

Final Mobile Harbor GRR/SEIS Response Matrix

Revision Date: August 14, 2019

| Comment No. | Commenter Name | Date | Comment Summary | Response |
|-------------|-------------------|-----------|--|---|
| 1 | Mobile Bay Keeper | 5/10/2019 | <ul style="list-style-type: none"> Request for a 30 day comment period extension. | <ul style="list-style-type: none"> The USACE, Mobile District published its Notice of Availability (NOA) in the Federal Register on May 10, 2019 announcing the 30-day agency review period. In response to requests, the USACE, Mobile District extended the agency review period for an additional 7 days and 30 days with its NOA publications in the Federal Register on May 31, 2019, and June 11, 2019, respectively. |
| 2 | Daniel Deese | 5/10/2019 | <ul style="list-style-type: none"> What studies analyzed effects on sea grass and shellfish from material placement in relic shell mined areas? | <ul style="list-style-type: none"> Analysis of potential effects to submerged grassbeds, shellfish, and other environmental parameters can be found in Appendix C and Attachment C-1. |
| 3 | George Crozier | 5/12/2019 | <ul style="list-style-type: none"> SEIS web link does not appear to be working. | <ul style="list-style-type: none"> Upon receipt, SEIS web link was checked for accessibility. |
| 4 | Stan Graves | 5/13/2019 | <p>1. I submitted public comments concerning the GRR/SEIS and I wanted and expected that my name and address information to be included as part of my submission. The Mobile District has redacted my name and address from my public comments. This involves Comment 64 and 305. I did not give the Mobile District the authority nor authorized the Mobile District to alter my public comments. 2. In Comment 305, the Mobile District has further redacted information in the body of my public comments that therefore alters the document and I believe the Mobile District has committed a flagrant error by changing the content of my public comments. 3. Public Comments are submitted as public documents and the public recognizes that their information will be public and that includes information about the issues and concerns of the individuals as well as their names, etc. This is no different than public documents available about a trial, public records such as property taxes, etc. The Corps of Engineers is no different. The Mobile District is on trial for their project to widen and deepen the mobile ship channel and whether or not the Mobile District is meeting its obligation in the Second Addendum to the August 14, 2009 Lawsuit Settlement Agreement (LSA) of the Corps vs Dauphin Island Property Owners lawsuit. These are all public documents. 4. Therefore, by what authority does the Mobile District have the expressed right to alter public comments?</p> | <p>5/16/19 Col. Joly provided the following response: It is the policy of the Army to redact information from comments received from private individuals including their home address and telephone numbers or any other information deemed as Personal Identifiable Information (PII). With comments you have submitted, your home address, phone number, and email address was redacted to protect your PII pursuant to Army Policy. Your name appears on the comments submitted. Comments submitted are included in their entirety in Appendix E. In regards to comment number 305, that comment was inadvertently truncated from the PDF file inserted into Appendix E. The appendix has been corrected and revised to include your complete comment. The corrected Appendix E has been placed on the Mobile Harbor GRR website and available to the public. Please be aware that your PII has also been redacted from comment 305. However, you name does appear as the comment submitter. See response to comment 1 and 4. Under the Privacy Act of 1974, 5 U.S.C. 552a, each Agency of the Government promulgates its own rules and policies regarding collection and use of Personal Identifiable Information (PII). It is the policy of the Army to protect private citizen's PII in published documents. That generally includes information such as full name, applicant Taxpayer Identification Number (TIN) (i.e., Social Security Number (SSN) or Employer Identification Number (EIN)), mailing address (street, city, state, zip code), employment information, home & work telephone numbers. Because of the nature of the document we kept the names of the commenters but redacted other information deemed PII.</p> |
| 5 | Quapaw Nation | 5/16/2019 | <ul style="list-style-type: none"> Project is outside of the current area of interest for the Quapaw Nation; therefore, the Quapaw Nation offers no comment. | <ul style="list-style-type: none"> Comment noted. |
| 6 | Dan Norfleet | 5/20/2019 | <ul style="list-style-type: none"> Cost benefits analysis inaccurate. A transfer terminal south of Dauphin Island should be built as done in China, Germany, and Dubai. | <ul style="list-style-type: none"> Comment noted. Please see Appendix B of the Main Report for detailed cost benefits analysis. |
| 7 | Myers Jordan | 5/20/2019 | <ul style="list-style-type: none"> Requests extension to the 30-day public review of the Final GRR/SEIS. Commented that the GRR/SEIS was completed prior to the ACCP. | <ul style="list-style-type: none"> The USACE, Mobile District published its Notice of Availability (NOA) in the Federal Register on May 10, 2019 announcing the 30-day agency review period. In response to requests, the USACE, Mobile District extended the agency review period for an additional 7 days and 30 days with its NOA publications in the Federal Register on May 31, 2019, and June 11, 2019, respectively. The State of Alabama requested technical assistance from the USACE, Mobile District to prepare a Comprehensive Plan for coastal resiliency. The State of Alabama funded this effort 100%. The ACCP does not recommend any construction projects but is rather is a 50-year planning effort based upon constituent input. |

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| 8 | Stan Graves | 5/21/2019 | <ul style="list-style-type: none"> Request that public comment period be extend and additional 30 days, until July, 9, 2019. | <ul style="list-style-type: none"> The USACE, Mobile District published its Notice of Availability (NOA) in the Federal Register on May 10, 2019 announcing the 30-day agency review period. In response to requests, the USACE, Mobile District extended the agency review period for an additional 7 days and 30 days with its NOA publications in the Federal Register on May 31, 2019, and June 11, 2019, respectively. |
| 9 | DI Mayor Jeff Collier | 5/23/2019 | <ul style="list-style-type: none"> Requests extension of the review period. | <ul style="list-style-type: none"> The USACE, Mobile District published its Notice of Availability (NOA) in the Federal Register on May 10, 2019 announcing the 30-day agency review period. In response to requests, the USACE, Mobile District extended the agency review period for an additional 7 days and 30 days with its NOA publications in the Federal Register on May 31, 2019, and June 11, 2019, respectively. |
| 10 | SELC Keith Johnston | 5/25/2019 | <ul style="list-style-type: none"> Requests a 60-day extension of the review period. | <ul style="list-style-type: none"> The USACE, Mobile District published its Notice of Availability (NOA) in the Federal Register on May 10, 2019 announcing the 30-day agency review period. In response to requests, the USACE, Mobile District extended the agency review period for an additional 7 days and 30 days with its NOA publications in the Federal Register on May 31, 2019, and June 11, 2019, respectively. |
| 11 | NMFS-HCD January Murray | 5/28/2019 | <ul style="list-style-type: none"> NMFS Habitat Conservation Division maintains its position stated in the September, 7, 2018 correspondence for this project. | <ul style="list-style-type: none"> Comment noted. No further action required. |
| 12 | Stan Graves | 5/30/2019 | <ul style="list-style-type: none"> States the 7-day extension is not long enough and requests extension to July 9, 2019. | <ul style="list-style-type: none"> The USACE, Mobile District published its Notice of Availability (NOA) in the Federal Register on May 10, 2019 announcing the 30-day agency review period. In response to requests, the USACE, Mobile District extended the agency review period for an additional 7 days and 30 days with its NOA publications in the Federal Register on May 31, 2019, and June 11, 2019, respectively. |
| 13 | EPA Ntale Kajumba | 5/31/2019 | <ul style="list-style-type: none"> Requests summary response to the EPA comments and requests additional coordination regarding WQ modeling. | <ul style="list-style-type: none"> The USACE, Mobile District hosted several teleconferences and one webinar that included respective technical subject matter experts (SMEs) to proactively facilitate addressing EPA's comments on the Draft SEIS. In response, EPA concluded in the July 17, 2019 letter that all concerns were adequately addressed. |
| 14 | Stan Graves | 5/31/2019 | <ul style="list-style-type: none"> Why did the Mobile District not provide a 45 day public period? | <ul style="list-style-type: none"> The USACE, Mobile District published its Notice of Availability (NOA) in the Federal Register on May 10, 2019 announcing the 30-day agency review period. In response to requests, the USACE, Mobile District extended the agency review period for an additional 7 days and 30 days with its NOA publications in the Federal Register on May 31, 2019, and June 11, 2019, respectively. |
| 15 | Myrtle Jones | 6/3/2019 | <ul style="list-style-type: none"> Concerns regarding impacts on Mobile Bay ecosystem by past USACE/ASPA practices. National security concerns as terrorists may enter the country from foreign containers entering the port. | <ul style="list-style-type: none"> The findings of the USACE in relation to the effects of the recommended channel modifications on Coastal Sediment Transport are as presented Section 5.3.3 Sediment Transport, and Section 6.1.1.1. Effect on Coastal Sediment Transport. Comment noted. |
| 16 | Vaile Feemster - Dauphin Island Water and Sewer Authority | 6/3/2019 | <ul style="list-style-type: none"> Concerns regarding the project's potential effects on Dauphin Island's drinking-water supply. What if model is wrong and salt water intrusion into the aquifer prohibits the W&S Authority from properly treating the drinking water supply? | <ul style="list-style-type: none"> See Paragraph 5.6 Groundwater of the Main Report and additional details reflected within the ERRATA sheet for our findings of the channel modification effects on groundwater. |
| 17 | Ellyn Fill | 6/4/2019 | <ul style="list-style-type: none"> Requests removal from email list serve. | <ul style="list-style-type: none"> Comment noted. Name was removed from list serve. |

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| 18 | Caroline Graves | 6/7/2019 | <ul style="list-style-type: none"> • Concerns over navigation channel's impact on erosion/mitigation. • Concerns over the segmentation of the Federal Project. • Concerns over the dredge quantities and effectiveness of SIBUA. | <ul style="list-style-type: none"> • The USACE, Mobile District has maintained the Federal Mobile Harbor Navigation Project since 1826. Throughout this period, multiple intermittent actions have been required to improve and maintain this navigation project. As noted in its 2019 Environmental Assessment, SIBUA was expanded to the northwest to provide additional capacity for continued operations and maintenance material dredged from the Bar Channel. Maintenance operations will occur in the fall at the Bar Channel prior to USACE, Mobile District constructing modifications to the channel associated with the Mobile Harbor GRR/SEIS. As such, the USACE, Mobile District proceeded with the 2019 Environmental Assessment but informed the agencies and public numerous times throughout the Mobile Harbor GRR/SEIS of this effort and need for future capacity of maintenance material. • Our findings as related to the recommended channel modifications and SIBUA are presented in Section 2.4.3.1.3 Bar Channel, Section 2.4.4.3. SIBUA for the Bar Channel, and Section 4.2.2.3 SIBUA for the Bar Channel. Additional Information on SIBUA can be found in paragraphs 5.3.3. Sediment Transport, Section 5.26.1 Monitoring, 5.7 Dredging and Placement Areas, and 6.1 Cumulative Impacts. |
| 19 | Caroline Graves | 6/7/2019 | <ul style="list-style-type: none"> • Concerns regarding segmentation of Federal projects related to Mobile Harbor GRR/SEIS and effectiveness of the SIBUA. | <ul style="list-style-type: none"> • The USACE, Mobile District has historically maintained the Federal Mobile Harbor Navigation Project since 1826. Throughout this period, multiple intermittent actions have been required to improve and maintain this navigation project. As noted in its 2019 Environmental Assessment, SIBUA was expanded to the northwest to provide additional capacity for continued operations and maintenance material dredged from the Bar Channel. Maintenance operations were undertaken at the Bar Channel prior to USACE, Mobile District concluding the Mobile Harbor GRR/SEIS in November 2020. As such, the USACE, Mobile District proceeded with the 2019 Environmental Assessment but informed the agencies and public numerous times throughout the Mobile Harbor GRR/SEIS of this effort and need for future capacity of maintenance material. The Upper Mobile Bay Beneficial Use Emergent Tidal Marsh Site is a preliminary concept for maintenance material but is not being pursued by USACE, Mobile District. • Our findings as related to the recommended channel modifications and SIBUA are presented in Section 2.4.3.1.3 Bar Channel, Section 2.4.4.3. SIBUA for the Bar Channel, and Section 4.2.2.3 SIBUA for the Bar Channel. Additional Information on SIBUA can be found in paragraphs 5.3.3. Sediment Transport, Section 5.26.1 Monitoring, and 5.7 Dredging and Placement Areas, and 6.1 Cumulative Impacts. |
| 20 | Caroline Graves | 6/7/2019 | <ul style="list-style-type: none"> • Concerns over navigation channel's impact on erosion/mitigation. • Concerns over the dredge quantities and effectiveness of SIBUA. | <ul style="list-style-type: none"> • The findings of the USACE in relation to the effects of the recommended channel modifications on Coastal Sediment Transport are as presented Section 5.3.3 Sediment Transport, and Section 6.1.1.1. Effect on Coastal Sediment Transport. • Our findings as related to the recommended channel modifications and SIBUA are presented in Section 2.4.3.1.3 Bar Channel, Section 2.4.4.3. SIBUA for the Bar Channel, and Section 4.2.2.3 SIBUA for the Bar Channel. Additional Information on SIBUA can be found in paragraphs 5.3.3. Sediment Transport, Section 5.26.1 Monitoring, and 5.7 Dredging and Placement Areas. |

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| 21 | Caroline Graves | 6/7/2019 | <ul style="list-style-type: none"> Concerns over navigation channel's impact on erosion/mitigation. Concerns over the dredge quantities and effectiveness of SIBUA. | <ul style="list-style-type: none"> The findings of the USACE in relation to the effects of the recommended channel modifications on Coastal Sediment Transport are as presented Section 5.3.3 Sediment Transport, and Section 6.1.1.1. Effect on Coastal Sediment Transport. Our findings as related to the recommended channel modifications and SIBUA are presented in Section 2.4.3.1.3 Bar Channel, Section 2.4.4.3. SIBUA for the Bar Channel, and Section 4.2.2.3 SIBUA for the Bar Channel. Additional Information on SIBUA can be found in paragraphs 5.3.3. Sediment Transport, Section 5.26.1 Monitoring, and 5.7 Dredging and Placement Areas. |
| 22 | Caroline Graves | 6/7/2019 | <ul style="list-style-type: none"> Concerns over navigation channel's impact on erosion/mitigation. Concerns over the dredge quantities and effectiveness of SIBUA. | <ul style="list-style-type: none"> Our findings as related to the recommended channel modifications and SIBUA are presented in Section 2.4.3.1.3 Bar Channel, Section 2.4.4.3. SIBUA for the Bar Channel, and Section 4.2.2.3 SIBUA for the Bar Channel. Additional Information on SIBUA can be found in paragraphs 5.3.3. Sediment Transport, Section 5.26.1 Monitoring, and 5.7 Dredging and Placement Areas. |
| 23 | Caroline Graves | 6/7/2019 | <ul style="list-style-type: none"> Concerns over the dredge quantities and effectiveness of SIBUA. | <ul style="list-style-type: none"> The findings of the USACE in relation to the effects of the recommended channel modifications on Coastal Sediment Transport are as presented Section 5.3.3 Sediment Transport, and Section 6.1.1.1. Effect on Coastal Sediment Transport. Our findings as related to the recommended channel modifications and SIBUA are presented in Section 2.4.3.1.3 Bar Channel, Section 2.4.4.3. SIBUA for the Bar Channel, and Section 4.2.2.3 SIBUA for the Bar Channel. Additional Information on SIBUA can be found in paragraphs 5.3.3. Sediment Transport, Section 5.26.1 Monitoring, and 5.7 Dredging and Placement Areas. |
| 24 | Caroline Graves | 6/7/2019 | <ul style="list-style-type: none"> Presents economic justification for mitigation. | <ul style="list-style-type: none"> See Section 4.2.3.3 Direct Placement on Dauphin Island Beaches and Section 5.26.1 Monitoring |
| 25 | Caroline Graves | 6/7/2019 | <ul style="list-style-type: none"> Concern over the effectiveness of SIBUA. | <ul style="list-style-type: none"> Our findings as related to the recommended channel modifications and SIBUA are presented in Section 2.4.3.1.3 Bar Channel, Section 2.4.4.3. SIBUA for the Bar Channel, and Section 4.2.2.3 SIBUA for the Bar Channel. Additional Information on SIBUA can be found in paragraphs 5.3.3. Sediment Transport, Section 5.26.1 Monitoring, and 5.7 Dredging and Placement Areas. |
| 26 | Caroline Graves | 6/7/2019 | <ul style="list-style-type: none"> Concern over monitoring and effectiveness of SIBUA Northwest Extension. | <ul style="list-style-type: none"> Our findings as related to the recommended channel modifications and SIBUA are presented in Section 2.4.3.1.3 Bar Channel, Section 2.4.4.3. SIBUA for the Bar Channel, and Section 4.2.2.3 SIBUA for the Bar Channel. Additional Information on SIBUA can be found in paragraphs 5.3.3. Sediment Transport, Section 5.26.1 Monitoring, and 5.7 Dredging and Placement Areas. |
| 27 | Caroline Graves | 6/7/2019 | <ul style="list-style-type: none"> Concerns over the dredge quantities and effectiveness of SIBUA. | <ul style="list-style-type: none"> Our findings as related to the recommended channel modifications and SIBUA are presented in Section 2.4.3.1.3 Bar Channel, Section 2.4.4.3. SIBUA for the Bar Channel, and Section 4.2.2.3 SIBUA for the Bar Channel. Additional Information on SIBUA can be found in paragraphs 5.3.3. Sediment Transport, Section 5.26.1 Monitoring, and 5.7 Dredging and Placement Areas. |

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| 28 | Anne Drury | 6/9/2019 | <ul style="list-style-type: none"> • Why in the 2019 SEIS/GRR Mobile Harbor report did the Corps omitted the fact in the Corps' 1978 Erosion study, which determine that the erosion of the 11 westernmost miles of Dauphin Island were the result of the removal of sand from the littoral drift system through maintenance dredging. • Why in the 2019 SEIS/GRR Mobile Harbor report did the Corps omitted the fact that the Corps left-out the erosion impacts to Dauphin Island 1980 EIS and the Corps failure to comply with the 1935 law in the 1980EIS/Mobile Harbor Survey Report. • Why in the 2019 SEIS/GRR Mobile Harbor report did the Corps omitted that the 1980 Environmental Impact Statement study was invalid and not legal. • Why in the 2019 SEIS/GRR Mobile Harbor report did the Corps omitted the Corps' False statements they put in Federal Documents that all "impacts to the Mobile Harbor were addressed in an Environmental Impact Statement (EIS) dated October, 1980". • Why in the 2019 SEIS/GRR Mobile Harbor report did the Corps omitted the fact that the Corps is restricting the investigations into Dauphin Island's erosion and past sand/land losses to Island the SEIS/GRR. • Why in the 2019 SEIS/GRR Mobile Harbor report did the Corps omitted all of the facts of the past severe erosional impacts to the Island starting in the 1990's, after first phase of the channel deepening was completed in 1990 that was authorized by the 1986 WRDA. • Why in the 2019 SEIS/GRR Mobile Harbor report did the Corps omitted the USGS study's critical information about the erosion on Dauphin Island, which reflects that five time the amount of sediment was eroded from the Island than got to the Island because of the Corps dredging. 1987-2006: 915,565cys/y of sediment was dredged, which reduced the net sand available to migrate to the Island's western shore face. | <ul style="list-style-type: none"> • Comments similar in context were received on the Draft SEIS and addressed in the Final SEIS. Based upon Engineering Regulation 200-2-2, no additional response will be provided given no substantive issues are raised which have not previously been address in the SEIS. |
| 29 | Caroline Graves | 6/9/2019 | <ul style="list-style-type: none"> • Concern over coastal sediment transport modeling. | <ul style="list-style-type: none"> • The coastal sediment transport modeling conducted as part of the Mobile Harbor GRR was initially developed by the USGS as part of the Alabama Barrier Island Restoration Assessment. This model was refined specifically for the Mobile Harbor GRR to evaluate potential impacts to the ebb-tidal shoal and near shore coastal areas (including dauphin island) from deepening and widening the navigation channel. This effort did not utilize work previously performed by Byrnes et al 2008/2010. See Appendix A, Attachment A-2 for additional modeling information. |
| 30 | Caroline Graves | 6/9/2019 | <ul style="list-style-type: none"> • Concerns over navigation channel's impact on erosion/need for mitigation. | <ul style="list-style-type: none"> • The findings of the USACE in relation to the effects of the recommended channel modifications on Coastal Sediment Transport are as presented Section 5.3.3 Sediment Transport, and Section 6.1.1.1. Effect on Coastal Sediment Transport. |
| 31 | Caroline Graves | 6/9/2019 | <ul style="list-style-type: none"> • Concerns over navigation channel's impact on erosion/need for mitigation. | <ul style="list-style-type: none"> • The findings of the USACE in relation to the effects of the recommended channel modifications on Coastal Sediment Transport are as presented Section 5.3.3 Sediment Transport, and Section 6.1.1.1. Effect on Coastal Sediment Transport. |

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| 32 | Brandi Schmidt | 6/10/2019 | <ul style="list-style-type: none"> • Why in the 2019 SEIS/GRR Mobile Harbor report did the Corps omitted the fact in the Corps' 1978 Erosion study, which determine that the erosion of the 11 westernmost miles of Dauphin Island were the result of the removal of sand from the littoral drift system through maintenance dredging. • Why in the 2019 SEIS/GRR Mobile Harbor report did the Corps omitted the fact that the Corps left-out the erosion impacts to Dauphin Island 1980 EIS and the Corps failure to comply with the 1935 law in the 1980EIS/Mobile Harbor Survey Report. • Why in the 2019 SEIS/GRR Mobile Harbor report did the Corps omitted that the 1980 Environmental Impact Statement study was invalid and not legal. • Why in the 2019 SEIS/GRR Mobile Harbor report did the Corps omitted the Corps' False statements they put in Federal Documents that all "impacts to the Mobile Harbor were addressed in an Environmental Impact Statement (EIS) dated October, 1980". • Why in the 2019 SEIS/GRR Mobile Harbor report did the Corps omitted the fact that the Corps is restricting the investigations into Dauphin Island's erosion and past sand/land losses to Island the SEIS/GRR. • Why in the 2019 SEIS/GRR Mobile Harbor report did the Corps omitted all of the facts of the past severe erosional impacts to the Island starting in the 1990's, after first phase of the channel deepening was completed in 1990 that was authorized by the 1986 WRDA. • Why in the 2019 SEIS/GRR Mobile Harbor report did the Corps omitted the USGS study's critical information about the erosion on Dauphin Island, which reflects that five time the amount of sediment was eroded from the Island than got to the Island because of the Corps dredging. 1987-2006: 915,565cys/y of sediment was dredged, which reduced the net sand available to migrate to the Island's western shore face. | • See comment response #28. |
| 33 | Judy Denise Preston | 6/10/2019 | <ul style="list-style-type: none"> • Why in the 2019 SEIS/GRR Mobile Harbor report did the Corps omitted the fact in the Corps' 1978 Erosion study, which determine that the erosion of the 11 westernmost miles of Dauphin Island were the result of the removal of sand from the littoral drift system through maintenance dredging. • Why in the 2019 SEIS/GRR Mobile Harbor report did the Corps omitted the fact that the Corps left-out the erosion impacts to Dauphin Island 1980 EIS and the Corps failure to comply with the 1935 law in the 1980EIS/Mobile Harbor Survey Report. • Why in the 2019 SEIS/GRR Mobile Harbor report did the Corps omitted that the 1980 Environmental Impact Statement study was invalid and not legal. • Why in the 2019 SEIS/GRR Mobile Harbor report did the Corps omitted the Corps' False statements they put in Federal Documents that all "impacts to the Mobile Harbor were addressed in an Environmental Impact Statement (EIS) dated October, 1980". • Why in the 2019 SEIS/GRR Mobile Harbor report did the Corps omitted the fact that the Corps is restricting the investigations into Dauphin Island's erosion and past sand/land losses to Island the SEIS/GRR. • Why in the 2019 SEIS/GRR Mobile Harbor report did the Corps omitted all of the facts of the past severe erosional impacts to the Island starting in the 1990's, after first phase of the channel deepening was completed in 1990 that was authorized by the 1986 WRDA. • Why in the 2019 SEIS/GRR Mobile Harbor report did the Corps omitted the USGS study's critical information about the erosion on Dauphin Island, which reflects that five time the amount of sediment was eroded from the Island than got to the Island because of the Corps dredging. 1987-2006: 915,565cys/y of sediment was dredged, which reduced the net sand available to migrate to the Island's western shore face. | • See comment response #28. |

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| 34 | Mike Greer | 6/10/2019 | <ul style="list-style-type: none"> • Why in the 2019 SEIS/GRR Mobile Harbor report did the Corps omitted the fact in the Corps' 1978 Erosion study, which determine that the erosion of the 11 westernmost miles of Dauphin Island were the result of the removal of sand from the littoral drift system through maintenance dredging. • Why in the 2019 SEIS/GRR Mobile Harbor report did the Corps omitted the fact that the Corps left-out the erosion impacts to Dauphin Island 1980 EIS and the Corps failure to comply with the 1935 law in the 1980EIS/Mobile Harbor Survey Report. • Why in the 2019 SEIS/GRR Mobile Harbor report did the Corps omitted that the 1980 Environmental Impact Statement study was invalid and not legal. • Why in the 2019 SEIS/GRR Mobile Harbor report did the Corps omitted the Corps' False statements they put in Federal Documents that all "impacts to the Mobile Harbor were addressed in an Environmental Impact Statement (EIS) dated October, 1980". • Why in the 2019 SEIS/GRR Mobile Harbor report did the Corps omitted the fact that the Corps is restricting the investigations into Dauphin Island's erosion and past sand/land losses to Island the SEIS/GRR. • Why in the 2019 SEIS/GRR Mobile Harbor report did the Corps omitted all of the facts of the past severe erosional impacts to the Island starting in the 1990's, after first phase of the channel deepening was completed in 1990 that was authorized by the 1986 WRDA. • Why in the 2019 SEIS/GRR Mobile Harbor report did the Corps omitted the USGS study's critical information about the erosion on Dauphin Island, which reflects that five time the amount of sediment was eroded from the Island than got to the Island because of the Corps dredging. 1987-2006: 915,565cys/y of sediment was dredged, which reduced the net sand available to migrate to the Island's western shore face. | <ul style="list-style-type: none"> • See comment response #28. |
| 35 | Myers Jordan | 6/10/2019 | <ul style="list-style-type: none"> • Why in the 2019 SEIS/GRR Mobile Harbor report did the Corps omitted the fact in the Corps' 1978 Erosion study, which determine that the erosion of the 11 westernmost miles of Dauphin Island were the result of the removal of sand from the littoral drift system through maintenance dredging. • Why in the 2019 SEIS/GRR Mobile Harbor report did the Corps omitted the fact that the Corps left-out the erosion impacts to Dauphin Island 1980 EIS and the Corps failure to comply with the 1935 law in the 1980EIS/Mobile Harbor Survey Report. • Why in the 2019 SEIS/GRR Mobile Harbor report did the Corps omitted that the 1980 Environmental Impact Statement study was invalid and not legal. • Why in the 2019 SEIS/GRR Mobile Harbor report did the Corps omitted the Corps' False statements they put in Federal Documents that all "impacts to the Mobile Harbor were addressed in an Environmental Impact Statement (EIS) dated October, 1980". • Why in the 2019 SEIS/GRR Mobile Harbor report did the Corps omitted the fact that the Corps is restricting the investigations into Dauphin Island's erosion and past sand/land losses to Island the SEIS/GRR. • Why in the 2019 SEIS/GRR Mobile Harbor report did the Corps omitted all of the facts of the past severe erosional impacts to the Island starting in the 1990's, after first phase of the channel deepening was completed in 1990 that was authorized by the 1986 WRDA. • Why in the 2019 SEIS/GRR Mobile Harbor report did the Corps omitted the USGS study's critical information about the erosion on Dauphin Island, which reflects that five time the amount of sediment was eroded from the Island than got to the Island because of the Corps dredging. 1987-2006: 915,565cys/y of sediment was dredged, which reduced the net sand available to migrate to the Island's western shore face. | <ul style="list-style-type: none"> • See comment response #28. |

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| 36 | Robert Neal | 6/10/2019 | <ul style="list-style-type: none"> • Why in the 2019 SEIS/GRR Mobile Harbor report did the Corps omitted the fact in the Corps' 1978 Erosion study, which determine that the erosion of the 11 westernmost miles of Dauphin Island were the result of the removal of sand from the littoral drift system through maintenance dredging. • Why in the 2019 SEIS/GRR Mobile Harbor report did the Corps omitted the fact that the Corps left-out the erosion impacts to Dauphin Island 1980 EIS and the Corps failure to comply with the 1935 law in the 1980EIS/Mobile Harbor Survey Report. • Why in the 2019 SEIS/GRR Mobile Harbor report did the Corps omitted that the 1980 Environmental Impact Statement study was invalid and not legal. • Why in the 2019 SEIS/GRR Mobile Harbor report did the Corps omitted the Corps' False statements they put in Federal Documents that all "impacts to the Mobile Harbor were addressed in an Environmental Impact Statement (EIS) dated October, 1980". • Why in the 2019 SEIS/GRR Mobile Harbor report did the Corps omitted the fact that the Corps is restricting the investigations into Dauphin Island's erosion and past sand/land losses to Island the SEIS/GRR. • Why in the 2019 SEIS/GRR Mobile Harbor report did the Corps omitted all of the facts of the past severe erosional impacts to the Island starting in the 1990's, after first phase of the channel deepening was completed in 1990 that was authorized by the 1986 WRDA. • Why in the 2019 SEIS/GRR Mobile Harbor report did the Corps omitted the USGS study's critical information about the erosion on Dauphin Island, which reflects that five time the amount of sediment was eroded from the Island than got to the Island because of the Corps dredging. 1987-2006: 915,565cys/y of sediment was dredged, which reduced the net sand available to migrate to the Island's western shore face. | • See comment response #28. |
| 37 | Susan Strickler | 6/10/2019 | <ul style="list-style-type: none"> • Why in the 2019 SEIS/GRR Mobile Harbor report did the Corps omitted the fact in the Corps' 1978 Erosion study, which determine that the erosion of the 11 westernmost miles of Dauphin Island were the result of the removal of sand from the littoral drift system through maintenance dredging. • Why in the 2019 SEIS/GRR Mobile Harbor report did the Corps omitted the fact that the Corps left-out the erosion impacts to Dauphin Island 1980 EIS and the Corps failure to comply with the 1935 law in the 1980EIS/Mobile Harbor Survey Report. • Why in the 2019 SEIS/GRR Mobile Harbor report did the Corps omitted that the 1980 Environmental Impact Statement study was invalid and not legal. • Why in the 2019 SEIS/GRR Mobile Harbor report did the Corps omitted the Corps' False statements they put in Federal Documents that all "impacts to the Mobile Harbor were addressed in an Environmental Impact Statement (EIS) dated October, 1980". • Why in the 2019 SEIS/GRR Mobile Harbor report did the Corps omitted the fact that the Corps is restricting the investigations into Dauphin Island's erosion and past sand/land losses to Island the SEIS/GRR. • Why in the 2019 SEIS/GRR Mobile Harbor report did the Corps omitted all of the facts of the past severe erosional impacts to the Island starting in the 1990's, after first phase of the channel deepening was completed in 1990 that was authorized by the 1986 WRDA. • Why in the 2019 SEIS/GRR Mobile Harbor report did the Corps omitted the USGS study's critical information about the erosion on Dauphin Island, which reflects that five time the amount of sediment was eroded from the Island than got to the Island because of the Corps dredging. 1987-2006: 915,565cys/y of sediment was dredged, which reduced the net sand available to migrate to the Island's western shore face. | • See comment response #28. |

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| 38 | William Stevens | 6/10/2019 | <ul style="list-style-type: none"> • Why in the 2019 SEIS/GRR Mobile Harbor report did the Corps omitted the fact in the Corps' 1978 Erosion study, which determine that the erosion of the 11 westernmost miles of Dauphin Island were the result of the removal of sand from the littoral drift system through maintenance dredging. • Why in the 2019 SEIS/GRR Mobile Harbor report did the Corps omitted the fact that the Corps left-out the erosion impacts to Dauphin Island 1980 EIS and the Corps failure to comply with the 1935 law in the 1980EIS/Mobile Harbor Survey Report. • Why in the 2019 SEIS/GRR Mobile Harbor report did the Corps omitted that the 1980 Environmental Impact Statement study was invalid and not legal. • Why in the 2019 SEIS/GRR Mobile Harbor report did the Corps omitted the Corps' False statements they put in Federal Documents that all "impacts to the Mobile Harbor were addressed in an Environmental Impact Statement (EIS) dated October, 1980". • Why in the 2019 SEIS/GRR Mobile Harbor report did the Corps omitted the fact that the Corps is restricting the investigations into Dauphin Island's erosion and past sand/land losses to Island the SEIS/GRR. • Why in the 2019 SEIS/GRR Mobile Harbor report did the Corps omitted all of the facts of the past severe erosional impacts to the Island starting in the 1990's, after first phase of the channel deepening was completed in 1990 that was authorized by the 1986 WRDA. • Why in the 2019 SEIS/GRR Mobile Harbor report did the Corps omitted the USGS study's critical information about the erosion on Dauphin Island, which reflects that five time the amount of sediment was eroded from the Island than got to the Island because of the Corps dredging. 1987-2006: 915,565cys/y of sediment was dredged, which reduced the net sand available to migrate to the Island's western shore face. | • See comment response #28. |
| 39 | Dwight Fierle | 6/11/2019 | <ul style="list-style-type: none"> • Why in the 2019 SEIS/GRR Mobile Harbor report did the Corps omitted the fact in the Corps' 1978 Erosion study, which determine that the erosion of the 11 westernmost miles of Dauphin Island were the result of the removal of sand from the littoral drift system through maintenance dredging. • Why in the 2019 SEIS/GRR Mobile Harbor report did the Corps omitted the fact that the Corps left-out the erosion impacts to Dauphin Island 1980 EIS and the Corps failure to comply with the 1935 law in the 1980EIS/Mobile Harbor Survey Report. • Why in the 2019 SEIS/GRR Mobile Harbor report did the Corps omitted that the 1980 Environmental Impact Statement study was invalid and not legal. • Why in the 2019 SEIS/GRR Mobile Harbor report did the Corps omitted the Corps' False statements they put in Federal Documents that all "impacts to the Mobile Harbor were addressed in an Environmental Impact Statement (EIS) dated October, 1980". • Why in the 2019 SEIS/GRR Mobile Harbor report did the Corps omitted the fact that the Corps is restricting the investigations into Dauphin Island's erosion and past sand/land losses to Island the SEIS/GRR. • Why in the 2019 SEIS/GRR Mobile Harbor report did the Corps omitted all of the facts of the past severe erosional impacts to the Island starting in the 1990's, after first phase of the channel deepening was completed in 1990 that was authorized by the 1986 WRDA. • Why in the 2019 SEIS/GRR Mobile Harbor report did the Corps omitted the USGS study's critical information about the erosion on Dauphin Island, which reflects that five time the amount of sediment was eroded from the Island than got to the Island because of the Corps dredging. 1987-2006: 915,565cys/y of sediment was dredged, which reduced the net sand available to migrate to the Island's western shore face. | • See comment response #28. |

