern regarding the Corps' study results indicating no impact on the environment from a major expansion project for the ship channel. The Corps needs to address the following items to ensure the study is comprehensive enough to determine impacts and doesn't underestimate the true impact.

My concerns include:

The study only includes one year of weather data as the base of its water quality models. Given how frequently and drastically these impact Mobile Bay watershed this is inadequate. The Corps must include at least three years of data to show how severe weather impacts the study's results;

The Corps must include studies about how pathogens, harmful algal blooms, and invasive species will enter Mobile Bay through a deeper channel;

The Corps must thoroughly review how the proposed project will generate new growth opportunities associated with the port that could have indirect impacts to our natural resources;

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The Corps must work with scientists to ensure the oyster assessment is more comprehensive. The Corps needs to look at how young oysters move and show how the presence of predators (oyster drills) may increase with changes in salinity;

The Corps needs to more comprehensively investigate impacts into the wetlands, seagrasses, fish, and aquatic resource assessments. For instance, the Corps has not studied how losses to seagrasses from higher salinity will affect the species that rely on them like the West Indian Manatee and waterfowl;

The Corps needs to recognize impacts to low income, minority communities as results show an increase of truck traffic by 25%;

The Corps must, as required by law, acknowledge past impacts on air quality and shoreline erosion since 1980 (the last environmental impact study conducted);

The Corps must consider creating a Dredge Management Plan that includes all proposed projects in the Mobile Bay area;

In conclusion, the Corps' finding of "no impact" on Mobile Bay's sensitive environment is very concerning given the magnitude of the proposed project. Thank you for your consideration and response to each of these comments. By thoroughly studying and developing a comprehensive plan for the port expansion, we can encourage responsible growth and mitigate any unavoidable impacts to the natural resources that support our economy and quality of life.

Sincerely,

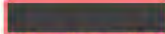
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Mobile, Alabama 36605

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**From:**   
**To:** [Newell, David P CIV CESAM CESAD \(US\)](#)  
**Subject:** [Non-DoD Source] The Mobile Ship Channel Dredging  
**Date:** Friday, September 14, 2018 9:05:04 PM

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David Newell,

Dear District Commander,

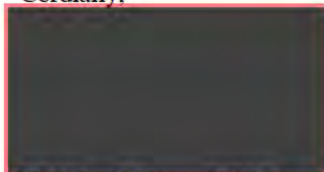
I'm adding my voice to the thousands of Mobilians who are concerned that your recent study has indicated no impact on the environment from a major expansion project for the ship channel. The study isn't thorough enough, is inadequate in many areas and is not respectful of the timing aspect of such results - one year is not enough. I am simply outlining the areas below by topic - you already know the worrisome issues sounding them:

Needs more input:

1. only includes one year of weather data as the base of its water quality models - need 3.
2. include studies about how pathogens, harmful algal blooms, and invasive species will enter Mobile Bay through a deeper channel;
3. review how the proposed project will generate new growth opportunities associated with the port that could have indirect impacts to our natural resources;
4. Ship wake analyses must be improved to include more accurate information (realistic ship sizes, weights, etc. and the impact on our aquatic life (oysters, seagrasses, etc.) and our shorelines from wave energy;
4. ensure the oyster assessment is more comprehensive. regarding salinity.
5. Better investigate impacts into the wetlands, seagrasses, fish, and aquatic resource assessments and effects on manatees and other species.
6. By law, acknowledge past impacts on air quality and shoreline erosion since 1980 (the last environmental impact study conducted);
7. Create a Dredge Management Plan that includes all proposed projects in the Mobile Bay area;

"No impact" on Mobile Bay's sensitive environment is an almost unbelievable reported result of this study. No impact? . . . really now. I firmly believe that once ALL the data is submitted, with good will from the shipping world and the rest of Mobile and Baldwin County, a deeper channel can be achieved with proper care for the quality of life we enjoy in south Alabama

Cordially,



Mobile, Alabama 36605

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**From:** [REDACTED]  
**To:** [Mobile Harbor GRR](#)  
**Subject:** [Non-DoD Source] Mobile Channel Dredging  
**Date:** Friday, September 14, 2018 8:52:37 PM

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COL Sebastien P. Joly, District Commander  
U.S. Army Corps of Engineers, Mobile District  
P.O. Box 2288  
Mobile, AL 36628-0001

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

I am writing this letter to the Corps of Engineers, Mobile District, to voice my concern regarding the Mobile Harbor Widening and Deepening project. I have two primary areas of concern for which I offer the following comments:

1. The Proposed Sand Island Beneficial Use Area Northwest Extension, and
2. The potential overall environmental impact

1. Regarding the proposed Sand Island Beneficial Use Area Northwest Expansion:

Earlier this year in preparation for the Corp's February 22 Public Hearing meeting at the Mobile Convention Center, my husband had several detailed discussions (i.e., calls) the days preceding with Dr. Mark Byrnes, author of several Corps-sponsored studies including the one dated September 2010 which concluded "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". The Corps has subsequently referenced Dr. Byrnes's study on many occasions to justify its Mobile Harbor dredging activities. However, during their discussions, Dr. Byrnes and my husband debated his September 2010 conclusion, and after several discussions (i.e., calls), they agreed to the following statement to summarize their overall discussions and Dr. Byrnes's updated conclusion:

"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."

