

Comment 180

From: 
To: [Newell, David P CIV CESAM CESAD \(US\)](#)
Subject: [Non-DoD Source] My comments on the Mobile Ship Channel expansion DSEIS
Date: Friday, September 14, 2018 3:12:00 PM

David Newell,

Dear District Commander,

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

My concerns include:

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

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

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

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

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

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

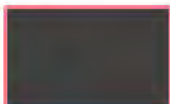
The Corps needs to recognize impacts to low income, minority communities as results show an increase of truck traffic by 25%;

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

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

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

Sincerely,





Mobile, Alabama 36610

<Blockedhttps://u1584542.ct.sendgrid.net/mpss/o/2AA/ni0YAA/t.2kv/K3oX50BjSVOOk3PpVxr4_A/o.gif>

Comment 181

From: 
To: [Newell, David P CIV CESAM CESAD \(US\)](#)
Subject: [Non-DoD Source] My comments on the Mobile Ship Channel expansion DSEIS
Date: Friday, September 14, 2018 2:58:51 PM

David Newell,

Dear District Commander,

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

My concerns include:

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

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

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

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

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

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

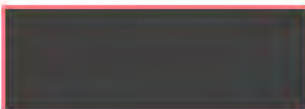
The Corps needs to recognize impacts to low income, minority communities as results show an increase of truck traffic by 25%;

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

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

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

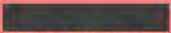
Sincerely,



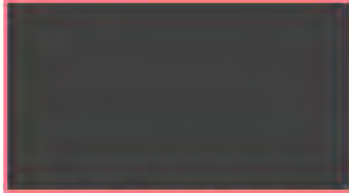
Mobile , Alabama 36604

<Blocked<https://u1584542.ct.sendgrid.net/mpss/o/CAE/ni0YAA/t.2kv/eGrbhe7BRv-fUWMQqjRYhQ/o.gif>>

Comment 182

From: 
To: [Mobile Harbor GRR](#); [Joly, Sebastien P COL USARMY CESAM \(US\)](#); Holliman.Daniel@epa.gov; [Bush, Eric L CIV USARMY CESAD \(US\)](#); [Diana M. Holland BG](#)
Subject: [Non-DoD Source] Dauphin Island SIBUA Northwest Extension
Date: Friday, September 14, 2018 1:29:05 PM
Importance: High

From:



Dauphin Island, ASL 36528

Dear Mobile Army Corps of Engineers, and EPA,

As a property owner on Dauphin Island for over 22 years we are asking for the Corp of Engineers to submit a signed Letter of Guarantee that they will use the SIBUA Northwest Extension for the life of the project and monitor the SIBUA Northwest Extension to make sure the sand was actually reaching the shoreline of Dauphin Island, especially, the western side of the island where people have properties that are now underwater.

The Corps needs to guarantee that they will use the SIBUA Northwest Extension every time they dredged the channel.

If after a year, the monitoring does not show the sand reaching the island and the properties, then the Corps will change the location of the dumping of the dredged sand, to a better location and guarantee that the sand would reach all properties on the southern shoreline on the island.

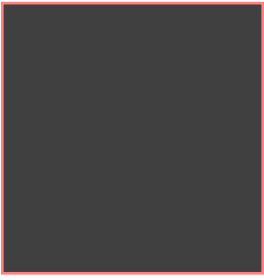
The Corps needs to continue monitoring all locations of the SIBUA Northwest Extensions and any other future locations and provide the documentation to the public.

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


It is very important to have a signed document by the Corps that they would use this location, because the Corps provided this same location to Senator Shelby and Congressmen Beville in 1993, BUT only as an option.

We appreciate your urgent attention to this matter.

Best Regards,



Comment 183

From: 
To: [Mobile Harbor GRR](#)
Subject: [Non-DoD Source] Our Island is NOT being replenished!
Date: Friday, September 14, 2018 1:05:50 PM

Nature works wonderfully on its own until Man interferes. This had happened over and over again to Dauphin Island ! The sand currents that naturally flow west along the Northern Gulf Coast are caught up in the the Mobile Ship Channel then sucked up by the COE and moved too far off shore to naturally distribute on down the Southern beaches if Dauphin Island.

This happens over and over again! Other beaches all over the US are replenished but the COE seems to ignore Dauphin Island's constant plea for help citing expense, time, labor, as deterrents each time!

It's time that the COE stops ignoring one of the nicest little unspoiled spits of land left... its time help should be given to protect Dauphin Island's Southern Beaches!

We need a COE Document Guaranteeing:

.....that they will use the SIBUA Northwest Extension for the life of the project and monitor the SIBUA Northwest Extension to make sure the sand is actually reaching the shoreline of Dauphin Island, especially, on both sides of the island where people's properties are underwater.

.....that they will use the SIBUA Northwest Extension EVERY TIME they dredge the channel.

..... If after a year, the monitoring does not show the sand reaching the island and the properties, the COE will change the location of the dumping of the dredged sand, to a BETTER LOCATION and guarantee that the sand would reach ALL properties on the southern shoreline of the island.

.....continue monitoring all locations of the SIBUA Northwest Extensions and any other future locations and PROVIDE the documentation to the public.

..... the depth of the location has to be at 15 ft OR LESS ACCORDING TO THE COE s DOCUMENTATION FIR THE REST IF THE COUNTRY!

It is very important to have a signed document by the Corps that they would use this location, because the Corps provided this same location to Senator Shelby and Congressmen Beville in 1993, BUT only as an option.



Comment 184

From: 
To: [Holliman Daniel](#); [Mobile Harbor GRR](#); [Joly, Sebastien P COL USARMY CESAM \(US\)](#); [Bush, Eric L CIV USARMY CESAD \(US\)](#); [Diana M. Holland BG](#)
Cc: Bradley.Byrne@HR.HOUSE.GOV
Subject: [Non-DoD Source] Mobile channel dredging
Date: Friday, September 14, 2018 12:34:48 PM

Dear Sirs and Madam,

The survival of the most important barrier island on Alabama's coast may be dependent on the actions you take in dredging the Mobile ship channel. The vague promises, suggestions, and advisories made in the past are not good enough. The Corps needs to sign a document:

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

It is very important to have a signed document by the Corps that they would use this location, because the Corps provided this same location to Senator Shelby and Congressmen Bevill in 1993, BUT only as an option.

Please have the professional integrity to do the right thing.

I thank you for preserving our way of life.

Sincerely,



From: 
To: [Newell, David P CIV CESAM CESAD \(US\)](#)
Subject: [Non-DoD Source] My comments on the Mobile Ship Channel expansion DSEIS
Date: Friday, September 14, 2018 12:23:38 PM

David Newell,

Dear District Commander,

Thank you for everything you are doing and have done for our environment. However, I am concerned regarding the Corps' study results indicating no impact on the environment from a major expansion project for the ship channel. The Corps needs to address the following items to ensure the study is comprehensive enough to determine impacts and doesn't underestimate the true impact.

My concerns include:

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

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

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

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

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

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

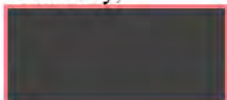
The Corps needs to recognize impacts to low income, minority communities as results show an increase of truck traffic by 25%;

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

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

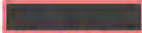
In conclusion, the Corps' finding of "no impact" on Mobile Bay's sensitive environment is very concerning given the magnitude of the proposed project. Thank you for your consideration and response to each of these comments. By thoroughly studying and developing a comprehensive plan for the port expansion,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

Sincerely,





<Blocked<https://u1584542.ct.sendgrid.net/mpss/o/2AA/ni0YAA/t.2kv/I6yaPbGWR-SnezyNXB2y1A/o.gif>>

From: 
To: [Newell, David P CIV CESAM CESAD \(US\)](#)
Subject: [Non-DoD Source] My comments on the Mobile Ship Channel expansion DSEIS
Date: Friday, September 14, 2018 12:23:18 PM

David Newell,

Dear District Commander,

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

My concerns include:

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

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

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

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

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

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

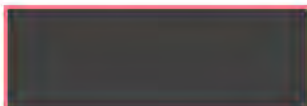
The Corps needs to recognize impacts to low income, minority communities as results show an increase of truck traffic by 25%;

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

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

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

Sincerely,



Mobile, Alabama 36608

<Blocked<https://u1584542.ct.sendgrid.net/mpss/o/2AA/ni0YAA/t.2kv/i6lAVN14REa4mVnF556eVw/o.gif>>

Comment 187

From: 
To: [Newell, David P CIV CESAM CESAD \(US\)](#)
Subject: [Non-DoD Source] My comments on the Mobile Ship Channel expansion DSEIS
Date: Friday, September 14, 2018 12:17:27 PM

David Newell,

Dear District Commander,

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

My concerns include:

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

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

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

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

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

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

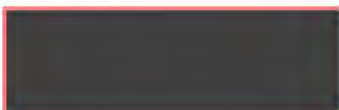
The Corps needs to recognize impacts to low income, minority communities as results show an increase of truck traffic by 25%;

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

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

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

Sincerely,



Mobile, Alabama 36607

<Blocked<https://u1584542.ct.sendgrid.net/mpss/o/9wA/ni0YAA/t.2kv/qUeeC0x8RfiAOC33YeEmGA/o.gif>>

Comment 188

From: 
To: [Newell, David P CIV CESAM CESAD \(US\)](#)
Subject: [Non-DoD Source] My comments on the Mobile Ship Channel expansion DSEIS
Date: Friday, September 14, 2018 12:17:26 PM

David Newell,

Dear District Commander,

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

My concerns include:

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

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

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

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

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

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

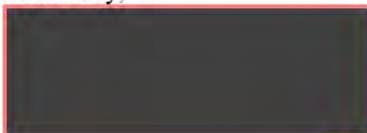
The Corps needs to recognize impacts to low income, minority communities as results show an increase of truck traffic by 25%;

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

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

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

Sincerely,





Mobile , Alabama 36608

<Blocked<https://u1584542.ct.sendgrid.net/mpss/o/-QA/ni0YAA/t.2kv/6bH5uBC2R9qxZB6dl1PZTw/o.gif>>

Comment 189

From: 
To: [Newell, David P CIV CESAM CESAD \(US\)](#)
Subject: [Non-DoD Source] My comments on the Mobile Ship Channel expansion DSEIS
Date: Friday, September 14, 2018 12:12:52 PM

David Newell,

Dear District Commander,

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

My concerns include:

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

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

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

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

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

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

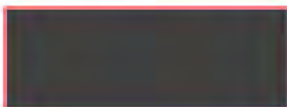
The Corps needs to recognize impacts to low income, minority communities as results show an increase of truck traffic by 25%;

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

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

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

Sincerely,



Bay Minette, Alabama 36507

<Blocked<https://u1584542.ct.sendgrid.net/mpss/o/1AA/ni0YAA/t.2kv/90iKMNqRTpKbsJE4vocjGQ/o.gif>>

From: 
To: [Newell, David P CIV CESAM CESAD \(US\)](#)
Subject: [Non-DoD Source] My comments on the Mobile Ship Channel expansion DSEIS
Date: Friday, September 14, 2018 12:10:58 PM

David Newell,

Dear District Commander,

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

My concerns include:

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

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

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

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

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

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

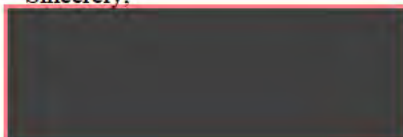
The Corps needs to recognize impacts to low income, minority communities as results show an increase of truck traffic by 25%;

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

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

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

Sincerely,



[REDACTED]
Fairhope, Alabama 36532

<Blocked<https://u1584542.ct.sendgrid.net/mpss/o/CAE/ni0YAA/t.2kv/zWEVDktVT4--pjFBnVc9RA/o.gif>>

Comment 191

From: [REDACTED]
To: [Mobile Harbor GRR](#)
Subject: [Non-DoD Source] Dauphin Island
Date: Friday, September 14, 2018 12:09:15 PM
Attachments: [Comments on Other Topics.docx](#)

Please find attached other areas that need to be addressed!!