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| 40 | Ruth Anne Foote | 6/11/2019 | <ul style="list-style-type: none"> • Why in the 2019 SEIS/GRR Mobile Harbor report did the Corps omitted the fact in the Corps' 1978 Erosion study, which determine that the erosion of the 11 westernmost miles of Dauphin Island were the result of the removal of sand from the littoral drift system through maintenance dredging. • Why in the 2019 SEIS/GRR Mobile Harbor report did the Corps omitted the fact that the Corps left-out the erosion impacts to Dauphin Island 1980 EIS and the Corps failure to comply with the 1935 law in the 1980EIS/Mobile Harbor Survey Report. • Why in the 2019 SEIS/GRR Mobile Harbor report did the Corps omitted that the 1980 Environmental Impact Statement study was invalid and not legal. • Why in the 2019 SEIS/GRR Mobile Harbor report did the Corps omitted the Corps' False statements they put in Federal Documents that all "impacts to the Mobile Harbor were addressed in an Environmental Impact Statement (EIS) dated October, 1980". • Why in the 2019 SEIS/GRR Mobile Harbor report did the Corps omitted the fact that the Corps is restricting the investigations into Dauphin Island's erosion and past sand/land losses to Island the SEIS/GRR. • Why in the 2019 SEIS/GRR Mobile Harbor report did the Corps omitted all of the facts of the past severe erosional impacts to the Island starting in the 1990's, after first phase of the channel deepening was completed in 1990 that was authorized by the 1986 WRDA. • Why in the 2019 SEIS/GRR Mobile Harbor report did the Corps omitted the USGS study's critical information about the erosion on Dauphin Island, which reflects that five time the amount of sediment was eroded from the Island than got to the Island because of the Corps dredging. 1987-2006: 915,565cys/y of sediment was dredged, which reduced the net sand available to migrate to the Island's western shore face. | • See comment response #28. |
| 41 | Tom Brennen | 6/11/2019 | <ul style="list-style-type: none"> • Why in the 2019 SEIS/GRR Mobile Harbor report did the Corps omitted the fact in the Corps' 1978 Erosion study, which determine that the erosion of the 11 westernmost miles of Dauphin Island were the result of the removal of sand from the littoral drift system through maintenance dredging. • Why in the 2019 SEIS/GRR Mobile Harbor report did the Corps omitted the fact that the Corps left-out the erosion impacts to Dauphin Island 1980 EIS and the Corps failure to comply with the 1935 law in the 1980EIS/Mobile Harbor Survey Report. • Why in the 2019 SEIS/GRR Mobile Harbor report did the Corps omitted that the 1980 Environmental Impact Statement study was invalid and not legal. • Why in the 2019 SEIS/GRR Mobile Harbor report did the Corps omitted the Corps' False statements they put in Federal Documents that all "impacts to the Mobile Harbor were addressed in an Environmental Impact Statement (EIS) dated October, 1980". • Why in the 2019 SEIS/GRR Mobile Harbor report did the Corps omitted the fact that the Corps is restricting the investigations into Dauphin Island's erosion and past sand/land losses to Island the SEIS/GRR. • Why in the 2019 SEIS/GRR Mobile Harbor report did the Corps omitted all of the facts of the past severe erosional impacts to the Island starting in the 1990's, after first phase of the channel deepening was completed in 1990 that was authorized by the 1986 WRDA. • Why in the 2019 SEIS/GRR Mobile Harbor report did the Corps omitted the USGS study's critical information about the erosion on Dauphin Island, which reflects that five time the amount of sediment was eroded from the Island than got to the Island because of the Corps dredging. 1987-2006: 915,565cys/y of sediment was dredged, which reduced the net sand available to migrate to the Island's western shore face. | • See comment response #28. |

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| 42 | Ashlee Becker | 6/12/2019 | <ul style="list-style-type: none"> •The study's assumption that fewer ships will enter the port if the channel is deepened and widened. This is especially problematic as this assumption drives the ship wake analysis and air quality studies. •Indirect and cumulative impacts resulting from expanding the port are not fully evaluated. •The ship wake analysis does not use realistic information (ship sizes, weights, speeds, etc.). The analysis also does not factor in how ship wakes will impact our marine life and shorelines. •The Corps has omitted or not adequately incorporated research available on the Bay (oysters, manatees, etc.) conducted by local scientists. •The 25% increase in truck traffic forecasted by the study will directly impact low income communities. The Corps has not acknowledged these impacts. •The study's consideration of air quality impacts is very inadequate. This is a clear violation of NEPA. The Corps' conclusion of "no impact" on the environment is unfounded given the flaws noted above and the magnitude of the proposed project. | <ul style="list-style-type: none"> • Due to the number of Post Panamax vessels in the world fleet and the opening of the Panama Canal expansion, the transition of larger vessels to the US Gulf Coast is anticipated to occur with or without the proposed channel deepening. However, previous navigation analyses have demonstrated that channel improvements alone will not have an impact on the forecasted demand of commodities handled at a particular port. The proposed channel improvements at Mobile Harbor would allow for those commodities that are currently transported through the harbor to move more efficiently. With the ability of these vessels calling on the harbor to transit more efficiently (carrying additional cargo per call), the total number of vessels required to meet the anticipated demand at Mobile Harbor during the period of analysis will decrease compared to the current channel configuration. • Section 6.1 Cumulative Impacts presents our findings of indirect and cumulative impacts. • Allen (2018), provided as Attachment A-4, Appendix A, utilized a complex and comprehensive field investigation of vessel generated wave energy (VGWE). The VGWE analysis presented used best available science methodologies and incorporated new and innovative approaches allowing more data availability than previous studies. Inaccuracies are inherent in any field investigation and Allen (2018) has acknowledged where these inaccuracies are likely to occur along with sensitivity testing which showed no significant impact. No evaluation of VGWE impacts to oysters and SAVs was completed as Allen (2018) found no increase in VGWE to warrant further investigation of impacts. |
| | Comment 42 Continued... | | | <ul style="list-style-type: none"> • See Section 3.8.9.2.1.1. Additional Oyster Larvae Tracking Assessment and Chapter 5 Appendix C Attachment C-1. Additional coordination and meetings were conducted with local scientists to ensure the best available science was utilized. • The 25% increase in traffic is due to the build out of the container terminal which will happen with or without the proposed action. The impacts associated with implementation of the proposed action and the associated transport and handling of hazardous materials would be minimal. See Section 5.23.1 Environmental Justice of the Main Report for further details. • Section 5.14 Air Quality presents our findings on the effects of recommended channel modifications on air quality. |
| 43 | Elizabeth Jellett | 6/12/2019 | <ul style="list-style-type: none"> •The study's assumption that fewer ships will enter the port if the channel is deepened and widened. This is especially problematic as this assumption drives the ship wake analysis and air quality studies. •Indirect and cumulative impacts resulting from expanding the port are not fully evaluated. •The ship wake analysis does not use realistic information (ship sizes, weights, speeds, etc.). The analysis also does not factor in how ship wakes will impact our marine life and shorelines. •The Corps has omitted or not adequately incorporated research available on the Bay (oysters, manatees, etc.) conducted by local scientists. •The 25% increase in truck traffic forecasted by the study will directly impact low income communities. The Corps has not acknowledged these impacts. •The study's consideration of air quality impacts is very inadequate. This is a clear violation of NEPA. The Corps' conclusion of "no impact" on the environment is unfounded given the flaws noted above and the magnitude of the proposed project. | <ul style="list-style-type: none"> • See comment response #42. |

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| 44 | Ilka Porter | 6/12/2019 | <ul style="list-style-type: none"> •The study's assumption that fewer ships will enter the port if the channel is deepened and widened. This is especially problematic as this assumption drives the ship wake analysis and air quality studies. •Indirect and cumulative impacts resulting from expanding the port are not fully evaluated. •The ship wake analysis does not use realistic information (ship sizes, weights, speeds, etc.). The analysis also does not factor in how ship wakes will impact our marine life and shorelines. •The Corps has omitted or not adequately incorporated research available on the Bay (oysters, manatees, etc.) conducted by local scientists. •The 25% increase in truck traffic forecasted by the study will directly impact low income communities. The Corps has not acknowledged these impacts. •The study's consideration of air quality impacts is very inadequate. This is a clear violation of NEPA. The Corps' conclusion of "no impact" on the environment is unfounded given the flaws noted above and the magnitude of the proposed project. | • See comment response #42. |
| 45 | James McClure | 6/12/2019 | <ul style="list-style-type: none"> •The study's assumption that fewer ships will enter the port if the channel is deepened and widened. This is especially problematic as this assumption drives the ship wake analysis and air quality studies. •Indirect and cumulative impacts resulting from expanding the port are not fully evaluated. •The ship wake analysis does not use realistic information (ship sizes, weights, speeds, etc.). The analysis also does not factor in how ship wakes will impact our marine life and shorelines. •The Corps has omitted or not adequately incorporated research available on the Bay (oysters, manatees, etc.) conducted by local scientists. •The 25% increase in truck traffic forecasted by the study will directly impact low income communities. The Corps has not acknowledged these impacts. •The study's consideration of air quality impacts is very inadequate. This is a clear violation of NEPA. The Corps' conclusion of "no impact" on the environment is unfounded given the flaws noted above and the magnitude of the proposed project. | • See comment response #42. |
| 46 | Jep Hill | 6/12/2019 | <ul style="list-style-type: none"> •The study's assumption that fewer ships will enter the port if the channel is deepened and widened. This is especially problematic as this assumption drives the ship wake analysis and air quality studies. •Indirect and cumulative impacts resulting from expanding the port are not fully evaluated. •The ship wake analysis does not use realistic information (ship sizes, weights, speeds, etc.). The analysis also does not factor in how ship wakes will impact our marine life and shorelines. •The Corps has omitted or not adequately incorporated research available on the Bay (oysters, manatees, etc.) conducted by local scientists. •The 25% increase in truck traffic forecasted by the study will directly impact low income communities. The Corps has not acknowledged these impacts. •The study's consideration of air quality impacts is very inadequate. This is a clear violation of NEPA. The Corps' conclusion of "no impact" on the environment is unfounded given the flaws noted above and the magnitude of the proposed project. | • See comment response #42. |
| 47 | Joe Anthony | 6/12/2019 | <ul style="list-style-type: none"> •The study's assumption that fewer ships will enter the port if the channel is deepened and widened. This is especially problematic as this assumption drives the ship wake analysis and air quality studies. •Indirect and cumulative impacts resulting from expanding the port are not fully evaluated. •The ship wake analysis does not use realistic information (ship sizes, weights, speeds, etc.). The analysis also does not factor in how ship wakes will impact our marine life and shorelines. •The Corps has omitted or not adequately incorporated research available on the Bay (oysters, manatees, etc.) conducted by local scientists. •The 25% increase in truck traffic forecasted by the study will directly impact low income communities. The Corps has not acknowledged these impacts. •The study's consideration of air quality impacts is very inadequate. This is a clear violation of NEPA. The Corps' conclusion of "no impact" on the environment is unfounded given the flaws noted above and the magnitude of the proposed project. | • See comment response #42. |

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| 48 | Laura Steele | 6/12/2019 | <ul style="list-style-type: none"> •The study's assumption that fewer ships will enter the port if the channel is deepened and widened. This is especially problematic as this assumption drives the ship wake analysis and air quality studies. •Indirect and cumulative impacts resulting from expanding the port are not fully evaluated. •The ship wake analysis does not use realistic information (ship sizes, weights, speeds, etc.). The analysis also does not factor in how ship wakes will impact our marine life and shorelines. •The Corps has omitted or not adequately incorporated research available on the Bay (oysters, manatees, etc.) conducted by local scientists. •The 25% increase in truck traffic forecasted by the study will directly impact low income communities. The Corps has not acknowledged these impacts. •The study's consideration of air quality impacts is very inadequate. This is a clear violation of NEPA. The Corps' conclusion of "no impact" on the environment is unfounded given the flaws noted above and the magnitude of the proposed project. | • See comment response #42. |
| 49 | Melissa MacDonald | 6/12/2019 | <ul style="list-style-type: none"> •The study's assumption that fewer ships will enter the port if the channel is deepened and widened. This is especially problematic as this assumption drives the ship wake analysis and air quality studies. •Indirect and cumulative impacts resulting from expanding the port are not fully evaluated. •The ship wake analysis does not use realistic information (ship sizes, weights, speeds, etc.). The analysis also does not factor in how ship wakes will impact our marine life and shorelines. •The Corps has omitted or not adequately incorporated research available on the Bay (oysters, manatees, etc.) conducted by local scientists. •The 25% increase in truck traffic forecasted by the study will directly impact low income communities. The Corps has not acknowledged these impacts. •The study's consideration of air quality impacts is very inadequate. This is a clear violation of NEPA. The Corps' conclusion of "no impact" on the environment is unfounded given the flaws noted above and the magnitude of the proposed project. | • See comment response #42. |
| 50 | Molly Broders | 6/12/2019 | <ul style="list-style-type: none"> •The study's assumption that fewer ships will enter the port if the channel is deepened and widened. This is especially problematic as this assumption drives the ship wake analysis and air quality studies. •Indirect and cumulative impacts resulting from expanding the port are not fully evaluated. •The ship wake analysis does not use realistic information (ship sizes, weights, speeds, etc.). The analysis also does not factor in how ship wakes will impact our marine life and shorelines. •The Corps has omitted or not adequately incorporated research available on the Bay (oysters, manatees, etc.) conducted by local scientists. •The 25% increase in truck traffic forecasted by the study will directly impact low income communities. The Corps has not acknowledged these impacts. •The study's consideration of air quality impacts is very inadequate. This is a clear violation of NEPA. The Corps' conclusion of "no impact" on the environment is unfounded given the flaws noted above and the magnitude of the proposed project. | • See comment response #42. |
| 51 | Pat & Gary Gover | 6/12/2019 | <ul style="list-style-type: none"> •The study's assumption that fewer ships will enter the port if the channel is deepened and widened. This is especially problematic as this assumption drives the ship wake analysis and air quality studies. •Indirect and cumulative impacts resulting from expanding the port are not fully evaluated. •The ship wake analysis does not use realistic information (ship sizes, weights, speeds, etc.). The analysis also does not factor in how ship wakes will impact our marine life and shorelines. •The Corps has omitted or not adequately incorporated research available on the Bay (oysters, manatees, etc.) conducted by local scientists. •The 25% increase in truck traffic forecasted by the study will directly impact low income communities. The Corps has not acknowledged these impacts. •The study's consideration of air quality impacts is very inadequate. This is a clear violation of NEPA. The Corps' conclusion of "no impact" on the environment is unfounded given the flaws noted above and the magnitude of the proposed project. | • See comment response #42. |

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| 52 | Rhonda Searcy | 6/12/2019 | <ul style="list-style-type: none"> •The study's assumption that fewer ships will enter the port if the channel is deepened and widened. This is especially problematic as this assumption drives the ship wake analysis and air quality studies. •Indirect and cumulative impacts resulting from expanding the port are not fully evaluated. •The ship wake analysis does not use realistic information (ship sizes, weights, speeds, etc.). The analysis also does not factor in how ship wakes will impact our marine life and shorelines. •The Corps has omitted or not adequately incorporated research available on the Bay (oysters, manatees, etc.) conducted by local scientists. •The 25% increase in truck traffic forecasted by the study will directly impact low income communities. The Corps has not acknowledged these impacts. •The study's consideration of air quality impacts is very inadequate. This is a clear violation of NEPA. The Corps' conclusion of "no impact" on the environment is unfounded given the flaws noted above and the magnitude of the proposed project. | • See comment response #42. |
| 53 | Ryann Wilcoxon | 6/12/2019 | <ul style="list-style-type: none"> •The study's assumption that fewer ships will enter the port if the channel is deepened and widened. This is especially problematic as this assumption drives the ship wake analysis and air quality studies. •Indirect and cumulative impacts resulting from expanding the port are not fully evaluated. •The ship wake analysis does not use realistic information (ship sizes, weights, speeds, etc.). The analysis also does not factor in how ship wakes will impact our marine life and shorelines. •The Corps has omitted or not adequately incorporated research available on the Bay (oysters, manatees, etc.) conducted by local scientists. •The 25% increase in truck traffic forecasted by the study will directly impact low income communities. The Corps has not acknowledged these impacts. •The study's consideration of air quality impacts is very inadequate. This is a clear violation of NEPA. The Corps' conclusion of "no impact" on the environment is unfounded given the flaws noted above and the magnitude of the proposed project. | • See comment response #42. |
| 54 | Sam St. John | 6/12/2019 | <ul style="list-style-type: none"> •The study's assumption that fewer ships will enter the port if the channel is deepened and widened. This is especially problematic as this assumption drives the ship wake analysis and air quality studies. •Indirect and cumulative impacts resulting from expanding the port are not fully evaluated. •The ship wake analysis does not use realistic information (ship sizes, weights, speeds, etc.). The analysis also does not factor in how ship wakes will impact our marine life and shorelines. •The Corps has omitted or not adequately incorporated research available on the Bay (oysters, manatees, etc.) conducted by local scientists. •The 25% increase in truck traffic forecasted by the study will directly impact low income communities. The Corps has not acknowledged these impacts. •The study's consideration of air quality impacts is very inadequate. This is a clear violation of NEPA. The Corps' conclusion of "no impact" on the environment is unfounded given the flaws noted above and the magnitude of the proposed project. | • See comment response #42. |
| 55 | Steve Lyda | 6/12/2019 | <ul style="list-style-type: none"> •The study's assumption that fewer ships will enter the port if the channel is deepened and widened. This is especially problematic as this assumption drives the ship wake analysis and air quality studies. •Indirect and cumulative impacts resulting from expanding the port are not fully evaluated. •The ship wake analysis does not use realistic information (ship sizes, weights, speeds, etc.). The analysis also does not factor in how ship wakes will impact our marine life and shorelines. •The Corps has omitted or not adequately incorporated research available on the Bay (oysters, manatees, etc.) conducted by local scientists. •The 25% increase in truck traffic forecasted by the study will directly impact low income communities. The Corps has not acknowledged these impacts. •The study's consideration of air quality impacts is very inadequate. This is a clear violation of NEPA. The Corps' conclusion of "no impact" on the environment is unfounded given the flaws noted above and the magnitude of the proposed project. | • See comment response #42. |

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| 56 | William Wyatt | 6/12/2019 | <ul style="list-style-type: none"> •The study's assumption that fewer ships will enter the port if the channel is deepened and widened. This is especially problematic as this assumption drives the ship wake analysis and air quality studies. •Indirect and cumulative impacts resulting from expanding the port are not fully evaluated. •The ship wake analysis does not use realistic information (ship sizes, weights, speeds, etc.). The analysis also does not factor in how ship wakes will impact our marine life and shorelines. •The Corps has omitted or not adequately incorporated research available on the Bay (oysters, manatees, etc.) conducted by local scientists. •The 25% increase in truck traffic forecasted by the study will directly impact low income communities. The Corps has not acknowledged these impacts. •The study's consideration of air quality impacts is very inadequate. This is a clear violation of NEPA. The Corps' conclusion of "no impact" on the environment is unfounded given the flaws noted above and the magnitude of the proposed project. | <ul style="list-style-type: none"> • See comment response #42. |
| 57 | Ann Montgomery | 6/13/2019 | <ul style="list-style-type: none"> •The study's assumption that fewer ships will enter the port if the channel is deepened and widened. This is especially problematic as this assumption drives the ship wake analysis and air quality studies. •Indirect and cumulative impacts resulting from expanding the port are not fully evaluated. •The ship wake analysis does not use realistic information (ship sizes, weights, speeds, etc.). The analysis also does not factor in how ship wakes will impact our marine life and shorelines. •The Corps has omitted or not adequately incorporated research available on the Bay (oysters, manatees, etc.) conducted by local scientists. •The 25% increase in truck traffic forecasted by the study will directly impact low income communities. The Corps has not acknowledged these impacts. •The study's consideration of air quality impacts is very inadequate. This is a clear violation of NEPA. The Corps' conclusion of "no impact" on the environment is unfounded given the flaws noted above and the magnitude of the proposed project. | <ul style="list-style-type: none"> • See comment response #42. |
| 58 | Aqualynn Kennedy | 6/13/2019 | <ul style="list-style-type: none"> •The study's assumption that fewer ships will enter the port if the channel is deepened and widened. This is especially problematic as this assumption drives the ship wake analysis and air quality studies. •Indirect and cumulative impacts resulting from expanding the port are not fully evaluated. •The ship wake analysis does not use realistic information (ship sizes, weights, speeds, etc.). The analysis also does not factor in how ship wakes will impact our marine life and shorelines. •The Corps has omitted or not adequately incorporated research available on the Bay (oysters, manatees, etc.) conducted by local scientists. •The 25% increase in truck traffic forecasted by the study will directly impact low income communities. The Corps has not acknowledged these impacts. •The study's consideration of air quality impacts is very inadequate. This is a clear violation of NEPA. The Corps' conclusion of "no impact" on the environment is unfounded given the flaws noted above and the magnitude of the proposed project. | <ul style="list-style-type: none"> • See comment response #42. |
| 59 | Benjamin Becker | 6/13/2019 | <ul style="list-style-type: none"> •The study's assumption that fewer ships will enter the port if the channel is deepened and widened. This is especially problematic as this assumption drives the ship wake analysis and air quality studies. •Indirect and cumulative impacts resulting from expanding the port are not fully evaluated. •The ship wake analysis does not use realistic information (ship sizes, weights, speeds, etc.). The analysis also does not factor in how ship wakes will impact our marine life and shorelines. •The Corps has omitted or not adequately incorporated research available on the Bay (oysters, manatees, etc.) conducted by local scientists. •The 25% increase in truck traffic forecasted by the study will directly impact low income communities. The Corps has not acknowledged these impacts. •The study's consideration of air quality impacts is very inadequate. This is a clear violation of NEPA. The Corps' conclusion of "no impact" on the environment is unfounded given the flaws noted above and the magnitude of the proposed project. | <ul style="list-style-type: none"> • See comment response #42. |

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| 60 | BJ Smith | 6/13/2019 | <ul style="list-style-type: none"> •The study's assumption that fewer ships will enter the port if the channel is deepened and widened. This is especially problematic as this assumption drives the ship wake analysis and air quality studies. •Indirect and cumulative impacts resulting from expanding the port are not fully evaluated. •The ship wake analysis does not use realistic information (ship sizes, weights, speeds, etc.). The analysis also does not factor in how ship wakes will impact our marine life and shorelines. •The Corps has omitted or not adequately incorporated research available on the Bay (oysters, manatees, etc.) conducted by local scientists. •The 25% increase in truck traffic forecasted by the study will directly impact low income communities. The Corps has not acknowledged these impacts. •The study's consideration of air quality impacts is very inadequate. This is a clear violation of NEPA. The Corps' conclusion of "no impact" on the environment is unfounded given the flaws noted above and the magnitude of the proposed project. | • See comment response #42. |
| 61 | Carmen Kearly | 6/13/2019 | <ul style="list-style-type: none"> •The study's assumption that fewer ships will enter the port if the channel is deepened and widened. This is especially problematic as this assumption drives the ship wake analysis and air quality studies. •Indirect and cumulative impacts resulting from expanding the port are not fully evaluated. •The ship wake analysis does not use realistic information (ship sizes, weights, speeds, etc.). The analysis also does not factor in how ship wakes will impact our marine life and shorelines. •The Corps has omitted or not adequately incorporated research available on the Bay (oysters, manatees, etc.) conducted by local scientists. •The 25% increase in truck traffic forecasted by the study will directly impact low income communities. The Corps has not acknowledged these impacts. •The study's consideration of air quality impacts is very inadequate. This is a clear violation of NEPA. The Corps' conclusion of "no impact" on the environment is unfounded given the flaws noted above and the magnitude of the proposed project. | • See comment response #42. |
| 62 | Carol Becker | 6/13/2019 | <ul style="list-style-type: none"> •The study's assumption that fewer ships will enter the port if the channel is deepened and widened. This is especially problematic as this assumption drives the ship wake analysis and air quality studies. •Indirect and cumulative impacts resulting from expanding the port are not fully evaluated. •The ship wake analysis does not use realistic information (ship sizes, weights, speeds, etc.). The analysis also does not factor in how ship wakes will impact our marine life and shorelines. •The Corps has omitted or not adequately incorporated research available on the Bay (oysters, manatees, etc.) conducted by local scientists. •The 25% increase in truck traffic forecasted by the study will directly impact low income communities. The Corps has not acknowledged these impacts. •The study's consideration of air quality impacts is very inadequate. This is a clear violation of NEPA. The Corps' conclusion of "no impact" on the environment is unfounded given the flaws noted above and the magnitude of the proposed project. | • See comment response #42. |
| 63 | Charles Cohen | 6/13/2019 | <ul style="list-style-type: none"> •The study's assumption that fewer ships will enter the port if the channel is deepened and widened. This is especially problematic as this assumption drives the ship wake analysis and air quality studies. •Indirect and cumulative impacts resulting from expanding the port are not fully evaluated. •The ship wake analysis does not use realistic information (ship sizes, weights, speeds, etc.). The analysis also does not factor in how ship wakes will impact our marine life and shorelines. •The Corps has omitted or not adequately incorporated research available on the Bay (oysters, manatees, etc.) conducted by local scientists. •The 25% increase in truck traffic forecasted by the study will directly impact low income communities. The Corps has not acknowledged these impacts. •The study's consideration of air quality impacts is very inadequate. This is a clear violation of NEPA. The Corps' conclusion of "no impact" on the environment is unfounded given the flaws noted above and the magnitude of the proposed project. | • See comment response #42. |

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| 64 | Clara Brunk | 6/13/2019 | <ul style="list-style-type: none"> •The study's assumption that fewer ships will enter the port if the channel is deepened and widened. This is especially problematic as this assumption drives the ship wake analysis and air quality studies. •Indirect and cumulative impacts resulting from expanding the port are not fully evaluated. •The ship wake analysis does not use realistic information (ship sizes, weights, speeds, etc.). The analysis also does not factor in how ship wakes will impact our marine life and shorelines. •The Corps has omitted or not adequately incorporated research available on the Bay (oysters, manatees, etc.) conducted by local scientists. •The 25% increase in truck traffic forecasted by the study will directly impact low income communities. The Corps has not acknowledged these impacts. •The study's consideration of air quality impacts is very inadequate. This is a clear violation of NEPA. The Corps' conclusion of "no impact" on the environment is unfounded given the flaws noted above and the magnitude of the proposed project. | • See comment response #42. |
| 65 | Dan Mclemore | 6/13/2019 | <ul style="list-style-type: none"> • Why in the 2019 SEIS/GRR Mobile Harbor report did the Corps omitted the fact in the Corps' 1978 Erosion study, which determine that the erosion of the 11 westernmost miles of Dauphin Island were the result of the removal of sand from the littoral drift system through maintenance dredging. • Why in the 2019 SEIS/GRR Mobile Harbor report did the Corps omitted the fact that the Corps left-out the erosion impacts to Dauphin Island 1980 EIS and the Corps failure to comply with the 1935 law in the 1980EIS/Mobile Harbor Survey Report. • Why in the 2019 SEIS/GRR Mobile Harbor report did the Corps omitted that the 1980 Environmental Impact Statement study was invalid and not legal. • Why in the 2019 SEIS/GRR Mobile Harbor report did the Corps omitted the Corps' False statements they put in Federal Documents that all "impacts to the Mobile Harbor were addressed in an Environmental Impact Statement (EIS) dated October, 1980". • Why in the 2019 SEIS/GRR Mobile Harbor report did the Corps omitted the fact that the Corps is restricting the investigations into Dauphin Island's erosion and past sand/land losses to Island the SEIS/GRR. • Why in the 2019 SEIS/GRR Mobile Harbor report did the Corps omitted all of the facts of the past severe erosional impacts to the Island starting in the 1990's, after first phase of the channel deepening was completed in 1990 that was authorized by the 1986 WRDA. • Why in the 2019 SEIS/GRR Mobile Harbor report did the Corps omitted the USGS study's critical information about the erosion on Dauphin Island, which reflects that five time the amount of sediment was eroded from the Island than got to the Island because of the Corps dredging. 1987-2006: 915,565cys/y of sediment was dredged, which reduced the net sand available to migrate to the Island's western shore face. | • See comment response #28. |
| 66 | Daniel Deese | 6/13/2019 | <ul style="list-style-type: none"> •The study's assumption that fewer ships will enter the port if the channel is deepened and widened. This is especially problematic as this assumption drives the ship wake analysis and air quality studies. •Indirect and cumulative impacts resulting from expanding the port are not fully evaluated. •The ship wake analysis does not use realistic information (ship sizes, weights, speeds, etc.). The analysis also does not factor in how ship wakes will impact our marine life and shorelines. •The Corps has omitted or not adequately incorporated research available on the Bay (oysters, manatees, etc.) conducted by local scientists. •The 25% increase in truck traffic forecasted by the study will directly impact low income communities. The Corps has not acknowledged these impacts. •The study's consideration of air quality impacts is very inadequate. This is a clear violation of NEPA. The Corps' conclusion of "no impact" on the environment is unfounded given the flaws noted above and the magnitude of the proposed project. | • See comment response #42. |

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| 67 | DJ Johnson | 6/13/2019 | <ul style="list-style-type: none"> •The study's assumption that fewer ships will enter the port if the channel is deepened and widened. This is especially problematic as this assumption drives the ship wake analysis and air quality studies. •Indirect and cumulative impacts resulting from expanding the port are not fully evaluated. •The ship wake analysis does not use realistic information (ship sizes, weights, speeds, etc.). The analysis also does not factor in how ship wakes will impact our marine life and shorelines. •The Corps has omitted or not adequately incorporated research available on the Bay (oysters, manatees, etc.) conducted by local scientists. •The 25% increase in truck traffic forecasted by the study will directly impact low income communities. The Corps has not acknowledged these impacts. •The study's consideration of air quality impacts is very inadequate. This is a clear violation of NEPA. The Corps' conclusion of "no impact" on the environment is unfounded given the flaws noted above and the magnitude of the proposed project. | • See comment response #42. |
| 68 | Emilee Foster | 6/13/2019 | <ul style="list-style-type: none"> •The study's assumption that fewer ships will enter the port if the channel is deepened and widened. This is especially problematic as this assumption drives the ship wake analysis and air quality studies. •Indirect and cumulative impacts resulting from expanding the port are not fully evaluated. •The ship wake analysis does not use realistic information (ship sizes, weights, speeds, etc.). The analysis also does not factor in how ship wakes will impact our marine life and shorelines. •The Corps has omitted or not adequately incorporated research available on the Bay (oysters, manatees, etc.) conducted by local scientists. •The 25% increase in truck traffic forecasted by the study will directly impact low income communities. The Corps has not acknowledged these impacts. •The study's consideration of air quality impacts is very inadequate. This is a clear violation of NEPA. The Corps' conclusion of "no impact" on the environment is unfounded given the flaws noted above and the magnitude of the proposed project. | • See comment response #42. |
| 69 | Gary Lindsay | 6/13/2019 | <ul style="list-style-type: none"> •The study's assumption that fewer ships will enter the port if the channel is deepened and widened. This is especially problematic as this assumption drives the ship wake analysis and air quality studies. •Indirect and cumulative impacts resulting from expanding the port are not fully evaluated. •The ship wake analysis does not use realistic information (ship sizes, weights, speeds, etc.). The analysis also does not factor in how ship wakes will impact our marine life and shorelines. •The Corps has omitted or not adequately incorporated research available on the Bay (oysters, manatees, etc.) conducted by local scientists. •The 25% increase in truck traffic forecasted by the study will directly impact low income communities. The Corps has not acknowledged these impacts. •The study's consideration of air quality impacts is very inadequate. This is a clear violation of NEPA. The Corps' conclusion of "no impact" on the environment is unfounded given the flaws noted above and the magnitude of the proposed project. | • See comment response #42. |
| 70 | Hanlon Walsh | 6/13/2019 | <ul style="list-style-type: none"> •The study's assumption that fewer ships will enter the port if the channel is deepened and widened. This is especially problematic as this assumption drives the ship wake analysis and air quality studies. •Indirect and cumulative impacts resulting from expanding the port are not fully evaluated. •The ship wake analysis does not use realistic information (ship sizes, weights, speeds, etc.). The analysis also does not factor in how ship wakes will impact our marine life and shorelines. •The Corps has omitted or not adequately incorporated research available on the Bay (oysters, manatees, etc.) conducted by local scientists. •The 25% increase in truck traffic forecasted by the study will directly impact low income communities. The Corps has not acknowledged these impacts. •The study's consideration of air quality impacts is very inadequate. This is a clear violation of NEPA. The Corps' conclusion of "no impact" on the environment is unfounded given the flaws noted above and the magnitude of the proposed project. | • See comment response #42. |