In other words, while the Corps has for years been promoting, based on Dr. Byrnes's and others' studies, the notion that the SIBUA was truly beneficial to the replenishing of sand and prevention of erosion to Dauphin Island's shoreline, Dr. Byrnes himself acknowledged that in practice this was unproven and might not be the case – thus their carefully worded, jointly approved, concluding statement summarizing their discussions.

And at the February 22 Public Hearing, which proved Dr. Byrnes's amended conclusion, the Corps revealed 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 implied 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! In other words, the current SIBUA has NOT been beneficial to Dauphin Island in preventing and/or restoring shoreline erosion, at least not to the degree that the Corps has alleged for many years!

Because of the above discussions/conclusions AND our personal observations of shoreline erosion over the past 50 years, if the Mobile Harbor dredging activity must continue, I am in favor of the proposed Sand Island Beneficial



Use Area Extension project with the following caveats:

1. The Corps must guarantee that it will use the SIBUA Northwest Extension for the life of the Mobile Harbor dredging project and will monitor the SIBUA Northwest Extension to make sure that the dredged sand is reaching the southern shoreline of Dauphin Island, especially the developed areas of the island where people's properties are at risk.
2. The Corps needs to commit that it will use the SIBUA Northwest Extension every time it dredges the channel unless there are circumstances which prevent such; however, in that case, the circumstance must be clearly documented and available to the public.
3. If, after a year, the monitoring doesn't show that the dredged sand is reaching the island and the properties, the Corps will change the location of the dumping of the dredged sand, to a more effective location and commit that the dredged sand will reach all properties on the southern shoreline of the island.
4. The Corps must continue monitoring all locations of the SIBUA Northwest Extensions, and any other future locations, and make available relevant performance documentation to the general public.
5. The depth of the SIBUA Extension location should be 15 feet or less according to Corps documentation for the other parts of the Country.

Each of the above items should be documented and committed to the public by the Corps before proceeding with the dredging project.

1. Regarding the potential overall environmental impact:

The Corps needs to address the following items to ensure the study is comprehensive enough to determine impacts and doesn't underestimate the true impact.

The study only includes one year of weather data as the base of its water quality models. Given how frequently and drastically these impact Mobile Bay watershed this is inadequate. The Corps must include at least three years of data to show how severe weather impacts the study's results;

The Corps must include studies about how pathogens, harmful algal blooms, and invasive species will enter Mobile Bay through a deeper channel;

The Corps must thoroughly review how the proposed project will generate new growth opportunities associated with the port that could have indirect impacts to our natural resources;

Ship wake analyses must be improved to include more accurate information (realistic ship sizes, weights, etc). The Corps needs to study the impacts on our aquatic life (oysters, seagrasses, etc.) and our shorelines from wave energy;

The Corps must work with scientists to ensure the oyster assessment is more comprehensive. The Corps needs to look at how young oysters move and show how the presence of predators (oyster drills) may increase with changes in salinity;

The Corps needs to more comprehensively investigate impacts into the wetlands, seagrasses, fish, and aquatic resource assessments. For instance, the Corps has not studied how losses to seagrasses from higher salinity will affect the species that rely on them like the West Indian Manatee and waterfowl;

The Corps needs to recognize impacts to low income, minority communities as results show an increase of truck traffic by 25%;

The Corps must, as required by law, acknowledge past impacts on air quality and shoreline erosion since 1980 (the last environmental impact study conducted; see my above comments re proposed SIBUA Extension);

The Corps must consider creating a Dredge Management Plan that includes all proposed projects in the Mobile Bay area;

In conclusion, the Corps' finding of "no impact" on Mobile Bay's sensitive environment is very concerning given the magnitude of the proposed project.

Thank you for your consideration and response to each of these comments. By thoroughly studying and developing a comprehensive plan for the port expansion, we can grow responsibly and mitigate any unavoidable impacts to the natural resources that support our economy and quality of life AND the vitally important barrier island which protects not only the bay but also the port, city and county – i.e., Dauphin Island.





**From:**   
**To:** [Mobile Harbor GRR](#)  
**Subject:** [Non-DoD Source] RE: Mobile Harbor Dredging Project  
**Date:** Friday, September 14, 2018 8:46:09 PM

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COL Sebastien P. Joly, District Commander  
U.S. Army Corps of Engineers, Mobile District  
P.O. Box 2288  
Mobile, AL 36628-0001

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

I am writing this letter to the Corps of Engineers, Mobile District, to voice my concern regarding the Mobile Harbor Widening and Deepening project. I have two primary areas of concern for which I offer the following comments:

1. The Proposed Sand Island Beneficial Use Area Northwest Extension, and
2. The potential overall environmental impact

1. Regarding the proposed Sand Island Beneficial Use Area Northwest Expansion:

Earlier this year in preparation for the Corp's February 22 Public Hearing meeting at the Mobile Convention Center, I had several detailed discussions (i.e., calls) the days preceding with Dr. Mark Byrnes, author of several Corps-sponsored studies including the one dated September 2010 which concluded "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". The Corps has subsequently referenced Dr. Byrne's study on many occasions to justify its Mobile Harbor dredging activities. However, during our discussions, Dr. Byrnes and I debated his September 2010 conclusion, and after several discussions (i.e., calls), we agreed to the following statement to summarize our overall discussions and Dr. Byrne's updated conclusion:

"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."