Comments on Other Topics

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

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

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

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

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

The report should explain how dredged material disposal capacity needs for the Tentatively Selected Plan (TSP) will be satisfied over the entire 50-year economic life of the project. Table 4-5 shows the remaining annual disposal capacity for the open water thin layer disposal sites in Mobile Bay (Figure 4-6) to be 59,594,000 cy after 20 years of use. Assuming the average annual dredging volume for the Bay Channel TSP consistently remains at 4,500,000 cy/year during the final 30 years of the project's 50-year economic life, a total of 135,000,000 cy will have to be dredged. Subtracting the remaining disposal site capacity of 59,594,000 cy from the projected total dredging requirement of 135,000,000 for the final 30-year period shows the Bay Channel segment will suffer from a disposal capacity deficit of 75,406,000 cy that will become increasingly more difficult to overcome and will likely increase the future cost of the maintenance program. The report provides no information as to how the Corps and the Alabama State Port Authority plan to satisfy the future dredged material disposal needs of the TSP after the initial 20 years of maintenance. The potential adverse impacts to Mobile Bay from future dredged material disposal practices are too significant for the report to ignore the significant importance of the dredged material disposal capacity deficit problem the TSP will experience over the total 50-year period of analysis.

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

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

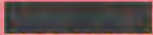
Figure 4-9 must be revised to include the 1,200-acre dredged material disposal island planned for the Upper Bay south of the Causeway. The island project was approved for funding on December 9, 2015 by the federal Gulf Coast Ecosystem Restoration Council at a cost of \$2.5 million. Initiation of the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

concerned the Corps is simply delaying starting the dredged material island study until after the current report to deepen the ship channel is finalized.

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

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

Comment 192

From: 
To: [Mobile Harbor GRR](#)
Subject: [Non-DoD Source] Dauphin Island
Date: Friday, September 14, 2018 12:03:14 PM
Attachments: [Comments on Dauphin Island Erosion \(1\).docx](#)

Please find attachment to save our island!!!

Comments on Dauphin Island Erosion

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

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

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

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

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

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

Comment 193

From: [REDACTED]
To: [Mobile Harbor GRR](#)
Subject: [Non-DoD Source] Fwd: Important! Send this before the 16th.
Date: Friday, September 14, 2018 11:35:52 AM

Begin forwarded message:

From: [REDACTED]@gmail.com [REDACTED]@gmail.com > >
Date: September 14, 2018 at 1:32:30 AM CDT
To: [REDACTED]@gmail.com [REDACTED]@gmail.com > >
Subject: Important! Send this before the 16th.

Dear Property Owner,

We need your help!!!! Important! Send this before the 16th.

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

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

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

4. The Corps needs to continue monitoring all locations of the SIBUA Northwest Extensions and any other future locations and provide the documentation to the public.

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

It is very important to have a signed document by the Corps that they would use this location, because the Corps provided this same location to Senator Shelby and Congressmen Beville in 1993, BUT only as an option.

I need everyone on the island to copy, paste the highlighted part into an email, and send it to the following:

MobileHarborGRR@usace.army.mil

sebastien.p.joly@usace.army.mil

Holliman.Daniel@epa.gov <<mailto:Holliman.Daniel@epa.gov>>

eric.l.bush@usace.army.mil <<mailto:eric.l.bush@usace.army.mil>>

diana m holland@usace.army.mil

We only have until a few more days to register our comments to the Corps, before the whole Mobile Harbor study is over.

With warmest regards,



Comment 194

From: [REDACTED]
To: [Mobile Harbor GRR](#)
Subject: [Non-DoD Source] Fw: Important! Send this before the 16th.
Date: Friday, September 14, 2018 10:19:03 AM

Sent from Yahoo Mail for iPhone <Blocked<https://overview.mail.yahoo.com/?src=iOS>>

Begin forwarded message:

On Friday, September 14, 2018, 1:35 AM, [REDACTED]@gmail.com> wrote:

Dear Property Owner,

We need your help!!!! Important! Send this before the 16th.

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

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

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

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

It is very important to have a signed document by the Corps that they would use this location, because the Corps provided this same location to Senator Shelby and Congressmen Beville in 1993, BUT only as an option.

I need everyone on the island to copy, paste the highlighted part into an email, and send it to the following:

MobileHarborGRR@usace.army.mil

sebastien.p.joly@usace.army.mil

Holliman.Daniel@epa.gov <<mailto:Holliman.Daniel@epa.gov>>

eric.l.bush@usace.army.mil <<mailto:eric.l.bush@usace.army.mil>>

diana.m.holland@usace.army.mil

We only have until a few more days to register our comments to the Corps, before the whole Mobile Harbor study is over.

With warmest regards,

A black rectangular redaction box covering the signature of the sender.

From: [REDACTED]
To: [Mobile Harbor GRR](#)
Cc: [REDACTED]
Subject: [Non-DoD Source] Comments on Corps Mobile Harbor
Date: Friday, September 14, 2018 10:14:55 AM

Dear Col. Jolly,

As a property owner since 1999 on the East End of Dauphin Island, I have witnessed the weekly erosion of our shoreline. HUNDREDS of feet of shoreline are gone. I have major issues with the recently released study to further deepen the Mobile Bay ship channel.

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

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

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

The impacts of shoreline erosion on sea turtle nesting should be discussed. Section 5.9.1 should be expanded to acknowledge that a consequence of the progressive erosion of Dauphin Island's Gulf Shoreline is the low success rate of sea turtle nesting on the island. The low percentage of successful nests on Dauphin Island compared to Baldwin County's beaches is believed to be associated with the deteriorated shoreline conditions attributable to erosion. This issue warrants coverage in the report because of the Endangered Species Act connection and because

Dauphin Island provides a substantial portion of Alabama's total Gulf shoreline used for nesting by sea turtles. It is possible that a "taking" type situation may exist as an indirect impact of the Bar Channel maintenance program and the Mobile Harbor project's role in contributing to the erosion of Dauphin Island and the lowered turtle nest success rates compared to other northern Gulf beaches.

We encountered several sea turtles this summer, both in the water and on our beaches. They are majestic creatures who must be protected.

Dauphin Island is an incredibly special place that has been mistreated for far too long. The citizens and property owners of Dauphin Islands demand and deserve better.

Sincerely,



Dauphin Island, AL 36528

Comment 196

From: [REDACTED]
To: [Mobile Harbor GRR](#); [Joly, Sebastien P COL USARMY CESAM \(US\)](#); Holliman.Daniel@epa.gov; [Bush, Eric L CIV USARMY CESAD \(US\)](#); [Diana M. Holland BG](#)
Subject: [Non-DoD Source] Commitment needed for Dauphin Island's sustainability.
Date: Friday, September 14, 2018 10:12:45 AM

Good folks:

According to consensus of the property owners on Dauphin Island, please help ensure the sustainability of the Island's geological infrastructure by providing a signed document outlining Corps policy with regard to the dredging practices of Mobile Ship Channel. I have provided details below.

Please provide a signed document:

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

I appreciate your attention to this important matter on behalf of every citizen of the gulf coast.

Kind regards,



Comment 197

From: [Mike Dees](#)
To: [Mobile Harbor GRR](#); [Joly, Sebastien P COL USARMY CESAM \(US\)](#); [Holliman.Daniel@epa.gov](#); [Bush, Eric L CIV USARMY CESAD \(US\)](#); [Diana M. Holland BG](#); [Mobile Harbor GRR](#); [Joly, Sebastien P COL USARMY CESAM \(US\)](#); [Holliman.Daniel@epa.gov](#); [Bush, Eric L CIV USARMY CESAD \(US\)](#); [Diana M. Holland BG](#)
Subject: [Non-DoD Source] Mobile Ship Channel Dredging
Date: Friday, September 14, 2018 9:54:13 AM

I would ask the Corp of Engineers to do the following for the benefit of the people of Dauphin Island and the citizens of Mobile County.

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

Thanks

Mike Dees

SOUTHERN TIMBERLANDS

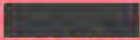
A Division of Cooper & Co., Inc.

Al. Ms. Broker

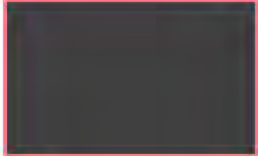
(251) 341-1110 Office

(251) 510-1005 Cell

Comment 198

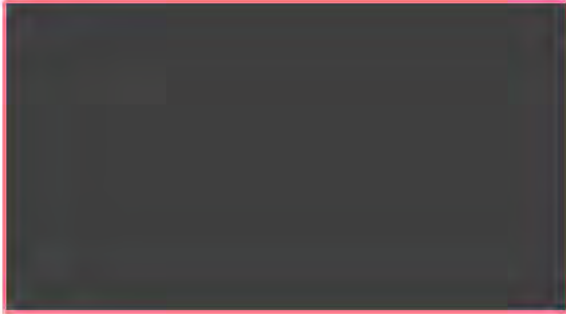
From: 
To: [Mobile Harbor GRR](#)
Subject: [Non-DoD Source] Dredging of Mobile Bay
Date: Friday, September 14, 2018 9:33:18 AM

The Mobile Bay dredging project is a necessary undertaking in order to maintain ship traffic commerce in the bay. I am all for the project. I would ask that you minimise the environmental impact on the bay and barrier islands as much as possible.



Comment 199

From: 
To: [Mobile Harbor GRR](#)
Subject: [Non-DoD Source] Dredging of the Mobile Bay Channel
Date: Friday, September 14, 2018 9:11:13 AM
Attachments: [Dredging of the Mobile Bay..doc](#)



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

09/14/18

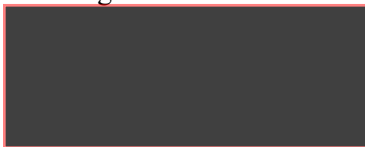
Dear Col. Sebastien Joly

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


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

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

Best regards



Comment 200

From: 
To: [Mobile Harbor GRR](#); [Joly, Sebastien P COL USARMY CESAM \(US\)](#); Holliman.Daniel@epa.gov; [Bush, Eric L CIV USARMY CESAD \(US\)](#); [Diana M. Holland BG](#)
Subject: [Non-DoD Source] Dauphin Island dredging concerns
Date: Friday, September 14, 2018 8:50:12 AM

Good day

We own several properties on Dauphin Island and are very concerned about sand erosion and dredging. We respectfully request that the Corps take into consideration issues of concern to homeowners on the island and sign a document that incorporates these provisions:

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

We thank you for your considering our needs as homeowners who wish to preserve this beautiful island!



Comment 201

From: [REDACTED]
To: [Mobile Harbor GRR](#)
Subject: [Non-DoD Source] Dredging of the Mobile Bay Channel
Date: Friday, September 14, 2018 8:19:31 AM

Mobile Harbor - To whom it may concern

I am writing this email on behalf of the dredging and sand placement of the Mobile Bay Channel.

I'm a concerned resident of Dauphin Island.

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

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

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

It is very important to have a signed document by the Corps that they would use this location because the Corps provided this same location to Senator Shelby and Congressmen Beville in 1993, BUT only as an option.

With warmest regards,



From: [REDACTED]
To: [Mobile Harbor GRR](#); [Joly, Sebastien P COL USARMY CESAM \(US\)](#); Holliman.Daniel@epa.gov; [Bush, Eric L CIV USARMY CESAD \(US\)](#); [Diana M. Holland BG](#)
Subject: [Non-DoD Source] Fwd: Important! Send this before the 16th.
Date: Friday, September 14, 2018 7:56:53 AM

----- Forwarded message -----

From: [REDACTED] gmail.com [REDACTED]@gmail.com > >
Date: Thu, Sep 13, 2018 at 5:44 PM
Subject: Important! Send this before the 16th.
To: [REDACTED]@gmail.com [REDACTED] gmail.com > >

Dear Property Owner,

We need your help!!!! Important! Send this before the 16th.