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| 71 | Herbert Wagner | 6/13/2019 | <ul style="list-style-type: none"> •The study's assumption that fewer ships will enter the port if the channel is deepened and widened. This is especially problematic as this assumption drives the ship wake analysis and air quality studies. •Indirect and cumulative impacts resulting from expanding the port are not fully evaluated. •The ship wake analysis does not use realistic information (ship sizes, weights, speeds, etc.). The analysis also does not factor in how ship wakes will impact our marine life and shorelines. •The Corps has omitted or not adequately incorporated research available on the Bay (oysters, manatees, etc.) conducted by local scientists. •The 25% increase in truck traffic forecasted by the study will directly impact low income communities. The Corps has not acknowledged these impacts. •The study's consideration of air quality impacts is very inadequate. This is a clear violation of NEPA. The Corps' conclusion of "no impact" on the environment is unfounded given the flaws noted above and the magnitude of the proposed project. | • See comment response #42. |
| 72 | Jacob Hartley | 6/13/2019 | <ul style="list-style-type: none"> •The study's assumption that fewer ships will enter the port if the channel is deepened and widened. This is especially problematic as this assumption drives the ship wake analysis and air quality studies. •Indirect and cumulative impacts resulting from expanding the port are not fully evaluated. •The ship wake analysis does not use realistic information (ship sizes, weights, speeds, etc.). The analysis also does not factor in how ship wakes will impact our marine life and shorelines. •The Corps has omitted or not adequately incorporated research available on the Bay (oysters, manatees, etc.) conducted by local scientists. •The 25% increase in truck traffic forecasted by the study will directly impact low income communities. The Corps has not acknowledged these impacts. •The study's consideration of air quality impacts is very inadequate. This is a clear violation of NEPA. The Corps' conclusion of "no impact" on the environment is unfounded given the flaws noted above and the magnitude of the proposed project. | • See comment response #42. |
| 73 | Jane Lightning | 6/13/2019 | <ul style="list-style-type: none"> •The study's assumption that fewer ships will enter the port if the channel is deepened and widened. This is especially problematic as this assumption drives the ship wake analysis and air quality studies. •Indirect and cumulative impacts resulting from expanding the port are not fully evaluated. •The ship wake analysis does not use realistic information (ship sizes, weights, speeds, etc.). The analysis also does not factor in how ship wakes will impact our marine life and shorelines. •The Corps has omitted or not adequately incorporated research available on the Bay (oysters, manatees, etc.) conducted by local scientists. •The 25% increase in truck traffic forecasted by the study will directly impact low income communities. The Corps has not acknowledged these impacts. •The study's consideration of air quality impacts is very inadequate. This is a clear violation of NEPA. The Corps' conclusion of "no impact" on the environment is unfounded given the flaws noted above and the magnitude of the proposed project. | • See comment response #42. |
| 74 | Janet Salmon | 6/13/2019 | <ul style="list-style-type: none"> •The study's assumption that fewer ships will enter the port if the channel is deepened and widened. This is especially problematic as this assumption drives the ship wake analysis and air quality studies. •Indirect and cumulative impacts resulting from expanding the port are not fully evaluated. •The ship wake analysis does not use realistic information (ship sizes, weights, speeds, etc.). The analysis also does not factor in how ship wakes will impact our marine life and shorelines. •The Corps has omitted or not adequately incorporated research available on the Bay (oysters, manatees, etc.) conducted by local scientists. •The 25% increase in truck traffic forecasted by the study will directly impact low income communities. The Corps has not acknowledged these impacts. •The study's consideration of air quality impacts is very inadequate. This is a clear violation of NEPA. The Corps' conclusion of "no impact" on the environment is unfounded given the flaws noted above and the magnitude of the proposed project. | • See comment response #42. |

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| 75 | Jared Davis | 6/13/2019 | <ul style="list-style-type: none"> •The study's assumption that fewer ships will enter the port if the channel is deepened and widened. This is especially problematic as this assumption drives the ship wake analysis and air quality studies. •Indirect and cumulative impacts resulting from expanding the port are not fully evaluated. •The ship wake analysis does not use realistic information (ship sizes, weights, speeds, etc.). The analysis also does not factor in how ship wakes will impact our marine life and shorelines. •The Corps has omitted or not adequately incorporated research available on the Bay (oysters, manatees, etc.) conducted by local scientists. •The 25% increase in truck traffic forecasted by the study will directly impact low income communities. The Corps has not acknowledged these impacts. •The study's consideration of air quality impacts is very inadequate. This is a clear violation of NEPA. The Corps' conclusion of "no impact" on the environment is unfounded given the flaws noted above and the magnitude of the proposed project. | • See comment response #42. |
| 76 | Jeff Deuschle | 6/13/2019 | <ul style="list-style-type: none"> •The study's assumption that fewer ships will enter the port if the channel is deepened and widened. This is especially problematic as this assumption drives the ship wake analysis and air quality studies. •Indirect and cumulative impacts resulting from expanding the port are not fully evaluated. •The ship wake analysis does not use realistic information (ship sizes, weights, speeds, etc.). The analysis also does not factor in how ship wakes will impact our marine life and shorelines. •The Corps has omitted or not adequately incorporated research available on the Bay (oysters, manatees, etc.) conducted by local scientists. •The 25% increase in truck traffic forecasted by the study will directly impact low income communities. The Corps has not acknowledged these impacts. •The study's consideration of air quality impacts is very inadequate. This is a clear violation of NEPA. The Corps' conclusion of "no impact" on the environment is unfounded given the flaws noted above and the magnitude of the proposed project. | • See comment response #42. |
| 77 | Jenny Hixon | 6/13/2019 | <ul style="list-style-type: none"> •The study's assumption that fewer ships will enter the port if the channel is deepened and widened. This is especially problematic as this assumption drives the ship wake analysis and air quality studies. •Indirect and cumulative impacts resulting from expanding the port are not fully evaluated. •The ship wake analysis does not use realistic information (ship sizes, weights, speeds, etc.). The analysis also does not factor in how ship wakes will impact our marine life and shorelines. •The Corps has omitted or not adequately incorporated research available on the Bay (oysters, manatees, etc.) conducted by local scientists. •The 25% increase in truck traffic forecasted by the study will directly impact low income communities. The Corps has not acknowledged these impacts. •The study's consideration of air quality impacts is very inadequate. This is a clear violation of NEPA. The Corps' conclusion of "no impact" on the environment is unfounded given the flaws noted above and the magnitude of the proposed project. | • See comment response #42. |
| 78 | John Cutts | 6/13/2019 | <ul style="list-style-type: none"> •The study's assumption that fewer ships will enter the port if the channel is deepened and widened. This is especially problematic as this assumption drives the ship wake analysis and air quality studies. •Indirect and cumulative impacts resulting from expanding the port are not fully evaluated. •The ship wake analysis does not use realistic information (ship sizes, weights, speeds, etc.). The analysis also does not factor in how ship wakes will impact our marine life and shorelines. •The Corps has omitted or not adequately incorporated research available on the Bay (oysters, manatees, etc.) conducted by local scientists. •The 25% increase in truck traffic forecasted by the study will directly impact low income communities. The Corps has not acknowledged these impacts. •The study's consideration of air quality impacts is very inadequate. This is a clear violation of NEPA. The Corps' conclusion of "no impact" on the environment is unfounded given the flaws noted above and the magnitude of the proposed project. | • See comment response #42. |

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| 79 | Lauren Wallace | 6/13/2019 | <ul style="list-style-type: none"> •The study's assumption that fewer ships will enter the port if the channel is deepened and widened. This is especially problematic as this assumption drives the ship wake analysis and air quality studies. •Indirect and cumulative impacts resulting from expanding the port are not fully evaluated. •The ship wake analysis does not use realistic information (ship sizes, weights, speeds, etc.). The analysis also does not factor in how ship wakes will impact our marine life and shorelines. •The Corps has omitted or not adequately incorporated research available on the Bay (oysters, manatees, etc.) conducted by local scientists. •The 25% increase in truck traffic forecasted by the study will directly impact low income communities. The Corps has not acknowledged these impacts. •The study's consideration of air quality impacts is very inadequate. This is a clear violation of NEPA. The Corps' conclusion of "no impact" on the environment is unfounded given the flaws noted above and the magnitude of the proposed project. | • See comment response #42. |
| 80 | Leslie Revel | 6/13/2019 | <ul style="list-style-type: none"> •The study's assumption that fewer ships will enter the port if the channel is deepened and widened. This is especially problematic as this assumption drives the ship wake analysis and air quality studies. •Indirect and cumulative impacts resulting from expanding the port are not fully evaluated. •The ship wake analysis does not use realistic information (ship sizes, weights, speeds, etc.). The analysis also does not factor in how ship wakes will impact our marine life and shorelines. •The Corps has omitted or not adequately incorporated research available on the Bay (oysters, manatees, etc.) conducted by local scientists. •The 25% increase in truck traffic forecasted by the study will directly impact low income communities. The Corps has not acknowledged these impacts. •The study's consideration of air quality impacts is very inadequate. This is a clear violation of NEPA. The Corps' conclusion of "no impact" on the environment is unfounded given the flaws noted above and the magnitude of the proposed project. | • See comment response #42. |
| 81 | Mark Wyatt | 6/13/2019 | <ul style="list-style-type: none"> •The study's assumption that fewer ships will enter the port if the channel is deepened and widened. This is especially problematic as this assumption drives the ship wake analysis and air quality studies. •Indirect and cumulative impacts resulting from expanding the port are not fully evaluated. •The ship wake analysis does not use realistic information (ship sizes, weights, speeds, etc.). The analysis also does not factor in how ship wakes will impact our marine life and shorelines. •The Corps has omitted or not adequately incorporated research available on the Bay (oysters, manatees, etc.) conducted by local scientists. •The 25% increase in truck traffic forecasted by the study will directly impact low income communities. The Corps has not acknowledged these impacts. •The study's consideration of air quality impacts is very inadequate. This is a clear violation of NEPA. The Corps' conclusion of "no impact" on the environment is unfounded given the flaws noted above and the magnitude of the proposed project. | • See comment response #42. |
| 82 | Martha Crosby | 6/13/2019 | <ul style="list-style-type: none"> •The study's assumption that fewer ships will enter the port if the channel is deepened and widened. This is especially problematic as this assumption drives the ship wake analysis and air quality studies. •Indirect and cumulative impacts resulting from expanding the port are not fully evaluated. •The ship wake analysis does not use realistic information (ship sizes, weights, speeds, etc.). The analysis also does not factor in how ship wakes will impact our marine life and shorelines. •The Corps has omitted or not adequately incorporated research available on the Bay (oysters, manatees, etc.) conducted by local scientists. •The 25% increase in truck traffic forecasted by the study will directly impact low income communities. The Corps has not acknowledged these impacts. •The study's consideration of air quality impacts is very inadequate. This is a clear violation of NEPA. The Corps' conclusion of "no impact" on the environment is unfounded given the flaws noted above and the magnitude of the proposed project. | • See comment response #42. |

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| 83 | Patricia Wagner | 6/13/2019 | <ul style="list-style-type: none"> •The study's assumption that fewer ships will enter the port if the channel is deepened and widened. This is especially problematic as this assumption drives the ship wake analysis and air quality studies. •Indirect and cumulative impacts resulting from expanding the port are not fully evaluated. •The ship wake analysis does not use realistic information (ship sizes, weights, speeds, etc.). The analysis also does not factor in how ship wakes will impact our marine life and shorelines. •The Corps has omitted or not adequately incorporated research available on the Bay (oysters, manatees, etc.) conducted by local scientists. •The 25% increase in truck traffic forecasted by the study will directly impact low income communities. The Corps has not acknowledged these impacts. •The study's consideration of air quality impacts is very inadequate. This is a clear violation of NEPA. The Corps' conclusion of "no impact" on the environment is unfounded given the flaws noted above and the magnitude of the proposed project. | <ul style="list-style-type: none"> • See comment response #42. |
| 84 | Rex Anderson | 6/13/2019 | <ul style="list-style-type: none"> • Why in the 2019 SEIS/GRR Mobile Harbor report did the Corps omitted the fact in the Corps' 1978 Erosion study, which determine that the erosion of the 11 westernmost miles of Dauphin Island were the result of the removal of sand from the littoral drift system through maintenance dredging. • Why in the 2019 SEIS/GRR Mobile Harbor report did the Corps omitted the fact that the Corps left-out the erosion impacts to Dauphin Island 1980 EIS and the Corps failure to comply with the 1935 law in the 1980EIS/Mobile Harbor Survey Report. • Why in the 2019 SEIS/GRR Mobile Harbor report did the Corps omitted that the 1980 Environmental Impact Statement study was invalid and not legal. • Why in the 2019 SEIS/GRR Mobile Harbor report did the Corps omitted the Corps' False statements they put in Federal Documents that all "impacts to the Mobile Harbor were addressed in an Environmental Impact Statement (EIS) dated October, 1980". • Why in the 2019 SEIS/GRR Mobile Harbor report did the Corps omitted the fact that the Corps is restricting the investigations into Dauphin Island's erosion and past sand/land losses to Island the SEIS/GRR. • Why in the 2019 SEIS/GRR Mobile Harbor report did the Corps omitted all of the facts of the past severe erosional impacts to the Island starting in the 1990's, after first phase of the channel deepening was completed in 1990 that was authorized by the 1986 WRDA. • Why in the 2019 SEIS/GRR Mobile Harbor report did the Corps omitted the USGS study's critical information about the erosion on Dauphin Island, which reflects that five time the amount of sediment was eroded from the Island than got to the Island because of the Corps dredging. 1987-2006: 915,565cys/y of sediment was dredged, which reduced the net sand available to migrate to the Island's western shore face. | <ul style="list-style-type: none"> • See comment response #28. |
| 85 | Rob Davis | 6/13/2019 | <ul style="list-style-type: none"> •The study's assumption that fewer ships will enter the port if the channel is deepened and widened. This is especially problematic as this assumption drives the ship wake analysis and air quality studies. •Indirect and cumulative impacts resulting from expanding the port are not fully evaluated. •The ship wake analysis does not use realistic information (ship sizes, weights, speeds, etc.). The analysis also does not factor in how ship wakes will impact our marine life and shorelines. •The Corps has omitted or not adequately incorporated research available on the Bay (oysters, manatees, etc.) conducted by local scientists. •The 25% increase in truck traffic forecasted by the study will directly impact low income communities. The Corps has not acknowledged these impacts. •The study's consideration of air quality impacts is very inadequate. This is a clear violation of NEPA. The Corps' conclusion of "no impact" on the environment is unfounded given the flaws noted above and the magnitude of the proposed project. | <ul style="list-style-type: none"> • See comment response #42. |

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| 86 | Robert Beckerle | 6/13/2019 | <ul style="list-style-type: none"> •The study's assumption that fewer ships will enter the port if the channel is deepened and widened. This is especially problematic as this assumption drives the ship wake analysis and air quality studies. •Indirect and cumulative impacts resulting from expanding the port are not fully evaluated. •The ship wake analysis does not use realistic information (ship sizes, weights, speeds, etc.). The analysis also does not factor in how ship wakes will impact our marine life and shorelines. •The Corps has omitted or not adequately incorporated research available on the Bay (oysters, manatees, etc.) conducted by local scientists. •The 25% increase in truck traffic forecasted by the study will directly impact low income communities. The Corps has not acknowledged these impacts. •The study's consideration of air quality impacts is very inadequate. This is a clear violation of NEPA. The Corps' conclusion of "no impact" on the environment is unfounded given the flaws noted above and the magnitude of the proposed project. | <ul style="list-style-type: none"> • See comment response #42. |
| 87 | Sage Arnold | 6/13/2019 | <ul style="list-style-type: none"> •The study's assumption that fewer ships will enter the port if the channel is deepened and widened. This is especially problematic as this assumption drives the ship wake analysis and air quality studies. •Indirect and cumulative impacts resulting from expanding the port are not fully evaluated. •The ship wake analysis does not use realistic information (ship sizes, weights, speeds, etc.). The analysis also does not factor in how ship wakes will impact our marine life and shorelines. •The Corps has omitted or not adequately incorporated research available on the Bay (oysters, manatees, etc.) conducted by local scientists. •The 25% increase in truck traffic forecasted by the study will directly impact low income communities. The Corps has not acknowledged these impacts. •The study's consideration of air quality impacts is very inadequate. This is a clear violation of NEPA. The Corps' conclusion of "no impact" on the environment is unfounded given the flaws noted above and the magnitude of the proposed project. | <ul style="list-style-type: none"> • See comment response #42. |
| 88 | Sophia Houston | 6/13/2019 | <ul style="list-style-type: none"> •The study's assumption that fewer ships will enter the port if the channel is deepened and widened. This is especially problematic as this assumption drives the ship wake analysis and air quality studies. •Indirect and cumulative impacts resulting from expanding the port are not fully evaluated. •The ship wake analysis does not use realistic information (ship sizes, weights, speeds, etc.). The analysis also does not factor in how ship wakes will impact our marine life and shorelines. •The Corps has omitted or not adequately incorporated research available on the Bay (oysters, manatees, etc.) conducted by local scientists. •The 25% increase in truck traffic forecasted by the study will directly impact low income communities. The Corps has not acknowledged these impacts. •The study's consideration of air quality impacts is very inadequate. This is a clear violation of NEPA. The Corps' conclusion of "no impact" on the environment is unfounded given the flaws noted above and the magnitude of the proposed project. | <ul style="list-style-type: none"> • See comment response #42. |
| 89 | Stan Graves | 6/13/2019 | <ul style="list-style-type: none"> • Requests clarification as to the nature of the Appendix E revisions. • Comment Letter dated June 13, 2019. Concerns relating to the potential effects of navigation channel on Dauphin Island shorelines and SIBUA effectiveness. | <ul style="list-style-type: none"> • Concur. A clarification was published to the list serve and GRR inbox stating the specific changes to the Appendix E on June 17, 2019. • The findings of the USACE in relation to the effects of the recommended channel modifications on Coastal Sediment Transport are as presented Section 5.3.3 Sediment Transport, and Section 6.1.1.1. Effect on Coastal Sediment Transport. • Our findings as related to the recommended channel modifications and SIBUA are presented in Section 2.4.3.1.3 Bar Channel, Section 2.4.4.3. SIBUA for the Bar Channel, and Section 4.2.2.3 SIBUA for the Bar Channel. Additional Information on SIBUA can be found in paragraphs 5.3.3. Sediment Transport, and 5.7 Dredging and Placement Areas. |

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| 90 | Sue Winter | 6/13/2019 | <ul style="list-style-type: none"> •The study's assumption that fewer ships will enter the port if the channel is deepened and widened. This is especially problematic as this assumption drives the ship wake analysis and air quality studies. •Indirect and cumulative impacts resulting from expanding the port are not fully evaluated. •The ship wake analysis does not use realistic information (ship sizes, weights, speeds, etc.). The analysis also does not factor in how ship wakes will impact our marine life and shorelines. •The Corps has omitted or not adequately incorporated research available on the Bay (oysters, manatees, etc.) conducted by local scientists. •The 25% increase in truck traffic forecasted by the study will directly impact low income communities. The Corps has not acknowledged these impacts. •The study's consideration of air quality impacts is very inadequate. This is a clear violation of NEPA. The Corps' conclusion of "no impact" on the environment is unfounded given the flaws noted above and the magnitude of the proposed project. | <ul style="list-style-type: none"> • See comment response #42. |
| 91 | Thomas Duncan | 6/13/2019 | <ul style="list-style-type: none"> •The study's assumption that fewer ships will enter the port if the channel is deepened and widened. This is especially problematic as this assumption drives the ship wake analysis and air quality studies. •Indirect and cumulative impacts resulting from expanding the port are not fully evaluated. •The ship wake analysis does not use realistic information (ship sizes, weights, speeds, etc.). The analysis also does not factor in how ship wakes will impact our marine life and shorelines. •The Corps has omitted or not adequately incorporated research available on the Bay (oysters, manatees, etc.) conducted by local scientists. •The 25% increase in truck traffic forecasted by the study will directly impact low income communities. The Corps has not acknowledged these impacts. •The study's consideration of air quality impacts is very inadequate. This is a clear violation of NEPA. The Corps' conclusion of "no impact" on the environment is unfounded given the flaws noted above and the magnitude of the proposed project. | <ul style="list-style-type: none"> • See comment response #42. |
| 92 | Wayne Shaw | 6/13/2019 | <ul style="list-style-type: none"> •The study's assumption that fewer ships will enter the port if the channel is deepened and widened. This is especially problematic as this assumption drives the ship wake analysis and air quality studies. •Indirect and cumulative impacts resulting from expanding the port are not fully evaluated. •The ship wake analysis does not use realistic information (ship sizes, weights, speeds, etc.). The analysis also does not factor in how ship wakes will impact our marine life and shorelines. •The Corps has omitted or not adequately incorporated research available on the Bay (oysters, manatees, etc.) conducted by local scientists. •The 25% increase in truck traffic forecasted by the study will directly impact low income communities. The Corps has not acknowledged these impacts. •The study's consideration of air quality impacts is very inadequate. This is a clear violation of NEPA. The Corps' conclusion of "no impact" on the environment is unfounded given the flaws noted above and the magnitude of the proposed project. | <ul style="list-style-type: none"> • See comment response #42. |
| 93 | Christopher Newsome | 6/14/2019 | <ul style="list-style-type: none"> •The study's assumption that fewer ships will enter the port if the channel is deepened and widened. This is especially problematic as this assumption drives the ship wake analysis and air quality studies. •Indirect and cumulative impacts resulting from expanding the port are not fully evaluated. •The ship wake analysis does not use realistic information (ship sizes, weights, speeds, etc.). The analysis also does not factor in how ship wakes will impact our marine life and shorelines. •The Corps has omitted or not adequately incorporated research available on the Bay (oysters, manatees, etc.) conducted by local scientists. •The 25% increase in truck traffic forecasted by the study will directly impact low income communities. The Corps has not acknowledged these impacts. •The study's consideration of air quality impacts is very inadequate. This is a clear violation of NEPA. The Corps' conclusion of "no impact" on the environment is unfounded given the flaws noted above and the magnitude of the proposed project. | <ul style="list-style-type: none"> • See comment response #42. |

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| 94 | Ellie Mallon | 6/14/2019 | <ul style="list-style-type: none"> •The study's assumption that fewer ships will enter the port if the channel is deepened and widened. This is especially problematic as this assumption drives the ship wake analysis and air quality studies. •Indirect and cumulative impacts resulting from expanding the port are not fully evaluated. •The ship wake analysis does not use realistic information (ship sizes, weights, speeds, etc.). The analysis also does not factor in how ship wakes will impact our marine life and shorelines. •The Corps has omitted or not adequately incorporated research available on the Bay (oysters, manatees, etc.) conducted by local scientists. •The 25% increase in truck traffic forecasted by the study will directly impact low income communities. The Corps has not acknowledged these impacts. •The study's consideration of air quality impacts is very inadequate. This is a clear violation of NEPA. The Corps' conclusion of "no impact" on the environment is unfounded given the flaws noted above and the magnitude of the proposed project. | • See comment response #42. |
| 95 | Elliott Lauderdale | 6/14/2019 | <ul style="list-style-type: none"> •The study's assumption that fewer ships will enter the port if the channel is deepened and widened. This is especially problematic as this assumption drives the ship wake analysis and air quality studies. •Indirect and cumulative impacts resulting from expanding the port are not fully evaluated. •The ship wake analysis does not use realistic information (ship sizes, weights, speeds, etc.). The analysis also does not factor in how ship wakes will impact our marine life and shorelines. •The Corps has omitted or not adequately incorporated research available on the Bay (oysters, manatees, etc.) conducted by local scientists. •The 25% increase in truck traffic forecasted by the study will directly impact low income communities. The Corps has not acknowledged these impacts. •The study's consideration of air quality impacts is very inadequate. This is a clear violation of NEPA. The Corps' conclusion of "no impact" on the environment is unfounded given the flaws noted above and the magnitude of the proposed project. | • See comment response #42. |
| 96 | Johnnie Johnson | 6/14/2019 | <ul style="list-style-type: none"> •The study's assumption that fewer ships will enter the port if the channel is deepened and widened. This is especially problematic as this assumption drives the ship wake analysis and air quality studies. •Indirect and cumulative impacts resulting from expanding the port are not fully evaluated. •The ship wake analysis does not use realistic information (ship sizes, weights, speeds, etc.). The analysis also does not factor in how ship wakes will impact our marine life and shorelines. •The Corps has omitted or not adequately incorporated research available on the Bay (oysters, manatees, etc.) conducted by local scientists. •The 25% increase in truck traffic forecasted by the study will directly impact low income communities. The Corps has not acknowledged these impacts. •The study's consideration of air quality impacts is very inadequate. This is a clear violation of NEPA. The Corps' conclusion of "no impact" on the environment is unfounded given the flaws noted above and the magnitude of the proposed project. | • See comment response #42. |
| 97 | Kathryn Westmark | 6/14/2019 | <ul style="list-style-type: none"> •The study's assumption that fewer ships will enter the port if the channel is deepened and widened. This is especially problematic as this assumption drives the ship wake analysis and air quality studies. •Indirect and cumulative impacts resulting from expanding the port are not fully evaluated. •The ship wake analysis does not use realistic information (ship sizes, weights, speeds, etc.). The analysis also does not factor in how ship wakes will impact our marine life and shorelines. •The Corps has omitted or not adequately incorporated research available on the Bay (oysters, manatees, etc.) conducted by local scientists. •The 25% increase in truck traffic forecasted by the study will directly impact low income communities. The Corps has not acknowledged these impacts. •The study's consideration of air quality impacts is very inadequate. This is a clear violation of NEPA. The Corps' conclusion of "no impact" on the environment is unfounded given the flaws noted above and the magnitude of the proposed project. | • See comment response #42. |

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| 98 | Raleigh Hoke | 6/14/2019 | <ul style="list-style-type: none"> •The study's assumption that fewer ships will enter the port if the channel is deepened and widened. This is especially problematic as this assumption drives the ship wake analysis and air quality studies. •Indirect and cumulative impacts resulting from expanding the port are not fully evaluated. •The ship wake analysis does not use realistic information (ship sizes, weights, speeds, etc.). The analysis also does not factor in how ship wakes will impact our marine life and shorelines. •The Corps has omitted or not adequately incorporated research available on the Bay (oysters, manatees, etc.) conducted by local scientists. •The 25% increase in truck traffic forecasted by the study will directly impact low income communities. The Corps has not acknowledged these impacts. •The study's consideration of air quality impacts is very inadequate. This is a clear violation of NEPA. The Corps' conclusion of "no impact" on the environment is unfounded given the flaws noted above and the magnitude of the proposed project. | <ul style="list-style-type: none"> • See comment response #42. |
| 99 | Rose Hart | 6/14/2019 | <ul style="list-style-type: none"> • States that the email was received unknowingly. | <ul style="list-style-type: none"> • Comment noted. Name has been removed from future correspondence. |
| 100 | Tim Neilsen | 6/14/2019 | <ul style="list-style-type: none"> •The study's assumption that fewer ships will enter the port if the channel is deepened and widened. This is especially problematic as this assumption drives the ship wake analysis and air quality studies. •Indirect and cumulative impacts resulting from expanding the port are not fully evaluated. •The ship wake analysis does not use realistic information (ship sizes, weights, speeds, etc.). The analysis also does not factor in how ship wakes will impact our marine life and shorelines. •The Corps has omitted or not adequately incorporated research available on the Bay (oysters, manatees, etc.) conducted by local scientists. •The 25% increase in truck traffic forecasted by the study will directly impact low income communities. The Corps has not acknowledged these impacts. •The study's consideration of air quality impacts is very inadequate. This is a clear violation of NEPA. The Corps' conclusion of "no impact" on the environment is unfounded given the flaws noted above and the magnitude of the proposed project. | <ul style="list-style-type: none"> • See comment response #42. |
| 101 | Carol Lawson | 6/15/2019 | <ul style="list-style-type: none"> •The study's assumption that fewer ships will enter the port if the channel is deepened and widened. This is especially problematic as this assumption drives the ship wake analysis and air quality studies. •Indirect and cumulative impacts resulting from expanding the port are not fully evaluated. •The ship wake analysis does not use realistic information (ship sizes, weights, speeds, etc.). The analysis also does not factor in how ship wakes will impact our marine life and shorelines. •The Corps has omitted or not adequately incorporated research available on the Bay (oysters, manatees, etc.) conducted by local scientists. •The 25% increase in truck traffic forecasted by the study will directly impact low income communities. The Corps has not acknowledged these impacts. •The study's consideration of air quality impacts is very inadequate. This is a clear violation of NEPA. The Corps' conclusion of "no impact" on the environment is unfounded given the flaws noted above and the magnitude of the proposed project. | <ul style="list-style-type: none"> • See comment response #42. |
| 102 | Cynthia Ratliff | 6/15/2019 | <ul style="list-style-type: none"> •The study's assumption that fewer ships will enter the port if the channel is deepened and widened. This is especially problematic as this assumption drives the ship wake analysis and air quality studies. •Indirect and cumulative impacts resulting from expanding the port are not fully evaluated. •The ship wake analysis does not use realistic information (ship sizes, weights, speeds, etc.). The analysis also does not factor in how ship wakes will impact our marine life and shorelines. •The Corps has omitted or not adequately incorporated research available on the Bay (oysters, manatees, etc.) conducted by local scientists. •The 25% increase in truck traffic forecasted by the study will directly impact low income communities. The Corps has not acknowledged these impacts. •The study's consideration of air quality impacts is very inadequate. This is a clear violation of NEPA. The Corps' conclusion of "no impact" on the environment is unfounded given the flaws noted above and the magnitude of the proposed project. | <ul style="list-style-type: none"> • See comment response #42. |

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| 103 | Elizabeth Wheat | 6/15/2019 | <ul style="list-style-type: none"> •The study's assumption that fewer ships will enter the port if the channel is deepened and widened. This is especially problematic as this assumption drives the ship wake analysis and air quality studies. •Indirect and cumulative impacts resulting from expanding the port are not fully evaluated. •The ship wake analysis does not use realistic information (ship sizes, weights, speeds, etc.). The analysis also does not factor in how ship wakes will impact our marine life and shorelines. •The Corps has omitted or not adequately incorporated research available on the Bay (oysters, manatees, etc.) conducted by local scientists. •The 25% increase in truck traffic forecasted by the study will directly impact low income communities. The Corps has not acknowledged these impacts. •The study's consideration of air quality impacts is very inadequate. This is a clear violation of NEPA. The Corps' conclusion of "no impact" on the environment is unfounded given the flaws noted above and the magnitude of the proposed project. | • See comment response #42. |
| 104 | J Antalan | 6/15/2019 | <ul style="list-style-type: none"> •The study's assumption that fewer ships will enter the port if the channel is deepened and widened. This is especially problematic as this assumption drives the ship wake analysis and air quality studies. •Indirect and cumulative impacts resulting from expanding the port are not fully evaluated. •The ship wake analysis does not use realistic information (ship sizes, weights, speeds, etc.). The analysis also does not factor in how ship wakes will impact our marine life and shorelines. •The Corps has omitted or not adequately incorporated research available on the Bay (oysters, manatees, etc.) conducted by local scientists. •The 25% increase in truck traffic forecasted by the study will directly impact low income communities. The Corps has not acknowledged these impacts. •The study's consideration of air quality impacts is very inadequate. This is a clear violation of NEPA. The Corps' conclusion of "no impact" on the environment is unfounded given the flaws noted above and the magnitude of the proposed project. | • See comment response #42. |
| 105 | Jeannine Dorroh | 6/15/2019 | <ul style="list-style-type: none"> •The study's assumption that fewer ships will enter the port if the channel is deepened and widened. This is especially problematic as this assumption drives the ship wake analysis and air quality studies. •Indirect and cumulative impacts resulting from expanding the port are not fully evaluated. •The ship wake analysis does not use realistic information (ship sizes, weights, speeds, etc.). The analysis also does not factor in how ship wakes will impact our marine life and shorelines. •The Corps has omitted or not adequately incorporated research available on the Bay (oysters, manatees, etc.) conducted by local scientists. •The 25% increase in truck traffic forecasted by the study will directly impact low income communities. The Corps has not acknowledged these impacts. •The study's consideration of air quality impacts is very inadequate. This is a clear violation of NEPA. The Corps' conclusion of "no impact" on the environment is unfounded given the flaws noted above and the magnitude of the proposed project. | • See comment response #42. |
| 106 | Joseph Scanlan | 6/15/2019 | <ul style="list-style-type: none"> •The study's assumption that fewer ships will enter the port if the channel is deepened and widened. This is especially problematic as this assumption drives the ship wake analysis and air quality studies. •Indirect and cumulative impacts resulting from expanding the port are not fully evaluated. •The ship wake analysis does not use realistic information (ship sizes, weights, speeds, etc.). The analysis also does not factor in how ship wakes will impact our marine life and shorelines. •The Corps has omitted or not adequately incorporated research available on the Bay (oysters, manatees, etc.) conducted by local scientists. •The 25% increase in truck traffic forecasted by the study will directly impact low income communities. The Corps has not acknowledged these impacts. •The study's consideration of air quality impacts is very inadequate. This is a clear violation of NEPA. The Corps' conclusion of "no impact" on the environment is unfounded given the flaws noted above and the magnitude of the proposed project. | • See comment response #42. |