In other words, while the Corps has for years been promoting, based on Dr. Byrne's and others' studies, the notion that the SIBUA was truly beneficial to the replenishing of sand and prevention of erosion to Dauphin Island's shoreline, Dr. Byrnes himself acknowledged that in practice this was unproven and might not be the case – thus our carefully worded, jointly approved, concluding statement summarizing our discussions.

And at the February 22 Public Hearing, which proved Dr. Byrne's amended conclusion, the Corps revealed 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 implied 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! In other words, the current SIBUA has NOT been beneficial to Dauphin Island in preventing and/or restoring shoreline erosion, at least not to the degree that the Corps has alleged for many years!

Because of the above discussions/conclusions AND my personal observations of shoreline erosion over the past 50 years, if the Mobile Harbor dredging activity must continue, I am in favor of the proposed Sand Island Beneficial Use Area Extension project with the following caveats:

1. The Corps must guarantee that it will use the SIBUA Northwest Extension for the life of the Mobile Harbor dredging project and will monitor the SIBUA Northwest Extension to make sure that the dredged sand is reaching the southern shoreline of Dauphin Island, especially the developed areas of the island where people's properties are at risk.
2. The Corps needs to commit that it will use the SIBUA Northwest Extension every time it dredges the channel unless there are circumstances which prevent such; however, in that case, the circumstance must be clearly documented and available to the public.
3. If, after a year, the monitoring doesn't show that the dredged sand is reaching the island and the properties, the Corps will change the location of the dumping of the dredged sand, to a more effective location and commit that the dredged sand will reach all properties on the southern shoreline of the island.
4. The Corps must continue monitoring all locations of the SIBUA Northwest Extensions, and any other future locations, and make available relevant performance documentation to the general public.
5. The depth of the SIBUA Extension location should be 15 feet or less according to Corps documentation for the other parts of the Country.

Each of the above items should be documented and committed to the public by the Corps before proceeding with the dredging project.

2. Regarding the potential overall environmental impact:

The Corps needs to address the following items to ensure the study is comprehensive enough to determine impacts and doesn't underestimate the true impact.

The study only includes one year of weather data as the base of its water quality models. Given how frequently and drastically these impact Mobile Bay watershed this is inadequate. The Corps must include at least three years of data to show how severe weather impacts the study's results;

The Corps must include studies about how pathogens, harmful algal blooms, and invasive species will enter Mobile Bay through a deeper channel;

The Corps must thoroughly review how the proposed project will generate new growth opportunities associated with the port that could have indirect impacts to our natural resources;

Ship wake analyses must be improved to include more accurate information (realistic ship sizes, weights, etc). The Corps needs to study the impacts on our aquatic life (oysters, seagrasses, etc.) and our shorelines from wave energy;

The Corps must work with scientists to ensure the oyster assessment is more comprehensive. The Corps needs to look at how young oysters move and show how the presence of predators (oyster drills) may increase with changes in salinity;

The Corps needs to more comprehensively investigate impacts into the wetlands, seagrasses, fish, and aquatic resource assessments. For instance, the Corps has not studied how losses to seagrasses from higher salinity will affect the species that rely on them like the West Indian Manatee and waterfowl;

The Corps needs to recognize impacts to low income, minority communities as results show an increase of truck traffic by 25%;

The Corps must, as required by law, acknowledge past impacts on air quality and shoreline erosion since 1980 (the last environmental impact study conducted; see my above comments re proposed SIBUA Extension);

The Corps must consider creating a Dredge Management Plan that includes all proposed projects in the Mobile Bay area;

In conclusion, the Corps' finding of "no impact" on Mobile Bay's sensitive environment is very concerning given the magnitude of the proposed project.

Thank you for your consideration and response to each of these comments. By thoroughly studying and developing a comprehensive plan for the port expansion, we can grow responsibly and mitigate any unavoidable impacts to the natural resources that support our economy and quality of life AND the vitally important barrier island which protects not only the bay but also the port, city and county – i.e., Dauphin Island.





**From:**   
**To:** [Newell, David P CIV CESAM CESAD \(US\)](#)  
**Subject:** [Non-DoD Source] My comments on the Mobile Ship Channel expansion DSEIS  
**Date:** Friday, September 14, 2018 8:29:51 PM

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David Newell,

Dear District Commander,

I am writing to express my concern regarding the Corps' study results indicating no impact on the environment from a major expansion project for the ship channel. The Corps needs to address the following items to ensure the study is comprehensive enough to determine impacts and doesn't underestimate the true impact.

My concerns include:

The study only includes one year of weather data as the base of its water quality models. Given how frequently and drastically these impact Mobile Bay watershed this is inadequate. The Corps must include at least three years of data to show how severe weather impacts the study's results;

The Corps must include studies about how pathogens, harmful algal blooms, and invasive species will enter Mobile Bay through a deeper channel;

The Corps must thoroughly review how the proposed project will generate new growth opportunities associated with the port that could have indirect impacts to our natural resources;

Ship wake analyses must be improved to include more accurate information (realistic ship sizes, weights, etc). The Corps needs to study the impacts on our aquatic life (oysters, seagrasses, etc.) and our shorelines from wave energy;

The Corps must work with scientists to ensure the oyster assessment is more comprehensive. The Corps needs to look at how young oysters move and show how the presence of predators (oyster drills) may increase with changes in salinity;