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

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

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

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

It is very important to have a signed document by the Corps that they would use this location, because the Corps provided this same location to Senator Shelby and Congressmen Beville in 1993, BUT only as an option.

I need everyone on the island to copy, paste this into an email, and send it to the following:

MobileHarborGRR@usace.army mil

sebastien.p.joly@usace.army mil

Holliman.Daniel@epa.gov <<mailto:Holliman.Daniel@epa.gov>>

eric.l.bush@usace.army mil <<mailto:eric.l.bush@usace.army.mil>>

diana.m.holland@usace.army mil

We only have until a few more days to register our comments to the Corps, before the whole Mobile Harbor study is over.

With warmest regards,



--



Comment 203

From: [REDACTED]
To: [Diana M. Holland BG](#); [Bush, Eric L CIV USARMY CESAD \(US\)](#); [Holliman.Daniel@epa.gov](#); [sebastien.p.toly@usace.army.mj](#); [Mobile Harbor GRR](#)
Subject: [Non-DoD Source] Dauphin Island
Date: Friday, September 14, 2018 7:34:04 AM

Please support us in this. Our island will disappear due to erosion as is evidenced especially on the West End.

Sincerely,
[REDACTED]

Begin forwarded message:

From: caroline graves [REDACTED]@gmail.com [REDACTED] gmail.com >>
Date: September 13, 2018 at 5:43:03 PM CDT
To: [REDACTED]@gmail.com [REDACTED]@gmail.com >>
Subject: Important! Send this before the 16th.

Dear Property Owner,

We need your help!!!! Important! Send this before the 16th.

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

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

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

4. The Corps needs to continue monitoring all locations of the SIBUA Northwest Extensions and any other future locations and provide the documentation to the public.

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

It is very important to have a signed document by the Corps that they would use this location, because the Corps provided this same location to Senator Shelby and Congressmen Beville in 1993, BUT only as an option.

I need everyone on the island to copy, paste this into an email, and send it to the following:

MobileHarborGRR@usace.army.mil

sebastien.p.joly@usace.army.mil

Holliman.Daniel@epa.gov <<mailto:Holliman.Daniel@epa.gov>>

eric.l.bush@usace.army.mil <<mailto:eric.l.bush@usace.army.mil>>

diana m holland@usace.army.mil

We only have until a few more days to register our comments to the Corps, before the whole Mobile Harbor study is over.

With warmest regards,

A black rectangular redaction box covering the signature of the sender.

Comment 204

From: [REDACTED]
To: [Mobile Harbor GRR](#); [Mobile Harbor GRR](#); Holliman.Daniel@epa.gov; [Bush, Eric L CIV USARMY CESAD \(US\)](#); [Diana M. Holland BG](#)
Subject: [Non-DoD Source] Guarantee the extension in writing
Date: Friday, September 14, 2018 7:18:42 AM

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

I explained to him that the Corps need signs a document yet he would not commit. We need this guarantee in writing.

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

It is very important to have a signed document by the Corps that they would use this location, because the Corps provided this same location to Senator Shelby and Congressmen Beville in 1993, BUT only as an OPTION.

respectfully submitted,

[REDACTED]

Comment 205

From: [Myers Jordan](#)
To: [Mobile Harbor GRR](#); [Joly, Sebastien P COL USARMY CESAM \(US\)](#); [Holliman.Daniel@epa.gov](#); [Bush, Eric L CIV USARMY CESAD \(US\)](#); [Diana M. Holland BG](#)
Subject: [Non-DoD Source] SIBUA NW Extension
Date: Friday, September 14, 2018 7:12:07 AM

Good morning,

At the Corps' meeting on Sept. 11, David Newell showed [REDACTED] the Extension to the Sand Island Beneficial Use underwater berm. She explained to him that the Corps needs to sign a document:

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

I agree with Ms. Graves, it is very important to have a signed document by the Corps that they would use this location, because the Corps provided this same location to Senator Shelby and Congressmen Beville in 1993, BUT only as an option. This needs to HAPPEN, not be merely "an option"!

Kindest regards,
Myers Jordan

[REDACTED]

--

Myers Jordan
Superior Printing Company Inc

1325 Logan Circle, NW

Atlanta, GA 30318

404 522-9291 Fax 404 584-5485

myers@superiorprinting.us <<mailto:myers@superiorprinting.us>>

Blockedwww.superiorprinting.us <Blockedhttp://www.superiorprinting.us>

MEMBER:

PIAG (Printing & Imaging Assoc of GA)

Allied Printing Trades Council

Comment 206

From: [REDACTED]
To: [Mobile Harbor GRR](#); [Joly, Sebastien P COL USARMY CESAM \(US\)](#); Holliman.Daniel@epa.gov; [Bush, Eric L CIV USARMY CESAD \(US\)](#); [Diana M. Holland BG](#)
Subject: [Non-DoD Source] As a Dauphin Island property owner.
Date: Friday, September 14, 2018 4:55:19 AM

The Corps need to sign a document:

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

Sincerely,

[REDACTED]

Comment 207

From: [REDACTED]
To: [Mobile Harbor GRR](#); [Joly, Sebastien P COL USARMY CESAM \(US\)](#); Holliman.Daniel@epa.gov; [Bush, Eric L CIV USARMY CESAD \(US\)](#)
Subject: [Non-DoD Source] Fwd: Important! Send this before the 16th.
Date: Thursday, September 13, 2018 8:17:52 PM

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

From: [REDACTED] gmail.com>
To: [REDACTED]@gmail.com>
Sent: Thu, Sep 13, 2018 5:52 pm
Subject: Important! Send this before the 16th.

Dear Property Owner,

We need your help!!!! Important! Send this before the 16th.

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

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

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

It is very important to have a signed document by the Corps that they would use this location, because the Corps

provided this same location to Senator Shelby and Congressmen Beville in 1993, BUT only as an option.

I need everyone on the island to copy, paste this into an email, and send it to the following:

MobileHarborGRR@usace.army mil <<mailto:MobileHarborGRR@usace.army.mil>>
sebastien.p.joly@usace.army mi <<mailto:sebastien.p.joly@usace.army.mil>> 1
Holliman.Daniel@epa.gov <<mailto:Holliman.Daniel@epa.gov>>
eric.l.bush@usace.army mil <<mailto:eric.l.bush@usace.army.mil>>
diana.m.holland@usace.army mil

We only have until a few more days to register our comments to the Corps, before the whole Mobile Harbor study is over.

With warmest regards,



Comment 208

From: [REDACTED]
To: [Mobile Harbor GRR](#)
Subject: [Non-DoD Source] Saving Dauphin Island.
Date: Thursday, September 13, 2018 7:34:52 PM

The Public interest, for many long years, has been very badly served by the Mobile Districts unprecedented stonewalling, and complete lack of proper action with regard to the dredging effects on Dauphin Island.

Dauphin Island, a significant financial asset on Alabama's coastline continues to erode due to the Corps actions, or lack of.

The dredging of the Mobile Ship channel, is an important economic asset to Alabama's economy, but this should never be allowed to be the death of Dauphin Island.

The dredging by the Corps of Engineers, to keep the Mobile Ship Channel open, has been eroding the sand on Dauphin Island for many years, bottom line.

I have been involved in so many meetings, where promises have been made and promptly broken, letters written, phone calls made, ad nauseam!!!

Enough, just fix the problem, change the dredging, simple!!!!!!!!!!

From: [REDACTED]
To: [Mobile Harbor GRR](#); [Joly, Sebastien P COL USARMY CESAM \(US\)](#); [Diana M. Holland BG](#); [Semonite, Todd T LTG USARMY HODA OCE \(US\)](#)
Cc: [Bush, Eric L CIV USARMY CESAD \(US\)](#); [CEIG](#); holliman.daniel@epa.gov
Subject: [Non-DoD Source] Corps' engineering failure for sand-starved Dauphin Island
Date: Thursday, September 13, 2018 7:29:43 PM
Attachments: [LETTER 24 years of facts to LG. Semonite, BG Holland, Col. Joly 9-13-18.doc](#)

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

In 2017, I received a letter about my FIOA, from Stephen L. Sowell, Mobile District Counsel stating,

“Based on our interviews, we concluded that most records related to Dauphin Island erosion, dredging, and the Sand Island Beneficial Use Area (SIBUA) had long since been packed away for storage or destroyed in accordance with Army records handling guidelines. While the general disposition of most records is approximately six (6) years [after such time records are typically destroyed]”

Wow!!! Is this the Corps excuse not to include Dauphin Island in the new 2018 draft SIES/GRR Mobile Harbor study, that the Corps either destroyed or packed away all of the records about the dredging causing the erosion on the Island.

That is a great excuse, we don't know nothing about the erosion on Dauphin Island, we destroy that information. SORRY.

What is so stupid about his statement is that the Mobile Harbor is one of the deepest and widest authorized channels in the Country, and connects to the 2nd largest waterway through the United States. Dauphin Island, a barrier island, is adjacent to the Mobile Harbor Entrance Channel, which the Corps has been dredging the Entrance Channel since 1904. Besides, the Corps' Mobile District is located in Mobile, Alabama, where the Harbor is located.

42 years of Engineering Failures of the Corps by not following the Federal laws and Corps' manuals to mitigate the erosional damage to the Dauphin Island shoreline, that is attributable to Mobile Harbor Federal navigation dredging project.

Mobile District Engineering Failures

1. Mobile District Engineering Failure of not following the recommendation in the 1978 study to put a nearshore berm in front of Dauphin Island.
2. Mobile District Engineering Failure of not adding the 1978 study's erosional impacts to the 1980 EIS/Mobile Harbor and suppressing the information from Congress.
3. Mobile District Engineering Failure of the Corps' National Demonstration of the Underwater Berms 1987 to 1993, which was restricted according to Susan Rees testimony.
4. Mobile District Engineering Failure of their Northern Gulf of Mexico Regional Sediment Management Demonstration Program 1999 to present, which SIBUA didn't work.
5. One of the Mobile District's biggest Engineering Failure is the dumping of 14 million cubic yards of sand into SIBUA and professing not to know where the sand has gone. They are still concealing and preventing the evidence from becoming known, even though the SEIS/GRR should include a study about SIBUA.

Not one of these programs has mitigated the sand/land loss for Dauphin Island. The programs were a fancy name to get rid of dredged material inexpensively, while lying to the public about benefiting the Island.

I have attached 24 years of Corps' statements showing undisputed evidence the Mobile District is the cause of erosion on Dauphin Island.

Sincerely,

[Redacted]

September 13, 2018

From [REDACTED]

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

I have put into chronological order 24 years of quotes from Corps' documents that were sent to me under the FOIA request. Numerous documents show the Corps admitting that they dredge all of the sand in the littoral system out of the channel and dump it deep off shore and this "factor is probably the most important cause of man-induced erosion" according to the Corps' Shoreline Protection Manual.

I became enraged, reading the Corps' statements, after remembering all of the Corps false statements to the people of Dauphin Island, during these years. Everything we have been told was to mislead and to deceive us into believing that the Corps was not responsible for the erosion on the Island, but the evidence show otherwise.

In this email, the Corps' documents are in Black, and my comments and the laws are in blue.

Over the 42 years, Corps has not disclose all of the facts relating to their duty under the law to protect people of Dauphin Island from property loss because of their dredging. Before the 1978 study, there were many laws that the Mobile District did not follow governing the Corps dredging of Mobile Harbor Federal project and the erosion to the adjacent shoreline. Many of these laws and Corps manuals address the interrupting of the littoral [sand] transport and the erosional impacts it has on the adjacent shoreline, exactly what the Corps is doing to Dauphin Island.