Final Mobile Harbor GRR/SEIS Response Matrix

Revision Date: August 14, 2019

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| 107 | Melissa Milano | 6/15/2019 | <ul style="list-style-type: none"> •The study's assumption that fewer ships will enter the port if the channel is deepened and widened. This is especially problematic as this assumption drives the ship wake analysis and air quality studies. •Indirect and cumulative impacts resulting from expanding the port are not fully evaluated. •The ship wake analysis does not use realistic information (ship sizes, weights, speeds, etc.). The analysis also does not factor in how ship wakes will impact our marine life and shorelines. •The Corps has omitted or not adequately incorporated research available on the Bay (oysters, manatees, etc.) conducted by local scientists. •The 25% increase in truck traffic forecasted by the study will directly impact low income communities. The Corps has not acknowledged these impacts. •The study's consideration of air quality impacts is very inadequate. This is a clear violation of NEPA. The Corps' conclusion of "no impact" on the environment is unfounded given the flaws noted above and the magnitude of the proposed project. | • See comment response #42. |
| 108 | Nolan White | 6/15/2019 | <ul style="list-style-type: none"> •The study's assumption that fewer ships will enter the port if the channel is deepened and widened. This is especially problematic as this assumption drives the ship wake analysis and air quality studies. •Indirect and cumulative impacts resulting from expanding the port are not fully evaluated. •The ship wake analysis does not use realistic information (ship sizes, weights, speeds, etc.). The analysis also does not factor in how ship wakes will impact our marine life and shorelines. •The Corps has omitted or not adequately incorporated research available on the Bay (oysters, manatees, etc.) conducted by local scientists. •The 25% increase in truck traffic forecasted by the study will directly impact low income communities. The Corps has not acknowledged these impacts. •The study's consideration of air quality impacts is very inadequate. This is a clear violation of NEPA. The Corps' conclusion of "no impact" on the environment is unfounded given the flaws noted above and the magnitude of the proposed project. | • See comment response #42. |
| 109 | Robert Dueitt | 6/15/2019 | <ul style="list-style-type: none"> •The study's assumption that fewer ships will enter the port if the channel is deepened and widened. This is especially problematic as this assumption drives the ship wake analysis and air quality studies. •Indirect and cumulative impacts resulting from expanding the port are not fully evaluated. •The ship wake analysis does not use realistic information (ship sizes, weights, speeds, etc.). The analysis also does not factor in how ship wakes will impact our marine life and shorelines. •The Corps has omitted or not adequately incorporated research available on the Bay (oysters, manatees, etc.) conducted by local scientists. •The 25% increase in truck traffic forecasted by the study will directly impact low income communities. The Corps has not acknowledged these impacts. •The study's consideration of air quality impacts is very inadequate. This is a clear violation of NEPA. The Corps' conclusion of "no impact" on the environment is unfounded given the flaws noted above and the magnitude of the proposed project. | • See comment response #42. |
| 110 | Sharen Oxman | 6/15/2019 | <ul style="list-style-type: none"> •The study's assumption that fewer ships will enter the port if the channel is deepened and widened. This is especially problematic as this assumption drives the ship wake analysis and air quality studies. •Indirect and cumulative impacts resulting from expanding the port are not fully evaluated. •The ship wake analysis does not use realistic information (ship sizes, weights, speeds, etc.). The analysis also does not factor in how ship wakes will impact our marine life and shorelines. •The Corps has omitted or not adequately incorporated research available on the Bay (oysters, manatees, etc.) conducted by local scientists. •The 25% increase in truck traffic forecasted by the study will directly impact low income communities. The Corps has not acknowledged these impacts. •The study's consideration of air quality impacts is very inadequate. This is a clear violation of NEPA. The Corps' conclusion of "no impact" on the environment is unfounded given the flaws noted above and the magnitude of the proposed project. | • See comment response #42. |

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| 111 | Shay Lawson | 6/15/2019 | <ul style="list-style-type: none"> •The study's assumption that fewer ships will enter the port if the channel is deepened and widened. This is especially problematic as this assumption drives the ship wake analysis and air quality studies. •Indirect and cumulative impacts resulting from expanding the port are not fully evaluated. •The ship wake analysis does not use realistic information (ship sizes, weights, speeds, etc.). The analysis also does not factor in how ship wakes will impact our marine life and shorelines. •The Corps has omitted or not adequately incorporated research available on the Bay (oysters, manatees, etc.) conducted by local scientists. •The 25% increase in truck traffic forecasted by the study will directly impact low income communities. The Corps has not acknowledged these impacts. •The study's consideration of air quality impacts is very inadequate. This is a clear violation of NEPA. The Corps' conclusion of "no impact" on the environment is unfounded given the flaws noted above and the magnitude of the proposed project. | • See comment response #42. |
| 112 | Hannah Vester | 6/16/2019 | <ul style="list-style-type: none"> •The study's assumption that fewer ships will enter the port if the channel is deepened and widened. This is especially problematic as this assumption drives the ship wake analysis and air quality studies. •Indirect and cumulative impacts resulting from expanding the port are not fully evaluated. •The ship wake analysis does not use realistic information (ship sizes, weights, speeds, etc.). The analysis also does not factor in how ship wakes will impact our marine life and shorelines. •The Corps has omitted or not adequately incorporated research available on the Bay (oysters, manatees, etc.) conducted by local scientists. •The 25% increase in truck traffic forecasted by the study will directly impact low income communities. The Corps has not acknowledged these impacts. •The study's consideration of air quality impacts is very inadequate. This is a clear violation of NEPA. The Corps' conclusion of "no impact" on the environment is unfounded given the flaws noted above and the magnitude of the proposed project. | • See comment response #42. |
| 113 | Heath Vester | 6/16/2019 | <ul style="list-style-type: none"> •The study's assumption that fewer ships will enter the port if the channel is deepened and widened. This is especially problematic as this assumption drives the ship wake analysis and air quality studies. •Indirect and cumulative impacts resulting from expanding the port are not fully evaluated. •The ship wake analysis does not use realistic information (ship sizes, weights, speeds, etc.). The analysis also does not factor in how ship wakes will impact our marine life and shorelines. •The Corps has omitted or not adequately incorporated research available on the Bay (oysters, manatees, etc.) conducted by local scientists. •The 25% increase in truck traffic forecasted by the study will directly impact low income communities. The Corps has not acknowledged these impacts. •The study's consideration of air quality impacts is very inadequate. This is a clear violation of NEPA. The Corps' conclusion of "no impact" on the environment is unfounded given the flaws noted above and the magnitude of the proposed project. | • See comment response #42. |
| 114 | Jessica Deese | 6/16/2019 | <ul style="list-style-type: none"> •The study's assumption that fewer ships will enter the port if the channel is deepened and widened. This is especially problematic as this assumption drives the ship wake analysis and air quality studies. •Indirect and cumulative impacts resulting from expanding the port are not fully evaluated. •The ship wake analysis does not use realistic information (ship sizes, weights, speeds, etc.). The analysis also does not factor in how ship wakes will impact our marine life and shorelines. •The Corps has omitted or not adequately incorporated research available on the Bay (oysters, manatees, etc.) conducted by local scientists. •The 25% increase in truck traffic forecasted by the study will directly impact low income communities. The Corps has not acknowledged these impacts. •The study's consideration of air quality impacts is very inadequate. This is a clear violation of NEPA. The Corps' conclusion of "no impact" on the environment is unfounded given the flaws noted above and the magnitude of the proposed project. | • See comment response #42. |

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| 115 | Kizzie Warren | 6/16/2019 | <ul style="list-style-type: none"> •The study's assumption that fewer ships will enter the port if the channel is deepened and widened. This is especially problematic as this assumption drives the ship wake analysis and air quality studies. •Indirect and cumulative impacts resulting from expanding the port are not fully evaluated. •The ship wake analysis does not use realistic information (ship sizes, weights, speeds, etc.). The analysis also does not factor in how ship wakes will impact our marine life and shorelines. •The Corps has omitted or not adequately incorporated research available on the Bay (oysters, manatees, etc.) conducted by local scientists. •The 25% increase in truck traffic forecasted by the study will directly impact low income communities. The Corps has not acknowledged these impacts. •The study's consideration of air quality impacts is very inadequate. This is a clear violation of NEPA. The Corps' conclusion of "no impact" on the environment is unfounded given the flaws noted above and the magnitude of the proposed project. | <ul style="list-style-type: none"> • See comment response #42. |
| 116 | Pauline Burak | 6/16/2019 | <ul style="list-style-type: none"> •The study's assumption that fewer ships will enter the port if the channel is deepened and widened. This is especially problematic as this assumption drives the ship wake analysis and air quality studies. •Indirect and cumulative impacts resulting from expanding the port are not fully evaluated. •The ship wake analysis does not use realistic information (ship sizes, weights, speeds, etc.). The analysis also does not factor in how ship wakes will impact our marine life and shorelines. •The Corps has omitted or not adequately incorporated research available on the Bay (oysters, manatees, etc.) conducted by local scientists. •The 25% increase in truck traffic forecasted by the study will directly impact low income communities. The Corps has not acknowledged these impacts. •The study's consideration of air quality impacts is very inadequate. This is a clear violation of NEPA. The Corps' conclusion of "no impact" on the environment is unfounded given the flaws noted above and the magnitude of the proposed project. | <ul style="list-style-type: none"> • See comment response #42. |
| 117 | Wesley Wyatt | 6/16/2019 | <ul style="list-style-type: none"> •The study's assumption that fewer ships will enter the port if the channel is deepened and widened. This is especially problematic as this assumption drives the ship wake analysis and air quality studies. •Indirect and cumulative impacts resulting from expanding the port are not fully evaluated. •The ship wake analysis does not use realistic information (ship sizes, weights, speeds, etc.). The analysis also does not factor in how ship wakes will impact our marine life and shorelines. •The Corps has omitted or not adequately incorporated research available on the Bay (oysters, manatees, etc.) conducted by local scientists. •The 25% increase in truck traffic forecasted by the study will directly impact low income communities. The Corps has not acknowledged these impacts. •The study's consideration of air quality impacts is very inadequate. This is a clear violation of NEPA. The Corps' conclusion of "no impact" on the environment is unfounded given the flaws noted above and the magnitude of the proposed project. | <ul style="list-style-type: none"> • See comment response #42. |
| 118 | Andrew Levert Coastal Alabama Partnership (CAP) | 6/17/2019 | <ul style="list-style-type: none"> • The CAP on behalf of its member entities fully supports what was presented in the USACE Final GRR/SEIS. | <ul style="list-style-type: none"> • Comment noted. |
| 119 | Becca Sales | 6/17/2019 | <ul style="list-style-type: none"> •The study's assumption that fewer ships will enter the port if the channel is deepened and widened. This is especially problematic as this assumption drives the ship wake analysis and air quality studies. •Indirect and cumulative impacts resulting from expanding the port are not fully evaluated. •The ship wake analysis does not use realistic information (ship sizes, weights, speeds, etc.). The analysis also does not factor in how ship wakes will impact our marine life and shorelines. •The Corps has omitted or not adequately incorporated research available on the Bay (oysters, manatees, etc.) conducted by local scientists. •The 25% increase in truck traffic forecasted by the study will directly impact low income communities. The Corps has not acknowledged these impacts. •The study's consideration of air quality impacts is very inadequate. This is a clear violation of NEPA. The Corps' conclusion of "no impact" on the environment is unfounded given the flaws noted above and the magnitude of the proposed project. | <ul style="list-style-type: none"> • See comment response #42. |

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| 120 | Debbie Quinn | 6/17/2019 | <ul style="list-style-type: none"> •The study's assumption that fewer ships will enter the port if the channel is deepened and widened. This is especially problematic as this assumption drives the ship wake analysis and air quality studies. •Indirect and cumulative impacts resulting from expanding the port are not fully evaluated. •The ship wake analysis does not use realistic information (ship sizes, weights, speeds, etc.). The analysis also does not factor in how ship wakes will impact our marine life and shorelines. •The Corps has omitted or not adequately incorporated research available on the Bay (oysters, manatees, etc.) conducted by local scientists. •The 25% increase in truck traffic forecasted by the study will directly impact low income communities. The Corps has not acknowledged these impacts. •The study's consideration of air quality impacts is very inadequate. This is a clear violation of NEPA. The Corps' conclusion of "no impact" on the environment is unfounded given the flaws noted above and the magnitude of the proposed project. | <ul style="list-style-type: none"> • See comment response #42. |
| 121 | Ramsey Sprague MEJAC | 6/17/2019 | <ul style="list-style-type: none"> • See attachment #1 for itemized comments and USACE responses. | <ul style="list-style-type: none"> • See attachment #1 below. |
| 122 | Jackie Stewart | 6/19/2019 | <ul style="list-style-type: none"> •The study's assumption that fewer ships will enter the port if the channel is deepened and widened. This is especially problematic as this assumption drives the ship wake analysis and air quality studies. •Indirect and cumulative impacts resulting from expanding the port are not fully evaluated. •The ship wake analysis does not use realistic information (ship sizes, weights, speeds, etc.). The analysis also does not factor in how ship wakes will impact our marine life and shorelines. •The Corps has omitted or not adequately incorporated research available on the Bay (oysters, manatees, etc.) conducted by local scientists. •The 25% increase in truck traffic forecasted by the study will directly impact low income communities. The Corps has not acknowledged these impacts. •The study's consideration of air quality impacts is very inadequate. This is a clear violation of NEPA. The Corps' conclusion of "no impact" on the environment is unfounded given the flaws noted above and the magnitude of the proposed project. | <ul style="list-style-type: none"> • See comment response #42. |
| 123 | Charlotte Schwartz | 6/27/2019 | <ul style="list-style-type: none"> •The study's assumption that fewer ships will enter the port if the channel is deepened and widened. This is especially problematic as this assumption drives the ship wake analysis and air quality studies. •Indirect and cumulative impacts resulting from expanding the port are not fully evaluated. •The ship wake analysis does not use realistic information (ship sizes, weights, speeds, etc.). The analysis also does not factor in how ship wakes will impact our marine life and shorelines. •The Corps has omitted or not adequately incorporated research available on the Bay (oysters, manatees, etc.) conducted by local scientists. •The 25% increase in truck traffic forecasted by the study will directly impact low income communities. The Corps has not acknowledged these impacts. •The study's consideration of air quality impacts is very inadequate. This is a clear violation of NEPA. The Corps' conclusion of "no impact" on the environment is unfounded given the flaws noted above and the magnitude of the proposed project. | <ul style="list-style-type: none"> • See comment response #42. |
| 124 | Mena Anderson | 2/28/2019 | <ul style="list-style-type: none"> •The study's assumption that fewer ships will enter the port if the channel is deepened and widened. This is especially problematic as this assumption drives the ship wake analysis and air quality studies. •Indirect and cumulative impacts resulting from expanding the port are not fully evaluated. •The ship wake analysis does not use realistic information (ship sizes, weights, speeds, etc.). The analysis also does not factor in how ship wakes will impact our marine life and shorelines. •The Corps has omitted or not adequately incorporated research available on the Bay (oysters, manatees, etc.) conducted by local scientists. •The 25% increase in truck traffic forecasted by the study will directly impact low income communities. The Corps has not acknowledged these impacts. •The study's consideration of air quality impacts is very inadequate. This is a clear violation of NEPA. The Corps' conclusion of "no impact" on the environment is unfounded given the flaws noted above and the magnitude of the proposed project. | <ul style="list-style-type: none"> • See comment response #42. |

| Comment No. | Commenter Name | Date | Comment Summary | Response |
|-------------|-----------------|-----------|--|---|
| 125 | Caroline Graves | 6/29/2019 | <ul style="list-style-type: none"> Concerns over the dredge quantities. Concerns over the effectiveness of SIBUA. | <ul style="list-style-type: none"> Our findings as related to the recommended channel modifications and SIBUA are presented in Section 2.4.3.1.3 Bar Channel, Section 2.4.4.3. SIBUA for the Bar Channel, and Section 4.2.2.3 SIBUA for the Bar Channel. Additional Information on SIBUA can be found in paragraphs 5.3.3. Sediment Transport, Section 5.26.1 Monitoring, and 5.7 Dredging and Placement Areas. |
| 126 | Caroline Graves | 6/29/2019 | <ul style="list-style-type: none"> Concerns over navigation channel's impact on erosion/ need for mitigation. | <ul style="list-style-type: none"> The findings of the USACE in relation to the effects of the recommended channel modifications on Coastal Sediment Transport are as presented Section 5.3.3 Sediment Transport, Section 6.1.1.1. Effect on Coastal Sediment Transport, and Section 5.26.1 Monitoring. |
| 127 | Caroline Graves | 6/29/2019 | <ul style="list-style-type: none"> Concerns over navigation channel's impact on erosion/need for mitigation. | <ul style="list-style-type: none"> The findings of the USACE in relation to the effects of the recommended channel modifications on Coastal Sediment Transport are as presented Section 5.3.3 Sediment Transport, Section 6.1.1.1. Effect on Coastal Sediment Transport, and Section 5.26.1 Monitoring. |
| 128 | Caroline Graves | 6/29/2019 | <ul style="list-style-type: none"> Concerns over navigation channel's impact on erosion/mitigation. Concerns over the effectiveness of SIBUA. | <ul style="list-style-type: none"> The findings of the USACE in relation to the effects of the recommended channel modifications on Coastal Sediment Transport are as presented Section 5.3.3 Sediment Transport, and Section 6.1.1.1. Effect on Coastal Sediment Transport. Our findings as related to the recommended channel modifications and SIBUA are presented in Section 2.4.3.1.3 Bar Channel, Section 2.4.4.3. SIBUA for the Bar Channel, and Section 4.2.2.3 SIBUA for the Bar Channel. Additional Information on SIBUA can be found in paragraphs 5.3.3. Sediment Transport, Section 5.26.1 Monitoring, and 5.7 Dredging and Placement Areas. |
| 129 | Caroline Graves | 6/29/2019 | <ul style="list-style-type: none"> Concerns that laws are not followed. Concerns over navigation channel's impact on erosion/need for mitigation. | <ul style="list-style-type: none"> See Section 6.2 Table of Compliance for details regarding the compliance status with NEPA and other environmental laws. The findings of the USACE in relation to the effects of the recommended channel modifications on Coastal Sediment Transport are as presented Section 5.3.3 Sediment Transport, Section 6.1.1.1. Effect on Coastal Sediment Transport, and Section 5.26.1 Monitoring. |
| 130 | Alicia Matthews | 7/1/2019 | <ul style="list-style-type: none"> The study's assumption that fewer ships will enter the port if the channel is deepened and widened. This is especially problematic as this assumption drives the ship wake analysis and air quality studies. Indirect and cumulative impacts resulting from expanding the port are not fully evaluated. The ship wake analysis does not use realistic information (ship sizes, weights, speeds, etc.). The analysis also does not factor in how ship wakes will impact our marine life and shorelines. The Corps has omitted or not adequately incorporated research available on the Bay (oysters, manatees, etc.) conducted by local scientists. The 25% increase in truck traffic forecasted by the study will directly impact low income communities. The Corps has not acknowledged these impacts. The study's consideration of air quality impacts is very inadequate. This is a clear violation of NEPA. The Corps' conclusion of "no impact" on the environment is unfounded given the flaws noted above and the magnitude of the proposed project. | <ul style="list-style-type: none"> See comment response #42. |

| Comment No. | Commenter Name | Date | Comment Summary | Response |
|-------------|----------------------|----------|--|-----------------------------|
| 131 | Allen Lee | 7/1/2019 | <ul style="list-style-type: none"> •The study's assumption that fewer ships will enter the port if the channel is deepened and widened. This is especially problematic as this assumption drives the ship wake analysis and air quality studies. •Indirect and cumulative impacts resulting from expanding the port are not fully evaluated. •The ship wake analysis does not use realistic information (ship sizes, weights, speeds, etc.). The analysis also does not factor in how ship wakes will impact our marine life and shorelines. •The Corps has omitted or not adequately incorporated research available on the Bay (oysters, manatees, etc.) conducted by local scientists. •The 25% increase in truck traffic forecasted by the study will directly impact low income communities. The Corps has not acknowledged these impacts. •The study's consideration of air quality impacts is very inadequate. This is a clear violation of NEPA. The Corps' conclusion of "no impact" on the environment is unfounded given the flaws noted above and the magnitude of the proposed project. | • See comment response #42. |
| 132 | Ames Yokel | 7/1/2019 | <ul style="list-style-type: none"> •The study's assumption that fewer ships will enter the port if the channel is deepened and widened. This is especially problematic as this assumption drives the ship wake analysis and air quality studies. •Indirect and cumulative impacts resulting from expanding the port are not fully evaluated. •The ship wake analysis does not use realistic information (ship sizes, weights, speeds, etc.). The analysis also does not factor in how ship wakes will impact our marine life and shorelines. •The Corps has omitted or not adequately incorporated research available on the Bay (oysters, manatees, etc.) conducted by local scientists. •The 25% increase in truck traffic forecasted by the study will directly impact low income communities. The Corps has not acknowledged these impacts. •The study's consideration of air quality impacts is very inadequate. This is a clear violation of NEPA. The Corps' conclusion of "no impact" on the environment is unfounded given the flaws noted above and the magnitude of the proposed project. | • See comment response #42. |
| 133 | Blair Gorsuch | 7/1/2019 | <ul style="list-style-type: none"> •The study's assumption that fewer ships will enter the port if the channel is deepened and widened. This is especially problematic as this assumption drives the ship wake analysis and air quality studies. •Indirect and cumulative impacts resulting from expanding the port are not fully evaluated. •The ship wake analysis does not use realistic information (ship sizes, weights, speeds, etc.). The analysis also does not factor in how ship wakes will impact our marine life and shorelines. •The Corps has omitted or not adequately incorporated research available on the Bay (oysters, manatees, etc.) conducted by local scientists. •The 25% increase in truck traffic forecasted by the study will directly impact low income communities. The Corps has not acknowledged these impacts. •The study's consideration of air quality impacts is very inadequate. This is a clear violation of NEPA. The Corps' conclusion of "no impact" on the environment is unfounded given the flaws noted above and the magnitude of the proposed project. | • See comment response #42. |
| 134 | Catherine Quckenbush | 7/1/2019 | <ul style="list-style-type: none"> •The study's assumption that fewer ships will enter the port if the channel is deepened and widened. This is especially problematic as this assumption drives the ship wake analysis and air quality studies. •Indirect and cumulative impacts resulting from expanding the port are not fully evaluated. •The ship wake analysis does not use realistic information (ship sizes, weights, speeds, etc.). The analysis also does not factor in how ship wakes will impact our marine life and shorelines. •The Corps has omitted or not adequately incorporated research available on the Bay (oysters, manatees, etc.) conducted by local scientists. •The 25% increase in truck traffic forecasted by the study will directly impact low income communities. The Corps has not acknowledged these impacts. •The study's consideration of air quality impacts is very inadequate. This is a clear violation of NEPA. The Corps' conclusion of "no impact" on the environment is unfounded given the flaws noted above and the magnitude of the proposed project. | • See comment response #42. |

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|-------------|--------------------|----------|--|---|
| 135 | Charles Cohen | 7/1/2019 | <ul style="list-style-type: none"> •The study's assumption that fewer ships will enter the port if the channel is deepened and widened. This is especially problematic as this assumption drives the ship wake analysis and air quality studies. •Indirect and cumulative impacts resulting from expanding the port are not fully evaluated. •The ship wake analysis does not use realistic information (ship sizes, weights, speeds, etc.). The analysis also does not factor in how ship wakes will impact our marine life and shorelines. •The Corps has omitted or not adequately incorporated research available on the Bay (oysters, manatees, etc.) conducted by local scientists. •The 25% increase in truck traffic forecasted by the study will directly impact low income communities. The Corps has not acknowledged these impacts. •The study's consideration of air quality impacts is very inadequate. This is a clear violation of NEPA. The Corps' conclusion of "no impact" on the environment is unfounded given the flaws noted above and the magnitude of the proposed project. | <ul style="list-style-type: none"> • See comment response #42. |
| 136 | Charles Kelly | 7/1/2019 | <ul style="list-style-type: none"> •The study's assumption that fewer ships will enter the port if the channel is deepened and widened. This is especially problematic as this assumption drives the ship wake analysis and air quality studies. •Indirect and cumulative impacts resulting from expanding the port are not fully evaluated. •The ship wake analysis does not use realistic information (ship sizes, weights, speeds, etc.). The analysis also does not factor in how ship wakes will impact our marine life and shorelines. •The Corps has omitted or not adequately incorporated research available on the Bay (oysters, manatees, etc.) conducted by local scientists. •The 25% increase in truck traffic forecasted by the study will directly impact low income communities. The Corps has not acknowledged these impacts. •The study's consideration of air quality impacts is very inadequate. This is a clear violation of NEPA. The Corps' conclusion of "no impact" on the environment is unfounded given the flaws noted above and the magnitude of the proposed project. | <ul style="list-style-type: none"> • See comment response #42. |
| 137 | Charlotte Schwartz | 7/1/2019 | <ul style="list-style-type: none"> •The study's assumption that fewer ships will enter the port if the channel is deepened and widened. This is especially problematic as this assumption drives the ship wake analysis and air quality studies. •Indirect and cumulative impacts resulting from expanding the port are not fully evaluated. •The ship wake analysis does not use realistic information (ship sizes, weights, speeds, etc.). The analysis also does not factor in how ship wakes will impact our marine life and shorelines. •The Corps has omitted or not adequately incorporated research available on the Bay (oysters, manatees, etc.) conducted by local scientists. •The 25% increase in truck traffic forecasted by the study will directly impact low income communities. The Corps has not acknowledged these impacts. •The study's consideration of air quality impacts is very inadequate. This is a clear violation of NEPA. The Corps' conclusion of "no impact" on the environment is unfounded given the flaws noted above and the magnitude of the proposed project. | <ul style="list-style-type: none"> • See comment response #42. |
| 138 | Daniel Deese | 7/1/2019 | <ul style="list-style-type: none"> •The study's assumption that fewer ships will enter the port if the channel is deepened and widened. This is especially problematic as this assumption drives the ship wake analysis and air quality studies. •Indirect and cumulative impacts resulting from expanding the port are not fully evaluated. •The ship wake analysis does not use realistic information (ship sizes, weights, speeds, etc.). The analysis also does not factor in how ship wakes will impact our marine life and shorelines. •The Corps has omitted or not adequately incorporated research available on the Bay (oysters, manatees, etc.) conducted by local scientists. •The 25% increase in truck traffic forecasted by the study will directly impact low income communities. The Corps has not acknowledged these impacts. •The study's consideration of air quality impacts is very inadequate. This is a clear violation of NEPA. The Corps' conclusion of "no impact" on the environment is unfounded given the flaws noted above and the magnitude of the proposed project. | <ul style="list-style-type: none"> • See comment response #42. |
| 139 | Daniel Deese | 7/1/2019 | <ul style="list-style-type: none"> • The environmental studies were inadequate. | <ul style="list-style-type: none"> • The USACE findings regarding environmental effects can be found in Appendix C of the Main Report. |

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| 140 | David Muscat | 7/1/2019 | <ul style="list-style-type: none"> •The study's assumption that fewer ships will enter the port if the channel is deepened and widened. This is especially problematic as this assumption drives the ship wake analysis and air quality studies. •Indirect and cumulative impacts resulting from expanding the port are not fully evaluated. •The ship wake analysis does not use realistic information (ship sizes, weights, speeds, etc.). The analysis also does not factor in how ship wakes will impact our marine life and shorelines. •The Corps has omitted or not adequately incorporated research available on the Bay (oysters, manatees, etc.) conducted by local scientists. •The 25% increase in truck traffic forecasted by the study will directly impact low income communities. The Corps has not acknowledged these impacts. •The study's consideration of air quality impacts is very inadequate. This is a clear violation of NEPA. The Corps' conclusion of "no impact" on the environment is unfounded given the flaws noted above and the magnitude of the proposed project. | • See comment response #42. |
| 141 | Debbie Volovecky | 7/1/2019 | <ul style="list-style-type: none"> •The study's assumption that fewer ships will enter the port if the channel is deepened and widened. This is especially problematic as this assumption drives the ship wake analysis and air quality studies. •Indirect and cumulative impacts resulting from expanding the port are not fully evaluated. •The ship wake analysis does not use realistic information (ship sizes, weights, speeds, etc.). The analysis also does not factor in how ship wakes will impact our marine life and shorelines. •The Corps has omitted or not adequately incorporated research available on the Bay (oysters, manatees, etc.) conducted by local scientists. •The 25% increase in truck traffic forecasted by the study will directly impact low income communities. The Corps has not acknowledged these impacts. •The study's consideration of air quality impacts is very inadequate. This is a clear violation of NEPA. The Corps' conclusion of "no impact" on the environment is unfounded given the flaws noted above and the magnitude of the proposed project. | • See comment response #42. |
| 142 | Eleanora Mauritsen | 7/1/2019 | <ul style="list-style-type: none"> •The study's assumption that fewer ships will enter the port if the channel is deepened and widened. This is especially problematic as this assumption drives the ship wake analysis and air quality studies. •Indirect and cumulative impacts resulting from expanding the port are not fully evaluated. •The ship wake analysis does not use realistic information (ship sizes, weights, speeds, etc.). The analysis also does not factor in how ship wakes will impact our marine life and shorelines. •The Corps has omitted or not adequately incorporated research available on the Bay (oysters, manatees, etc.) conducted by local scientists. •The 25% increase in truck traffic forecasted by the study will directly impact low income communities. The Corps has not acknowledged these impacts. •The study's consideration of air quality impacts is very inadequate. This is a clear violation of NEPA. The Corps' conclusion of "no impact" on the environment is unfounded given the flaws noted above and the magnitude of the proposed project. | • See comment response #42. |
| 143 | James and Lynn Parker | 7/1/2019 | <ul style="list-style-type: none"> •The study's assumption that fewer ships will enter the port if the channel is deepened and widened. This is especially problematic as this assumption drives the ship wake analysis and air quality studies. •Indirect and cumulative impacts resulting from expanding the port are not fully evaluated. •The ship wake analysis does not use realistic information (ship sizes, weights, speeds, etc.). The analysis also does not factor in how ship wakes will impact our marine life and shorelines. •The Corps has omitted or not adequately incorporated research available on the Bay (oysters, manatees, etc.) conducted by local scientists. •The 25% increase in truck traffic forecasted by the study will directly impact low income communities. The Corps has not acknowledged these impacts. •The study's consideration of air quality impacts is very inadequate. This is a clear violation of NEPA. The Corps' conclusion of "no impact" on the environment is unfounded given the flaws noted above and the magnitude of the proposed project. | • See comment response #42. |

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| 144 | James Hood | 7/1/2019 | <ul style="list-style-type: none"> •The study's assumption that fewer ships will enter the port if the channel is deepened and widened. This is especially problematic as this assumption drives the ship wake analysis and air quality studies. •Indirect and cumulative impacts resulting from expanding the port are not fully evaluated. •The ship wake analysis does not use realistic information (ship sizes, weights, speeds, etc.). The analysis also does not factor in how ship wakes will impact our marine life and shorelines. •The Corps has omitted or not adequately incorporated research available on the Bay (oysters, manatees, etc.) conducted by local scientists. •The 25% increase in truck traffic forecasted by the study will directly impact low income communities. The Corps has not acknowledged these impacts. •The study's consideration of air quality impacts is very inadequate. This is a clear violation of NEPA. The Corps' conclusion of "no impact" on the environment is unfounded given the flaws noted above and the magnitude of the proposed project. | <ul style="list-style-type: none"> • See comment response #42. |
| 145 | Jim Harlow | 7/1/2019 | <ul style="list-style-type: none"> • Requests Bar Channel dredged sands be placed within SIBUA NW Expansion at 15 feet or below. | <ul style="list-style-type: none"> • Our findings as related to the recommended channel modifications and SIBUA are presented in Section 2.4.3.1.3 Bar Channel, Section 2.4.4.3. SIBUA for the Bar Channel, and Section 4.2.2.3 SIBUA for the Bar Channel. Additional Information on SIBUA can be found in paragraphs 5.3.3. Sediment Transport, and 5.7 Dredging and Placement Areas. |
| 146 | JJ Moody | 7/1/2019 | <ul style="list-style-type: none"> •The study's assumption that fewer ships will enter the port if the channel is deepened and widened. This is especially problematic as this assumption drives the ship wake analysis and air quality studies. •Indirect and cumulative impacts resulting from expanding the port are not fully evaluated. •The ship wake analysis does not use realistic information (ship sizes, weights, speeds, etc.). The analysis also does not factor in how ship wakes will impact our marine life and shorelines. •The Corps has omitted or not adequately incorporated research available on the Bay (oysters, manatees, etc.) conducted by local scientists. •The 25% increase in truck traffic forecasted by the study will directly impact low income communities. The Corps has not acknowledged these impacts. •The study's consideration of air quality impacts is very inadequate. This is a clear violation of NEPA. The Corps' conclusion of "no impact" on the environment is unfounded given the flaws noted above and the magnitude of the proposed project. | <ul style="list-style-type: none"> • See comment response #42. |
| 147 | Joe Anthony | 7/1/2019 | <ul style="list-style-type: none"> •The study's assumption that fewer ships will enter the port if the channel is deepened and widened. This is especially problematic as this assumption drives the ship wake analysis and air quality studies. •Indirect and cumulative impacts resulting from expanding the port are not fully evaluated. •The ship wake analysis does not use realistic information (ship sizes, weights, speeds, etc.). The analysis also does not factor in how ship wakes will impact our marine life and shorelines. •The Corps has omitted or not adequately incorporated research available on the Bay (oysters, manatees, etc.) conducted by local scientists. •The 25% increase in truck traffic forecasted by the study will directly impact low income communities. The Corps has not acknowledged these impacts. •The study's consideration of air quality impacts is very inadequate. This is a clear violation of NEPA. The Corps' conclusion of "no impact" on the environment is unfounded given the flaws noted above and the magnitude of the proposed project. | <ul style="list-style-type: none"> • See comment response #42. |
| 148 | Joshua Boyd | 7/1/2019 | <ul style="list-style-type: none"> •The study's assumption that fewer ships will enter the port if the channel is deepened and widened. This is especially problematic as this assumption drives the ship wake analysis and air quality studies. •Indirect and cumulative impacts resulting from expanding the port are not fully evaluated. •The ship wake analysis does not use realistic information (ship sizes, weights, speeds, etc.). The analysis also does not factor in how ship wakes will impact our marine life and shorelines. •The Corps has omitted or not adequately incorporated research available on the Bay (oysters, manatees, etc.) conducted by local scientists. •The 25% increase in truck traffic forecasted by the study will directly impact low income communities. The Corps has not acknowledged these impacts. •The study's consideration of air quality impacts is very inadequate. This is a clear violation of NEPA. The Corps' conclusion of "no impact" on the environment is unfounded given the flaws noted above and the magnitude of the proposed project. | <ul style="list-style-type: none"> • See comment response #42. |