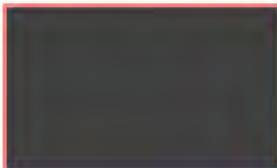
The Corps needs to more comprehensively investigate impacts into the wetlands, seagrasses, fish, and aquatic resource assessments. For instance, the Corps has not studied how losses to seagrasses from higher salinity will affect the species that rely on them like the West Indian Manatee and waterfowl;

The Corps needs to recognize impacts to low income, minority communities as results show an increase of truck traffic by 25%;

The Corps must, as required by law, acknowledge past impacts on air quality and shoreline erosion since 1980 (the last environmental impact study conducted);

The Corps must consider creating a Dredge Management Plan that includes all proposed projects in the Mobile Bay area;

In conclusion, the Corps' finding of "no impact" on Mobile Bay's sensitive environment is very concerning given the magnitude of the proposed project. Thank you for your consideration and response to each of these comments. By thoroughly studying and developing a comprehensive plan for the port expansion, we can grow responsibly and mitigate any unavoidable impacts to the natural resources that support our economy and quality of life.







Dauphin Island, Alabama 36528

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**From:** [REDACTED]  
**To:** [Newell, David P CIV CESAM CESAD \(US\)](#)  
**Subject:** [Non-DoD Source] My comments on the Mobile Ship Channel expansion DSEIS  
**Date:** Friday, September 14, 2018 8:25:15 PM

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David Newell,

Dear District Commander,

I am writing to express my concern regarding the Corps' study results indicating no impact on the environment from a major expansion project for the ship channel. The Corps needs to address the following items to ensure the study is comprehensive enough to determine impacts and doesn't underestimate the true impact.

My concerns include:

The study only includes one year of weather data as the base of its water quality models. Given how frequently and drastically these impact Mobile Bay watershed this is inadequate. The Corps must include at least three years of data to show how severe weather impacts the study's results;

The Corps must include studies about how pathogens, harmful algal blooms, and invasive species will enter Mobile Bay through a deeper channel;

The Corps must thoroughly review how the proposed project will generate new growth opportunities associated with the port that could have indirect impacts to our natural resources;

Ship wake analyses must be improved to include more accurate information (realistic ship sizes, weights, etc). The Corps needs to study the impacts on our aquatic life (oysters, seagrasses, etc.) and our shorelines from wave energy;

The Corps must work with scientists to ensure the oyster assessment is more comprehensive. The Corps needs to look at how young oysters move and show how the presence of predators (oyster drills) may increase with changes in salinity;

The Corps needs to more comprehensively investigate impacts into the wetlands, seagrasses, fish, and aquatic resource assessments. For instance, the Corps has not studied how losses to seagrasses from higher salinity will affect the species that rely on them like the West Indian Manatee and waterfowl;

The Corps needs to recognize impacts to low income, minority communities as results show an increase of truck traffic by 25%;

The Corps must, as required by law, acknowledge past impacts on air quality and shoreline erosion since 1980 (the last environmental impact study conducted);

The Corps must consider creating a Dredge Management Plan that includes all proposed projects in the Mobile Bay area;

In conclusion, the Corps' finding of "no impact" on Mobile Bay's sensitive environment is very concerning given the magnitude of the proposed project. Thank you for your consideration and response to each of these comments. By thoroughly studying and developing a comprehensive plan for the port expansion, we can grow responsibly and mitigate any unavoidable impacts to the natural resources that support our economy and quality of life.

Sincerely,

[REDACTED]  
PS: Our state has a beautiful natural resource many areas of the world would be grateful for in our extensive system of waterways. These waters are home to People, other animals, and plants that should be treasured and protected. The recreational opportunities available alone are worth protecting. We have a special environment here at the

bottom of our beautiful state. Please take time and great care before plowing through our bay for potential gain in commerce at the expense of potential long term damage to this very special part of the world.  
Thank you.



Mobile, Alabama 36608

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**From:** [REDACTED]  
**To:** [Newell, David P CIV CESAM CESAD \(US\)](#)  
**Subject:** [Non-DoD Source] My comments on the Mobile Ship Channel expansion DSEIS  
**Date:** Friday, September 14, 2018 7:36:23 PM

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David Newell,

Dear District Commander,

I would very much like to see more studies done. The shoreline of the property on the bay changes with every change made to the bay. What impact will a deeper, wider channel have on the seafood industry?

I am writing to express my concern regarding the Corps' study results indicating no impact on the environment from a major expansion project for the ship channel. The Corps needs to address the following items to ensure the study is comprehensive enough to determine impacts and doesn't underestimate the true impact.

My concerns include:

The study only includes one year of weather data as the base of its water quality models. Given how frequently and drastically these impact Mobile Bay watershed this is inadequate. The Corps must include at least three years of data to show how severe weather impacts the study's results;

The Corps must include studies about how pathogens, harmful algal blooms, and invasive species will enter Mobile Bay through a deeper channel;

The Corps must thoroughly review how the proposed project will generate new growth opportunities associated with the port that could have indirect impacts to our natural resources;

Ship wake analyses must be improved to include more accurate information (realistic ship sizes, weights, etc). The Corps needs to study the impacts on our aquatic life (oysters, seagrasses, etc.) and our shorelines from wave energy;

The Corps must work with scientists to ensure the oyster assessment is more comprehensive. The Corps needs to look at how young oysters move and show how the presence of predators (oyster drills) may increase with changes in salinity;