1935 law concern with erosion problems ...associated with the Corps of Engineers' harbor activities- to mitigate damages attributable to federal navigation projects

1962 §426e—for prevention or mitigation of damage to shores and beaches is attributable to Federal navigation projects

(1968)—Section 111 for the mitigation of shore damages attributable to federal navigation works.

1969 The National Environmental Policy Act of 1969 (NEPA). NEPA required consideration of environmental impacts during the planning stage of a project.

1971 USACE Manual 1110-2-38 Policy: Maintenance ..including avoidance of destruction or degradation ...accomplish sedimentation and erosion control.

1976 The Water Resources Development Act (WRDA) of 1976, Public Law (PL) 94-587, to place on the beaches of such State beach-quality sand which has been dredged in constructing and maintaining navigation inlets and channels adjacent to such beaches,

1984 SHORE PROTECTION MANUAL VOLUME I

Man- Induced Causes .

b. **Interruption of Material in Transport. This factor is probably the most important cause of man-induced erosion. Improvement of inlets by both channel dredging and channel control and by harbor structures impounds littoral material This can be mitigated by sand-bypassing systems.**

c. Reduction of Sediment Supply to the Littoral Zone .

5. Effect of Inlets on Barrier Beaches . Inlets may have significant effects on adjacent shores by interrupting the longshore transport and trapping onshore-offshore moving sand.

1976 February 5 MEM Dauphin Island Beach Nourishment.pdf

- The need for **nourishment of the beach on the southeast end of Dauphin Island is evident**
- In view of the above analysis of **processes affecting erosion**, at least a circumstantial case could be put forth in support of **justifying Federal mitigation for the indirect erosion** effects of the ship channel.

1962 §426e—for prevention or mitigation of damage to shores and beaches is attributable to Federal navigation projects
(1968)—Section 111 for the mitigation of shore damages attributable to federal navigation works.

1978 Feasibility Report for Beach Erosion Control and Hurricane Protection Mobile County, Alabama, Including Dauphin Island

Scope Of The Study

This study was primarily concerned with **an investigation of the cause of beach erosion** within Mobile County including Dauphin Island, and a determination of the economic, social and environmental feasibility of controlling this erosion.

- **“the total recession of the shoreline attributable to maintenance dredging of the bar channel** since 1939 would be about **119 feet**’
- “Although the entire gulf shore of the island experiences a degree of erosion, the problem is most severe along its **westernmost 11 miles. There the erosion rate is about 10.3 feet per year**”
- “The **principal causes of shore erosion** along the western-most 11 miles of Dauphin Island are attributable to rise in sea level and **maintenance dredging of the Mobile Bay entrance channel**’
- **“Since it is not economically feasible to totally eliminate erosion on Dauphin Island,** investigations were made to determine the possibility of partially alleviating the problem. Maintenance dredging of the Mobile Bay entrance channel has already been discussed as a probable cause for part of the island’s erosion problem. **About 264,000 cubic yards of material per year are dredged** from the entrance channel into Mobile Bay and placed in deep water off the gulf shore of Dauphin Island. This material is essentially lost to the littoral drift system and represents a significant percentage of the total yardage lost to erosion. **If this amount of material could be placed directly onshore, or placed so it could re-enter the littoral drift system where waves and currents would distribute it and thereby contribute to stabilization of the littoral drift system, erosion could be reduced.**”
- **The “No Action” alternative is not considered to be a viable course of action since it would not solve the existing erosion problem.**
- “Implementation of the selected plan, as defined herein, *would only involve a modification* of the present operation and maintenance practice employed for the Mobile Harbor Navigation Project. **The modification is considered within the prerogative of the Chief of Engineers for operation and maintenance of the navigation project and affects no areas of local responsibility for the project.** Accordingly, **total responsibility for implementation of the selected plan and associated costs are a Federal responsibility.**”
- “Further, the selected plan **could be implemented under the operation and maintenance authority of the Chief of Engineers for the existing Federal Navigation Project for Mobile Harbor.**

1985 June 5 MEM Beneficial Use of Dredged Material.pdf

- The entrance channel reaches of our deep-draft ship channel projects are routinely maintained by hopper dredging. Current practice for disposal of the dredged material from this work calls for it to be dumped in 50-60 foot depths offshore. **This practice effectively removes large quantities of sand from the littoral system and places it in depths from which it cannot return.**
- Since the smaller, split-hulled, hopper dredges began operating ‘in this area several years ago, we have held several informal discussions with Jim Baxter, OP-ON, concerning **the use of these dredges to place material from entrance channel O&M at locations closer inshore where the material could return to the littoral system and alleviate erosion downdrift of the inlet.**

[Effect of Inlets on Barrier Beaches . Inlets may have significant effects on adjacent shores by interrupting the longshore transport and trapping onshore-offshore moving sand.](#)

1986 Water Resources Development Act Section 1135 (PL-104-303), Project Modification for Improvements to the Environment. Under this authority, [if the construction or operation of a USACE project has contributed to the degradation of the quality of the environment, measures for restoration through modification of the structure](#)

1986 September 1 MSC Fact Sheet Demonstration of Underwater Berm.pdf

- In the Ft. Morgan peninsula vicinity, for example, this ***movement of sand is generally east to west.***
- As this ***sand is deposited in a navigation channel*** the customary practice is to remove the sand by hopper dredge and ***transport it to an approved deep water outside the littoral zone.***
- Disposal within the littoral zone (***feeder placement***) of sandy dredged material removed from the entrance portion of a deep-draft channel ***would utilize natural processes to nourish the beach.***
- Feeder placement restores beach quality sand ***to the littoral zone and would reduce beach erosion to some extent.***

1986 October 7 MSC Keynote Address for MG Hatch.pdf

- Nevertheless, because of the large, volume involved in the deepening project, ***we will devote considerable effort towards minimizing the physical impacts*** through the identification of the most appropriate ***disposal alternatives and procedures.***

1986 October MSC Presentation Notes Langan Beneficial Uses Workshop.pdf

- Feeder placement ***would replace sandy material in the littoral process*** and over a period of time ***reduce to some extent the erosion to down drift beaches***
Interruption of sand in littoral system. This factor is probably the most important cause of man-induced erosion

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

- On April 4, 1987, Mr. Mathew Laws (Chief, PD-FC) and Mr. Jim Baxter (Chief, OP-ON) spoke to the Dauphin Island Property Owners Association at the Civic Center on Dauphin Island.
- Mr. Laws ... briefly described the "Mobile County, Alabama (Including Dauphin Island) Feasibility Study for Beach Erosion Control and Hurricane Protection" completed in September 1978.
- Laws remarks were concluded with the statement that solutions ***to the problem on the western 11 miles of the Island were tied to maintenance of the Mobile Ship Channel bar crossing.***

1987 Corps Environmental Engineering for Deep-Draft Navigation Projects Manual

6-1. Policy...**[Damage from Federal navigation work along the shorelines of the United States must be prevented or mitigated](#)**

6-3. Justification for Mitigation.

a. ...*Endangered and threatened species*

b. **[Impacts resulting from dredged material disposal..on.. shorelines.](#)**

1987 October 16 MFR Impact of Proposed Mobile Bay Ship Channel Deepening on the Littoral Drift System.pdf

- SUBJECT: **[Impact of the proposed Mobile Bay ship channel deepening on the littoral drift system in the Mobile Bay pass.](#)**
- to discuss Mr. Francis Escoffier's concerns **[regarding the impact of the deeper channel on the littoral drift system at the Mobile Bay pass.](#)**
- Mr. Escoffier supplied a paper which he had written on the littoral drift system at an inlet.
[\[Retired Corps expert on inlet and littoral systems\]](#)
- The District had already constructed a "feeder berm" south of Sand Island near the lighthouse and was closely monitoring its movement. **[It was pointed out that the basic premise behind the feeder berm concept was to resupply the area with the materials, which were being blocked by the channel.](#)**
Interruption of sand in littoral system. This factor is probably the most important cause of man-induced erosion

1989 May MSC Handwritten Note to Commander.pdf

- Berm Planning, Design, And Construction Feeder Berm : The feeder berm was planned to take advantage of the opportunity for nearshore placement of sandy material dredged from maintenance of the Mobile Harbor entrance channel.
- ***This would provide a chance for the material to remain in the nearshore coastal regime and by natural processes supplement sand available for reducing shore erosion.***
- Historically, ***material dredged*** from the entrance channel ***has been placed in an open water site outside the active zone of transport.***
Effect of Inlets on Barrier Beaches . Inlets may have significant effects on adjacent shores by interrupting the longshore transport and trapping onshore-offshore moving sand.

1990 Water Resources Development Act §2316. Environmental protection mission

(a) General rule The Secretary shall include ***environmental protection as one of the primary missions*** of the Corps of Engineers ***in planning, designing, constructing, operating, and maintaining water resources projects.***

1990 Massive Expansion and Deepening of Outer Bar Channel.

Phase I construction completed in 1990 consisted of deepening the entrance channel from 42 feet to 47 feet for a distance of 6.1 miles from the Gulf of Mexico to Mobile Bay.

*Corps Environmental Engineering for Deep-Draft Navigation Projects Manual 6-1. Policy...**Damage from Federal navigation work along the shorelines** of the United States **must be prevented or mitigated** b. Impacts resulting from dredged material disposal..on.. shorelines,*

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

- In a continuing effort to conduct the national dredging program in an economically and environmentally sound manner, the US Army Corps of Engineers (USACE) is constructing experimental submerged berms on the open seafloor offshore of Sand Island, Alabama
- The purpose is ***to evaluate methods of using dredged material to reduce*** wave damage and the ***rate of coastal sand losses*** to deep offshore waters.
- ***Coastal erosion occurs where sand is removed faster than it is replaced. Such imbalance often causes problems*** which ***can be reduced by placement of new material in the shore compartment.***
- The value of such action will depend on the nature of the local problem plus the location, quantity, and ***rate of sand replacement.*** Man's concerns are usually at the shoreline. Traditional placement directly on the beach has an immediate benefit.
- ***Any addition of sand*** to the active prism ***tends to correct coastal sand deficiencies and eventually reduces regional erosion problems.***

Corps admits their dredging causes the erosion

Interruption of sand in littoral system. This factor is probably the most important cause of man-induced erosion

1991 May 15 MFR Dauphin Island Erosion Problem A.pdf

- ***"Corps activities obviously play some role in modifying the littoral drift system".***
Corps admits their dredging causes the erosion
Interruption of sand in littoral system. This factor is probably the most important cause of man-induced erosion

1991 MEM Potential Opportunities for Beach Improvement.pdf

- Undoubtedly, ***our practice of dredging this area*** and placing the material in the designated gulf disposal area ***removes sand from the littoral system.***

Interruption of sand in littoral system. This factor is probably the most important cause of man-induced erosion

1990 ***Beach and Nearshore Placement of Material Dredged from Federally Authorized Navigation Projects***
U.S. Army Engineer.. ***most environmentally sound manner possible (ER 1130-2-307***

Corps admits their dredging causes the erosion on Dauphin Island and that is the reason they did the feeder berm.