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| 149 | Kathy Gimore | 7/1/2019 | <ul style="list-style-type: none"> •The study's assumption that fewer ships will enter the port if the channel is deepened and widened. This is especially problematic as this assumption drives the ship wake analysis and air quality studies. •Indirect and cumulative impacts resulting from expanding the port are not fully evaluated. •The ship wake analysis does not use realistic information (ship sizes, weights, speeds, etc.). The analysis also does not factor in how ship wakes will impact our marine life and shorelines. •The Corps has omitted or not adequately incorporated research available on the Bay (oysters, manatees, etc.) conducted by local scientists. •The 25% increase in truck traffic forecasted by the study will directly impact low income communities. The Corps has not acknowledged these impacts. •The study's consideration of air quality impacts is very inadequate. This is a clear violation of NEPA. The Corps' conclusion of "no impact" on the environment is unfounded given the flaws noted above and the magnitude of the proposed project. | <ul style="list-style-type: none"> • See comment response #42. |
| 150 | Laura Jane Rogers | 7/1/2019 | <ul style="list-style-type: none"> •The study's assumption that fewer ships will enter the port if the channel is deepened and widened. This is especially problematic as this assumption drives the ship wake analysis and air quality studies. •Indirect and cumulative impacts resulting from expanding the port are not fully evaluated. •The ship wake analysis does not use realistic information (ship sizes, weights, speeds, etc.). The analysis also does not factor in how ship wakes will impact our marine life and shorelines. •The Corps has omitted or not adequately incorporated research available on the Bay (oysters, manatees, etc.) conducted by local scientists. •The 25% increase in truck traffic forecasted by the study will directly impact low income communities. The Corps has not acknowledged these impacts. •The study's consideration of air quality impacts is very inadequate. This is a clear violation of NEPA. The Corps' conclusion of "no impact" on the environment is unfounded given the flaws noted above and the magnitude of the proposed project. | <ul style="list-style-type: none"> • See comment response #42. |
| 151 | Leslie Leachman | 7/1/2019 | <ul style="list-style-type: none"> •The study's assumption that fewer ships will enter the port if the channel is deepened and widened. This is especially problematic as this assumption drives the ship wake analysis and air quality studies. •Indirect and cumulative impacts resulting from expanding the port are not fully evaluated. •The ship wake analysis does not use realistic information (ship sizes, weights, speeds, etc.). The analysis also does not factor in how ship wakes will impact our marine life and shorelines. •The Corps has omitted or not adequately incorporated research available on the Bay (oysters, manatees, etc.) conducted by local scientists. •The 25% increase in truck traffic forecasted by the study will directly impact low income communities. The Corps has not acknowledged these impacts. •The study's consideration of air quality impacts is very inadequate. This is a clear violation of NEPA. The Corps' conclusion of "no impact" on the environment is unfounded given the flaws noted above and the magnitude of the proposed project. | <ul style="list-style-type: none"> • See comment response #42. |
| 152 | Linde Lynn | 7/1/2019 | <ul style="list-style-type: none"> • Trusts Mobile BayKeeper and requests a new study. | <ul style="list-style-type: none"> • The USACE findings regarding environmental effects can be found in Appendix C of the Main Report. |
| 153 | Margaret Neely | 7/1/2019 | <ul style="list-style-type: none"> •The study's assumption that fewer ships will enter the port if the channel is deepened and widened. This is especially problematic as this assumption drives the ship wake analysis and air quality studies. •Indirect and cumulative impacts resulting from expanding the port are not fully evaluated. •The ship wake analysis does not use realistic information (ship sizes, weights, speeds, etc.). The analysis also does not factor in how ship wakes will impact our marine life and shorelines. •The Corps has omitted or not adequately incorporated research available on the Bay (oysters, manatees, etc.) conducted by local scientists. •The 25% increase in truck traffic forecasted by the study will directly impact low income communities. The Corps has not acknowledged these impacts. •The study's consideration of air quality impacts is very inadequate. This is a clear violation of NEPA. The Corps' conclusion of "no impact" on the environment is unfounded given the flaws noted above and the magnitude of the proposed project. | <ul style="list-style-type: none"> • See comment response #42. |

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| 154 | Martha Robbins | 7/1/2019 | <ul style="list-style-type: none"> •The study's assumption that fewer ships will enter the port if the channel is deepened and widened. This is especially problematic as this assumption drives the ship wake analysis and air quality studies. •Indirect and cumulative impacts resulting from expanding the port are not fully evaluated. •The ship wake analysis does not use realistic information (ship sizes, weights, speeds, etc.). The analysis also does not factor in how ship wakes will impact our marine life and shorelines. •The Corps has omitted or not adequately incorporated research available on the Bay (oysters, manatees, etc.) conducted by local scientists. •The 25% increase in truck traffic forecasted by the study will directly impact low income communities. The Corps has not acknowledged these impacts. •The study's consideration of air quality impacts is very inadequate. This is a clear violation of NEPA. The Corps' conclusion of "no impact" on the environment is unfounded given the flaws noted above and the magnitude of the proposed project. | • See comment response #42. |
| 155 | Peggy Partridge | 7/1/2019 | <ul style="list-style-type: none"> •The study's assumption that fewer ships will enter the port if the channel is deepened and widened. This is especially problematic as this assumption drives the ship wake analysis and air quality studies. •Indirect and cumulative impacts resulting from expanding the port are not fully evaluated. •The ship wake analysis does not use realistic information (ship sizes, weights, speeds, etc.). The analysis also does not factor in how ship wakes will impact our marine life and shorelines. •The Corps has omitted or not adequately incorporated research available on the Bay (oysters, manatees, etc.) conducted by local scientists. •The 25% increase in truck traffic forecasted by the study will directly impact low income communities. The Corps has not acknowledged these impacts. •The study's consideration of air quality impacts is very inadequate. This is a clear violation of NEPA. The Corps' conclusion of "no impact" on the environment is unfounded given the flaws noted above and the magnitude of the proposed project. | • See comment response #42. |
| 156 | Priscilla Dabney | 7/1/2019 | <ul style="list-style-type: none"> •The study's assumption that fewer ships will enter the port if the channel is deepened and widened. This is especially problematic as this assumption drives the ship wake analysis and air quality studies. •Indirect and cumulative impacts resulting from expanding the port are not fully evaluated. •The ship wake analysis does not use realistic information (ship sizes, weights, speeds, etc.). The analysis also does not factor in how ship wakes will impact our marine life and shorelines. •The Corps has omitted or not adequately incorporated research available on the Bay (oysters, manatees, etc.) conducted by local scientists. •The 25% increase in truck traffic forecasted by the study will directly impact low income communities. The Corps has not acknowledged these impacts. •The study's consideration of air quality impacts is very inadequate. This is a clear violation of NEPA. The Corps' conclusion of "no impact" on the environment is unfounded given the flaws noted above and the magnitude of the proposed project. | • See comment response #42. |
| 157 | Rebecca Parker | 7/1/2019 | <ul style="list-style-type: none"> •The study's assumption that fewer ships will enter the port if the channel is deepened and widened. This is especially problematic as this assumption drives the ship wake analysis and air quality studies. •Indirect and cumulative impacts resulting from expanding the port are not fully evaluated. •The ship wake analysis does not use realistic information (ship sizes, weights, speeds, etc.). The analysis also does not factor in how ship wakes will impact our marine life and shorelines. •The Corps has omitted or not adequately incorporated research available on the Bay (oysters, manatees, etc.) conducted by local scientists. •The 25% increase in truck traffic forecasted by the study will directly impact low income communities. The Corps has not acknowledged these impacts. •The study's consideration of air quality impacts is very inadequate. This is a clear violation of NEPA. The Corps' conclusion of "no impact" on the environment is unfounded given the flaws noted above and the magnitude of the proposed project. | • See comment response #42. |

| Comment No. | Commenter Name | Date | Comment Summary | Response |
|-------------|----------------|----------|--|---|
| 158 | Rick Normand | 7/1/2019 | <ul style="list-style-type: none"> •The study's assumption that fewer ships will enter the port if the channel is deepened and widened. This is especially problematic as this assumption drives the ship wake analysis and air quality studies. •Indirect and cumulative impacts resulting from expanding the port are not fully evaluated. •The ship wake analysis does not use realistic information (ship sizes, weights, speeds, etc.). The analysis also does not factor in how ship wakes will impact our marine life and shorelines. •The Corps has omitted or not adequately incorporated research available on the Bay (oysters, manatees, etc.) conducted by local scientists. •The 25% increase in truck traffic forecasted by the study will directly impact low income communities. The Corps has not acknowledged these impacts. •The study's consideration of air quality impacts is very inadequate. This is a clear violation of NEPA. The Corps' conclusion of "no impact" on the environment is unfounded given the flaws noted above and the magnitude of the proposed project. | <ul style="list-style-type: none"> • See comment response #42. |
| 159 | Russ Voisin | 7/1/2019 | <ul style="list-style-type: none"> • Requests Bar Channel dredged sands be placed within SIBUA NW Expansion at 15 feet or below. | <ul style="list-style-type: none"> • See Section See Section 4.2.2.3 SIBUA for the Bar Channel and Section 4.2.2.3.1 Future Monitoring and Management of SIBUA. • Further details can be found in Sections 2.4.3.1.3 Bar Channel, 2.4.4.3 SIBUA for the Bar Channel, 5.3.3 Sediment Transport, and 5.7 Dredging and Placement Areas |
| 160 | Sam Wilkes | 7/1/2019 | <ul style="list-style-type: none"> •The study's assumption that fewer ships will enter the port if the channel is deepened and widened. This is especially problematic as this assumption drives the ship wake analysis and air quality studies. •Indirect and cumulative impacts resulting from expanding the port are not fully evaluated. •The ship wake analysis does not use realistic information (ship sizes, weights, speeds, etc.). The analysis also does not factor in how ship wakes will impact our marine life and shorelines. •The Corps has omitted or not adequately incorporated research available on the Bay (oysters, manatees, etc.) conducted by local scientists. •The 25% increase in truck traffic forecasted by the study will directly impact low income communities. The Corps has not acknowledged these impacts. •The study's consideration of air quality impacts is very inadequate. This is a clear violation of NEPA. The Corps' conclusion of "no impact" on the environment is unfounded given the flaws noted above and the magnitude of the proposed project. | <ul style="list-style-type: none"> • See comment response #42. |
| 161 | Sharon Dixon | 7/1/2019 | <ul style="list-style-type: none"> •The study's assumption that fewer ships will enter the port if the channel is deepened and widened. This is especially problematic as this assumption drives the ship wake analysis and air quality studies. •Indirect and cumulative impacts resulting from expanding the port are not fully evaluated. •The ship wake analysis does not use realistic information (ship sizes, weights, speeds, etc.). The analysis also does not factor in how ship wakes will impact our marine life and shorelines. •The Corps has omitted or not adequately incorporated research available on the Bay (oysters, manatees, etc.) conducted by local scientists. •The 25% increase in truck traffic forecasted by the study will directly impact low income communities. The Corps has not acknowledged these impacts. •The study's consideration of air quality impacts is very inadequate. This is a clear violation of NEPA. The Corps' conclusion of "no impact" on the environment is unfounded given the flaws noted above and the magnitude of the proposed project. | <ul style="list-style-type: none"> • See comment response #42. |

| Comment No. | Commenter Name | Date | Comment Summary | Response |
|-------------|-----------------|----------|--|---|
| 162 | Charles Rodning | 7/2/2019 | <ul style="list-style-type: none"> •The study's assumption that fewer ships will enter the port if the channel is deepened and widened. This is especially problematic as this assumption drives the ship wake analysis and air quality studies. •Indirect and cumulative impacts resulting from expanding the port are not fully evaluated. •The ship wake analysis does not use realistic information (ship sizes, weights, speeds, etc.). The analysis also does not factor in how ship wakes will impact our marine life and shorelines. •The Corps has omitted or not adequately incorporated research available on the Bay (oysters, manatees, etc.) conducted by local scientists. •The 25% increase in truck traffic forecasted by the study will directly impact low income communities. The Corps has not acknowledged these impacts. •The study's consideration of air quality impacts is very inadequate. This is a clear violation of NEPA. The Corps' conclusion of "no impact" on the environment is unfounded given the flaws noted above and the magnitude of the proposed project. | <ul style="list-style-type: none"> • See comment response #42. |
| 163 | Debbie Pezzillo | 7/2/2019 | <ul style="list-style-type: none"> •The study's assumption that fewer ships will enter the port if the channel is deepened and widened. This is especially problematic as this assumption drives the ship wake analysis and air quality studies. •Indirect and cumulative impacts resulting from expanding the port are not fully evaluated. •The ship wake analysis does not use realistic information (ship sizes, weights, speeds, etc.). The analysis also does not factor in how ship wakes will impact our marine life and shorelines. •The Corps has omitted or not adequately incorporated research available on the Bay (oysters, manatees, etc.) conducted by local scientists. •The 25% increase in truck traffic forecasted by the study will directly impact low income communities. The Corps has not acknowledged these impacts. •The study's consideration of air quality impacts is very inadequate. This is a clear violation of NEPA. The Corps' conclusion of "no impact" on the environment is unfounded given the flaws noted above and the magnitude of the proposed project. | <ul style="list-style-type: none"> • See comment response #42. |
| 164 | Denise Keaton | 7/2/2019 | <ul style="list-style-type: none"> •The study's assumption that fewer ships will enter the port if the channel is deepened and widened. This is especially problematic as this assumption drives the ship wake analysis and air quality studies. •Indirect and cumulative impacts resulting from expanding the port are not fully evaluated. •The ship wake analysis does not use realistic information (ship sizes, weights, speeds, etc.). The analysis also does not factor in how ship wakes will impact our marine life and shorelines. •The Corps has omitted or not adequately incorporated research available on the Bay (oysters, manatees, etc.) conducted by local scientists. •The 25% increase in truck traffic forecasted by the study will directly impact low income communities. The Corps has not acknowledged these impacts. •The study's consideration of air quality impacts is very inadequate. This is a clear violation of NEPA. The Corps' conclusion of "no impact" on the environment is unfounded given the flaws noted above and the magnitude of the proposed project. | <ul style="list-style-type: none"> • See comment response #42. |
| 165 | Greg Becker | 7/2/2019 | <ul style="list-style-type: none"> •The study's assumption that fewer ships will enter the port if the channel is deepened and widened. This is especially problematic as this assumption drives the ship wake analysis and air quality studies. •Indirect and cumulative impacts resulting from expanding the port are not fully evaluated. •The ship wake analysis does not use realistic information (ship sizes, weights, speeds, etc.). The analysis also does not factor in how ship wakes will impact our marine life and shorelines. •The Corps has omitted or not adequately incorporated research available on the Bay (oysters, manatees, etc.) conducted by local scientists. •The 25% increase in truck traffic forecasted by the study will directly impact low income communities. The Corps has not acknowledged these impacts. •The study's consideration of air quality impacts is very inadequate. This is a clear violation of NEPA. The Corps' conclusion of "no impact" on the environment is unfounded given the flaws noted above and the magnitude of the proposed project. | <ul style="list-style-type: none"> • See comment response #42. |

| Comment No. | Commenter Name | Date | Comment Summary | Response |
|-------------|-----------------|----------|--|-----------------------------|
| 166 | Jennifer Woods | 7/2/2019 | <ul style="list-style-type: none"> •The study's assumption that fewer ships will enter the port if the channel is deepened and widened. This is especially problematic as this assumption drives the ship wake analysis and air quality studies. •Indirect and cumulative impacts resulting from expanding the port are not fully evaluated. •The ship wake analysis does not use realistic information (ship sizes, weights, speeds, etc.). The analysis also does not factor in how ship wakes will impact our marine life and shorelines. •The Corps has omitted or not adequately incorporated research available on the Bay (oysters, manatees, etc.) conducted by local scientists. •The 25% increase in truck traffic forecasted by the study will directly impact low income communities. The Corps has not acknowledged these impacts. •The study's consideration of air quality impacts is very inadequate. This is a clear violation of NEPA. The Corps' conclusion of "no impact" on the environment is unfounded given the flaws noted above and the magnitude of the proposed project. | • See comment response #42. |
| 167 | Johnnie Johnson | 7/2/2019 | <ul style="list-style-type: none"> •The study's assumption that fewer ships will enter the port if the channel is deepened and widened. This is especially problematic as this assumption drives the ship wake analysis and air quality studies. •Indirect and cumulative impacts resulting from expanding the port are not fully evaluated. •The ship wake analysis does not use realistic information (ship sizes, weights, speeds, etc.). The analysis also does not factor in how ship wakes will impact our marine life and shorelines. •The Corps has omitted or not adequately incorporated research available on the Bay (oysters, manatees, etc.) conducted by local scientists. •The 25% increase in truck traffic forecasted by the study will directly impact low income communities. The Corps has not acknowledged these impacts. •The study's consideration of air quality impacts is very inadequate. This is a clear violation of NEPA. The Corps' conclusion of "no impact" on the environment is unfounded given the flaws noted above and the magnitude of the proposed project. | • See comment response #42. |
| 168 | Muriel Hoquist | 7/2/2019 | <ul style="list-style-type: none"> •The study's assumption that fewer ships will enter the port if the channel is deepened and widened. This is especially problematic as this assumption drives the ship wake analysis and air quality studies. •Indirect and cumulative impacts resulting from expanding the port are not fully evaluated. •The ship wake analysis does not use realistic information (ship sizes, weights, speeds, etc.). The analysis also does not factor in how ship wakes will impact our marine life and shorelines. •The Corps has omitted or not adequately incorporated research available on the Bay (oysters, manatees, etc.) conducted by local scientists. •The 25% increase in truck traffic forecasted by the study will directly impact low income communities. The Corps has not acknowledged these impacts. •The study's consideration of air quality impacts is very inadequate. This is a clear violation of NEPA. The Corps' conclusion of "no impact" on the environment is unfounded given the flaws noted above and the magnitude of the proposed project. | • See comment response #42. |
| 169 | Prentiss Smith | 7/2/2019 | <ul style="list-style-type: none"> •The study's assumption that fewer ships will enter the port if the channel is deepened and widened. This is especially problematic as this assumption drives the ship wake analysis and air quality studies. •Indirect and cumulative impacts resulting from expanding the port are not fully evaluated. •The ship wake analysis does not use realistic information (ship sizes, weights, speeds, etc.). The analysis also does not factor in how ship wakes will impact our marine life and shorelines. •The Corps has omitted or not adequately incorporated research available on the Bay (oysters, manatees, etc.) conducted by local scientists. •The 25% increase in truck traffic forecasted by the study will directly impact low income communities. The Corps has not acknowledged these impacts. •The study's consideration of air quality impacts is very inadequate. This is a clear violation of NEPA. The Corps' conclusion of "no impact" on the environment is unfounded given the flaws noted above and the magnitude of the proposed project. | • See comment response #42. |

| Comment No. | Commenter Name | Date | Comment Summary | Response |
|-------------|--------------------|----------|--|---|
| 170 | Sam St. John | 7/2/2019 | <ul style="list-style-type: none"> •The study's assumption that fewer ships will enter the port if the channel is deepened and widened. This is especially problematic as this assumption drives the ship wake analysis and air quality studies. •Indirect and cumulative impacts resulting from expanding the port are not fully evaluated. •The ship wake analysis does not use realistic information (ship sizes, weights, speeds, etc.). The analysis also does not factor in how ship wakes will impact our marine life and shorelines. •The Corps has omitted or not adequately incorporated research available on the Bay (oysters, manatees, etc.) conducted by local scientists. •The 25% increase in truck traffic forecasted by the study will directly impact low income communities. The Corps has not acknowledged these impacts. •The study's consideration of air quality impacts is very inadequate. This is a clear violation of NEPA. The Corps' conclusion of "no impact" on the environment is unfounded given the flaws noted above and the magnitude of the proposed project. | <ul style="list-style-type: none"> • See comment response #42. |
| 171 | Caroline Graves | 7/5/2019 | <ul style="list-style-type: none"> • Concerns over navigation channel's impact on erosion/need for mitigation. | <ul style="list-style-type: none"> • The findings of the USACE in relation to the effects of the recommended channel modifications on Coastal Sediment Transport are as presented Section 5.3.3 Sediment Transport, and Section 6.1.1.1. Effect on Coastal Sediment Transport. |
| 172 | Stella CF Fickling | 7/5/2019 | <ul style="list-style-type: none"> •The study's assumption that fewer ships will enter the port if the channel is deepened and widened. This is especially problematic as this assumption drives the ship wake analysis and air quality studies. •Indirect and cumulative impacts resulting from expanding the port are not fully evaluated. •The ship wake analysis does not use realistic information (ship sizes, weights, speeds, etc.). The analysis also does not factor in how ship wakes will impact our marine life and shorelines. •The Corps has omitted or not adequately incorporated research available on the Bay (oysters, manatees, etc.) conducted by local scientists. •The 25% increase in truck traffic forecasted by the study will directly impact low income communities. The Corps has not acknowledged these impacts. •The study's consideration of air quality impacts is very inadequate. This is a clear violation of NEPA. The Corps' conclusion of "no impact" on the environment is unfounded given the flaws noted above and the magnitude of the proposed project. | <ul style="list-style-type: none"> • See comment response #42. |
| 173 | Sue Beard | 7/5/2019 | <ul style="list-style-type: none"> •The study's assumption that fewer ships will enter the port if the channel is deepened and widened. This is especially problematic as this assumption drives the ship wake analysis and air quality studies. •Indirect and cumulative impacts resulting from expanding the port are not fully evaluated. •The ship wake analysis does not use realistic information (ship sizes, weights, speeds, etc.). The analysis also does not factor in how ship wakes will impact our marine life and shorelines. •The Corps has omitted or not adequately incorporated research available on the Bay (oysters, manatees, etc.) conducted by local scientists. •The 25% increase in truck traffic forecasted by the study will directly impact low income communities. The Corps has not acknowledged these impacts. •The study's consideration of air quality impacts is very inadequate. This is a clear violation of NEPA. The Corps' conclusion of "no impact" on the environment is unfounded given the flaws noted above and the magnitude of the proposed project. | <ul style="list-style-type: none"> • See comment response #42. |
| 174 | Judith Hornady | 7/7/2019 | <ul style="list-style-type: none"> •The study's assumption that fewer ships will enter the port if the channel is deepened and widened. This is especially problematic as this assumption drives the ship wake analysis and air quality studies. •Indirect and cumulative impacts resulting from expanding the port are not fully evaluated. •The ship wake analysis does not use realistic information (ship sizes, weights, speeds, etc.). The analysis also does not factor in how ship wakes will impact our marine life and shorelines. •The Corps has omitted or not adequately incorporated research available on the Bay (oysters, manatees, etc.) conducted by local scientists. •The 25% increase in truck traffic forecasted by the study will directly impact low income communities. The Corps has not acknowledged these impacts. •The study's consideration of air quality impacts is very inadequate. This is a clear violation of NEPA. The Corps' conclusion of "no impact" on the environment is unfounded given the flaws noted above and the magnitude of the proposed project. | <ul style="list-style-type: none"> • See comment response #42. |

Final Mobile Harbor GRR/SEIS Response Matrix

Revision Date: August 14, 2019

| Comment No. | Commenter Name | Date | Comment Summary | Response |
|-------------|---|-----------|--|---|
| 175 | Stan Graves | 7/8/2019 | <ul style="list-style-type: none"> Concerns over navigation channel's impact on erosion and need for mitigation. | <ul style="list-style-type: none"> The findings of the Corps of Engineers in relation to the effects of the recommended channel modifications on Coastal Sediment Transport are as presented Section 5.3.3 Sediment Transport, and Section 6.1.1.1. Effect on Coastal Sediment Transport. |
| 176 | Penny Smith | 7/9/2019 | <ul style="list-style-type: none"> USACE failed to mitigate for wrongdoings of the past 40 years. USACE GRR/SEIS has errors based on errors in 2008 Byrnes report. Requests a complete beach renourishment for entire 6.5 miles of shoreline. Requests Bar sands be placed in waters 10-15 feet deep along a parallel nearshore berm for the modification and all future maintenance. | <ul style="list-style-type: none"> See Section 5.3.3 Sediment Transport, Section 6.1 Cumulative Impacts, and 6.1.1.1 Effects on Coastal Sediment Transport. Also see Section 4.2.3.3. Direct Placement on Dauphin Island Beaches |
| 177 | Elizabeth Mack | 7/10/2019 | <ul style="list-style-type: none"> The study's assumption that fewer ships will enter the port if the channel is deepened and widened. This is especially problematic as this assumption drives the ship wake analysis and air quality studies. Indirect and cumulative impacts resulting from expanding the port are not fully evaluated. The ship wake analysis does not use realistic information (ship sizes, weights, speeds, etc.). The analysis also does not factor in how ship wakes will impact our marine life and shorelines. The Corps has omitted or not adequately incorporated research available on the Bay (oysters, manatees, etc.) conducted by local scientists. The 25% increase in truck traffic forecasted by the study will directly impact low income communities. The Corps has not acknowledged these impacts. The study's consideration of air quality impacts is very inadequate. This is a clear violation of NEPA. The Corps' conclusion of "no impact" on the environment is unfounded given the flaws noted above and the magnitude of the proposed project. | <ul style="list-style-type: none"> See comment response #42. |
| 178 | Garrett Mangum | 7/14/2019 | <ul style="list-style-type: none"> USACE actions form of eminent domain. Studies and public comments were ignored. | <ul style="list-style-type: none"> See Appendix E for the record of public comments and the USACE responses. In addition, see Section 6.3.4 General Public Meetings of the Main report for public involvement details. |
| 179 | Avery Bates Organized Seafood Association | 7/15/2019 | <ul style="list-style-type: none"> See attachment 2 for itemized comments and USACE responses. | <ul style="list-style-type: none"> See attachment #2 below. |
| 180 | Jessica Croft | 7/16/2019 | <ul style="list-style-type: none"> The study's assumption that fewer ships will enter the port if the channel is deepened and widened. This is especially problematic as this assumption drives the ship wake analysis and air quality studies. Indirect and cumulative impacts resulting from expanding the port are not fully evaluated. The ship wake analysis does not use realistic information (ship sizes, weights, speeds, etc.). The analysis also does not factor in how ship wakes will impact our marine life and shorelines. The Corps has omitted or not adequately incorporated research available on the Bay (oysters, manatees, etc.) conducted by local scientists. The 25% increase in truck traffic forecasted by the study will directly impact low income communities. The Corps has not acknowledged these impacts. The study's consideration of air quality impacts is very inadequate. This is a clear violation of NEPA. The Corps' conclusion of "no impact" on the environment is unfounded given the flaws noted above and the magnitude of the proposed project. | <ul style="list-style-type: none"> See comment response #42. |
| 181 | Caroline Graves | 7/17/2019 | <ul style="list-style-type: none"> Concerns over the ASPA's financial capability to meet cost/share responsibility. | <ul style="list-style-type: none"> Tax revenue from the Rebuild Alabama infrastructure bill will supply the necessary state match for the Alabama State Port Authority. |
| 182 | Eddie Kerr Mobile County | 7/17/2019 | <ul style="list-style-type: none"> Requests to be a recipient of dredge material for a Beneficial Use project along a 3.3 mile stretch in Mobile County from Bayfront Park to Cedar Point. | <ul style="list-style-type: none"> Concur. During the USACE's Planning Engineering and Design Phase (PED), Mobile District will coordinate with Mobile County representatives to ensure anticipated dredging schedules are known to allow ample time for completion of their planning, design, and containment construction efforts. This close communication between Mobile County and USACE, Mobile District will allow the new work dredged material to be beneficially utilized by the County. |
| 183 | EPA Ntale Kajumba | 7/17/2019 | <ul style="list-style-type: none"> Acknowledges the USACE responses to EPA comments and concerns. Reiterated USACE commitments to included information in the ERRATA sheets with the Record of Decision and future coordination to develop criteria for relevant water resource parameters and the water quality monitoring approach. | <ul style="list-style-type: none"> Concur. No further action required. |

Final Mobile Harbor GRR/SEIS Response Matrix

Revision Date: August 14, 2019

| Comment No. | Commenter Name | Date | Comment Summary | Response |
|-------------|--------------------------------|-----------|--|---|
| 184 | Casi Callaway Mobile BayKeeper | 7/18/2019 | <ul style="list-style-type: none"> • See attachment #3 for itemized comments and USACE responses. | <ul style="list-style-type: none"> • See attachment #3 below. |
| 185 | CJ Small City of Mobile | 7/18/2019 | <ul style="list-style-type: none"> • Requests viable dredge material for a beneficial use project. | <ul style="list-style-type: none"> • Concur. During the USACE's Planning Engineering and Design Phase (PED), Mobile District will coordinate with City of Mobile representatives to ensure anticipated dredging schedules are known to allow ample time for completion of their planning, design, and containment construction efforts. This close communication between the City and USACE, Mobile District will allow the new work dredged material to be beneficially utilized by the City. |
| 186 | Emma McDonald | 7/18/2019 | <ul style="list-style-type: none"> •The study's assumption that fewer ships will enter the port if the channel is deepened and widened. This is especially problematic as this assumption drives the ship wake analysis and air quality studies. •Indirect and cumulative impacts resulting from expanding the port are not fully evaluated. •The ship wake analysis does not use realistic information (ship sizes, weights, speeds, etc.). The analysis also does not factor in how ship wakes will impact our marine life and shorelines. •The Corps has omitted or not adequately incorporated research available on the Bay (oysters, manatees, etc.) conducted by local scientists. •The 25% increase in truck traffic forecasted by the study will directly impact low income communities. The Corps has not acknowledged these impacts. •The study's consideration of air quality impacts is very inadequate. This is a clear violation of NEPA. The Corps' conclusion of "no impact" on the environment is unfounded given the flaws noted above and the magnitude of the proposed project. | <ul style="list-style-type: none"> • See comment response #42. |
| 187 | Fred Bell | 7/18/2019 | <ul style="list-style-type: none"> •The study's assumption that fewer ships will enter the port if the channel is deepened and widened. This is especially problematic as this assumption drives the ship wake analysis and air quality studies. •Indirect and cumulative impacts resulting from expanding the port are not fully evaluated. •The ship wake analysis does not use realistic information (ship sizes, weights, speeds, etc.). The analysis also does not factor in how ship wakes will impact our marine life and shorelines. •The Corps has omitted or not adequately incorporated research available on the Bay (oysters, manatees, etc.) conducted by local scientists. •The 25% increase in truck traffic forecasted by the study will directly impact low income communities. The Corps has not acknowledged these impacts. •The study's consideration of air quality impacts is very inadequate. This is a clear violation of NEPA. The Corps' conclusion of "no impact" on the environment is unfounded given the flaws noted above and the magnitude of the proposed project. | <ul style="list-style-type: none"> • See comment response #42. |
| 188 | Keith Johnston SELC | 7/18/2019 | <ul style="list-style-type: none"> • See attachment #4 for itemized comments and USACE responses. | <ul style="list-style-type: none"> • See attachment #4 below. |
| 189 | Dauphin Island POA | 7/19/2019 | <ul style="list-style-type: none"> • SIBUA has not performed as expected. • USACE historically has not been placing material in shallower waters. • DIPOA requests USACE purchase necessary equipment and only solicit bids from qualified dredge contractors that will employ shallow water dredges. | <ul style="list-style-type: none"> • See Section 6.1 Cumulative Impacts and 6.1.1.1 Effects on Coastal Sediment Transport • See Section 4.2.2.3 SIBUA for the Bar Channel • See Section 4.2.2.3.1 Future Monitoring and Management of SIBUA • Section 5.3.3. Sediment Transport • 5.7 Dredging and Placement Areas • 5.26.1 Monitoring |
| 190 | Sierra Club | 7/15/2019 | <ul style="list-style-type: none"> • See attachment #5 for itemized comments and USACE responses. | <ul style="list-style-type: none"> • See attachment #5 below. |
| 191 | Roberta Swann MBNEP | 7/23/2019 | <ul style="list-style-type: none"> • Requests viable dredge material for a beneficial use project. | <ul style="list-style-type: none"> • During the USACE's Planning Engineering and Design Phase (PED), Mobile District will coordinate with MBNEP representatives to coordinate beneficial use opportunities. |

Mobile Environmental Justice Action Coalition (MEJAC) Comments
June 17, 2019

1) Mobile Environmental Justice Action Coalition (MEJAC) is formally requesting a public hearing to allow for wider participation in the review process for the Mobile Harbor, Mobile, Alabama Integrated Final General Evaluation Report with Supplemental Environmental Impact Statement, Mobile County, Alabama (GRR/SEIS).

No further public hearings/meetings are anticipated at this time for the Mobile Harbor GRR Study. A very robust public involvement plan was executed for this study as shown in paragraphs 6.3.4 and 6.3.5 of the Main Report.

2) Again, the Corps' page numbering scheme appears to be faulty in its Appendices.

Comment noted.

3) In response to Environmental Appendix C, Attachment C-3 (as referenced in 5.14 Air Quality section, but which appears labeled as Appendix D) Air Quality Analysis, Section 1.1.3. Stationary Source Permitting Regulation, page "D-14" paragraph 5: "However, due to specific concerns expressed by local communities during scoping and in individual Focus Group meetings, the potential operating emissions from on-port point sources such as terminal exhaust stacks and coal transport operations were quantified."; and

Section 1.1.4. Mobile Sources Regulation, page "D-15": "The emissions from these mobile sources are regulated under Title II of the CAA, which establishes emission standards that manufacturers must achieve. Therefore, unlike stationary sources, no permitting requirements exist for operating mobile sources."; and

Section 1.2 Methodology and Impact Determination, page "D-15" paragraph 3: "The sources of criteria pollutant emissions evaluated include those identified within the port boundary and depicted in Figures 2 and 3.";

The C-TOOLS model developed with USEPA for baseline 2011 and future 2035 emissions inventories in the Corps' Air Quality analysis with respect to both the "Recommended Plan" (RP) and the "No Action Alternative" (NAA) ignore every above ground petrochemical storage tank complex along the Mobile River including the Plains Marketing LP petrochemical terminal at Magazine Point in Africatown, all of which regularly transmit petrochemical product to ocean going tanker vessels, a process through which significant NAAQS-regulated toxic air pollution is emitted annually to the tune of hundreds and hundreds of tons. It makes very little rational sense why these facilities, directly benefited by the RP ship channel enlargement via greater petrochemical product throughput, would be ignored.

For instance, the Plains Marketing LP petrochemical terminal at Magazine Point in Africatown reported in their 2015 Clean Air Act Major Source Operating Permit (Title V) that they were emitting 443.50 tons per year of Volatile Organic Compounds. As MEJAC has been advocating in writing to the Corps' Mobile District for several years since the beginning of this process, the overall petrochemical throughput emission increase resulting from the Corps' RP might impact the air quality model calculations used to contrast against the "major stationary source definition of 250 tons" that was "selected as a comparable project-level significant impact threshold for this SEIS" (Appendix-C Section 2.12.3. Baseline Conditions)

to comply with Clean Air Act and National Environmental Policy Act regulations which require analysis of such potentially adverse project impacts to local air quality.