The Corps needs to more comprehensively investigate impacts into the wetlands, seagrasses, fish, and aquatic resource assessments. For instance, the Corps has not studied how losses to seagrasses from higher salinity will affect the species that rely on them like the West Indian Manatee and waterfowl;

The Corps needs to recognize impacts to low income, minority communities as results show an increase of truck traffic by 25%;

The Corps must, as required by law, acknowledge past impacts on air quality and shoreline erosion since 1980 (the last environmental impact study conducted);

The Corps must consider creating a Dredge Management Plan that includes all proposed projects in the Mobile Bay area;

In conclusion, the Corps' finding of "no impact" on Mobile Bay's sensitive environment is very concerning given the magnitude of the proposed project. Thank you for your consideration and response to each of these comments. By thoroughly studying and developing a comprehensive plan for the port expansion, we can grow responsibly and mitigate any unavoidable impacts to the natural resources that support our economy and quality of life.

Sincerely,





Mobile, Alabama 36608

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**From:** [REDACTED]  
**To:** [Newell, David P CIV CESAM CESAD \(US\)](#)  
**Subject:** [Non-DoD Source] My comments on the Mobile Ship Channel expansion DSEIS  
**Date:** Friday, September 14, 2018 7:28:47 PM

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David Newell,

Dear District Commander,

I am writing to express my concern regarding the Corps' study results indicating no impact on the environment from a major expansion project for the ship channel. The Corps needs to address the following items to ensure the study is comprehensive enough to determine impacts and doesn't underestimate the true impact.

My concerns include:

The study only includes one year of weather data as the base of its water quality models. Given how frequently and drastically these impact Mobile Bay watershed this is inadequate. The Corps must include at least three years of data to show how severe weather impacts the study's results;

The Corps must include studies about how pathogens, harmful algal blooms, and invasive species will enter Mobile Bay through a deeper channel;

The Corps must thoroughly review how the proposed project will generate new growth opportunities associated with the port that could have indirect impacts to our natural resources;

Ship wake analyses must be improved to include more accurate information (realistic ship sizes, weights, etc). The Corps needs to study the impacts on our aquatic life (oysters, seagrasses, etc.) and our shorelines from wave energy;

The Corps must work with scientists to ensure the oyster assessment is more comprehensive. The Corps needs to look at how young oysters move and show how the presence of predators (oyster drills) may increase with changes in salinity;

The Corps needs to more comprehensively investigate impacts into the wetlands, seagrasses, fish, and aquatic resource assessments. For instance, the Corps has not studied how losses to seagrasses from higher salinity will affect the species that rely on them like the West Indian Manatee and waterfowl;

The Corps needs to recognize impacts to low income, minority communities as results show an increase of truck traffic by 25%;

The Corps must, as required by law, acknowledge past impacts on air quality and shoreline erosion since 1980 (the last environmental impact study conducted);

The Corps must consider creating a Dredge Management Plan that includes all proposed projects in the Mobile Bay area;

In conclusion, the Corps' finding of "no impact" on Mobile Bay's sensitive environment is very concerning given the magnitude of the proposed project. Thank you for your consideration and response to each of these comments. By thoroughly studying and developing a comprehensive plan for the port expansion, we can grow responsibly and mitigate any unavoidable impacts to the natural resources that support our economy and quality of life.

Sincerely,  
[REDACTED]

P. S. I do not want to see Dauphin Island disappear in my lifetime. It has already changed so much in the past 25 years. By increasing the shipping channel in depth and width, it would insure the distinction of mobile counties

barrier island.



Mobile , Alabama 36608

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**From:**   
**To:** [Newell, David P CIV CESAM CESAD \(US\)](#)  
**Subject:** [Non-DoD Source] My comments on the Mobile Ship Channel expansion DSEIS  
**Date:** Friday, September 14, 2018 6:27:31 PM

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David Newell,

Dear District Commander,

I am writing to express my concern regarding the Corps' study results indicating no impact on the environment from a major expansion project for the ship channel. The Corps needs to address the following items to ensure the study is comprehensive enough to determine impacts and doesn't underestimate the true impact.

My concerns include:

The study only includes one year of weather data as the base of its water quality models. Given how frequently and drastically these impact Mobile Bay watershed this is inadequate. The Corps must include at least three years of data to show how severe weather impacts the study's results;

The Corps must include studies about how pathogens, harmful algal blooms, and invasive species will enter Mobile Bay through a deeper channel;

The Corps must thoroughly review how the proposed project will generate new growth opportunities associated with the port that could have indirect impacts to our natural resources;

Ship wake analyses must be improved to include more accurate information (realistic ship sizes, weights, etc). The Corps needs to study the impacts on our aquatic life (oysters, seagrasses, etc.) and our shorelines from wave energy;

The Corps must work with scientists to ensure the oyster assessment is more comprehensive. The Corps needs to look at how young oysters move and show how the presence of predators (oyster drills) may increase with changes in salinity;

The Corps needs to more comprehensively investigate impacts into the wetlands, seagrasses, fish, and aquatic resource assessments. For instance, the Corps has not studied how losses to seagrasses from higher salinity will affect the species that rely on them like the West Indian Manatee and waterfowl;

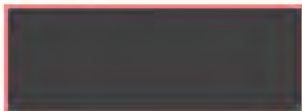
The Corps needs to recognize impacts to low income, minority communities as results show an increase of truck traffic by 25%;

The Corps must, as required by law, acknowledge past impacts on air quality and shoreline erosion since 1980 (the last environmental impact study conducted);

The Corps must consider creating a Dredge Management Plan that includes all proposed projects in the Mobile Bay area;

In conclusion, the Corps' finding of "no impact" on Mobile Bay's sensitive environment is very concerning given the magnitude of the proposed project. Thank you for your consideration and response to each of these comments. By thoroughly studying and developing a comprehensive plan for the port expansion, we can grow responsibly and mitigate any unavoidable impacts to the natural resources that support our economy and quality of life.