1992 March 24 MSC Press Release Dauphin Island Study Not Conclusive.pdf

- Pat Robbins: “***The Environmental Assessment*** that was done ***for the maintenance dredging*** project in the channel ***indicated the dredging could have an influence on erosion at Dauphin Island.***”
- ***“That is why the dredged material was placed in a feeder berm off shore rather than use deep ocean disposal.”***

Corps admits their dredging causes the erosion in the 1978 study

Interruption of sand in littoral system. This factor is probably the most important cause of man-induced erosion

1992 May 8 MSC Fact Sheet Erosion Problems.pdf

- Problem. Two separate reaches of shoreline on Dauphin Island, Alabama, have recently experienced severe erosion.
- Shoreline change maps for the period 1942 to 1974 show gulf ***shoreline erosion rates of about 6 feet per year***
- In 1978 the Mobile District submitted a report , *Mobile County, Alabama Feasibility Report For Beach Erosion Control And Hurricane Protection*. ***That study concluded that problems did exist***
- The sole ***recommendation*** in that report ***was for littoral zone placement near Dauphin Island of suitable material dredged during maintenance of the ship channel. A nearshore berm in front of the Island***
- This recommendation was based on a study of historical maps and charts that suggested ***that the practice of dumping material*** removed by hopper dredge ***in depths beyond littoral processes could be contributing to erosion on the island.***
- SAD indicated that revisions to the navigation project should be addressed in on going studies of that project. South Atlantic Division directed the Mobile District to put the results from 1978 Dauphin Island’s study erosion impacts in the 1980 EIS/Mobile Harbor study. The Mobile District left out all impacts to Dauphin Island in the 1980 EIS/Mobile Harbor
- Other Reports. ***Dr. Scott Douglass*** is a professor of Civil Engineer at the University of South Alabama with a background in coastal engineering. He has been acting as a consultant to the Alabama Department of Economic and Community Affairs, Coastal Programs Office. His first report was *Summary Of Existing Coastal Engineering Data For Dauphin Island, Alabama*, dated January 1991. He has recently completed *Coastal Processes Of Dauphin Island, Alabama*, dated February 25, 1992. That report has several conclusions. ***Those directly implicating Corps projects and activities include:***
 1. ***That maintenance dredging the ship channel “has completely blocked the natural, long-term source of sand for the beaches of Dauphin Island,”***

Corps admits that after the deepening of the channel there is severe erosion on the Island. Interruption of sand in littoral system. This factor is probably the most important cause of man-induced erosion

1992 May 20 LTR to Rep Bevill.pdf

Letter to Congressman Bevill from the District Colonel

- **There is no question that the shoreline on the island is undergoing severe erosion** at two locations. One is at the east end of the island near Fort Gaines and the other is about three miles west at the public use area with the fishing pier.
- **Dr. Scott Douglass**, at the University of South Alabama, has recently completed a report for the Alabama Department of Economic and Community Affairs, *Coastal Processes Of Dauphin Island, Alabama*, covering studies he made. His report attributes **the cause of long-term erosion** on the island, at least in part, **to past disposal practice for maintenance dredged material from the Mobile Harbor ship channel**

Letter to Senator Shelby from Mike Henderson, *Dauphin Island Park and Beach Board*

- As shown, Dr. Douglas feels **two of our worse erosion problems directly relate to the Corps' method of deepening and dredging two channels** - the Main Ship Channel and Fort Gaines Channel.
- One striking aspect of this study is the documentation of **sand removed by the Corps that would have otherwise been deposited onto Dauphin Island**.
- Earlier publications had **estimated 15 million cubic yards of sand had been permanently removed** from Alabama's coastal system by this method.
- **Dr. Douglas proves this figure is closer to 50 million cubic yards**
- As you can see from **ADECA's 12-month study, it draws the same basic conclusions, as the Corps' own study published in 1978. One important difference** is whereas the Corps study states 264,000 cubic yards of sand was being removed per year back in 1978, **Dr. Douglas shows this amount has now increased to an average of 1 million cubic yards a year is being removed.**

Corps admits that **Dr. Douglass statements are correct** and the dredging causes the erosion

1992 October 1 MEM Fact Sheet on Erosion Problems.pdf

- Shoreline change maps for the period 1942 to 1974 show gulf shoreline erosion rates of about 6 feet per year.
- Phase I of the channel improvement authorized by the 1986 WRDA was completed in 1990 and the entrance channel is presently maintained at 47 feet deep by 600 feet wide.
- Corps' records show that **since 1974 about 15 million cubic yards of material has been removed** from the entrance channel. Almost 7 million cubic yards of that amount was removed in 1990 for the channel improvement.
- **Dr. Douglass has pointed out the annualized amount removed exceeds the estimated annual littoral transport volume for this area.**
- **While this may be correct**, the littoral transport path estimated by Dr. Douglass indicates that any effects from this practice **would be felt mostly on the west end of the island** and not at the present problem areas. Interruption of sand in littoral system. This factor is probably the most important cause of man-induced erosion

1993 January 4 MEM Bar Channel.pdf

- c) To our knowledge, **the District does not have a current survey of the littoral zone.**

According to Dr. Nicholas C. Kraus, "**Sediment budgets are regularly produced by the Corps** to represent local and regional sediment **transport magnitudes and pathways for an inlet and its adjacent beaches.**"

The Corps has to know in detail the amount of sand that goes into the channel and is dredged out for the channel for the shipping industry.

1993 March 29 MEM Fact Sheet on Erosion Problems.pdf

- Phase I of the channel improvement authorized by the 1986 WRDA was completed in 1990 and the entrance channel is presently maintained at 47 feet deep by 600 feet wide.
- **Corps' records show that since 1974 about 15 million cubic yards of material have been removed from the entrance channel.** Almost 7 million cubic yards of that amount were removed in 1990 for the channel improvement.
- **Dr. Douglass has pointed out the annualized amount removed exceeds the estimated annual littoral transport volume for this area. While this may be correct,** the littoral transport path estimated by Dr. Douglass indicates that any effects from this practice would be felt mostly on the west end of the island and not at either of the present problem areas. **Corps admits they are dredging far more material out of the channel sand than what is needed for nourishment of the shoreline and causes the erosion to the island.**

1993 [Review of Geologic Data Sources for Coastal Sediment Budgets](#) by Edward Meisburger USACE
[Where tidal inlets interrupt the free flow of alongshore drift, they reduce or virtually eliminate the supply of sediment to down-current beaches, causing sand starvation and often serious erosion problems](#)

1993 May 5 MEM Dauphin Island Shoreline.pdf

- Prior Studies. There have been no prior studies or reports on this particular problem by the Corps of Engineers. The problem area was included, however, in the [Feasibility Report For Mobile County, Alabama \(Including Dauphin Island\), Beach Erosion Control And Hurricane Protection dated September 1978](#). **The sole recommendation in that report was for littoral zone placement near Dauphin Island of suitable material dredged during maintenance of the Mobile Harbor ship channel.**
 The Corps' recommendation in the 1978 study was to put the sand in a nearshore berm in front of the Island.
- **Dr. Scott Douglass is a professor of Civil Engineering at the University of South Alabama with a background in coastal engineering.** He has investigated... the erosion on Dauphin Island as consultant to the Alabama Department of Economic and Community Affairs, Coastal Programs Office and prepared two reports. The first report was [Summary Of Existing Coastal Engineering Data For Dauphin Island, Alabama](#), dated January 1991. The second was [Coastal Processes Of Dauphin Island, Alabama](#), dated February 25, 1992.

That report had several conclusions indicating that Corps activities in the area may have contributed to the overall erosion problem, but none that attributed the problem at the main beach park to those activities. Corps admits that their dredging has caused erosion on all of the shoreline, except the Park and Beach Board property.

Since the massive deepening of the channel in 1990, [the erosion has been 30 feet a year.](#)

- For the past several years this area has experienced [shoreline erosion at an average rate of about 30 feet per year](#) (ft/yr) in the vicinity of the pier. Given the overall process, we can reasonably assume that the entire offshore profile is moving shoreward. Calculations using this assumption result in a bottom recession, or deepening, of 3 ft/yr.
- After the Corps deepening the channel in 1989-1990 the western [shoreline eroded 50 ft a year.](#)
- **During the 1990-91 period the critical reach eroded at rates ranging from 10 ft/yr east of the pier up to 50 ft/yr about 1500 feet to the west.**
- Based on discussions with the sea turtle contacts and personal observations of the project area by the undersigned and my staff, suggests that [suitable habitat for sea turtle nesting](#) currently does not exist in the project area. **Extensive shoreline and dune erosion in the project area would prohibit the likelihood of such activities.**
 The shoreline erosion stopped the turtles from nesting on the island.
- In order for the Department to proceed with its review of the proposal, information must be provided which will satisfy the provisions of ADEM Administrative Code Rule 335-8-1-.08 which are as follows:

(1) Any use intended to mitigate a shoreline erosion problem in the coastal area shall use non-structural erosion control methods to the maximum extent practicable, **including but not limited to preservation and restoration of dunes, beaches, ...and shoreline restoration and nourishment.** Corps admits that ADEM as an Alabama agency, requires the Corps mitigates the shoreline erosion.

The Corps put 600,000 cys in the feeder berm the merger with Pelican Island.

- This action is being undertaken **to lessen the accelerated erosion** that is occurring due to migration of Pelican Passage. During the past several years, the subject **area has eroded at a rate of about 30 feet per year compared to the historical rate of about 1 feet per year.** Heinz J. Mueller, Chief Environmental Policy Section Federal Activities Branch

Corps Engineering and Design EM 1110-2-1810, USACE, 31 January 1995 COASTAL GEOLOGY

(4) Interruption of sediment transport at engineered inlets.

(a) At most sites, the designers of a project must ensure that the structures do not block the littoral drift; otherwise, severe downdrift erosion can occur.

1995 August 7 MSC Briefing for COL Vogel.pdf

- Mobile District's position - -historical erosion of east end of Dauphin Island and migration of sand island northward thus narrowing pelican passage
- **Sand dredged** from bottom of "u" (approx. 300k cy annually) **placed in ocean site outside of littoral system**
- Erosion in area fronting pelican passage has accelerated since 1979 due to northward migration of sand island and pelican passage feeder berm constructed in 1987 in littoral system merged into offshore slope of sand/pelican island
- **Our recommendations--Deny public hearing request.**

1995 October 30 MEM Comments on Public Workshop.pdf

- Technical Issues. Dr. Douglas' public statements regarding the impact of the **entrance channel maintenance on "severing" the littoral transport from east to west, thus aggravating the erosion on Dauphin Island have technical merit.** Corps admits Dr. Douglass is right.
- **In fact, there has been a long history of discussion on this issue within Mobile at CERC, and the coastal profession in general.**

The Corps is agreeing with Dr. Douglas conclusions and state the Corps and coastal profession have been discussing for a long time that the erosion impacts to Dauphin Island from the Corps dredging of the entrance channel.

1995 December 1 MFR Mobile Harbor Water Quality Certification.pdf

Memorandum For Record

- We have received a memo from Joan Pope that basically states **that "As good stewards of the environment, we should place the bar channel material into the littoral zone."**
[Joan Pope was Research Supervisor Coastal and Hydraulics Laboratory, September 1984 – 2004 (20 years Division Chief involved specifically in coastal engineering projects and problem)].
- We have sent ADEM the manuscript of the public hearing, and **they are formulating a letter** basically **requesting a more environmentally beneficial disposal option.** We feel this request is due to their continued fear of a lawsuit.
- The John Reed letter accuses some guilt as a result of the 1978 Erosion Study. Our position is that we are in compliance with NEPA, they acknowledge the historical erosion problem and that our channel contributes an insignificant amount to the problem. The 1978 report is not a NEPA document and was not approved by SAD. **The Corps knew the 1978 study stated erosion impacts to the island, the Corps suppressed all environmental and erosion impacts from that study in the 1980 EIS/Mobile Harbor Study**
- Key Notes: **The report sent to SAD [Corps' South Atlantic Division] recommended that we modify our maintenance plan for disposal of the bar channel.** The report only addresses the erosion on the western 2/3's of the island. SAD told the Mobile District to modify their maintenance plan under the 1980 Mobile Harbor study to put the sand in a nearshore berm, which the **Mobile District ignored SAD recommendation.**

1996 **Water Resources Development Act of 1996** (P.L. 104-303),
Sec. 207 which provides for the *placement of dredged sediment via methods that are not the least-cost option when the Corps determines incremental costs are reasonable in relation to environmental benefits.*

Sec. 302. Mobile Harbor, Alabama. "In disposing of dredged material from such project, the Secretary... may consider alternatives to disposal of such material in the Gulf of Mexico, including environmentally acceptable alternatives for beneficial uses of dredged material and environmental restoration."