The above ground petrochemical storage tank facilities in question presumably already have Clean Air Act-compliant permit baselines established. Their inclusion would not have been mathematically onerous. Their exclusion, however, may have been mathematically advantageous, and as an environmental justice coalition, we must fundamentally question the decision to exclude these facilities in the calculations of potential air quality impact between the RP and the NAA in the Corps' Air Quality Analysis without reconciliation beyond stating on pages 5-68/69 of the Mobile Harbor Main Report, "Each terminal maintains its own air permit and any potential increase in air emissions would be addressed and mitigated, if appropriate, through the individual permits, resulting in minor impacts to air quality." The Corps' Air Quality Analysis of its RP in this regard strikes MEJAC as not only inadequate and unacceptable, but, considering the public health implications, as irresponsible and disingenuous, as well.

The Corps must revise its exclusion of all of the Mobile Harbor Ship Channel-dependent above ground petrochemical storage tank facilities from its Air Quality analysis.

With or without deepening the harbor, the impacts remain the same; although a short-term surge could occur due to large ship involvement.

4) In response to Environmental Appendix C, Section 3 Environmental Affects, 24 Environmental Justice pages 3-105/106: "The general absence of significant adverse impacts to human health, environmental health risks, and safety risk indicates the proposed project would not have disproportionately high and adverse impacts to any communities, including environmental justice communities or children for most resource areas. As in the No Action Alternative, there would minor disproportionate impacts to environmental justice communities from truck traffic transporting hazardous materials.";

MEJAC finds it unacceptable that the Corps has decided not to factor in the many hundreds of tons per year worth of toxic emissions from the ship channel-reliant above ground petrochemical storage tank industry in its emissions calculations and how these emissions were also omitted as part of the Corps' Environmental Justice analysis. With several fixed-roof above ground petrochemical storage tanks, the Plains Marking LP facility's potential petrochemical product throughput increases due to increased ship channel capacity should be analyzed appropriately and the potential adverse human health impacts upon people living in the Africatown community from potential exposure should be given due consideration and mitigation if found appropriate.

It is also unacceptable that the impacts upon the Down the Bay community both in the form of increased general port related traffic through their community along the I-10 corridor and connected rail corridors as well as in the form of regular noxious odors and smells indicative of air quality impacts emanating from the Alabama State Port Authority (ASPA) Port of Mobile activities find zero mention whatsoever in the Corps' analysis given the community's direct proximity across the interstate from portions of the Port of Mobile which are projecting massive expansion in the coming years.

The Corps must do due diligence and basic justice to consider the impacts of communities living along the fencelines of the major arterial transportation corridors serving its facilities.

MEJAC considers it grossly inadequate that NAAQS air quality sampling along the ASPA facility fencelines and major arterial transportation corridors were not taken and the micro-climate air quality of directly impacted communities along these critical infrastructural corridors was ignored.

As indicated above, with or without deepening the harbor, they remain the same although a short-term surge could occur due to large ship involvement.

5) The Mobile Harbor GRR/SEIS process has revealed gaping holes in the knowledge base of the federal agency regarding the actual air quality in communities living along the fencelines of ASPA facilities and Mobile Harbor-dependent facilities. MEJAC insists that the Mobile District Army Corps of Engineers do more to embrace the science of air quality and to sensitize itself to the conditions within cumulatively impacted environmental justice communities which face a barrage of challenges that make resilient health and wellness a difficult status to achieve for many within them.

Where ASPA and the Corps embraced public participation within environmental justice communities and in partnership with area nonprofit advocacy groups, robust conversations were had that emerged numerous concerns about the, at the time, Tentatively Selected Project (TSP). It is disturbing to find those concerns largely ignored.

Comment noted.

6) Process concerns raised by MEJAC with regards to the environmental justice and public participation outreach components were not addressed in the GRR/SEIS public comment responses despite having been raised explicitly and in detail. Because those concerns appear to have been ignored and because it appears most if not all of MEJAC's comments were not responded to in any form or fashion, MEJAC is reiterating its previous commentary in its entirety:

USACE:

Per request, our comments and concerns contained herein are designed to be as direct as possible. Responses referencing sections (i.e. 2.4.1) of our comments and questions would be appreciated.

1. The numbering schemes in the Draft GRR/SEIS seem worryingly inconsistent for many sections. For instance, in the draft GRR/SEIS, Section 6.1 is attributed to both "Cumulative Impacts" and "Public Engagement". In the Environmental Appendices, some sections seemingly misattribute their Appendix assignment, affecting page number identification, and as such, MEJAC will try to describe specific passages of concern to the best of our ability.

Comment noted.

2. AIR QUALITY:

1. On page 4-46 of Environmental Appendix C section 4.7.11 Air Quality, we understand that "incremental effects" are to be considered in the Cumulative Impact assessment, but the actual calculations of what these are appear to be missing. Would USACE please provide the detailed air emission calculations that decided that "the incremental contribution from implementation of the

TSP combined with the past, present, and reasonable foreseeable future projects, would not result in significant impacts within the ROI”?

2. On page 2-9 of Environmental Appendix C & page D-18 of Environmental Appendix C/”D” Attachments C-3, would USACE please elaborate on why “the future emission trends predicted by the Charleston Harbor Navigation Improvement Project. . . [are] used as the reference in discussing potential emission impacts as a result of proposed action in the port”?

3. On page D-23 of Environmental Appendix C/”D”, USACE asserts the decision to base the “Projected Changes in 2035 Emissions under Channel Deepening Alternative” on Charleston Harbor Navigation Improvement Project (CHNIP) findings for the Charleston area air quality impacts. Unfortunately, the two separate ports are not compared in any meaningful way in the Draft GRR/SEIS for the public to understand USACE's logic. It is simply asserted that there exists a “given” similarity. Would USACE please elaborate on the many similarities it sees and also any key differences that may support or challenge the assumption of analogous data sets?

The USACE addressed port facility emissions using port baseline conditions predicted by EPA to only establish a trend as a result of harbor deepening as compared to absolute emissions from harbor activities. No comparison of absolute emissions levels were considered in the EIS.

4. According to Page 15, Air Emissions Inventory, Appendix D, Charleston Harbor Post 45, Charleston South Carolina, Final Feasibility Report and Environmental Impact Study, retrieved from <http://www.sac.usace.army.mil/Portals/43/docs/civilworks/post45/mainreport/Appendix%20N%20-%20Air%20Emission%20Inventory.pdf>, the CHNIP included non-South Carolina State Port Authority (SCSPA) terminal, private port terminal, contributions to regional air quality in its calculations.

1. Did the Mobile Harbor Expansion GRR/SEIS do that as well? Please elaborate on USACE's reasoning as to why or why not.

The SEIS relies on available baseline emission inventory for the port established in its CPORT model, any sources considered in that model were the basis for making a qualitative comparison between No Action and Action alternatives. Any other terminals that USACE has no control over were not considered in the analysis following the similar procedure per CAA conformity determination requirement within a nonattainment or maintenance area.

2. Is the lack of this kind of comprehensive and (in MEJAC's opinion) reasonable analysis an explanation for why the CHNIP Air Emissions Inventory is almost three times as large as the corresponding MHE GRR/SEIS Air Quality Analysis despite the SCSPA facilities handling half of the cargo tonnage as ASPA facilities?

The emission inventory considered is only related to the port operations for which the USACE has control over on its channel expansion project for which the baseline emission inventory is available from EPA model.

3. Would USACE please elaborate on why this apparent discrepancy should be justified as a “given”?

The SEIS relies on available baseline emission inventory for the port established in its CPORT model, any sources considered in that model were the basis for making a qualitative comparison between No Action and Action alternatives. Any other terminals that USACE has no control over were not considered in the analysis following the similar procedure per CAA conformity determination requirement within a nonattainment or maintenance area.

4. In MEJAC's original scoping letter from in its calculations of future air quality impacts,

Again, the SEIS is focusing on the comparison of No Action and Action Alternatives in terms of change in emissions inventory at the Port, therefore the air quality trend under these two alternatives provided in the SEIS is considered valid.

5. On page 18 of Environmental Appendix C/"D", USACE asserts, "the major stationary source definition of 250 tons. . . [was] selected as a comparable project-level significant impact threshold for this SEIS".

1. Did USACE anticipate that ASPA's actual contribution would be higher or lower?

2. Was 250 tons chosen to simplify the air quality impact considerations in place of providing a comprehensive assessment of both ASPA and non-ASPA terminal contributions to regional air quality, like how the CHNIP did with SCSPA and non-SCSPA terminal contributions to regional air quality?

The 250 tons per year threshold is used as a measure on a project-level (as compared to regional level) emissions incremental impact in terms of net change in each criteria pollutant. This is an analogy to the Clean Air Act General Conformity Rule requirement applicable to a nonattainment or maintenance area that relies on a comparison of de minimis emission threshold (per major source threshold) to determine whether a further analysis is required. Since the project is in an attainment area, therefore PSD major source threshold of 250 tons per year was used as a comparative measure to determine whether a further analysis is required.

6. According to the USACE Waterborne Commerce Statistics Center as compiled by the American Association of Port Authorities and retrieved from <aapa.files.cms-plus.com/Statistics/2016%20U.S.%20PORT%20RANKINGS%20BY%20CARGO%20TONNAGE.xlsx>, ASPA handles roughly twice SCSPA's total cargo tonnage.

1. In selecting the CHNIP as a guiding air quality baseline for TSP air quality impacts did USACE consider that the SCSPA facilities rank as the 29th largest port in the US while the ASPA facilities rank at 10th in terms of cargo tonnage in 2016 according to the USACE?

3. Would USACE please elaborate about how the differences in tonnage were factored into the Draft GRR/SEIS findings of net decreases in all NAAQS criteria air pollutants?

The SEIS relies on available baseline emission inventory for the port established in its CPORT model, any sources considered in that model were the basis for making a qualitative comparison between No Action and Action alternatives. Any other terminals that USACE has no control over were not considered in the analysis following the similar procedure per CAA conformity determination requirement within a nonattainment or maintenance area.

3. ENVIRONMENTAL JUSTICE:

1. On page 2-152 of Environmental Appendix C, USACE asserts, "Special notices of public meetings were mailed (and emailed) to various neighborhood associations, City Planners, Municipalities, Churches, Community Centers, Chapters of the National Association for the Advancement of Colored People, etc. to obtain feedback from groups and individuals with environmental justice-related concerns", but Mobile County NAACP Unit #5044 President David Smith is certain that his Unit received no such invitation for participation or outreach purposes. Examination of the Unit's contact email address shows no such record of contact. MEJAC does notice that this precise paragraph appears to be lifted almost verbatim in its entirety minus its quantitative assertion from the CHNIP, which reads on page 2-131, "Over 150 special notices of public meetings were mailed to various neighborhood associations, City Planners, Municipalities, Churches, Community Centers, Chapters of the National Association for the Advancement of Colored People, etc. to obtain feedback from groups and individuals with EJ-related concerns." Would the USACE please provide their documentation of all outreach efforts to the Mobile County NAACP Unit #5044 and other southwest Alabama regional NAACP Units?

2. Also on Page 2-152 of Environmental Appendix C, MEJAC suggests that the paragraph reading "In an effort to assure opportunities for environmental justice populations to provide input to the NEPA process, workshop meetings were held at the James Seals Community Center located in the Africatown Neighborhood and other communities. Workshops provide a forum to explain the project and its implications, answer questions, listen to concerns, and gain an understanding of neighborhood issues." should be corrected to reflect that the community center at which an environmental justice focus group workshop was held was actually the Robert Hope Community Center. The James Seals Community Center is in the Down the Bay community.

3. And again on page 2-152 of Environmental Appendix C, USACE acknowledges solicitation of data regarding the rates of subsistence fisherfolk in the ROI. MEJAC wishes to praise these efforts and looks forward to both greater illumination on the subject and, should USACE feel it necessary, an acknowledgement of a data gap with respect to these vulnerable populations in our region.

4. FOCUS GROUP MEETINGS:

1. On page 6-18, Section 6.1.5 of GRR/SEIS Environmental Compliance, a December 13, 2017 meeting with "Local Environmental NGO's" is identified to have taken place at the USACE Mobile District office. Would USACE please elaborate on why MEJAC, a 5 year old environmental grassroots 501c3 nonprofit which had by that point already identified itself as a very engaged environmental stakeholder group, was not invited to participate in this meeting?

This was a focus group meeting with specific environmental NGO's in regards to potential impacts on the aquatic resources. Focus group meetings were often smaller groups to ensure the best dialogue, understanding, and exchange of information.

2. In reflecting upon USACE's acknowledged environmental justice communities of concern from Figure 2-42 on page 2-151 of Environmental Appendix C, MEJAC is concerned that USACE did not attempt consultation with communities along the Dauphin Island Parkway corridor south of I-10. Understanding USACE's assertions on public participation outreach from page 2-152 of Environmental Appendix C, could USACE please provide documentation of outreach efforts to community leadership or community action groups from that part of our community?

As part of this study, the USACE Attempted to engage all groups and communities along the bay and those that could be effected by the channel modifications. In particular to your concern, the Peninsula of Mobile, a group representing the Dauphin Island Parkway corridor south of I-10 was included in focus group meetings.

3. It is MEJAC's understanding of an environmental justice outreach liaison having been identified at one point by the Project Delivery Team to help consult upon and develop its environmental justice outreach strategy. MEJAC is concerned that by scuttling this position may have negatively affected the environmental justice consultation process. Would USACE please explain what happened with this position and why this personnel was ultimately removed from their assignments and never replaced with another member of the Mobile region's environmental justice community leadership or seemingly anybody at all?

It was determined after the first few focus group meetings that it was more advantageous to coordinate the Focus Group meetings with the ASPA and an environmental justice outreach liaison was no longer necessary.

4. MEJAC believes that USACE owes a more robust response to the concerns raised by individual representing environmental justice communities of concern in the GRR/SEIS focus group meetings.

Comment noted

1. In the Africatown EJ focus group, USACE asserted there would be "three air quality monitoring studies". Would USACE please identify what these three air quality monitoring studies consisted of?

There were no assertions that a specific number of air quality monitoring studies would be conducted as part of the NEPA process. USACE asserted that they would be looking into air quality as part of the environmental impact analysis, including evaluations associated with traffic over the Africatown Bridge. The USACE did evaluate air quality as part of the SEIS. Detailed air quality data was not available for the Port and without detailed Port specific data, site specific air modeling studies could not be performed. Therefore, the USACE used the best available data to extrapolate air quality impacts associated with the harbor deepening and widening project.

2. Would USACE please make some effort to elaborate on why TSP air quality impacts with respect to increased commodity traffic collateral emissions (i.e. hazardous petrochemical storage tank vapors, coal dust, diesel engine soot, etc.) were excluded from mitigation?

The impacts associated with implementation of the proposed action were considered to be minor, therefore, no additional mitigation was warranted.

1. Are these also assumed simply to have net reductions in accordance with USACE's assertion that GRR/SEIS is analogous to CHNIP?

Comparing the No Action and Action Alternative, it will either remain the same or would be less as a result of increasing harbor mobility as demonstrated in the CHNIP. The anticipated shipment trend would include a potential short surge of activities as a result of large ship involvement; however, the overall throughput (activities) on an annual basis would remain the same. Therefore with the improved harbor mobility to handle congested shipment under the Action Alternative, the effects would likely be an improvement in air quality under the TSP.

3. Will USACE conduct follow up environmental justice focus group meetings to better facilitate community education about and literacy of the GRR/SEIS findings?

As noted in our response to the first comment, no further public hearings/meetings are anticipated at this time for the Mobile Harbor GRR Study. A very robust public involvement plan was executed for this study as shown in paragraphs 6.3.4 and 6.3.5 of the Main Report.

5. CULTURAL AND HISTORIC RESOURCES

1. On page 2-112, Section 2.16.2 History of the Mobile Bay Area of Environmental Appendix C addresses the history of the "Clotilde" slaveship schooner that brought the founders of the present-day Africatown community to North America from Africa. MEJAC appreciates this section having been included. The opening statement, however, is somewhat confused with the double-negative statement [emphasis added], "Although the location of this ship wreck is still unknown, the historical record does not indicate that this ship wreck is not located adjacent to or within the APE of the proposed Mobile Harbor modification area. However, due to the significance of the history of the slave ship Clotilde is an important chapter in the history of Mobile Bay and the Mobile Delta. As such, it is included in this context." The context of the paragraph would suggest the opening sentence be revised to reflect its intent without the use of double negatives.

The references to the Clotilde have been removed. The location of the ship has been found and it is not within the area of potential effect.

2. On Page 2-114 paragraph 5, USACE states, "By Lewis' account, Tarkar West Africans asked to be repatriated, but were denied." However, the reliance upon

“Tarkar” as a scholarly tribal identifier has been challenged by historian Sylviane A. Diouf who painstakingly clarifies in her watershed tome “Dreams of Africa in Alabama” that there is not an African ethnicity known as “Tarkar” (pp 37, 39, 227, 231, 246 of Dreams., Diouf). MEJAC recommends dropping the dubious ethnic identifier if for no other reason than that the shipmates came from a wide region and represented many West African ethnicities – unless USACE can identify a primary source material that contradicts Dr. Diouf.

Reference to the Tarkar has been removed.

6. GENERAL

1. Did USACE calculations of the growth in containerized chemical transport sector factor in potential traffic impacts upon the Africatown community with respect to containerized chemical tanker cleaning facilities located in the neighborhood on Telegraph Rd? Would USACE please elaborate on its reasoning?

AECOM grew traffic on Telegraph Road a rate 1.5% per year from 2016 to 2066. The current average daily traffic on Telegraph Road is 3,310 vehicles per day and 2066 projections indicate an average daily volume of 6,968. The existing capacity of Telegraph road is approximately 24,300 vehicles per day. Telegraph Road is significantly under capacity; therefore, the proposed chemical tanker cleaning facilities are indirectly accounted for in our projections.

3. Generally, MEJAC believes it to be an abrogation of the Corp's environmental justice obligations to project increases of truck and train traffic as much as 25% through transportation corridors in clearly identifiable environmental justice communities of concern and for USACE not to identify any mitigation for the increases in diesel combustion pollution. Would USACE please elaborate on why there is no response from USACE with respect to mitigation of these impacts?

The 25% increase in traffic is due to the build out of the container terminal which will happen with or without the proposed action. The impacts associated with implementation of the proposed action and the associated transport and handling of hazardous materials would be minimal.

Organized Seafood Association of Alabama Letter, dated, July 15, 2019**Introductory Comments**

- 1) The Commercial Seafood Industry has been ignored from the very beginning of this projects. We were deliberately left out as stake holders by the Corp from being included at initial discussions and meeting regarding the placement of dredge spoils in both the north and south ends of the channels which is critical to our barrier island, Dauphin Island, and our oyster/clam reefs in Mobile Bay.

Response: See Section 6.3.4 General Public Meetings of the Main report for public involvement details. Focus group meetings for South Mobile County commercial fishing interests were held August 17-18, 2017, in Bayou La Batre, Alabama.

- 2) Open Water Dispersment from 1980 forward has covered thousands of acres of living reef areas from the mouth of Mobile River southward along both the east and west side of Mobile Bay. In upper Mobile Bay, tremendous amount of organic matter, dredge material was placed in these areas which smothered oysters and clams in these areas. Filling the holes near the old Brookley Field complex covered many acres; silt filtered southward to cover live oysters and clams. This incident was reported to both the Corp and the Department of Conservation and Natural Recourses with no action of mitigation for your actions. This was reported as recently as in 2018.

Response: On May 14, 2014, the USACE, Mobile District released a Public Notice (FP14-MH01-10) to modify the previously certified maintenance dredging and placement activities by changing the open bay thin-layer disposal activity defined in Public Notice (FP11-MH01-06) as being an emergency storm-related action to also include a long term open bay thin-layer disposal option. Providing this option added an environmentally acceptable alternative for managing maintenance dredged material within the Mobile Bay navigation channel that allows sufficient time for benthic recovery and permits the bottom elevations to return to that of the adjacent bottom as the placed sediment is remobilized within the Bay's natural sediment transport system. These open-water sites are located immediately adjacent to the west and east of the channel. Dredged material placement via thin-layer is limited only to these sites and each site is not utilized every year. Monitoring of the thin-layer disposal sites began shortly after the 2012 placement with the collection of sediment cores and profiling imagery. Sampling conducted at the thin-layer placement stations represented a time series from 24 hours to 6 months post-placement. Numeric modeling was conducted to show the behavior of the thin-layer material once it has been placed on the bay bottom. Current and wave induced sediment transport was simulated for both the natural bay bottom and the placed material. The simulations were conducted representing known seasonal conditions from February through May of 2010. Also included in the simulations were storm events representing Hurricane Gustav (Aug-Sept 2008) and Hurricane Ida (2009). These periods were modeled representing both the "with" and "without" project conditions. The "with" project conditions assumed 12-inch thick thin-layer deposits placed evenly in the designated disposal areas. The "without" condition assumed no thin-layer disposal and represented the natural bay bottom. Simulations were conducted using different scenarios representing the placed and natural bottom sediment characteristics. Conclusions from the modeling effort indicate the following:

- Approximately 35% of the sediment that erodes from the designated disposal areas is transported and deposited in the navigation channel.
- The remaining 65% is widely dispersed throughout the bay by waves, wind, river, and tide driven currents.
- The dredged material placed in thin-layers is less erodible (~ 45%) than native sediment.

These areas are historically utilized open-water sites removed from the reef sites and the USACE, Mobile District coordinated this change with the public and state and Federal agencies prior to the commencement of any action. Similar actions discussed as these were taken by the USACE, Mobile District for utilizing the Brookley Hole.

- 3) All sands dredged from the Mobile Harbor bar channel should be placed in waters less than 15 feet deep along Sand Island bar within the Sand Island Beneficial Use Area's new Extension. The Corp's history of placing sand outside the natural littoral movement pattern has caused extensive erosion to Dauphin Island and Petit Bois Pass along with the bars that protect Grand Batture and Grand Bay.

Response: See Section 4.2.2.3 SIBUA for the Bar Channel

- 4) The Corp continues to follow their same pattern of dredge spoil dispersment, and continuance blatant disregard to laws and regulations; Alabama Statutory Law -Alabama Pollution Law 22-22-1,2 &3; National Environmental Policy Act, 1935 Rivers and Harbors Act.

Response: See Section 6.2 Table of Compliance of the Main Report

- 5) The Corps has dismissed the public's concerns and objections expressed during the 3+ year study and consistently ignored all relevant comments where the Corps is unable to develop a response that support the Corps' positions.

- a. The Corps has failed to prepare an objective and unbiased report
- b. Disrespected the views of the public by conducting only perfunctory public meetings with no real interest in sincerely addressing the public's stated concerns
- c. Presented unsupported environmental impact conclusions in the Final Report
- d. Made a mockery of the Corps' agency study process that is intended to produce a final recommendation representing the overall public interest.
- e. Instead of being the study's "honest broker" required by Corps agency procedures, the Corps (Mobile District Office) has become an advocate for the project and a complicity ally of the Alabama State Port Authority whose sole interest is to deepen the channel at the least cost; with NO regard for the communities, individuals, and natural resources of Western Coastal Alabama that will have to bear the full environment cost of the project.

Response: See Appendix E for the record of public comments and the USACE responses. In addition, see Section 6.3.4 General Public Meetings of the Main report for public involvement details.

Mobile Bay Letter, dated, July 18, 2019**1. Lack of Acknowledgement of Project Impacts**

Comment: A conclusion of “no impact” from this project is improbable considering the location of the project in a highly sensitive and complex ecosystem and the amount of work proposed.

Response: The majority of the potential direct and indirect impacts from implementation of the RP on the various resources that were evaluated would be temporary, localized, and not significant. These incremental effects, when combined with relevant past, present, and reasonably foreseeable future projects, are unlikely to result in any adverse cumulative impacts. A full and detailed cumulative impact analysis is included in Section 4, Appendix C.

Comment: The Corps has indicated an increase in trucks across the Cochrane Africatown Bridge and a 2.5% increase in trucks carrying hazardous waste will generate an increased risk for an environmental justice community. Despite both of these increases identified by the study, the Corps has not acknowledged these as impacts necessary to mitigate.

Response: See Section 5.23.1 for discussion on traffic increases across Cochrane Africatown Bridge.

Comment: “The Corps aquatic resources assessment also concludes potential impacts to “wetland communities that exist on and around Little Sand Island.” Berkowitz et al. (2018) indicates these wetlands “are typical of those found in disturbed areas.” This likely means these remaining wetland resources are needed in order to balance the disturbed system – this should not be an excuse to call them insignificant losses.”

Response: Little Sand Island was formed and enlarged using dredged sediment from the harbor with the existing vegetation being indicative of highly disturbed areas. Due to the dynamic nature of the Little Sand Island shoreline/embankments, any wetland plant recruitment species that take root are subject to changing conditions and likely mortality. Based on its highly disturbed condition, there would be no significant losses to wetland communities and SAVs from the proposed action (Section 3.7.2.1).

Comment: “In multiple instances, including but not limited to what is listed below, the Corps has indicated the proposed project would result in “minor and temporary impacts” to several natural resources. Despite these being described in the SEIS, they are not acknowledged for their cumulative impact on the health of Mobile Bay.”

Response: The majority of the potential direct and indirect impacts from implementation of the RP on the various resources that were evaluated would be temporary, localized, and not significant. These incremental effects, when combined with relevant past, present, and reasonably foreseeable future projects, are unlikely to result in any adverse cumulative impacts. A full and detailed cumulative impact analysis is included in Section 4, Appendix C.

Comment: “...the Corps is using natural and existing conditions, such as Sea Level Rise, the Bay’s turbid waters, and shoreline armoring, as justifications for saying impacts to natural resources would be minor and/or insignificant as compared to these other existing factors. While we firmly agree with the challenges associated with Sea Level

Rise, the Corps is not considering the additional impacts increased shipping and a wider, deeper ship channel will have on climate change and Sea Level Rise. Those impacts must be quantified and mitigated.”

Response: A detailed description on the effects of sea level change in relation to the navigation project can be found in Section 5.3.4 of the Main Report with further details found in Section 2.10.4, Appendix A.

Comment: “Similarly, the Corps indicates the natural turbidity levels in Mobile Bay are already high and as such the disturbance of sediments during construction and from the project are temporary and are not significant given the existing turbid conditions. The Corps dismisses turbidity as an issue and does not model the distances for material transport or estimate the distances of anticipated sedimentation. Therefore, the impact to oysters, submerged aquatic vegetation, wetlands, etc. cannot accurately be determined.”

Response: Maintenance dredging with subsequent thin-layer placement (6- to 12-inches) within open-water disposal sites is the standard operation to ensure sufficient channel dimensions. Water quality associated with that placement method adheres to the Alabama Department of Environmental Management (ADEM) requirements issued in their water quality certification. Water quality certification for past maintenance activities required the USACE, Mobile District not to exceed 50 NTUs above background levels. Turbidity is greater with thin-layer placement during placement in comparison to overflow as sediment is allowed to settle out within the scow prior to release. The length of time overflow would be allowed is strictly based upon the USACE, Mobile District and/or its contractor adherence to the State of Alabama’s water quality certification. No sediment fate modeling was conducted as part of this general reevaluation study for overflow operations based upon compliance with current routine O&M dredging efforts and the proximity of the adjacent existing open-water dredged material placement areas. Furthermore, elutriate testing will also be undertaken to demonstrate potential effects of placement of dredged material into open-water (i.e. overflow) compliant with the Marine, Protection, Research and Sanctuaries and Clean Water Acts. Sediment evaluation will be conducted to the Tier III level during the Project Engineering and Design (PED) phase which will address the physical, chemical and biological effects on the aquatic environment and organisms. Additional details can be found in Sections 2.4.4 and 3.5.4.2.1, Appendix C.

Comment: “... shoreline armoring was used as an explanation for the correlation found between vessel calls and shoreline changes to discredit the cumulative impacts to shoreline along the Western shore of Mobile Bay.”

Response: Comment Noted.

2. Inadequate Cumulative and Indirect Impacts Analysis

Comment: The study does not consider the cumulative impact of the several “minor and temporary” impacts identified to the ecosystem nor does it accurately acknowledge the cumulative impacts of the foreseeable projects that will also have impacts to our natural resources.

Response: Details of the environmental effects of alternative actions for the proposed Mobile Harbor Federal Navigation Project and a summary of the potential cumulative impacts

associated with the RP can be found in Section 5 Environmental Effects and Section 6 Environmental Compliance of the Main Report.

Comment: *“...the Final Environmental Impact Statement presented for the building of the Mobile River Bridge and raising the Bayway lists the potential impacts to air quality from a tolled bridge increasing traffic to the Cochran/Africatown Bridge because that route would be free. The bridge EIS lists the area’s Air Quality could exceed the attainment standards and offers suggested mitigation alternatives. The Mobile River Bridge and Bayway project has also indicated dredging needs to complete the project, and is setting up mitigation to offset those impacts. These are just two examples where the net impact is overlooked and understated by the Corps in direct opposition to how those same impacts are handled in the bridge project.”*

Response: The Mobile River Bridge and Mobile Harbor GRR projects are separate projects with separate purpose and needs as well as potential environmental/economic effects.

Comment: *“The Port is currently in a phased expansion project to grow its annual capacity and with this has come new growth including the new Walmart distribution center, a new Intermodal Container Transfer Facility, and an automobile roll-on/roll-off shipping terminal already announced. These new activities, along with the existing increases in coal and steel port operations, make the Port of Mobile an attraction and strong competitor internationally. The Corps does not acknowledge these cumulative and indirect impacts that will occur as a result of implementing this project.”*

Response: Details of the environmental effects of alternative actions for the proposed Mobile Harbor Federal Navigation Project and a summary of the potential cumulative impacts associated with the RP can be found in Section 5 Environmental Effects and Section 6 Environmental Compliance of the Main Report. In addition, further details regarding analysis of port operations can be found in Section 2.2 Port Facilities. It has been determined that the new port activities and operations would occur with or without the proposed project and are not integrally related.

3. Insufficient Alternatives Analysis

Comment: *The final SEIS contains insufficient analysis of alternatives without the consideration and incorporation of other ports. The Corps fails to conduct inter-port analyses despite many other expansions either occurring or proposed across the nation (including Houston, New Orleans, Tampa, Jacksonville, Savannah, Norfolk, Miami, Beaumont, among others).*

Response: Multiport competition is assessed qualitatively for this study as it relates to shifting cargo from one port to another port based on factors such as deepening of a harbor. The recommended plan includes deepening the existing ship channel to more efficiently load larger vessels. However, larger vessels alone do not drive growth for the harbor. Many factors may influence the growth of a particular harbor: landside development and infrastructure; location of distribution centers for imports; source locations for exports; population, income growth, and location; port logistics and fees; business climate and taxes; carrier preferences; labor stability and volatility; and, business relationships. Harbor depth is just one of many factors involved in determining growth and market share for a particular port. The economic analysis was conducted with the historical Mobile cargo share remaining the same in both the future without-project and future with-project conditions. To restate multiport considerations, justification of the

recommendation of this study is not based on the assumption that cargo will shift to Mobile with deepening alone. The analysis assumes Mobile receives the same share of regional cargo volumes with or without the deepening of the Mobile Ship Channel. Details regarding the multiport analysis and alternatives can be found in Section 6 of Appendix B Economics.

4. Inadequate Air Quality Analysis

Comments: “The final SEIS fails to evaluate how the proposed project will impact the air quality of the surrounding communities. In the air quality section of the SEIS, the Corps states the increase in emissions would not result in air quality problems.”

“The Corps is following predictions from the Charleston Harbor Environmental Impact Statement to justify the reduction in larger ships and from the harbor activities. However, it is not clear that the Port will be applying all of the same measures Charleston Harbor has implemented.”

“The study does not contain any substantive analysis or dispersion modeling to identify localized impacts, short term, or long term increases in emissions.”

“The Corps states the area is considered in attainment under the Clean Air Act for all National Ambient Air Quality Standards (NAAQS) and therefore find it unnecessary to evaluate the project’s impact on NAAQS.”

Response: The air quality analysis for the Charleston Harbor EIS is based on a comparison of emissions for future years associated with the No Action Alternative (without deepening harbor) and the Action Alternative, as shown in the Charleston Harbor EIS Appendix N. The emission reduction trend under the Action Alternative has been demonstrated for all pollutants in the Charleston Harbor EIS; however, based on an evaluation of emission inventory worksheet, the highlighted improvement elements (ship to shore cranes are electric; the rubber tired gantry cranes are Tier 3 and moving to Tier 4/electric; or that the port has a dray replacement program that limits the age of the dray fleet) were not considered in the total port emissions summarized in the Charleston Harbor EIS. For example, in the impact analysis, it was assumed that the land equipment operational emissions (cranes, forklift, backhoe, container handler, etc.) would remain the same during future years, with or without the harbor deepening action. Therefore, the EIS-established emission trend does not reflect the detail measures as commented. This can be further illustrated in the discussion in the Appendix N of the Charleston Harbor EIS.

Furthermore, the ASPA has implemented a number of emission reduction programs including an idle reduction program and the installation of three low emission locomotives. Likewise, APM Terminals has converted to electric ship to shore cranes and is in the process of replacing the rubber tired gantry cranes for the entire facility with an electrified fleet.

Based on this information, the USACE continues to support their final conclusion that “the proposed action would result in a net emission reduction for each criteria pollutant.”

5. Failure to utilize “[a]ccurate scientific analysis, expert agency comments, and public scrutiny” 40 C.F.R. 1500.1(b).

Comment: “...water quality modelling performed by the Engineering Research and Development Center (ERDC) does not follow normal documented and verified patterns, particularly with hypoxic conditions, and was subject to critique by several expert

scientists when presented. The most concerning aspect of this model being inaccurate is the role the model plays in determining impacts to wetlands, submerged aquatic vegetation, oysters, benthic invertebrates, and fish populations. Beyond the model not being able to recreate known trends in Mobile Bay during 2010, it also does not include the influence and contribution of offshore currents, despite local scientists indicating their importance for understanding the Bay’s hydrological system.”