Sincerely,





fairhope, Alabama 36532

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## Comment 163

**From:** [REDACTED]  
**To:** [Mobile Harbor GRR](#); [Joly, Sebastien P COL USARMY CESAM \(US\)](#); [Holliman.Daniel@epa.gov](mailto:Holliman.Daniel@epa.gov); [Bush, Eric L CIV USARMY CESAD \(US\)](#); [Diana M. Holland BG](#)  
**Subject:** [Non-DoD Source] Dauphin Island  
**Date:** Friday, September 14, 2018 6:19:39 PM

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The Corps need signs a document:

1 Guaranteeing that they will use the SIBUA Northwest Extension for the life of the project and monitor the SIBUA Northwest Extension to make sure the sand was actually reaching the shoreline of Dauphin Island, especially, on both sides of the island where people's properties are underwater.


2 The Corps needs to guarantee that they will use the SIBUA Northwest Extension every time they dredged the channel.

3 If after a year, the monitoring does not show the sand reaching the island and the properties, then the Corps will change the location of the dumping of the dredged sand, to a better location and guarantee that the sand would reach all properties on the southern shoreline on the island.

4 The Corps needs to continue monitoring all locations of the SIBUA Northwest Extensions and any other future locations and provide the documentation to the public.

5 The depth of the location has to be at 15 feet or less according to Corps documentation for the rest of the Country.

[REDACTED]

**From:**   
**To:** [Newell, David P CIV CESAM CESAD \(US\)](#)  
**Subject:** [Non-DoD Source] Ship Channel Expansion  
**Date:** Friday, September 14, 2018 6:14:12 PM

---

David Newell,

Hello,

I'm writing to express my concern regarding the Corps' study results indicating "no impact" on the environment from a major expansion project for the ship channel. The Corps needs to address the following items to ensure the study is comprehensive enough to determine impacts and doesn't underestimate the true impact.

My concerns include:

The study only includes one year of weather data as the base of its water quality models. Given how frequently and drastically these impact Mobile Bay watershed this is inadequate. The Corps must include at least three years of data to show how severe weather impacts the study's results;

The Corps must include studies about how pathogens, harmful algal blooms, and invasive species will enter Mobile Bay through a deeper channel;

The Corps must thoroughly review how the proposed project will generate new growth opportunities associated with the port that could have indirect impacts to our natural resources;

Ship wake analyses must be improved to include more accurate information (realistic ship sizes, weights, etc). The Corps needs to study the impacts on our aquatic life (oysters, seagrasses, etc.) and our shorelines from wave energy;

The Corps must work with scientists to ensure the oyster assessment is more comprehensive. The Corps needs to look at how young oysters move and show how the presence of predators (oyster drills) may increase with changes in salinity;

The Corps needs to more comprehensively investigate impacts into the wetlands, seagrasses, fish, and aquatic resource assessments. For instance, the Corps has not studied how losses to seagrasses from higher salinity will affect the species that rely on them like the West Indian Manatee and waterfowl;

The Corps needs to recognize impacts to low income, minority communities as results show an increase of truck traffic by 25%;

The Corps must, as required by law, acknowledge past impacts on air quality and shoreline erosion since 1980 (the last environmental impact study conducted);

The Corps must consider creating a Dredge Management Plan that includes all proposed projects in the Mobile Bay area;

In conclusion, the Corps' finding of "no impact" on Mobile Bay's sensitive environment is very concerning given the magnitude of the proposed project. Thank you for your consideration and response to each of these comments. By thoroughly studying and developing a comprehensive plan for the port expansion, we can grow responsibly and mitigate any unavoidable impacts to the natural resources that support our economy and quality of life.

To close, I cannot overstate that I am very much in favor of this project coming to fruition, but I'd like to ensure we get it right the first time so as to mitigate the environmental impact as much as possible.

Kind Regards,



Mobile, Alabama 36606

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## Comment 165

**From:**   
**To:** [Newell, David P CIV CESAM CESAD \(US\)](#)  
**Subject:** [Non-DoD Source] My comments on the Mobile Ship Channel expansion DSEIS  
**Date:** Friday, September 14, 2018 5:59:10 PM

---

David Newell,

Dear District Commander,

I am writing to express my concern regarding the Corps' study results indicating no impact on the environment from a major expansion project for the ship channel. The Corps needs to address the following items to ensure the study is comprehensive enough to determine impacts and doesn't underestimate the true impact.