Attached fact sheet 12/1/96 to be used to brief Callahan

- Fact Sheet Dauphin Island Erosion Issues Hand written on document **to be used to brief Callahan**
- ISSUE: **Dauphin Island**, particularly the eastern end from Fort Gaines to the vicinity of the public fishing pier, has been **undergoing erosion for a number of years.**
- Although the issue has been raised a number of times in the past, the relationship between the Mobile Harbor project and the erosion came to the surface **in 1991 when the facilities around the fishing pier became unsafe due to erosion** and **the swimming area at Fort Gaines had to be closed due to a number of drownings.**
- The issue was raised most recently in response to a Public Notice dated 13 June 1995 announcing our request to **renew State Water Quality Certification** for the Mobile Harbor Federal Navigation Project as required by Section 401 of the Clean Water Act. **The Corps is ignoring the dangers and the drownings** related to the erosion, after the massive expansion in 1990. The Corps does not care about the dangers to the public, all they are interest in is getting ADEM to approve the Water Certification.
- The State water quality **certification and coastal zone consistency** for the Mobile Harbor project expired 3 July 1995. ADEM issued a 90-day extension of certification on 6 July and a second extension on 23 October 1995. **Failure to resolve the issue to the satisfaction of ADEM could severely limit our ability to provide adequate navigation depths at Mobile.** They do not care about the dangers or the lost of property on Dauphin Island, all they are interest in is getting ADEM to approve the Water Certification.
- **Mans' activities obviously play some role in modifying the sand transport system.** Corps admits their dredging is causing the erosion. Mans' activities refer to the **Corps dredging of the Channel**
- **It has been estimated that one-half mile or more of the east end of the island would currently be open water had the armoring not taken place.**
- In addition, the maintenance of the bar channel portion of the Mobile Harbor project **removes sand** which would naturally be distributed along the western portion of the ebb tidal shoal and **places it in water depths which are greater than that required for littoral sand transport.** Interruption of sand in littoral system. This factor is probably the most important cause of man-induced erosion.
- Our records indicate that since 1970 approximately **8.3 million cubic yards of maintenance material has been removed from the bar channel** and 6.7 million cubic yards of new work was removed from channel between 1988-90. This adds up to **15 million cys removed** from the Channel during and after the 1978 study on the erosion to Dauphin Island.
- **The maintenance material would be that material, which would have been in the littoral, drift system and trapped in the channel.** Corps admits that their dredging takes away the sand that would have gotten to Dauphin Island
- **the net annual littoral transport to the west is about 196,000 cubic yards/year...the Corps is removing the entire net annual littoral transport quantity.**
USACE Where tidal inlets interrupt the free flow of alongshore drift, they reduce or virtually eliminate the supply of sediment to down-current beaches, causing sand starvation and often serious erosion problems
- In 1978, the Mobile District completed a feasibility report entitled "Mobile County, Alabama Beach Erosion Control and Hurricane Protection". The results of this report indicated that with one exception the one exception was the modification of the current (at that time) practice for the maintenance of the Mobile Harbor bar channel.

SAD told the Mobile District to modify their maintenance plan for the 1980 EIS/Mobile Harbor study to put the sand in a nearshore berm. ***The Mobile District ignored SAD recommendation and suppressed the erosion and environmental impacts in the 1980 EIS/Mobile Harbor study***

- The conclusion of the report that the authority for this modification rested with the Chief of Engineers and that since no areas of local responsibility for the project would be affected that total responsibility for implementation and associated costs were a Federal responsibility. 1978 study states, "total responsibility for implementation of the selected plan and associated costs are a Federal responsibility."
- [feeder Berm] This would allow the **resumption of the natural transport of sand in the littoral system** but would not provide immediate (or possibly even long term) relief to the erosive areas on the eastern end of the island. **So why did the Corps change the feeder berm to a deeper and more distance location?**

Interruption of sand in littoral system. This factor is probably the most important cause of man-induced erosion

- **The obvious question which can be raised is how removal of all the sand within the net littoral drift can be considered environmentally acceptable**

USACE Where tidal inlets interrupt the free flow of alongshore drift, they reduce or virtually eliminate the supply of sediment to down-current beaches, causing sand starvation and often serious erosion problems

1990 **Water Resources Development Act** §2316. Environmental protection mission

(a) General rule The Secretary shall include environmental protection as one of the primary missions of the Corps of Engineers in **planning, designing, constructing, operating, and maintaining water resources projects.**

Corps admits by their dredging, they are removing all of the sand in the littoral system from getting to Dauphin Island. The Corps knows that removing all of the sand out of a deep-draft Federal project has disastrous effects on the adjacent shoreline and against all coastal engineering principles.

The Corps has known the coastal procedures for erosion since 1935 in Santa Barbara, CA, when the Corps had to start pumping sand on the Beach because of the erosion to adjacent shoreline, they caused.

- **Man's understanding of the processes at work in this area is minimal**, however it is felt that what we do is subsumed within the impacts caused by the natural processes. As an example, 600,000 cubic yards of material was removed from the bar channel during September-October 1985 as a direct result of the multiple passages of Hurricane Elena. ...**it appears the wisest approach would be to place the material in an area which would allow the resumption of the natural process.**
1987 *Corps Environmental Engineering for Deep-Draft Navigation Projects Manual*
6-1. Policy...**Damage from Federal navigation work along the shorelines of the United States must be prevented or mitigated**
- **Although the cost of implementing such an option is not excessive considering the Mobile Harbor project alone**, if this type approach was taken at a number of coastal civil works projects the total cost to the government could be excessive. **Why is the placement of the dredged sand in an area that would let the sand reach the sand starve shoreline of the Island, an excessive expense? Especially since the Corps is bypassing sand in every other deep-draft inlet on the Gulf coast?**
- A separate but equally important factor to consider is that placement of maintenance material on the Sand Island shoals is not going to solve the erosion problem on the east end of Dauphin Island, but **will merely over the long term allow the resource to migrate in the littoral transport system as if the channel were not in place. That is what the Island needs is for the Corps to bypass the sand as if the Corps was not dredging the channel.**
- Impact To Mobile Harbor Navigation Project: As indicated in the issues paragraph the maintenance of the Mobile Harbor project is being certified by ADEM via 90-day extensions of the expired water quality certification.
- **Although we do not believe that ADEM will deny certification, they are in a touchy position in that the coastal zone program calls for the beneficial use of dredged material wherever possible** and they believe the potential of a legal challenge to the certification is increased if nothing is changed.

- **Ultimately ADEM would like for the Corps to be able to place the bar channel dredged material on the Sand Island shoals if at all possible** but also understand the regulations that we work under. We believe they would be willing to support any effort to return material to the natural sediment transport process.
- Discussions with the **ADEM** point of contact on 30 November indicated that they **plan to transmit a letter** to the District **requesting that we place the material dredged from the bar channel in a more environmentally beneficial location**

The above 3 statements reveals that the Corps knows the Alabama Department of Environmental Management, ADEM, is very concerned about the erosion on Dauphin Island and they are asking the Corps to put the sand in a more environmental beneficial area according to the coastal zone program. BUT the Corps is only interested in getting the Water Certification, they do not care about the environmental or erosional impacts to Dauphin Island from their massive expansion to the channel in 1990.

Talking About Feeder Berm

1997 January 7 MEM Dredged Material Disposal Water Quality Certification.pdf

SUBJECT: Mobile Harbor - Dredged Material Disposal for Water Quality Recertification

- This memorandum documents our findings for the subject evaluation. You verbally requested our determinations of the **location, suitability, and quantity of dredged material from the subject project channel for disposal within the littoral zone.**
- The Sand Island Bar and Mound... The bar **was constructed as a test** to return entrance channel **maintenance material to the littoral zone.**
- The bar material did not respond as a single unit, and had broken into three segments. The northernmost segment migrated **northeastward**, the middle segment gradually lost volume and disappeared, and **part of the southern segment remained where placed initially.**

The Corps did not tell ADEM that they were planning on putting the dredged sand into an area that is farther away and in deeper water where the sand would not reach Dauphin Island.

The start of the Corps lies about the Sand Island Beneficial Use Area.

The Corps deliberately **puts a false location in a Federal Public Notice** for the dredged sand, between Dauphin Island and Little Sand Island.

1997 March 17 MSC Modification of Joint Public Notice.pdf

- The proposed beneficial use area would be located on the west side adjacent to the southern portion of the Mobile Harbor Ship Channel **between Dauphin Island and Little Sand Island** (Figure 1).
- **Erosion has occurred in the vicinity of Dauphin Island** and suitable material placed in the proposed Sand Island Beneficial Use Area **would aid in beach nourishment through the littoral transport process.**
- Evaluation: The decision whether to proceed with the proposed action will be based on evaluating **the probable impact including cumulative impacts of the proposed activity** on the public interest. That decision will reflect the national concern **for both protection** and utilization of **important resources**. The benefits which may be reasonably expected to accrue from the proposal must be balanced against its reasonably foreseeable detriments. **All factors which may be relevant to the proposal will be considered including the cumulative effects thereof**, among those are conservation, economics, esthetics, general environmental concerns.
 - wetlands, historic properties, fish and wildlife values, flood hazards, flood plain values, land use, navigation, **shore erosion** and accretion, recreation, water supply and conservation,
 - water quality, energy needs, safety, food and fiber production, mineral needs, **considerations of property ownership**, and, in general, the needs and welfare of the people.

The Corps wanted ADEM to think the Corps was putting the dredged sand in a more environmental beneficial location for the erosion on Dauphin Island. **The Corps states they will consider all cumulative impacts** including cumulative impacts of the dredging of the Mobile Harbor Outer Bar Channel on Dauphin Island's shoreline erosion and considerations of property ownership?

1997 May 30 MEM Sect 302 WRDA Mobile Harbor.pdf

- [from] Department Of The Army --Memorandum For Commander, South Atlantic Division
SUBJECT: Implementation of Section 302 of the Water Resources Development Act of 1996 (WRDA 96) - Mobile Harbor, Alabama
1. **Section 302 of WRDA 96** affords an excellent opportunity to revisit the authorized plan for **maintenance of Mobile Harbor in the interest of environmental protection and restoration** and economic efficiency. Coupled with the high cost of maintaining the project as currently authorized and changing attitudes among environmental interests regarding the value of dredged material as a resource, Section 302 may allow you to develop a "master plan" for maintenance of lower Mobile Harbor that incorporates many **positive environmental features** and saves O&M funds.

This law gives the Mobile District **the Authority** to change the maintenance dredging of the Outer Bar Channel for the environmental protection and restoration of Dauphin Island.

Sec. 302. **Mobile Harbor, Alabama.** "**In disposing of dredged material from such project**, the Secretary... may consider alternatives to disposal of such material in the Gulf of Mexico, including **environmentally acceptable alternatives for beneficial uses of dredged material and environmental restoration.**"

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

ADEM sent Corps Scott Douglass statements about the erosion to the Corps.