Response: Wilmott Index of Agreement (IA) skills score was used to evaluate model performance. This statistical valuation of model performance will be included as an Errata to the Final Report. The IA for water levels are over 0.9 at all the National Oceanic Atmospheric Administration (NOAA) tide gage locations in the model domain—Shell Beach, LA to Pensacola, FL in East-West direction and 3 stations in Mobile Bay (Mobile State Docks, AL , Coast Guard Sector Mobile, AL and Dauphin Island, AL). The IA for salinity also results in above 0.9 at the locations along the navigation channel between Dauphin Island and Middle Bay Light. The surveys done by University of South Alabama cover 2010 and also include vertical profiles. One of the prominent features of estuarine hydrodynamics especially that of Mobile Bay, is variation of vertical structure, i.e., stratification over varying tidal, meteorological, and hydrological conditions. The IA was calculated over the entire year and all the vertical locations. This data not only shows the response of the Bay to hydrological forcing and meteorological forcing but also shows the response to offshore conditions, i.e., it shows variation of influence of offshore salinity in the similar temporal and spatial extent as intrusion.

In addition, as described in Appendix C section 2.6 there are several continuous environmental monitoring sites located within the lower, middle and upper part of Mobile bay that provide data on the spatial and temporal trends in the bay. The continuous sites have been operational over differing time periods with the longest operating monitoring sites being Dauphin Island (2003-2018), Middle Bay (2005-2018) and Meaher Park (2003-2018) stations. Evaluation of dissolved oxygen (DO) data from the continuous monitoring sites indicate temporal trends correlated to temperature and river flows, with the lowest levels occurring during the late summer and early fall months when temperatures are highest and river flows are lowest. These temporal trends are also observed within the modeled results. For DO, the IA was 0.7, which for limits in the total number of available observations, values of above 0.5, indicate acceptable prediction over observation.

The most reasonable statistics; however, for a water quality model whose kinetics represents large temporal and spatial scale processes, compared to the hydrodynamic model is an evaluation of the model bias. Because limited number of observations were available at each station located throughout the system, reasonable statistical analyses is to compare first and second order moments, i.e., mean and variance. Table 1 below provides comparisons for mean and variance values for DO.

Table 1. Comparison of Means values and Variances

| | Mean | Variances |
|--------------|------|-----------|
| Observed DO | 6.61 | 13.13 |
| Predicted DO | 8.57 | 5.25 |

The DO has positive bias, about 1.96 mg/L, and the IA is about 0.7. Considering uncertainty in spatial distribution of sediment oxygen demand as such, the statistics indicate the water quality model for prediction of relative changes in DO is reasonably calibrated for project impact assessment. In addition, the predicted salinity at the long term monitoring sites match the spatial

and temporal variations throughout the Bay. The ERDC Modeling Report included in Attachment A-1 also compares the survey data and the model results within the Delta. Based on the statistics of IA and comparison of modeling results at different locations within the Bay including the Mobile delta, it is fair to conclude that the model realizes the hydrodynamics of the Bay appropriately for all the conditions given including offshore conditions.

By email dated July 30, 2019, the Dauphin Island Sea Lab (DISL) concluded coordination with the USACE, Mobile District by proposing no further comments and offering future assistance if necessary.

Comment: “The Corps ignored the information provided by the ADCNR-DMR on proportionate contribution for each reef that had been provided to the agency. Furthermore, local scientists voiced concerns about the larval models not being able to accurately determine “flushing” (oyster larvae that is pushed out of the system and not able to settle) due to the lack of suitable habitat overlay.”

Response: Larval trajectories from each reef are independent (that is, the particles don't interact) and are driven by the hydrodynamic and water quality modeling. Given that the simulated larval tracks showed little relative difference between with and without-project conditions, the overall contribution was not calculated. However, each reef's contribution to the overall system can be back-calculated based on the results presented in Chapter 5 of Attachment C-1, Table 5.2 of the Report.

Oyster settlement on suitable habitat, identified as existing reef polygons, was determined as part of the hot spot analysis. The results of the hot spot analysis at each reef location were analyzed without and with project to determine if the proposed channel deepening affected the likelihood of a reef being a hot spot or not. Of the 18 reefs that were included in the analysis, seven are predicted to be particle settlement hot spots (>50% of the area identified as a hot spot at $\alpha=0.05$) under without project conditions and 8 are predicted to be particle settlement hot spots with the deepening (Table 3-10). A greater proportion of Kings Bayou Reef and Whitehouse/Denton Reef were identified as hot spots for larval settlement in the with-project condition than the without-project condition. While Shell Banks Reef was not identified as a hot spot based on the >50% of the total area criteria, 13.2% of the reef area was located in a hot spot region under without-project conditions. Under with project conditions the location of the hot spot in that region shifted so that Shell Banks reef was no longer in the hot spot. This does not indicate that larvae are not settling on Shell Banks reef, but that the criteria for classifying it as a hot spot were not met. Of the 3262 acres of oyster reef included in the analysis, 2700 acres were identified as larval settlement hot spots under without project conditions and 2761 acres were identified as larval settlement hot spot with project conditions. Note that since not all larval sources are simulated, there may be more hot spots within Mobile Bay that are not represented in these results. As the model did not explicitly account for particle settling, additional analysis of the larval trajectory data were used to determine if competent larvae passed over reef areas before finally settling. ArcMap 10.6.1 was used to visualize the particle trajectories 10 days from release to the end of the simulation and the line density of the trajectories was mapped. As with the final larval particle location point density maps, the overall pattern of line density was similar between Without and With project conditions, indicating that a similar density of competent larvae passed over reef areas (Figure 3-19). The Warren similarity index between the line density maps was 0.980, indicating a high degree of similarity between the two datasets. A

more detailed discussion of these results are included in Section 3.8.9.2.1.1, Appendix C and Chapter 5 of Attachment C-1.

By email dated July 30, 2019, the Dauphin Island Sea Lab (DISL) concluded coordination with the USACE, Mobile District by proposing no further comments and offering future assistance if necessary.

Comments: *“Another area of concern for scientific inaccuracies is the ship wake analysis.”*

Response: Allen (2018), provided as Attachment A-4, Appendix A, utilized a complex and comprehensive field investigation of vessel generated wave energy (VGWE). The VGWE analysis presented used best available science methodologies and incorporated new and innovative approaches allowing more data availability than previous studies. Inaccuracies are inherent in any field investigation and Allen (2018) has acknowledged where these inaccuracies are likely to occur along with sensitivity testing which showed no significant impact.

“One of the main issues with the VGWE was the use of 10 knots as the vessel speed when calculating wake energy to determine impact.”

Response: See Allen (2018) provided as Attachment A-4, Appendix A. Vessel speeds of 10 knots was determined using vessel speeds recorded in the 2016 calendar year. Allen (2018) does not imply no vessel will travel greater than 10 knots and addresses these outliers within the report. Sensitivity of speeds greater than 10 knots was tested using a practical maximum limit as a function of channel geometry and 25% greater speeds which found similar likelihoods of potential impacts. This sensitivity testing is detailed on page 56-57 of Allen (2018).

“...the Corps has not evaluated how these waves contribute to oyster and submerged aquatic vegetation stress from sedimentation.”

Response: Allen (2018) found no increase in VGWE; therefore, no further evaluation of impacts to oysters and SAV was conducted.

Comment: *“... we noticed inconsistencies with the assumption of fewer ships “With Project” than “Without Project” that needs to be addressed.” “If the project’s justification is to provide a better port for vessels to bring business to, then the assumption that fewer vessels will come post improvement is counterintuitive.”*

Response: The USACE’s objective in water and related land-resources project planning is to contribute to national economic development (NED) consistent with protecting the Nation’s environment, in accordance with the national environmental statutes, applicable executive orders, and other Federal planning requirements. As such, the project benefits are derived from reduction in vessel transportation costs for goods shipped through Mobile Harbor with deepening and or widening. Currently some vessels are light loading, meaning vessels carry less cargo tons than maximum capacity because of sailing draft constraints (channel depth). A channel deepening will allow shippers to load their vessels more efficiently. The premise is with channel deepening improvements, cargo loads for vessels can be increased. Some vessels are being delayed due to the channel being one way for vessels over a certain size. Channel widening would allow larger vessels to meet/pass and reduce delay times for vessels waiting offshore or at the dock, thus reduce the vessel operating cost and contributing to the NED.

Due to the number of Post Panamax vessels in the world fleet and the opening of the Panama Canal expansion, the transition of larger vessels to the US Gulf Coast is anticipated to occur with or without the proposed channel deepening. However, previous navigation analyses have demonstrated that channel improvements alone will not have an impact on the forecasted demand of commodities handled at a particular port. The proposed channel improvements at Mobile Harbor would allow for those commodities that are transported through the harbor to move more efficiently. With the ability of these vessels calling on the harbor to transit more efficiently (carrying additional cargo per call), the total number of vessels required to meet the anticipated demand at Mobile Harbor during the period of analysis will decrease compared to the current channel configuration.

Comment: “Similar inconsistencies were seen in the Air Quality analyses. In the Future Maintenance Section of Air Quality, the Corps states that “Due to the upcoming increase of the number of Post Panamax vessels in the world fleet and the opening of the Panama Canal expansion, the transition of larger vessels in the Gulf of Mexico is anticipated to occur with or without the proposed channel deepening”. This statement does not account for what may happen if the improvements are not made: vessels may choose another port to call, reducing the amount of vessels without project.”

Response: See response regarding multipoint analysis in topic #3 above.

Comment: “The Corps has not worked in cooperation with expert agencies, particularly with the EPA. After the release of the draft SEIS, the EPA submitted a comment letter indicating the study was insufficient and contained environmental concerns (“EC-2”). Upon the release of the final SEIS on May 10, 2019 the Corps’ response to the EPA’s letter was omitted from the document and was later revised to include the Corps’ responses on June 12, 2019.”

Response: Following the incidental exclusion of the EPA Region IV comments to the Draft GRR/SEIS, the EPA brought the matter to the attention of the Mobile District. All comments submitted by the EPA were then subsequently inserted into the Appendix E along with the USACE responses. This revision to Appendix E then went out for a full 30-day period as required by Notice of Availability dated June 11, 2019. This 30-day extension was published in the Federal Register on June 14, 2019 with the 30-day State/Federal Agency review period concluding on July 18, 2019. Additional meetings and webinars were held to discuss all related comments and responses. By letter dated July 17, the EPA Region IV stated “The purpose of this letter is to provide the EPA’s comments on the proposed project. On September 17, 2018, we provided comments and recommendations on the draft GRR/SEIS designed to improve the disclosure of impacts and mitigation related to water quality and water quality modeling, sediment and dredge placement, air quality and community impacts. The EPA's recommendations on the draft GRR/SEIS and the USACE's response are included in the revised version of Appendix E of the final GRR/SEIS. Following the revision of Appendix E, the USACE amended the initial Federal Register notice and extended the public and agency comment period to July 18, 2019. The USACE also held a joint webinar with the EPA on June 25, 2019, to discuss the response to the EPA's draft GRR/SEIS comments and recommendations.”

“The EPA appreciates the efforts made by the USACE to address our comments and conduct the webinar. Based on a review of the final GRR/SFEIS and the interagency webinar, the USACE responded to the EPA's comments regarding coordination, water quality, water quality modeling, dredged material and placement including beneficial use, and air quality. The USACE

committed to including additional information/commitments in the ERRATA sheets associated with the Record of Decision (ROD) to address the EPA's recommendations related to water quality modeling and monitoring, and dredge material and placement (including beneficial use). The USACE has also agreed to work with the EPA and other stakeholders to develop appropriate criteria for relevant water resource parameters and the water quality monitoring approach. Based upon recent discussions with the USACE, the EPA also understands that the USACE is continuing to address some community concerns and any potential environmental impacts."

"We appreciate the opportunity to provide comments on the final GRR/SEIS and look forward to working with your office on the water quality monitoring issues and other environmental commitments identified by the USACE. When available, we request a copy of the ROD for our records."

Comments: *"Comment letters were submitted requesting the Corps to evaluate the risk of gulf HABs entering Mobile Bay after the expansion and to assess the flow of oil after a spill offshore and to what extent that oil will travel up the Bay given the new channel design."*

"The Corps did not model how both of these factors could change with the project implemented. It was also requested that the Corps model how the channel may alter the distribution and dispersion of contaminants coming from the McDuffie wastewater treatment facility in Mobile."

Response: The hydrodynamics changes in the with- and with-out project condition were minimal. As such, effects resulting from channel modifications would not alter the distribution and dispersal of oil or HABs entering the Bay or the dispersion of contaminants coming from the McDuffie wastewater facility.

6. NEPA – Inappropriate Segmenting of Related Studies/Projects

Comment: *"Improper segmentation of closely related projects into distinct actions for purposes of preparing or avoiding environmental impact statements violates NEPA. The Corps has several related and interdependent projects to the proposed dredging that have been segmented out of the final SEIS." Including: Upper Mobile Bay Beneficial Use Wetland Creation Site and the Sand Island Beneficial Use Area (SIBUA) expansion.*

Response: The USACE, Mobile District has historically maintained the Federal Mobile Harbor Navigation Project since 1826. Throughout this period, multiple intermittent actions have been required to improve and maintain this navigation project. As noted in its 2019 Environmental Assessment, SIBUA was expanded to the northwest to provide additional capacity for continued operations and maintenance material dredged from the Bar Channel. Maintenance operations will be undertaken at the Bar Channel prior to USACE, Mobile District commencing construction of the recommendations within the Mobile Harbor GRR/SEIS. As such, the USACE, Mobile District proceeded with the 2019 Environmental Assessment but informed the agencies and public numerous times throughout the Mobile Harbor GRR/SEIS of this effort and need for future capacity of maintenance material. The Upper Mobile Bay Beneficial Use Emergent Tidal Marsh Site is a preliminary concept for maintenance material but is not being pursued by USACE, Mobile District.

7. Endangered Species

Comment: *“The Corps must comply with the Endangered Species Act (ESA) and shall evaluate if the proposed project “may affect” any listed species 50 C.F.R. § 402.14(a).”*

Response: The U.S. Fish and Wildlife Service (FWS) concurred with the USACE’s determination on 21 December 2018. Proposed channel improvements are within the congressionally authorized project dimensions; therefore, the USACE, Mobile District will implement terms and conditions for sea turtles and Gulf sturgeon identified in NMFS – Protected Resources Division’s (PRD) Gulf Regional Biological Opinion for Dredging of Gulf of Mexico Navigation Channels and Sand Mining Areas Using Hopper Dredges by COE Galveston, New Orleans, Mobile, and Jacksonville Districts (Consultation Number F/SER/2000/01287) (GRBO) dated November 19, 2003 (amended 2005 and 2007). These protective measures will be utilized if a hydraulic hopper dredge constructs the improvement features or performs routine future maintenance of the navigation channel. The project area is outside of designated Gulf sturgeon critical habitat and placement of material will not breach the water surface. Thus, based upon this previous coordination, NMFS-PRD concluded these activities will not likely jeopardize the continued existence of these species.

Mobile District acknowledged the USFWS’ Fish and Wildlife Coordination Act Report response and conducted a detailed environmental, economic and engineering analyses justifying project improvements as identified in the GRR/SEIS. Impacts were fully considered to all listed threatened and endangered species, including the Bryde’s whale (page 5-58 of the Final SEIS). The 2003 GRBO is the most recent Biological Opinion that evaluates potential dredging impacts in the Gulf of Mexico, and during the Feasibility Study, Mobile District coordinated with the NMFS-PRD verifying its applicability for the project as its analyses included project dimensions for the authorized Mobile Harbor navigation project. Furthermore, the 2003 GRBO (as amended 2005 and 2007) concluded that whale species were not likely to be adversely impacted by dredging activities. Mobile District is compliant with the Endangered Species Act.

Southern Environmental Law Center Letter, dated, July 18, 2019

Paragraphs 1-3, page 1 and 2 of letter – “On May 10,.....inadequate in the Final GRR/SEIS.”

Response: As part of this 48-month GRR/SEIS feasibility study, Mobile District performed an array of modeling and fieldwork to assess potential impacts associated with improving the Federal Mobile Harbor navigation project. Specifically, hydrodynamic modeling was performed to analyze potential changes to flows, circulations, waves, ship wake, etc. attributable to the proposed navigation channel modifications. Remote monitoring station sensors were also deployed during this study to quantify sediment influxes and measure river discharge in the northern Bay. Data gained from these sensors was utilized to develop a comprehensive sediment transport model of Mobile Bay. Coastal sediment modeling also included relative changes in sediment pathways and morphological responses on the ebb tidal shoal and adjacent coastal areas. Hydrographic and water quality modeling was also conducted as part of the Feasibility Study to analyze an array of parameters, including but not limited to dissolved oxygen, temperature, and salinity.

Mobile District further assessed impacts to biological resources by characterizing the baseline wetland community assemblages and distribution in estuarine, transitional and freshwater habitats throughout Mobile Bay and the associated Delta region. Salinity tolerance classes were established that included productivity and mortality for each wetland community using literature sources. Fieldwork was performed to ground truth established wetland communities. The study area encompasses the entire salinity gradient occurring in Mobile Bay region, ranging from salt-intolerant bottomland hardwood forest species assemblages in the north to the halophytic plants communities common throughout coastal wetlands of the northern Gulf of Mexico. Benthic macroinvertebrate communities were also identified as part of the GRR/SEIS Feasibility Study during the fall (October 2016) and spring (May 2017) periods in 120 sample locations per season. Samples included 40 stations within each zone (freshwater, brackish and estuarine). Salinity results from water quality modeling were used in the bottom strata to characterize benthic macrofauna invertebrate changes attributed to channel improvements. Impacts to oysters and oyster larvae distribution were also considered as part of this GRR/SEIS Feasibility Study. Based upon received comments, the Mobile District further analyzed potential impacts by obtaining data from the Alabama Department of Natural Resources, Division of Marine Resources on eighteen reefs to assess for changes in salinity and dissolved oxygen based upon juvenile and adult oyster tolerance thresholds. Based upon this comprehensive analyses, no loss of wetlands, submerged aquatic vegetation, oysters, and recreational and/or commercial fisheries are anticipated nor are any significant adverse impacts to listed species or marine mammals anticipated.

Paragraphs 4 - 5, page 2 of the letter – “In addition to grossly.....impact of the Project to the Bay.”

Response: Based upon minimal level of impacts determined for the recommended plan and future maintenance and operations, no compensatory mitigation is proposed for the action as no loss of wetlands, submerged aquatic vegetation, oysters, and recreational and/or commercial fisheries are anticipated nor are any significant adverse impacts to listed species or marine mammals anticipated. As such, the proposed beneficial use of dredged material (i.e. wetland resources) is not mitigation for project impacts. Mobile District considered a range of alternatives from “no action” (i.e. maintaining to 45- and 45-feet in the Bay and Bar Channels respectively) to its fully authorized depths (i.e. 55- and 57-feet).

Furthermore, the Mobile District completed a comprehensive cumulative impact analysis that included Pre-Water Resources Development Act (WRDA) 1986 projects; WRDA 86 Reauthorization projects; other channel improvements; known present actions; and reasonably foreseeable future projects. The Port of Mobile Expansion Projects were included in the cumulative impact analysis, specifically under geology, soils and sediment; water quality; biological resources; commercial and recreational fishing; invasive species; air quality; hazardous, toxic and radioactive waste; noise; cultural and historic resources; aesthetics and recreation; socioeconomics; and environmental justice. However, the District recognized that a detailed description of the Port of Mobile Expansion Projects was not included Section 4.6 (Future Actions) of Appendix C. The following has been added to Appendix C:

4.6.4.4 Port of Mobile Expansion Projects

The Port of Mobile has established a five-phase long-term plan to grow the terminals annual capacity to 1.5 million twenty-foot equivalent units (TEUs). To date, Phases 1 and 2 have been completed which provided an intermodal container transfer facility, along with 20 acres of additional container yard space and installed two new super Post-Panamax cranes to serve new business through the terminal, including containers bound for Walmart’s 2.6 million square foot import distribution center. Phase 3 expansion is underway and adds a 400-foot dock extension, super Post-Panamax crane rails and upgrades to the fender system to accommodate 14,000 TEU ships.

Future phased development, as with prior expansions, is market driven. Phases 4 and 5 expansion activities would include developing yard area on an adjacent 35 acres and investing in equipment and automation to increase operational efficiencies and throughput capacity at the terminal.

Paragraph 6 – 8, page 2 – 3 of the letter – “Furthermore, Mobile District’s....environmental impacts.”

Response: Mobile District acknowledged the USFWS’ FWCAR response and conducted a detailed environmental, economic and engineering analyses justifying project improvements as identified in the GRR/SEIS. Impacts were fully considered to all listed threatened and endangered species, including the Bryde’s whale (page 5-58 of the Final SEIS). The 2003 GRBO is the most recent Biological Opinion that evaluates potential dredging impacts in the Gulf of

Mexico, and during the Feasibility Study, Mobile District coordinated with the National Marine Fisheries Service – Protected Resources Division verifying its applicability for the project as its analyses included project dimensions for the authorized Mobile Harbor navigation project. Furthermore, the 2003 GRBO concluded that whale species were not likely to be adversely impacted by dredging activities. In addition, the USFWS concurred with the USACE’s determination on 21 December 2018. Proposed channel improvements are within the congressionally authorized project dimensions; therefore, the USACE, Mobile District will implement terms and conditions for sea turtles and Gulf sturgeon identified in NMFS – Protected Resources Division’s (PRD) Gulf Regional Biological Opinion for Dredging of Gulf of Mexico Navigation Channels and Sand Mining Areas Using Hopper Dredges by COE Galveston, New Orleans, Mobile, and Jacksonville Districts (Consultation Number F/SER/2000/01287) (GRBO) dated November 19, 2003 (amended 2005 and 2007). These protective measures will be utilized if a hydraulic hopper dredge constructs the improvement features or performs routine future maintenance of the navigation channel. The project area is outside of designated Gulf sturgeon critical habitat and placement of material will not breach the water surface. Thus, based upon this previous coordination, NMFS-PRD concluded these activities will not likely jeopardize the continued existence of these species. Mobile District is compliant with the Endangered Species Act.

Paragraphs 9 – 11, page 3 - 4

Response: See previous response to paragraphs 1 – 8.

Paragraph 12- , page 4 – 5 of the letter, “In addition to the projects above.....the ODMDS in the cumulative impacts analysis.”

Response: Mobile District notes on multiple occasions in the SEIS/GRR that pursuant to MPRSA EPA, Region 4 has an ongoing NEPA effort to designate the Mobile ODMDS. This newly designated Section 102 site is located predominantly within the boundaries of the historic Section 103 USACE selected ODMDS. Furthermore, Mobile District notes on page 6-8 of *Section 6.1.2 Irreversible and Irrecoverable Commitments of Resources* that “the bulk of the new work material will be placed in the ODMDS.”

Paragraphs 13-15, page 5 of the letter, “We also previously.....1508.25.”

Response: Southern Environmental Law Center previously submitted this comment pertaining to the cumulative impacts and accounting for impacts from Port expansion (five-phase expansion program and related dredging projects), Walmart distribution center, etc. and this information was included in the cumulative impacts section. As indicated above, an addition description of the Port’s five-phase expansion is being included in the Final SEIS/GRR.

Multiport competition is assessed qualitatively for this study as it relates to shifting cargo from one port to another port based on factors such as deepening of a harbor. The recommended plan includes deepening the existing ship channel to more efficiently load larger vessels.

However, larger vessels alone do not drive growth for the harbor. Many factors may influence the growth of a particular harbor: landside development and infrastructure; location of distribution centers for imports; source locations for exports; population, income growth, and location; port logistics and fees; business climate and taxes; carrier preferences; labor stability and volatility; and, business relationships. Harbor depth is just one of many factors involved in determining growth and market share for a particular port.

Furthermore, there are multiple ports along the Gulf Coast, including the Port of Pensacola, Port of Pascagoula, Biloxi Port, and Port of Gulf Port. Of these ports, the Port of Mobile is the most inland and is located along the Mobile River where it empties into the Mobile Bay and then, approximately 31 miles south, into the Gulf of Mexico. From this point, the Port of Gulfport is approximately 80-mi west along the coast. USACE Regulation (ER 1105-2-100) requires, “each investigation on navigation improvements potentially affecting adjacent shoreline will include analysis of the probable effects on shoreline configurations. A distance of not less than ten miles along the shore on either side of the improvement should be analyzed.” Based on this requirement, the Mobile District did not include the Port of Gulfport (80-mi to the west) in the direct, indirect, or cumulative impact analysis associated with this SEIS/GRR.

Paragraph 15, page 5 – 6 of the letter, “B. The Corps.....(7th Cir.1986).”

Response: Mobile District considered a range of alternatives from “no action” (i.e. maintaining to 45- and 45-feet in the Bay and Bar Channels respectively) to its fully authorized depths (i.e. 55- and 57-feet). In addition, several non-structural measures were considered as possible alternatives. Reasonable alternatives were considered during the Mobile Harbor improvement study and information based upon the presented modeling and fieldwork was provided to allow a reasoned choice of alternatives so far as environment aspects are concerned.

Paragraph 16, Page 6 of the letter, “Most glaringly.....1502.14.”

Response: As part of the focused array of alternatives, Mobile District considered a depth from 47- to 50-foot based upon economic justification, engineering feasibility, and environment impact acceptance. To conservatively account for environmental impacts and remain compliant with the study’s schedule, analyses were performed upon the maximum potential environmental impact(s) (i.e. 50-foot deep and a 5-mile widener). Based upon this approach, Mobile District acknowledged risks resulting in mitigation requirements being based upon greater potential environmental impacts. As previously noted, Mobile District included shallower depths which accounted for “significant alternatives suggested by other agencies.” Material associated with improvements will be beneficially utilized to establish ecological habitats. Specifically, cohesive clays and silts will be utilized to establish emergent tidal marsh habitat along the western shoreline and sandy material removed from the upper turning basin will be utilized to reestablish oyster habitat at Denton Reef.

Paragraph 17, page 6 – 7 of the letter, “Also, as pointed out in our first....alternatives.”

Response: See previous response.

Paragraphs 18 – 20, page 7 of the letter, “The Final GRR/SEIS.....1502.14”

Response: Previously addressed in earlier responses.

Paragraph 21, page 7 - 8 of the letter, “Furthermore, the Corps....by NEPA.”

Response: Previously addressed the evaluation of the alternative (i.e. maximum potential dimensions analyzed.)

Paragraph 22, page 8 of the letter, “Additionally, we previously commented...final studies.”

Response: Per Appendix B Economics, Paragraph 6, Multiport competition was assessed qualitatively for this study as it relates to shifting of cargo from one port to another port based on factors such a deepening or widening a ship channel. The recommended plan includes a deeper channel and partially wider channel to more efficiently operate larger vessels. Larger vessels alone does not drive growth for the harbor. Many factors may influence the growth of a particular harbor; landside development and infrastructure, location of distribution centers for imports, source locations for exports, population and income growth and location, port logistics and fees, business climate and taxes, carrier preferences, labor stability and volatility, and business relationships. Harbor depth is just one of many factors involved in determining growth and market share for a particular port. The economic analysis was conducted with the historical Mobile cargo share remaining the same in both the future without-project and future with-project conditions. To restate the multiport considerations in another way, justification of the recommendation for this study is not based on the assumption that cargo will shift to Mobile with deepening alone. The analysis assumes Mobile receives the same share of regional cargo volumes with or without the deepening of the channel.

Paragraph 23, page 8 of the letter, “An agency’s...NEPA principle.”

Response: Comment noted.

Paragraphs 24 - 27, pages 8 - 10 of the letter, “C. The Corps....violates NEPA.”

Response: The Upper Mobile Bay Beneficial Use Wetland Creation Site was considered in an Interagency Working Group that was a separate effort for O&M material several years prior to the commencement of the GRR/SEIS. No efforts to pursue this wetland creation project are ongoing. The reinstatement of thin-layer placement for O&M material was pursued prior to the commencement of the GRR/SEIS, and is only utilized for O&M material given its ability to be placed 6 to 12 inches in thickness. Impacts associated with thin-layer placement were fully addressed in that Environmental Assessment. An identified dredging need prior to the GRR/SEIS completion resulted in the Mobile District preparing an Environmental Assessment for the SIBUA northwest expansion; however, this effort was noted throughout the GRR/SEIS and analyzed to ensure its interdependence for placement of future sandy material dredged during maintenance operations. Although Mobile District included new work placement in the

northwest SIBUA expansion as a potential placement, it clarified the unlikeliness that suitable material would be dredged during the improvement effort.

Paragraphs 28 – 36 pages 10 – 12 of the letter, “D. The Corps..... this biological resource.”

Response: See previous responses regarding fieldwork and modeling performed to analyze impacts. The purpose of modeling conducted as part of the Mobile Harbor GRR was to assess potential adverse effects of the proposed channel modifications on the environment. Comparing relative differences in with and without project modeled results over varying meteorological and hydrological conditions meet this objective. Using forcing conditions for 2010 covers a wide range of conditions to include normal as well as above and extended below normal flows. The modeled results of with and without project conditions over all flow conditions did not exhibit any significant impact from the proposed channel modifications. Extending simulations over longer below normal flow conditions would show the influence of droughts on the system; however, based on the comparisons done through this study there is no reason to conclude relative difference from the proposed channel modifications being greater than what was evaluated. The response to such synoptic scale extreme conditions will overshadow responses from any local scale implementation such as those contained within the with project simulations. SAVs and oyster reefs throughout Mobile Bay have been well documented by multiple agencies, such as ADCNR-MRD and Mobile Bay NEP. USACE’s open-water placement areas utilized for maintenance material are adjacent to the navigation channel and are removed from these resources.

Paragraph 37 - 42, pages 12 – 15, “iii. The Corps’ air quality.....at risk.”

Response: The SEIS/GRR addressed the impact from the project based on assumptions that the port does not increase processing capacity by improving mobility and consequently it improves overall air quality conditions. Please note the SEIS/GRR is intended for assessing potential project impacts. It is not designed for improving baseline (existing) air quality conditions as emphasized in the comment.

At the time of the preparation of the SEIS/GRR, actual emission data was not available; therefore, the Mobile District considered using the emission patterns established for a similar harbor improvement project as a reasonable approach for addressing air emission impacts. Although traffic could increase by 25% due to the build-out of the container terminal, this increase in traffic and associated emissions would occur with or without the project.

In contrast to operational activities, construction activities are relatively short-term conditions with the potential to produce temporary air quality effects. According to CFR § 93.123(c)(5), “CO, PM10, and PM2.5 hot spot analyses are not required to consider construction-related activities which cause temporary increases in emissions. Each site which is affected by construction-related activities shall be considered separately, using established ‘Guideline’ methods. Temporary increases are defined as those which occur only during the construction phase and last five years or less at any individual site.” Therefore, based on the channel

deepening activities along the channel at a specific site, the Mobile District considers that construction activities are considered temporary and would not require a quantitative hot spot analysis. Therefore, potential construction impacts would be temporary and insignificant.

Paragraphs 43 – 53, page 15 - 18, “E. The Corps Insufficiently....problems accordingly.”

Response: Based upon minimal level of impacts determined for the recommended plan and future maintenance and operations, no compensatory mitigation is proposed for the action as no loss of wetlands, submerged aquatic vegetation, oysters, and recreational and/or commercial fisheries are anticipated nor are any significant adverse impacts to listed species or marine mammals anticipated. Modeling and fieldwork was performed to analyze impacts. Given Savannah River is ecologically different from Mobile Bay, comparing identified impacts attributed from channel improvements are not comparable.

Paragraphs 54 – 64 pages 18 – 21 “II. The Final GRR/SEIS Violates the CWA....to make that claim.”

Response: A Section 404(b)1 Evaluation was prepared and reviewed with the Draft and Final SEISs. Mobile District will request WQC from the State of Alabama during PED Phase. Sediment evaluation will also be performed during this time and results will be provided to the State of Alabama and EPA pursuant to the CWA and MPRSA, respectively. See previous response pertaining to multiport and alternative analyses and FWCAR response.

Paragraph 65 - 66, page 21, “Regarding groundwater.....in the Final GRR/SEIS.”

Response:

Regarding groundwater concerns, it is still unclear in the Final GRR/SEIS which aquifers are beneath Mobile Bay despite the Corps' added discussions regarding groundwater effects.

The aquifer in question for this study is the A2 aquifer, also known as the upper portion of the Miocene-Pliocene aquifer. These terms are used interchangeably throughout the main GRR/SEIS, the EN Appendix, and Attachment A-7.

See Final GRR/SEIS at 5-18 to 5-19. For example, references to the Watercourse Aquifer were removed in portions of the main body of the Final GRR/SEIS but not from the Engineering Report that summarizes groundwater modeling. See id. at 2-38 (removing references to the Watercourse Aquifer); but see id. at App. A at 5-8 (explaining the Watercourse Aquifer and Miocene-Pliocene Aquifer are "hydraulically linked").

The last paragraph of section 2.5.5 of the initial submittal was struck from the report to avoid redundancy. It contains all the same information as paragraph 1 of section 5.6 of the initial and second public submittal.

Additionally, the Final GRR/SEIS's discussion of groundwater effects resulting from project construction misleadingly summarizes findings in the Engineering Report to claim "it is not

anticipated that the deepening of the channel would result in adverse impacts to the aquifer or associated groundwater used by Dauphin Island." Final GRR/SEIS at 5-19. This conclusive statement seems to contradict the Engineering Report's findings that "the aquifer is hydraulically linked to the bay in the areas where new work deepening will occur.

The statement that the aquifer may be currently exposed does not contradict the statement in the final GRR/SEIS. Historical borings show that there are areas in the bay that are already linked hydraulically to the aquifer in question. Even so, there have been no documented issues of increased groundwater salinity. The statement made in the Final GRR/SEIS, "it is not anticipated that the deepening of the channel would result in adverse impacts to the aquifer or associated groundwater used by Dauphin Island", is based on a model that assumes that the aquifer is further exposed by dredging of the confining layer. This model concludes that the flow regime to the Dauphin Island water wells is changed slightly, however, it would take thousands of years for the slight change to be noticed.