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The Corps must include studies about how pathogens, harmful algal blooms, and invasive species will enter Mobile Bay through a deeper channel;

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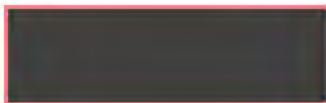
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Sincerely,



Cullman, Alabama 35057-4028

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**From:**   
**To:** [Newell, David P CIV CESAM CESAD \(US\)](#)  
**Subject:** [Non-DoD Source] My comments on the Mobile Ship Channel expansion DSEIS  
**Date:** Friday, September 14, 2018 5:39:07 PM

---

David Newell,

Dear District Commander,

I am writing to express my concern regarding the Corps' study results indicating no impact on the environment from a major expansion project for the ship channel. The Corps needs to address the following items to ensure the study is comprehensive enough to determine impacts and doesn't underestimate the true impact.

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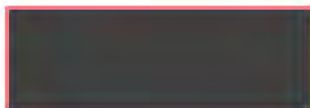
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Sincerely,



Spanish Fort, Alabama 36527

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**From:**   
**To:** [Newell, David P CIV CESAM CESAD \(US\)](#)  
**Subject:** [Non-DoD Source] My comments on the Mobile Ship Channel expansion DSEIS  
**Date:** Friday, September 14, 2018 5:36:14 PM

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David Newell,

Dear District Commander,

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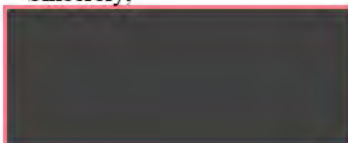
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Sincerely,



  
Mobile, Alabama 36605

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**From:**   
**To:** [Newell, David P CIV CESAM CESAD \(US\)](#)  
**Subject:** [Non-DoD Source] My comments on the Mobile Ship Channel expansion DSEIS  
**Date:** Friday, September 14, 2018 5:28:10 PM

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David Newell,

Dear District Commander,

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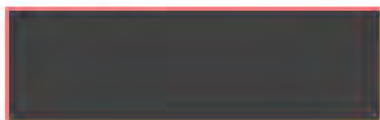
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Sincerely,



Lucedale , Mississippi 39452

<Blocked<https://u1584542.ct.sendgrid.net/mpss/o/5gA/ni0YAA/t.2kv/UGOwLEsCQYuAbM7YVbJFKw/o.gif>>



**From:**   
**To:** [Newell, David P CIV CESAM CESAD \(US\)](#)  
**Subject:** [Non-DoD Source] My comments on the Mobile Ship Channel expansion DSEIS  
**Date:** Friday, September 14, 2018 5:23:48 PM

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David Newell,

Dear District Commander,

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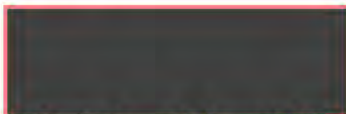
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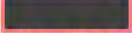
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Sincerely,



Birmingham, Alabama 35243

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**From:**   
**To:** [Newell, David P CIV CESAM CESAD \(US\)](#)  
**Subject:** [Non-DoD Source] My comments on the Mobile Ship Channel expansion DSEIS  
**Date:** Friday, September 14, 2018 5:22:17 PM

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David Newell,

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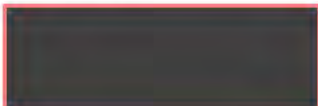
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Mobile, Alabama 36604

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**From:**   
**To:** [Newell, David P CIV CESAM CESAD \(US\)](#)  
**Subject:** [Non-DoD Source] My comments on the Mobile Ship Channel expansion DSEIS  
**Date:** Friday, September 14, 2018 5:13:15 PM

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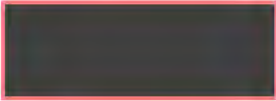
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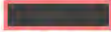
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Sincerely,



Spanish Fort, Alabama 36527

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**From:**   
**To:** [Holliman.Daniel@epa.gov](mailto:Holliman.Daniel@epa.gov); [Mobile Harbor GRR](#); [Joly, Sebastien P COL USARMY CESAM \(US\)](#); [Bush, Eric L CIV USARMY CESAD \(US\)](#); [Diana M. Holland BG](#)  
**Subject:** [Non-DoD Source] Dauphin Island  
**Date:** Friday, September 14, 2018 4:11:36 PM  
**Importance:** High

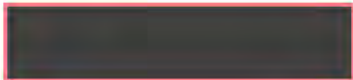
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The Corps needs to sign a document:

1. Guaranteeing that they will use the SIBUA Northwest Extension for the life of the project and monitor the SIBUA Northwest Extension to make sure the sand was actually reaching the shoreline of Dauphin Island, especially, on both sides of the island where people's properties are underwater.
2. The Corps needs to guarantee that they will use the SIBUA Northwest Extension every time they dredged the channel.
3. If after a year, the monitoring does not show the sand reaching the island and the properties, then the Corps will change the location of the dumping of the dredged sand, to a better location and guarantee that the sand would reach all properties on the southern shoreline on the island.
4. The Corps needs to continue monitoring all locations of the SIBUA Northwest Extensions and any other future locations and provide the documentation to the public.
5. The depth of the location has to be at 15 feet or less according to Corps documentation for the rest of the Country.

Thank you.