The removal of sand from the outer bar of Mobile Pass (part a. of the Mobile Harbor, Alabama navigation project as described in the public notice) **has possibly exceeded 50 million cubic yards of sand in the last century.** Most of this sand has been removed from the littoral system of the State of Alabama and been disposed of in deeper water. This is a significant amount of sand by most relative measures. **The annual removal rate is many times greater than the rate at which sand is moved along the beaches of Alabama to Mobile Pass.**

It is the same order of magnitude of volume that has been removed from all the federally maintained ship channels in Florida. In Florida, there is a fairly **well-established link between the removal of sand at the ship channels and downdrift beach erosion.**

First of all, **the implied depths are too deep.** Coastal engineering research indicates that **depths of 30 feet are too deep to expect sand to migrate landward at a reasonable rate.** The rate of migration of sand features placed in the nearshore appears to be extremely dependent on depth. Off the Alabama coast the expected value of migration rate **in a depth of 30 feet is less than 10 feet per year** if the sand is exposed to the full Gulf of Mexico wave climate. The corresponding rate for **a depth of 15 ft. is 30 ft./yr.** This implies that placing the sand in shallower water will ensure that it moves up into the critical upper portions of the ebb-tidal delta. These upper elevations of the ebb-tidal delta appear to be critical because sand there moves northwestward toward the west end of Dauphin Island while effecting the wave climate on the east end of the Dauphin Island. The natural, pre-ship-channel depths across the Mobile Pass outer bar were about 20 feet. Results of monitoring programs of the fate of nearshore placed sands throughout the US (including much larger wave climates in the Atlantic and Pacific Oceans) **indicate that 30 feet is too deep to expect significant onshore migration**

Corps response to ADEM about Scott Douglass statements:

- We agree that the rate of disposal material **migration would be increased by placement of the material in shallower depths**. Our intentions for designation of this beneficial use area generally included cost-efficient disposal within the littoral zone.
- The operational cost to place the material **in average depths of 15 feet as suggested in the comments will likely be increased over that expected for disposal of the material in deeper water.** The Corps admits the shallower depths increase the rate of sand to the beaches and the Corps has been recommending the 15 foot depth for other near shore berms across the Country BUT not for Dauphin Island?

Even after Scott Douglass letter about the placement of the Dredged sand, the Corps know that by putting the sand farther away and into deeper water, the sand will not reach Dauphin Island, **BUT Mobile District doesn't care about the destruction and the lost of property on the Island.**

Interruption of sand in littoral system. This factor is probably the most important cause of man-induced erosion

1998 January 6 MSC Fact Sheet Dauphin Island Erosion Issues.pdf

- **Mans' activities -obviously play some role in modifying the sand transport-system.** In the early 1900's the eastern end of Dauphin Island was armored to prevent the erosion/destruction of Fort Gaines. It has been estimated that **one-half mile or more of the east end of the island would currently be open water** had the armoring not taken place.
- In addition, **the maintenance** of the bar channel portion of the Mobile Harbor project **removes sand which would naturally be distributed** along the western portion of the ebb tidal shoal and **places it in water depths which are greater than that required for littoral sand transport.** **In 1998 the Corps admits that their dredging removes the sand that would have nourished the shoreline of Dauphin Island.**
- The maintenance requirement for the bar channel is restricted to a one and one-half mile reach at the lighthouse and southward. Approximately 420,000 cubic yards of sandy material is removed from this area every other year by hopper dredge and transported to the ocean disposal site approximately 3 miles south of Dauphin Island **in water depths in excess of 30 feet.**

Interruption of sand in littoral system. This factor is probably the most important cause of man-induced erosion

- **the net annual littoral transport to the west is about 196,000 cubic yards/year. ...the Corps is removing the entire net annual littoral transport quantity** Corps admits they are removing the total amount of sand that would have nourished the shoreline of Dauphin Island.
- [1978 study] **to determine that the erosion of the 11 westernmost miles of Dauphin Island** (beginning at the location of the public fishing pier) were the result of increasing sea level and **the removal of sand from the littoral drift system through maintenance dredging.** Corps admits in the Corps 1978 study, **their dredging caused the erosion on Dauphin Island** from the fishing pier to the west.
- will merely over the long term allow the resource **to migrate in the littoral transport system as if the channel were not in place.** 6-1. Policy... **Damage from Federal navigation work along the shorelines of the United States must be prevented or mitigated**

1999 massive expansion to the Outer Bar Channel deepening from 47 to 49 feet and widening to 700 feet wide.

1999 January 26 MEM Advanced Maintenance Dredging.pdf

The proposed advanced maintenance would be utilized to **widen the east side of the bar channel by 100 feet over a distance of 12,000 feet** in the location shown on the enclosed drawings. the Mobile District determined that the only economical means to move the large volume of material .. was by utilizing a pipeline dredge.. **Pipeline dredging cost \$1.19 per yard.. Hopper dredging cost \$2 per yard.** **Corps is finally stating the pipeline dredge cost less than a hopper dredge.**

1999 March 5 MSC Presentations from 2nd Annual Coast Issues Symposium Solutions.pdf

The above [1999 January 26](#) document states **Pipeline dredging cost \$1.19 per yard vs. Hopper dredging cost \$2 per yard**

During the question and answer period, Corps' Pat Langham and Alma Wagner on try to confuse the people at the meeting about the costs from \$6 to \$9 dollars a cy. to pump the sand to the beach not one word about pumping the sand in a nearshore berm in front of the island. What the Corps failed to disclose was the costs of the pipeline dredging and the Federal Laws and Corps manuals that govern the Corps' dredging of a Federal project on the erosion on the adjacent shoreline.

Interruption of sand in littoral system. This factor is probably the most important cause of man-induced erosion

1999 October 4 MSC Fact Sheet Dauphin Island Erosion Issues

- Studies of the shoreline change between the period 1942 and 1974 indicate gulf shore erosion rates of 6.3 feet per year.
- **Changes to the shoreline of the eastern end**... with **over 500 feet of shoreline recession**
Interruption of sand in littoral system. This factor is probably the most important cause of man-induced erosion
- The cause of physical **changes of the western end of the island is not clearly understood**. Douglass et al. (1998) postulate that the maintenance of the Mobile Harbor Entrance Channel may be a cause of this erosion. **Mobile District's Engineering Failure** stating they do not know what causes the erosion to the western side of the Island.

1935 law **concern with erosion problems... to mitigate damages attributable to federal navigation projects**

1984 **Shore Protection Manual Volume I. 5. Effect of Inlets on Barrier Beaches . Inlets may have significant effects on adjacent shores...by interrupting the longshore transport and trapping onshore-offshore moving sand.**

1987 Corps Environmental Engineering for Deep-Draft Navigation Projects Manual

6-1. Policy...**Damage from Federal navigation work along the shorelines of the United States must be prevented or mitigated**

6-3. Justification for Mitigation.

a. ...**Endangered and threatened species**

b. **Impacts resulting from dredged material disposal..on.. shorelines.**

- Our records indicate that since 1970 approximately 8.3 million cubic yards of maintenance material has been removed from the bar channel and 6.7 million cubic yards of new work was removed from channel between 1988-90. **The maintenance material would be that material which would have been in the littoral drift system and trapped in the channel.** Interruption of sand in littoral system. This factor is probably the most important cause of man-induced erosion
- d. Beach Erosion Control and Hurricane Protection Study: In 1978, the Mobile District completed a feasibility report entitled "**Mobile County, Alabama Beach Erosion Control and Hurricane Protection**" **Including Dauphin Island**
- The one exception was the modification of the current (at that time) practice for the maintenance of the Mobile Harbor bar channel. SAD told the Mobile District to modify their maintenance plan under the 1980 Mobile Harbor study to put the sand in a nearshore berm, which the Mobile District ignored SAD recommendation.
- that the erosion of the 11 westernmost miles of Dauphin Island (beginning at the location of the public fishing pier) were the result of increasing sea level and **the removal of sand from the littoral drift system through maintenance dredging.** Interruption of sand in littoral system. This factor is probably the most important cause of man-induced erosion
- The conclusion of the report that the authority for this modification rested with the Chief of Engineers and that since no areas of local responsibility for the project would be affected that total responsibility for implementation and associated costs were a Federal responsibility. **1978 study states, "total responsibility for implementation of the selected plan and associated costs are a Federal responsibility."**
- Division also indicated that any change in the maintenance practices for Mobile Harbor should be studied as part of that project not the Mobile County study. The South Atlantic Division ordered the Mobile District to put the 1978 Dauphin Island study's erosion impacts in the 1980 EIS/Mobile Harbor study, but the **Mobile District suppressed all of the environmental and erosion impacts to the Island.**
- Further funding for the Mobile County study was not forthcoming and the study was subsequently deauthorized by Congress in 1987. Deauthorize **to conceal the study and the erosion impacts, just before the massive expansion of the channel started in 1989.**

- e. National Underwater Berm Demonstration Program: In 1986 the Mobile District initiated investigations of the feasibility and effectiveness of constructing underwater berms with dredged material for providing shore protection. In March 1987, a "feeder" berm was constructed with 656,000 cubic yards of material from the bar channel. This berm was placed in an area on the southern flank of the Sand Island shoal in 14 to 18 feet of water. 3) **determine whether placement of material in these depths of water would be beneficial in supplying sand to the littoral system.** Results of the monitoring showed that overtime the 'structure' melded into the Sand Island shoal so that it was no longer identifiable.
But the Corps is not telling the entire story, according to ERDC report, the Corps put **6,755,352cys of sand into the feeder berm** from dredging for the massive expansion, 1989-1990.
- Shallow draft split-hull dredges can perform the required activities, however **there are only 2** in operation in the U.S. and they are owned by the same company. Increase in costs over that currently expended for this part of the channel would be approximately **\$294,000 per dredging cycle**

Again this is a Corps lie according to 1990 MSC National Berm Demonstration Project.pdf

1990 **Nearshore Mound Construction Using Dredged Material** states **13 shallow draft split-hulled hopper dredges**..operating in the United States on a routine basis.

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

- Recent Activities
Federal Standard: Based on Corps regulations for operation and maintenance of Civil Works projects (33CFR335), the baseline for maintenance of the channel is the Federal Standard which is roughly the least costly, **environmentally acceptable**, engineering feasible alternative. The Federal Standard for Mobile Harbor has been the transport of all dredged material to the ocean disposal site as authorized by the Water Resources Development Act (WRDA) of 1986 (P.L. 99-662). **Corps fails to disclose the 1996 WRDA section 302. may consider alternatives to disposal** of such material in the Gulf of Mexico, including **environmentally acceptable alternatives for beneficial uses of dredged material and environmental restoration.**
- c. Sand Island Beneficial Use Area. In 1997, the District in coordination with the Alabama Department of Environmental Management (ADEM) proposed the designation of a large area of the subtidal delta as the Sand Island Beneficial Use Area (SIBUA).
This is a lie. The Corps' Public Notice No.FT97-MH08-2 Sand Island Beneficial Use Area shows **false location in the Federal Documents.** The public notice stated that the Corps would **put sand between Dauphin Island and Little Sand Island** that was never done
- g. Northern Gulf Regional Sediment Management Initiative: In response to the damages to the navigation channel caused by Hurricane Georges in September 1998, a recovery plan was developed in concert with ADEM the use of the SIBUA for material to be dredged from the entrance channel. Approximately 3 million cubic yards of predominately sandy material was placed in the site by shallow draft hopper dredge between May and September 1999. Based on the initiative, **we developed an extensive monitoring program** aimed at describing the evolution of this material, currently we are utilizing existing operations and **maintenance funds for this monitoring.**

This statement is a **Corps lie, because**

2014 "Pat Robbins, stated "Corps has **no** formal **monitoring program to ensure that the sand is reaching its intended targets**"

In a December 2017 meeting, the Corps staff acknowledged the Sand Island Beneficial Use Area (SIBUA) disposal site **is not monitored** and that the Corps **does not know** where any **sand leaving the site actually goes.** There are no Corps documents changing the location of SIBUA, before 2008, according to the Corps statements, under the FIOA request to me.

**D-13 Coastal Engineering Research Board
Proceeding**

1998 Coastal Inlets Research Program

Dr. Nicholas C. Kraus, Research Physical Scientist and Julie D. Rosati Research Engineer
US. Army Engineer Waterways Experiment Station Coastal and Hydraulics Laboratory Vicksburg, MS

"Inlet Channels and Adjacent Shorelines."

a PC-based system to formulate sediment budgets for inlets and adjacent shores is being developed.