The USACE, Mobile District acknowledges dredged material placement must be compliant with the Clean Water Act and the Inland Testing Manual. As previously stated, USACE, Mobile District deferred testing to PED phase. A scope of work for the sediment evaluation effort has been developed and coordinated with EPA, Region IV pursuant to CWA and MRPSA. In addition, water quality certification pursuant to section 401 of the Clean Water Act will be obtained from the Alabama Department of Environmental Management (ADEM) prior to construction. All conditions of the water quality certification will be implemented in order to minimize adverse impacts to water quality to the maximum extent practicable. A determination of consistency with the State of Alabama Coastal Zone Management program pursuant to the Coastal Zone Management Act of 1972 will be obtained from the ADEM prior to construction. All conditions of the consistency determination will be implemented in order to minimize adverse impacts to the coastal zone to the maximum extent practicable.

Paragraph 67 – 79 page 22 – 24 "B. The Project...of the project."

Response: See earlier response. Public Notice has been conducted during the Draft and Final SEIS review.

Paragraph 80 – to the end.

Response: Mobile District is in compliance with the National Historic Preservation Act and will continue to cooperatively work with the Alabama State Historic Preservation Officer in accordance with the signed Programmatic Agreement.

Sierra Club Letter, dated, July 15, 2019**Introductory Comments**

- A. First, the Corps reworded and abbreviated each of our comments to create summary bullet statements that the Sierra Club neither authored or approved as representing our comments. The Corps' unilateral decision to reword the Sierra Club' 24 separate comments resulted in the Corps changing and diluting the essential content, intent, pertinence, relevance, and significance of each of our comments. None of the Corps' bulletized interpretations represent accurate representations of our 24 individual comments. As a result, the Sierra Club rejects all of the comment summaries prepared by the Corps staff on the basis that they do not represent the Sierra Club's actual comments as we submitted them and to which the Corps is obligated to respond in accordance with the provisions of the Council on Environmental Quality's National Environmental Policy Act implementing regulations prescribed in Section 1503.4(a) and item (5) in particular.
- B. Second, the Corps took the further disturbing step of refusing to respond to any of the Sierra Club comments. Instead, the Corps simply tells the reader to " ... see responses to comment number 20 ..." that were prepared by Mr. Glen Coffee. A perusal of the 33 pages of comments submitted by Mr. Coffee indicates some of his comments do indeed touch upon some of the issues and concerns raised by the Sierra Club. However, the Corps also reworded Mr. Coffee's comments which makes it impossible for the Sierra Club to track and ascertain which of the Corps' very cryptic responses to Mr. Coffee's original comments represent applicable and adequate responses to the 24 separate comments provided by the Sierra Club.

Comment:

1. The purpose of the GRR/SEIS is to reanalyze the 1980 Survey Report/EIS that originally recommended Mobile Harbor be deepened and widened. The 1980 report failed to: (1) consider the erosion of Dauphin Island and (2) evaluate how deepening the Mobile Harbor Bar Channel would influence erosion of Dauphin Island. As a result, the 1980 Survey Report/EIS was deficient by completely ignoring Dauphin Island's erosion problem even though the Mobile District was aware of the erosion issue and its connection to maintenance of the Bar Channel because a previous 1978 report. Corps ER 1105-2-100 requires a General Reevaluation Report to conduct a " ... reanalysis of a previously completed study, using current planning criteria and policies, which is required due to changed conditions and/or assumptions". Further, Section 1508.7 of the Council on Environmental Quality's (CEQ) NEPA regulations requires the cumulative impacts of past actions related to and relevant to the subject project being evaluated in a current NEPA document. However, the Mobile District staff has refused to consider the erosional changes to Dauphin Island since 1980 in the Draft GRR/SEIS, stating the GRR Study will only consider present and projected future changes to the Study Area environment attributed to the TSP. The historic erosion of Dauphin Island since 1980 represents a significant "changed condition" within the Project Area. By ignoring the erosion that occurred between the 1980 Survey Report and the 2018 Baseline Year considered in the GRR Study, the resulting Draft GRR/SEIS has continued to perpetuate the 1980 report's original error of omission. The historic and ongoing erosion problem

clearly represents a relevant issue associated with maintenance of the Bar Channel proposed for deepening. The historic erosion resulted from the effects of past maintenance actions that are relevant to and useful in analyzing whether the reasonably foreseeable effects of proposed channel deepening may have a continuing, additive and significant relationship to the shoreline erosion effects. Based on the above, the Sierra Club believes the Draft GRR/SEIS is deficient because it fails to adequately comply with §1508.7 of CEQ's NEPA Regulations by not analyzing the effects and consequences of past impacts of channel maintenance on the erosion problem that will not only be continued but made worse by deepening the channel. The Draft GRR/SIS also fails to adequately comply with paragraph 4-1a(1) of Corps ER 1105-2-100 by not considering the significant erosion of Dauphin Island that has occurred since 1980 and if deepening of the channel could exacerbate the effects of shoreline erosion.

Response: [See Section 6.1 Cumulative Impacts and 6.1.1.1 Effects on Coastal Sediment Transport](#)

2. The Mobile Harbor project should mitigate for the historic, present, and future contribution of the Bar Channel maintenance program on the erosion of Dauphin Island. Corps dredging data show that over the 36-year period between 1980 and 2016, approximately 72% (i.e., approximately 21,200,000 cy) of the littoral drift sands crossing from the Fort Morgan Peninsula were diverted or entirely removed by channel maintenance from the nearshore system. Proof of the historic loss of littoral drift sands is contained in the Draft GRR/SEIS which acknowledges 58% of the sand placed in the SIBUA since 1999 alone has accumulated within the disposal site and not rejoined the littoral drift system as the Mobile District stated would occur. The Mobile District needs to take the next step by unequivocally acknowledging the role the Bar Channel maintenance program plays in reducing the supply of littoral drift sands which is starving Dauphin Island of much needed sand.

Response: [See Section 6.1 Cumulative Impacts and 6.1.1.1 Effects on Coastal Sediment Transport](#)

3. Page 5-23 of the Draft GRR/SEIS states the proposed Sand Island Beneficial Use Area (SIBUA) expansion "... provides an effective means of continued bypassing of sand dredged from the Bar Channel to the downdrift littoral system." The Sierra Club is not prepared to support the proposed SIBUA expansion until the Mobile District provides the information identified in our September 6, 2018 letter sent in response to your August 8, 2018 Public Notice No. FP18-MH01-09 (see attached). The GRR/SEIS should be revised to provide assurances, based upon sound scientific documentation, that up to 100% of the dredged sands placed in the proposed SIBUA expansion area will rejoin the littoral drift system to nourish Sand/Pelican and Dauphin Islands. It is not enough for the GRR/SEIS to just make the above quoted statement. The GRR/SEIS must also provide adequate information to thoroughly demonstrate the statement is valid.

Response: [See Section 4.2.2.3 SIBUA for the Bar Channel](#)

4. The Draft GRR/SEIS ignores the concerned public's request to take advantage of the "opportunity" to analyze a disposal alternative that would implement Section 302 of the WRDA 1996 to beneficially use dredged sands to restore Sand/Pelican Island and nourish Dauphin Island. Since 2011, the Mobile District has consistently applied the

Section 302 authority to justify alleged "beneficial uses" of dredged material within Mobile Bay but has never addressed a truly beneficial use of dredged sand from the Bar Channel to counter erosion of Dauphin Island under the discretionary authority granted the Corps under Section 302. It is time the Mobile District took that step which is demanded by the concerned public. Why does the Mobile District continue to refuse to develop the incremental cost of such a beneficial use disposal alternative to maintain the Bar Channel which is certainly within the scope of the project authority presented in Section 1.1.1?

Response: SIBUA was created under the authority provided by Section 302 of WRDA 1996. The SIBUA Northwest Extension was permitted in 2019 and allows the best opportunity for natural and sustainable transport of bar channel dredge material to Dauphin Island.

5. The Draft GRR/SEIS acknowledges 364,000 yd/yr (58%) of the 624,000 cy/yr of sand placed in the SIBUA on an average annual basis accumulates within the site instead of moving out to rejoin the littoral drift system as intended. The accumulation of that volume of sand represents a significant interruption of the natural littoral drift system. The GRR/SEIS should state without equivocation that the accumulating sand is interrupting the natural littoral drift system which would mean the channel maintenance program is contributing to the erosion of Dauphin Island by reducing the amount of sand transported to the island. Also, the GRR/SEIS should provide substantiating evidence to prove that the 260,000 cy/yr that does move out of the SIBUA actually rejoins the littoral drift system as alleged by the Mobile District. The Draft GRR/SEIS does not provide that proof.

Response: In accordance with paragraph 4.2.2.3.1 Future Monitoring and Management of SIBUA: The USACE, Mobile District, will budget for additional funds to place material in shallower areas within the existing SIBUA and the SIBUA Northwest Extension. The area will be proactively monitored and managed by performing semiannual hydrographic surveys to ensure material is placed in the best locations possible given the availability of funds and capabilities of the dredging industry. Hydrographic surveys of placement areas every 6 months, along with a comprehensive survey of the complex annually, will be conducted to gain a better understanding of future capacities and coastal processes that move sediment within the region. If additional funds are not available, the Mobile District will place material within the existing SIBUA and Northwest Extension, as necessary, to ensure reliability of the navigation channel.

6. The Draft GRR/SEIS relies upon the results of the Vessel Generated Wave Energy model to assess the effects of ship wakes. The results of that assessment indicate ship generated waves only range between 0.02 ft to 0.15 ft, with the highest values being closer to the Mobile Harbor Federal Navigation Channel and decrease in height further from the channel. Because of the concern over ship generated waves, the Mobile District and Alabama State Port Authority should evaluate imposing speed limits on the larger deep draft loaded ships to reduce the magnitude of waves from passing vessels.

Response: Speed limits may be imposed at the discretion of the Harbor Master; however, average vessel speeds of 10 knots were determined using AIS records in the 2016 calendar year. Allen (2018) does not imply no vessel will travel greater than 10 knots and addresses

these outliers within the report. Sensitivity of speeds greater than 10 knots was tested using a practical maximum limit as a function of channel geometry and 25% greater speeds which found similar likelihoods of potential impacts. This sensitivity testing is detailed on page 56-57 of Allen (2018), as shown in attachment A-4.

7. The discussion on page 2-45 should be expanded to adequately describe the history of the serious erosion problem that has been clearly observed to be adversely affecting Sand/Pelican and Dauphin Islands since at least the early 1970s. The historic nature of the erosion problem and its connection to the Bar Channel maintenance program according to the 1978 Mobile District is important. Pertinent background information describing the nature of the loss of these islands dating back until at least 1980 should be discussed in the GRR/SEIS.

Response: The conclusions of the 1978 report were based on observational information: maps, charts, and photos. This may have been an appropriate methodology at the time, but, because of technological improvements in the intervening four decades, the hydrodynamic and sediment transport modeling used for this study more accurately characterizes coastal processes. See Section 5.3.3 Sediment Transport, Section 6.1 Cumulative Impacts, and 6.1.1.1 Effects on Coastal Sediment Transport.

8. The only information and literature references provided for the page 2-51 discussion of Sediment Transport at the Coastal/Ebb Tidal Delta are those that support the Mobile District's position that maintenance of the Bar Channel does not contribute to the erosion of Dauphin Island. For this discussion to be completely objective, the discussion should also include other relevant information from credible sources that do not agree with the Mobile District position. By excluding coverage of the alternative views of other coastal engineers and scientist that disagree with the Mobile District on the significant and relevant erosion issue causes one to question the objectivity of the Draft GRR/SEIS.

Response: See Section 6.1.1.1 Effects on Coastal Sediment Transport for a complete discussion.

9. A portion of the projected \$34.5 million of annual excess benefits should be used to pay for beneficial use projects with dredged material from the Mobile Harbor project; environmental restoration projects; and mitigation for the significant historic adverse impacts of maintaining the ship channel on key resources. Example projects include restoration of Sand/Pelican and Dauphin Islands; restoration of Mobile Bay's depleted oyster reefs; and to prepare Study Area natural resources to withstand future Sea Level Rise.

Response: See Section 4.2.3.2 Beneficial Use of Dredged Material

10. The Draft GRR/SEIS Economic Analysis does not discuss a relevant element of the true cost to the Nation of investing \$387,000,000 to deepen and maintain the Mobile Harbor project at an increased depth of 5 additional feet over the next 50 years. The Congressional Research Survey developed information to aid Congress arrive at decisions on which of the nation's ports represent the best value in the competition for funds to pay for deepening their channels to attract the larger ships transiting the new Panama Canal. A 2011 report entitled "Harbor Maintenance Trust Fund (HMTF) Expenditures" authored by John Frittelli showed that over the 10-year period between FY

1999 and FY2008, Mobile Harbor was the second most expensive navigation project to maintain in the nation. Of equal importance, Mobile Harbor was not included among the nation's top 25 projects in the amount of import fees received which provide the source of monies for the HMTF. Frittelli's subsequent 2013 report entitled "Harbor Maintenance Finance and Funding" compared the \$8,720,000 of import taxes collected at Mobile Harbor in FY2011 against the Corps' \$23,560,000 budget request to maintain the project for that year. The comparison showed 62% of the federal cost to maintain Mobile Harbor in FY 2011 was subsidized by the import taxes received at other more profitable ports in the nation. That information should also be discussed in the GRR/SEIS.

Response: See Section 4 of Appendix B for Transportation Cost Saving Benefit Analysis

11. To support its contention that disposing dredged material within Mobile Bay benefits the bay's environment, the Draft GRR/SEIS depends entirely upon three brief and vague unsubstantiated statements made 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". The Draft GRR/SEIS neither describes what the specific environmental benefits are received by the bay by spreading 4,000,000 cy of dredged material over its bottoms nor any evidence from scientific studies to support the "benefit" contention. By pursuing thin layer disposal in Mobile Bay as an "alternative to disposal of such material in the Gulf of Mexico" as required by the WRDA of 1986, the Mobile District has interpreted Section 302 of the WRDA of 1996 as giving the Corps carte blanche approval to abandon disposal in the ODMDS in favor of various disposal options within Mobile Bay without having to adequately justify the alleged beneficial uses the Mobile District contends results from a return to dredged material disposal in the bay. The Draft GRR/SEIS continues the Mobile District's pattern of not providing the necessary requisite scientific-based information to support beneficial use claims. The Draft GRR/SEIS bases its recommendation entirely upon the 2014 EA to place the TSP's 500,000 cy/year of future maintenance material in the same thin layer sites over the next 50 years that are already receiving 4,000,000 cy/year from maintenance of the existing Bay Channel. In reality, thin layer disposal is primarily being driven by the Mobile District's desire to eliminate the cost of transporting dredged material to the ODMDS. Detailed information from appropriate studies and the scientific literature must be added to the GRR/SEIS to support the contention thin layer disposal is beneficial for Mobile Bay. Otherwise, use of the thin layer sites to receive future maintenance material dredged from Bay Channel cannot be supported from an environmental benefit standpoint since there appears to be no such benefits. All federal and state agencies and environmental organizations should call for a cessation of thin layer disposal in Mobile Bay until the Mobile District can prove the existence of the alleged environmental benefits of thin layer disposal.

Response: The reinstatement of thin-layer placement for O&M material was pursued prior to the commencement of the GRR/SEIS, and is only utilized for O&M material given its ability to be placed 6 to 12 inches in thickness. Impacts associated with thin-layer placement were fully addressed in that Environmental Assessment.

12. Section 2.5.12 should be expanded to point out residents in downtown and midtown Mobile have filed a lawsuit against the Alabama State Port Authority over fugitive coal dust originating from the McDuffie Coal Terminal. Airborne coal dust is settling in

residential neighborhoods west of the terminal despite required measures that are supposed to prevent the escape of coal dust. Given the fact that increased future shipments of coal, as both exports and imports, are projected to occur in the benefit calculations to justify the TSP, the existence of the present lawsuit is relevant to the TSP and should be discussed in the GRR/SEIS.

Response: Alabama State Port Authority is not aware of any lawsuit that has been filed against them over fugitive coal dust originating from the McDuffie Coal Terminal. Furthermore, the volume of coal handled at the McDuffie Coal Terminal is the same in the with or without project condition.

13. Complaints and concerns over the existing occurrence of various petroleum and chemical odors in the Africatown community and other residential neighborhoods bordering the Port of Mobile, tank farms, and railroads exiting the port facilities have been raised by nearby residents. These concerns were presented at relatively recent City of Mobile land use planning and zoning meetings concerning the possible expansion of the tank farms bordering Mobile Harbor. The Draft GRR/SEIS forecasts petroleum and chemical commodity shipments will continue to increase over the next 50 years. Given the existing concerns expressed by nearby residents over existing escaping vapors from port related facilities, Sections 2.5.12 and 2.5.13 should be expanded to thoroughly discuss this local air quality issue.

Response: Odor is an annoyance issue pending on human perception and it does not have regulatory standards as those air pollutants under CAA. Therefore in general it cannot be feasibly addressed through a NEPA process. Nonetheless transporting petroleum and chemicals through the port always follows standard practice to minimize leaks or spills per health and safety requirements, and therefore, the existing condition at the port should not differ from any other ports in the U.S. unlikely causing any significant impacts to the neighborhood. The TSP would not induce more capacity at the port on an annual basis as compared to the No Action Alternative. Therefore given the same level of transport activities using trucks under the TSP as compared to the No Action Alternative, the impacts on odors from transporting petroleum and chemical product would likely remain the same.

14. The discussion on page 4-6 stating filling of the relic shell mining areas with new work dredged material will " ... restore sediment to the system and improve bay bottom conditions ... " should be expanded to describe exactly what the alleged benefit is, including the data from scientific studies that support this action as being a legitimate beneficial action. The Draft GRR/SEIS does not explain how moving existing sediments within Mobile Bay from one location to another within the bay will "restore sediment to the bay system".

Response: The relic shell mined area was identified for beneficial use of dredged material based upon cooperating agency discussions to restore sediment to the system. Deep holes dredged during mining of relic shell prior to 1982 is documented to have deepened bay bottom in the region as well as possibly contributed to degraded bay bottom characteristics and decreased ecological productivity in the area (May 1971, May 1976, Schroder et. al. 1998, Miller-Way et al. 1995, Reine et al. 2013; Reine et al. 2014, Byrnes et. al. 2013, and Nwokebuihe et al. 2016). Several cooperating agencies identified the area due to its degraded conditions and low dissolved oxygen levels during the summer months. ERDC

conducted benthic sampling during fall 2016 and spring 2017 and found favorable water quality conditions (i.e. low dissolved oxygen levels were not identified during this sampling period). Baseline conditions of the benthic habitat were established by this effort. Prior to construction and associated with the sediment evaluation effort and monitoring plan for the Mobile Harbor navigation improvements, water quality and sediment samples will be collected on a seasonal basis from the relic shell mined areas along with hydrographic surveys to assess potential movement of the placed new work dredge material. Water quality sampling locations for the monitoring plan will be identified during the PED phase at which time the USACE, Mobile District will seek the EPA Region IV's technical expertise among other state and Federal agencies' input to ensure that low dissolved oxygen levels are accurately captured within the potential sites. Although not an ecosystem restoration project, the USACE, Mobile District will sample the sites for a minimum of 2 years to assess water quality conditions, sediment composition, and benthic recovery. As with the pre-construction monitoring, the USACE, Mobile District will also coordinate this effort with the state and Federal agencies.

The USACE, Mobile District acknowledges dredged material placement must be compliant with the Clean Water Act and the Inland Testing Manual. As previously stated, USACE, Mobile District deferred testing to PED phase. A scope of work for the sediment evaluation effort has been developed and coordinated with EPA, Region IV pursuant to CWA and MRPSA. Grab samples from within the Relic Shell Mined Area will be taken to assess the physical and chemical characteristics of the material in compliance with the Inland Testing Manual. These results will be compared to the physical and chemical characteristics of the dredged material from the channel prior to placement in the Relic Shell Mined Area.

15. The GRR/SEIS does not explain how the total dredged material disposal capacity needs for the Bay Channel, including the TSP increment, will be satisfied over the entire SO-year period of analysis. Tables 4-3 and 4-5 show the disposal capacity remaining after 20 years would be 52,000,000 cy for the ODMDS and 59,594,000 cy for the thin layer open water sites within Mobile Bay. Based upon an annual dredging volume of 4,500,000 cy for the Bay Channel (see Table 4-5), during the last 30 years of the SO-year period of analysis, a total of 135,000,000 cy would be dredged from the Bay Channel. Since the remaining capacity of the thin layer sites would be 59,594,000 at the beginning of the final 30 years of the SO-year period of analysis, there would be insufficient disposal capacity in the thin layer sites to accommodate 75,406,000 cy (135,000,000 minus 59,594,000) of sediments to be dredged from the Bay Channel. Even if the remaining capacity of 52,000,000 cy in the ODMDS at the beginning of the final 30 years of the planning period was used to receive the excess Bay Channel sediments, there would still be a remaining disposal capacity shortfall of 23,406,000 cy (75,406,000 minus 52,000,000) that would have to be satisfied. That volume is equivalent to the total volume of sediments that would be dredged during 5 years of maintenance of the entire Bay Channel. Since future satisfaction of that significant disposal capacity shortage could materially influence the cost side of the BCR for the TSP, the GRR/SEIS must address the disposal capacity issue in considerably more detail for the entirety of the 50-year period of analysis. Otherwise, the present conceptual life cycle design for the TSP is incomplete since the ability to adequately maintain the deepened channel in a cost-effective and an environmentally sustainable manner is questionable.

Response: [Refer to paragraph 2.4.3.1 Maintenance Dredge Material Quantities](#)

16. The failure of the Draft GRR/SEIS to identify adequate disposal capacity to satisfy the maintenance needs of the TSP, along with the entire Bay Channel) for the entire 50-year study period results in many of the Section 5.0 discussions being deficient. That is because the various elements of the SEIS that address specific resource categories cannot be completed without more detailed information as to where all dredged material will be disposed over the total 50-year economic life of the deepened channel. This specifically applies to the discussions on pages 5-18 and 5-19 that address the SIBUA and ODMDs, respectively, as well as several other discussions in Section 5.0. Before the GRR/SEIS can be finalized, additional work is required to identify all future disposal sites, and their capacities, likely to be used over the 50-year period of analysis. The potential adverse impacts to Mobile Bay from future dredged material disposal are potentially too significant for the GRR/SEIS to ignore the important absence of adequate 50-year disposal capacity for the TSP. The inability of the Draft GRR/SEIS to identify adequate disposal capacity for the entire 50-year planning period makes the SEIS component of GRR/SEIS seriously deficient from a NEPA compliance standpoint because the present TSP does not represent a complete project.

Response: [Refer to paragraph 2.4.3.1 Maintenance Dredge Material Quantities](#)

17. Revision of Section 4.2.2.3 is required to provide information to substantiate the contention that:
 "... sand has been transported out of the SIBUA at a rate of approximately 260,000 cubic yards per year. This material has primarily continued to move northwest to join in with the shallow platform associated with Sand and Pelican Islands".

Reliance upon the results of numerical model studies alone does not serve as an adequate source of proof. Since the Mobile District has never monitored the movement of sand placed in the SIBUA, there is no reliable physical information to:

- (1) Identify with certainty in which direction the sand leaving the SIBUA does go; and
- (2) Support the Draft GRR/SEIS allegation that the sand moves "... northwest to join in with the shallow platform associated with Sand and Pelican Islands".

Response: [See Section 4.2.2.3.1 Future Monitoring and Management of SIBUA](#)

18. The text on page 4-14, Figure 4-8, and Section 5.3.3.1 should be expanded to clearly define the location and depths at which future dredged sands will be placed in the proposed SIBUA expansion. Coastal engineering information indicates the sands must be discharged in waters much less than 15 feet if most of the sand is to have the best opportunity to rejoin the littoral drift system. If the Mobile District proposes to place sand at depths greater than 15 feet, the GRR/SEIS must explain how all the sand placed at such depths will be able to rejoin the littoral drift system and why the historic sand accumulations experienced since 1999 in the existing SIBUA will not be repeated in the proposed expansion area.

Response: [See Section 4.2.2.3 SIBUA for the Bar Channel and Section 4.2.2.3.1 Future Monitoring and Management of SIBUA](#)

19. Before the GRR/SEIS is finalized, the coverage of potential implementable beneficial use options for inclusion in the TSP should be strengthened in Section 4.2.3 .2.1. It is not appropriate to delay consideration of beneficial uses of dredged material until the Preconstruction Engineering and Design (PED) phase of project implementation when the public will not be afforded an opportunity to be involved in the development of such measures. That has been the case since 2011 when the Mobile District established the Mobile Bay Interagency Working Group (IWG) to explore beneficial uses of dredged material in Mobile Bay. The concerned public was intentionally excluded from the activities of the IWG which were essentially conducted in secrecy and with little regard for the views of the public.

Response: [Comment Noted.](#)

20. The text accompanying Figure 4-9 should be expanded to provide information about each of the beneficial use sites illustrated in the figure. An explanation is needed as to why consideration of those sites was not included in developing the TSP, especially given the fact that the Bay Channel will experience a future disposal capacity shortfall during the final 30 years of the 50-year period of analysis. Additional text is needed to explain why Figure 4-9 does not include the planned 1,200-acre dredged material disposal island in the Upper Bay south of the Causeway. The Corps maintains the Mobile Bay IWG supports construction of that island as a beneficial use of dredged material to contain future sediments dredged from the Mobile Harbor channel. Because of the long-term shortfall of disposal capacity for the Bay Channel component of the TSP, the Mobile District must explain why the Draft GRR/SEIS fails to include a discussion of the 1,200-acre island which has moved beyond the conceptual planning stage.

Response: [See Section 4.2.3.2 Beneficial Use of Dredged Material](#)

21. Ship wake induced waves generated by moving deep draft vessels in the Bay Channel are a real concern from a shoreline erosion standpoint. The larger the ship, the more loaded it is, and the faster it is traveling combine to generate waves that can be problematic, considering tidal elevation, ambient wave condition, and the distances from the passing ships. Section 5.3.1.2.1 of the GRR/SEIS should address setting speed limits on ships traveling within Mobile.

Response: [Speed limits may be imposed at the discretion of the Harbor Master. Following the initial comment period additional work was completed to address the long term impacts to shorelines within Mobile Bay. Cumulative impacts to shorelines as a function of VGWE were assessed in Allen \(2018\) using historical vessel call data from 1956 to 2017 and comprehensive shoreline position data spanning a similar timeframe. A weak correlation was identified between vessel calls and shoreline change; however, the correlation was only valid prior to 1997 and the inflection of this correlation is more likely than not attributed to the increase of shoreline armoring. Allen \(2018\) concluded present and foreseeable cumulative impacts of VGWE on Mobile Bay shorelines are considered not significant.](#)

22. The water quality modeling analyses discussed in Section 5.3.3 and Appendix C should have considered a multi-year drought condition to adequately analyze the potential effects of the TSP on salinity regimes within Mobile Bay to determine if specific environmental resources could be adversely affected during extended periods of

extreme low flow. The greatest prolonged changes in salinity in Mobile Bay naturally occur during periods of sustained low flow that occur during multi-year "extreme drought" events affecting large portions of the Mobile Drainage Basin. Such droughts typically span two to three years and can influence the extent of certain Submerged Aquatic Vegetation (SAV) communities occurring south of the Causeway, as well as oyster reefs in lower Mobile Bay. The water quality model must be rerun to generate the projected "worst case" Without-Project natural salinity regimes that could to occur in the foreseeable future and compare those conditions with the changes in salinity levels and locations that would occur with the TSP during a multi-year drought.

Response: The purpose of modeling conducted as part of the Mobile Harbor GRR was to assess potential adverse effects of the proposed channel modifications on the environment. Comparing relative differences in with and without project modeled results over varying meteorological and hydrological conditions meet this objective. As discussed in Appendix A Engineering Section 6.1.1, using forcing conditions for 2010 covers a wide range of conditions to include normal as well as above and extended below normal flows. The modeled results of with and without project conditions over all flow conditions did not exhibit any significant impact from the proposed channel modifications. Extending simulations over longer below normal flow conditions would show the influence of droughts on the system; however, based on the comparisons done through this study there is no reason to conclude relative difference from the proposed channel modifications being greater than what was evaluated. The response to such synoptic scale extreme conditions will overshadow responses from any local scale implementation such as those contained within the with project simulations.

23. Section 5.9.1 should be expanded to discuss the impacts of Dauphin Island's historic shoreline erosion on sea turtle nesting. The progressive erosion of Dauphin Island's Gulf shoreline has contributed to a low success rate of sea turtle nesting attempts on the island. The low success rate is an indirect consequence of shoreline erosion and should be addressed in the GRR/SEIS since Dauphin Island provides a substantial portion of Alabama's limited Gulf shoreline that is available for sea turtle nesting.

Response: See Section 6.1.1.1 Effects on Coastal Sediment Transport

24. 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." Since annual maintenance dredging of the Bay Channel will discharge a total of 4,500,000 cy of dredged fine-grained sediments (including the TSP increment) in open water, that impact statement does not appear to be logical. The text must explain why the disposal of such a large volume of dredged sediments in open water over thousands of acres of Mobile Bay bottoms during a single year will not increase turbidity values above ambient levels. The projected lack of impact defies logical common sense.

Response: See Section 5.5.4 Turbidity and Suspended Solids

Additional Comment: Our September 6, 2018 letter included a valid request for a public hearing on that action - a request that was made by a large segment of the interest public. However, by refusing to respond to our letter, the Corps ignored the Sierra Club's request, without providing an explanation for the Corps' decision to not hold the requested hearing.

Response: A very robust public involvement plan was executed for this study as shown in paragraphs 6.3.4 and 6.3.5 of the Main Report. This included a townhall format general public meeting on February 22, 2018.

Additional Comment: The Corps is obligated to provide the Sierra Club a carefully thought out response in view of the combination of wording from pages ES-7 and 4-16 in the Final GRR/SEIS that clearly states " ... this [GRR] study **includes an assessment** [emphasis added] of a proposed extension to the SIBUA ... to ensure adequate placement capacity for maintenance dredging of the Bar Channel". That wording indicates beyond question that the SIBUA extension was assessed in connection with the GRR study and not as an entirely separate Operation and Maintenance action as the Corps now attempts to confusingly imply. The fact that the SIBUA extension environmental assessment is relevant to the GRR study is demonstrated by the Corps' belated decision to include the Sierra Club's September 6, 2018 letter as Comment 22 on page 7 of the Final GRR/SEIS's Appendix E.

Response: The USACE, Mobile District has historically maintained the Federal Mobile Harbor Navigation Project since 1826. Throughout this period, multiple intermittent actions have been required to improve and maintain this navigation project. As noted in its 2019 Environmental Assessment, SIBUA was expanded to the northwest to provide additional capacity for continued operations and maintenance material dredged from the Bar Channel. Maintenance operations were undertaken at the Bar Channel prior to USACE, Mobile District concluding the Mobile Harbor GRR/SEIS in November 2020. As such, the USACE, Mobile District proceeded with the 2019 Environmental Assessment but informed the agencies and public numerous times throughout the Mobile Harbor GRR/SEIS of this effort and need for future capacity of maintenance material. The Upper Mobile Bay Beneficial Use Emergent Tidal Marsh Site is a preliminary concept for maintenance material but is not being pursued by USACE, Mobile District.

Additional Comment: Before I close, I must point out the relevance of all our above comments is supported by the Environmental Protection Agency's (EPA) September 17, 2018 comment letter on the Draft GRR/SEIS. Many of the comments conveyed in the EPA letter are similar in nature and content to our above comments. The absence of information in the Draft GRR/SEIS on the identified crucial impact issues resulted in the EPA assigning the Corps report the poor rating of EC-2 (i.e., the EPA has "Environmental Concerns" and considers the information included in the Draft GRR/SEIS to be "Insufficient"). Our review of the resulting Final GRR/SEIS indicates the overall content of the Final report is essentially unchanged from the Draft that received the poor EPA rating.

Response: Following the incidental exclusion of the EPA Region IV comments to the Draft GRR/SEIS, the EPA brought the matter to the attention of the Mobile District. All comments submitted by the EPA were then subsequently inserted into the Appendix E along with the USACE responses. This revision to Appendix E then went out for a full 30-day period as required by Notice of Availability dated June 11, 2019. This 30-day extension was published in the Federal Register on June 14, 2019 with the 30-day State/Federal Agency review period concluding on July 18, 2019. Additional meetings and webinars were held to discuss all related comments and responses. By letter dated July 17, the EPA Region IV stated "The purpose of this letter is to provide the EPA's comments on the proposed project. On September 17, 2018, we provided comments and recommendations on the draft GRR/SEIS designed to improve the disclosure of impacts and mitigation related to water quality and

water quality modeling, sediment and dredge placement, air quality and community impacts. The EPA's recommendations on the draft GRR/SEIS and the USACE's response is included in the revised version of Appendix E of the final GRR/SEIS. Following the revision of Appendix E, the USACE amended the initial Federal Register notice and extended the public and agency comment period to July 18, 2019. The USACE also held a webinar with the EPA on June 25, 2019, to discuss the response to the EPA's draft GRR/SEIS comments and recommendations.”

By letter dated July 17, 2019, the EPA stated “The EPA appreciates the efforts made by the USACE to address our comments and conduct the webinar. Based on a review of the final GRR/SFEIS and the interagency webinar, the USACE responded to the EPA's comments regarding coordination, water quality, water quality modeling, dredged material and placement including beneficial use, and air quality. The USACE committed to including additional information/commitments in the ERRATA sheets associated with the Record of Decision (ROD) to address the EPA's recommendations related to water quality modeling and monitoring, and dredge material and placement (including beneficial use). The USACE has also agreed to work with the EPA and other stakeholders to develop appropriate criteria for relevant water resource parameters and the water quality monitoring approach. Based upon recent discussions with the USACE, the EPA also understands that the USACE is continuing to address some community concerns and any potential environmental impacts.”

“We appreciate the opportunity to provide comments on the final GRR/SEIS and look forward to working with your office on the water quality monitoring issues and other environmental commitments identified by the USACE. When available, we request a copy of the ROD for our records.”