Sincerely,





**From:**   
**To:** [Newell, David P CIV CESAM CESAD \(US\)](#)  
**Subject:** [Non-DoD Source] My comments on the Mobile Ship Channel expansion DSEIS  
**Date:** Friday, September 14, 2018 4:09:18 PM

---

David Newell,

Dear District Commander,

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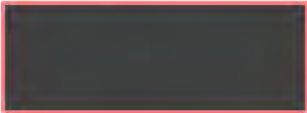
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Sincerely,





Fairhope , Alabama 36532

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**From:**   
**To:** [Newell, David P CIV CESAM CESAD \(US\)](#)  
**Subject:** [Non-DoD Source] My comments on the Mobile Ship Channel expansion DSEIS  
**Date:** Friday, September 14, 2018 4:07:11 PM

---

David Newell,

Dear District Commander,

I am writing to express my concern regarding the Corps' study results indicating no impact on the environment from a major expansion project for the ship channel. The Corps needs to address the following items to ensure the study is comprehensive enough to determine impacts and doesn't underestimate the true impact.

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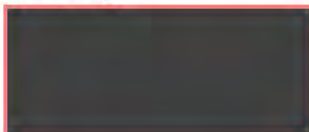
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Sincerely,





Mobile, AL, Alabama 36609

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## Comment 175

**From:** [REDACTED]  
**To:** [Newell, David P CIV CESAM CESAD \(US\)](#)  
**Subject:** [Non-DoD Source] My comments on the Mobile Ship Channel expansion DSEIS  
**Date:** Friday, September 14, 2018 4:02:39 PM

---

David Newell,

Dear District Commander,

I know that a form letter had been set up for us to send to the Commander so I might be scolded for deleting the form letter with the concerns about widening the channel in the river and bay but here goes. As for me after reading the research and my working on the river at World Marine and working with the USCOE, I find that you study is good. The impact on the environment if any would be minor. When you dredge you always do it properly and have all the environmental cautions in place. As for the salinity of the water, the Mobile Bay and the rivers feeding the bay are used to the salinity levels going up and down as to the amount of rain fall we receive and the wildlife in the area is well adapted to these changes.

In my opinion the deepening and widening of the channel would not adversely affect the environment but would enhance Mobile seaport and the economy of our great city.

Regards

[REDACTED]

[REDACTED]

Mobile, Alabama 36604

<Blocked<https://u1584542.ct.sendgrid.net/mpss/o/DQE/ni0YAA/t.2kv/O4zeOLj6QMeoC5w6D4NfDQ/o.gif>>



**From:**   
**To:** [Newell, David P CIV CESAM CESAD \(US\)](#)  
**Subject:** [Non-DoD Source] My comments on the Mobile Ship Channel expansion DSEIS  
**Date:** Friday, September 14, 2018 3:48:34 PM

---

David Newell,

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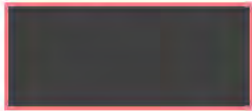
The Corps needs to recognize impacts to low income, minority communities as results show an increase of truck traffic by 25%;

The Corps must, as required by law, acknowledge past impacts on air quality and shoreline erosion since 1980 (the last environmental impact study conducted);

The Corps must consider creating a Dredge Management Plan that includes all proposed projects in the Mobile Bay area;

In conclusion, the Corps' finding of "no impact" on Mobile Bay's sensitive environment is very concerning given the magnitude of the proposed project. Thank you for your consideration and response to each of these comments. By thoroughly studying and developing a comprehensive plan for the port expansion, we can grow responsibly and mitigate any unavoidable impacts to the natural resources that support our economy and quality of life.

Sincerely,



Athens, Alabama 35613

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**From:**   
**To:** [Newell, David P CIV CESAM CESAD \(US\)](#)  
**Subject:** [Non-DoD Source] My comments on the Mobile Ship Channel expansion DSEIS  
**Date:** Friday, September 14, 2018 3:37:29 PM

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David Newell,

Dear District Commander,

I am writing to express my concern regarding the Corps' study results indicating no impact on the environment from a major expansion project for the ship channel. The Corps needs to address the following items to ensure the study is comprehensive enough to determine impacts and doesn't underestimate the true impact.

My concerns include:

The study only includes one year of weather data as the base of its water quality models. Given how frequently and drastically these impact Mobile Bay watershed this is inadequate. The Corps must include at least three years of data to show how severe weather impacts the study's results;

The Corps must include studies about how pathogens, harmful algal blooms, and invasive species will enter Mobile Bay through a deeper channel;

The Corps must thoroughly review how the proposed project will generate new growth opportunities associated with the port that could have indirect impacts to our natural resources;

Ship wake analyses must be improved to include more accurate information (realistic ship sizes, weights, etc). The Corps needs to study the impacts on our aquatic life (oysters, seagrasses, etc.) and our shorelines from wave energy;

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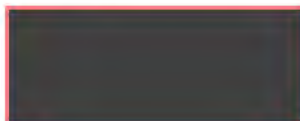
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Sincerely,



Fairhope, Alabama 36532

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**From:**   
**To:** [Newell, David P CIV CESAM CESAD \(US\)](#)  
**Subject:** [Non-DoD Source] My comments on the Mobile Ship Channel expansion DSEIS  
**Date:** Friday, September 14, 2018 3:21:09 PM

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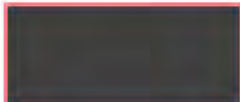
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Fairhope, Alabama 36532

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**From:**   
**To:** [Newell, David P CIV CESAM CESAD \(US\)](#)  
**Subject:** [Non-DoD Source] My comments on the Mobile Ship Channel expansion DSEIS  
**Date:** Friday, September 14, 2018 3:14:11 PM

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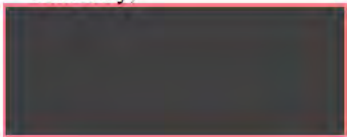
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