Sediment budgets are regularly produced by the Corps to represent local and regional **sediment transport** magnitudes and pathways **for an inlet and its adjacent beaches.**

The Sediment Budget Analysis System (SBAS) under development within the CIRP will provide a uniform, defensible procedure for designing sand management alternatives, and for identifying, quantifying, and mitigating inlet impacts.

This PC-based system will provide methods and a uniform structure to estimate

- (1) ***alongshore distance of an inlet's impact,***
- (2) ***sediment volume captured by an inlet system,***
- (3) ***magnitudes and directions of sediment fluxes,*** and
- (4) ***uncertainties associated with each of (1) to (3).***

The Corps requires estimates of these quantities to mitigate for inlet impacts (Section 111 studies), to design sand-bypassing systems, to formulate sand-management strategies, and to optimize channel maintenance and sediment handling.

Input data **include the rate of volume change on the adjacent beaches,** shoals, and inlet channel; mechanical bypassing history; engineering activities that would alter the budget; other sources and sinks; **net and gross longshore sediment transport rates** at the boundaries of the system; and uncertainties associated with each of these data sets or estimated quantities.

Parameters which the user can vary include the effectiveness of inlet jetties in trapping sand and **the degree to which the inlet naturally bypasses sand to the adjacent beaches.**

Typical results for an inlet application might include **the range of net and gross longshore sediment transport rates for the inlet and its adjacent beaches,** with associated values of uncertainty.

The user might compare these results to those from a modified **regional sediment budget** which incorporates a particular engineering activity **at the inlet or along the adjacent shores,** e.g., overdepth dredging, and mechanical bypassing.

2000 December 7 RPT National Regional Sediment Management Demonstration

National Regional Sediment Management Demonstration

- Mobile Pass (**Sand Island Beneficial Use Area**) –
In the past O&M requirements and logistics dictated placement of dredged material from the Mobile Pass navigation bar channel **outside the limits of littoral processes**. Disposal of the material in such locations **removes it from the local littoral system**. Interruption of sand in littoral system. This factor is probably the most important cause of man-induced erosion
 - Keeping the dredged material in the littoral zone **requires placement in a location** where natural processes are able **to move the material to the adjacent downdrift shorelines**.
Where tidal inlets interrupt the free flow of alongshore drift, they reduce or virtually eliminate the supply of sediment to down-current beaches, causing sand starvation and often serious erosion problems.
 - Alternative **placement of dredged material from the bar channel requires investigation and monitoring** to determine optimum **placement for the return to the littoral system**.
Now we know that Sand Island Beneficial Use Area SIBUA is not working, why did the Corps change it to an area for the sand to get to Dauphin Island.
- §2316. Environmental protection mission (a) General rule The Secretary shall include **environmental protection as one of the primary missions** of the Corps of Engineers **in planning, designing, constructing, operating, and maintaining water resources projects**.
- STATUS: The Northern Gulf of Mexico RSM program is entering into its second year. Numerous other accomplishments have been achieved including
 - a **historical data search**;
 - hydrographic and topographic data, beach profile data**, and aerial photography;
 - a **regional sediment budget to determine regional sediment migration and pathways**;

The Corps Engineering failure is their failure of SIBUA and Regional Sediment Management Demonstration. Neither has worked to provide sand to Dauphin Island.

DAUPHIN ISLAND PROJECT STUDY MATRIX

This document states that the Corps was doing their own studies for the DIPOA1 lawsuit.

And the footnote states **1. Tasks that SAM feels are related to lawsuit**.
[SAM is the Mobile District Corps of Engineers.]

Also, the Corps is doing studies on Dauphin Island under MH GRR2, Section 1032, Section 1112
Footnote 2. **Elements included in Project Study Plans**

This means the Corps started the studies about Dauphin Island in 2000 right after the Dauphin Island Property Owners Association (DIPOA) filed the lawsuit.

The Corps must have started the MH GRR studies Massive Expansion at the same time.

Another Corps lie about a study for nourishing Dauphin Island beaches.

2012 Alabama Beach Nourishment Borrow Area Study February 2012.pdf

Mobile District was asked by the Alabama Department of Conservation and Natural Resources to identify offshore sand resources in state waters **for nourishing Dauphin Island beaches.**

This is a false statement in a Federal Document. This study is for the State of Alabama to sell sand within the Dauphin Island's corporate limits to the Corps for use on the Mississippi barrier Islands, for \$7 dollars a cubic yard.

Approximately 250,000 to **300,000 cubic yards** of material are dredged from the channel annually and disposed of in the SIBUA.

This is a false statement in a Federal Document. The amount dredged was 973,254 cubic yards, that was averaged by the Corps between 1990 to 2015. That was 3 times the amount this study is stating.

Corps is paying \$100 million dollars to store 30 million cubic yards of River sand in Alabama.

Dauphin Island is eroding away and the Mobile District tested the sand on Dauphin Island for the Mississippi Barrier Islands.

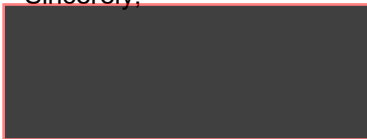
2013 Dauphin Island Pilot Study November 2013.pdf

The eastern tip of Dauphin Island near Fort Gaines is stabilized by a revetment and a series of groins built prior to 1909. However, sand had eroded from behind the structures by 1992 and today are located approximately **340 to 490 feet seaward of the current shoreline.**

This value increases to nearly 30 million cy when considering sites along the Tennessee-Tombigbee River system. Over the years, diminishing storage capacity, primarily in upland placement sites, has resulted in the need for acquisition of additional within-banks and upland areas. The sand stored adjacent to the BWT in existing dredged material placement sites could provide a much needed source for the coast should it meet suitability criteria. **Use of this sand would in turn help restore storage capacity for dredged material removed from these navigation channels.**

Is the Mobile District Corps taking all of the above facts into consideration while doing the massive expansion for 2018-2019 SEIS/GRR

Sincerely,



Comment 210

From: [Henry, Emily](#)
To: [Mobile Harbor GRR](#)
Subject: [Non-DoD Source] Port of Mobile ATI Support Letter
Date: Thursday, September 13, 2018 11:31:07 AM
Attachments: [Port of Mobile ATI Support Letter 2018-09-12.pdf](#)

Please see attached letter. A hard copy will also be sent in the mail. Let me know if there are any questions!

Thank you,

Emily

Emily Henry

Administrative Secretary, Alabama Transportation Institute

3023 Cyber Hall | 248 Kirkbride Lane

The University of Alabama

Tuscaloosa, AL 35487-0288

Tel: 205-348-4341

E-mail: eehenry@ua.edu

September 12, 2018

Ms. Jennifer L. Jacobson
U.S. Army Corps of Engineers, Mobile District
P.O. Box 2288
Mobile, AL 36628-0001

Dear Ms. Jacobson,

*Re: Draft Mobile Harbor, Mobile, Alabama Integrated General Reevaluation Report
with Supplemental Impact Statement*

On behalf of Alabama Transportation Institute (ATI) at The University of Alabama, I write to offer comments in support of the Tentatively Selected Plan (TSP) identified in the Draft Mobile Harbor, Mobile, Alabama Integrated General Reevaluation Report with Supplemental Environmental Impact Statement. ATI serves as a planning, research and policy resource to advance a 21st century transportation system. ATI brings together nationally recognized research and development industry professionals seeking innovative solutions to the challenges of building and maintaining a transportation system that provides safety and mobility for Alabama's citizens, while providing efficient freight movement, stimulating economic growth and conserving energy resources.

The Port of Mobile, operated by the Alabama State Port Authority, is the 10th largest seaport in the United States and has been identified as the fastest growing container terminal in North America. The Port Authority has invested more than \$700 million in key expansion projects to keep up with growing demand. While these investments have made it possible to better serve many Port customers and businesses across Alabama and, indeed the Southeastern United States, another critical project must be completed to maintain and enhance the Port's competitiveness and value in an increasingly global marketplace.

The critical need now is to deepen, widen, and improve the ship channel from its current average depth of 45 feet and width of 400 feet. This would enable major economic development opportunities and spur additional investment by allowing larger, wide bodied, bulk carriers in and out of the Port. Furthermore, modernizing the capabilities of the Port will serve to reduce transportation delays and inefficiencies currently experienced due to the limited channel depth and width. These translate to significant cost and time savings to the public as well as businesses.

These enhancements to the Port of Mobile are critical to the immediate and long-term economic success and vitality of our State. It is our belief that the TSP is a responsible plan from both an economic and environmental standpoint and we urge your support.

Sincerely,



Shashi Nambisan, Ph.D., P.E.
Executive Director, Alabama Transportation Institute

Comment 211

From: [Greg Alexander](#)
To: [Mobile Harbor GRR](#)
Subject: [Non-DoD Source] Port Widening Letter of Support
Date: Wednesday, September 12, 2018 2:03:55 PM
Attachments: [Port Widening Letter of Support.pdf](#)

Good afternoon,

Please see the attached letter of support. Please feel free to reach out to me with any questions.

Respectfully,
Greg

Greg Alexander
President & CEO

<Blockedhttps://chambermaster.blob.core.windows.net/userfiles/UserFiles/chambers/487/CMS/convert/www.mygulfoastchamber.com/files/203.jpg>

3150 Gulf Shores Parkway
Gulf Shores, AL 36542
Phone: (251) 968-7221
www.mygulfoastchamber.com <Blockedhttp://www.mygulfoastchamber.com>



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

RE: Support of the Mobile Shipping Harbor Channel Expansion Project

Dear Sir or Madam,

Advantage Coastal Alabama, a division of the Coastal Alabama Business Chamber, is writing to inform you that our organization is in full support of the U.S. Army Corps of Engineers' Tentatively Selected Plan to increase the depth and width of the Mobile Shipping Harbor Channel, as outlined in the General Re-evaluation Report and Supplemental Environmental Impact Statement (GRR/SEIS). One of our organization's core missions is to support and expand business and serve as a catalyst to enhance transportation and infrastructure needs. We believe that this project is vital for the continued growth and economic success of the Port of Mobile, and thereby that of Coastal Alabama.

In our business community along the beaches of Coastal Alabama, we depend on the tourism industry and visitors to our area. While the health of our tourism industry is essential to maintaining the quality of life we all enjoy, we also recognize that supporting diverse industries across our region is vital to ensuring a sustainable economy in Coastal Alabama. The Alabama State Port Authority is one of the largest economic engines for the state, with a \$22.4 billion impact. The channel expansion is vital in continuing the growth of the port and increasing the diversity of industries to the State of Alabama. According to an economic impact study from the University of Alabama's Center for Business and Economic Research, the port is responsible for 134,608 direct and indirect jobs in the state with a direct and indirect tax impact of \$486.9 million.

Deepening the channel by 5 feet to a depth of 50 will clear the way for the Port to accommodate larger ships that are already coming through the expanded Panama Canal. Widening the channel for 3 nautical miles will allow two-way traffic making the Port more efficient for importers and exporters. Expanding the Choctow Pass turning basin will

accommodate safe turning of larger vessels and bend easing in the Bar Channel. Channel improvement modifications will help to support the \$350 million in planned and complete capital improvement projects, focused on meeting Post-Panamax vessel requirements as well as the new \$60 million automobile roll-on, roll-off terminal to support automotive logistics in Alabama, which is another major industry. In addition, the channel improvement modifications will result in reduced transportation costs by allowing a more efficient future fleet mix and less congestion when traversing the port.

Preserving and enhancing the natural resources in our environment is also vital to the quality of life and success of our business community, so we were encouraged to see that the feasibility study on this project examined the environmental impacts of expanding the channel. We were also encourage to see that the U.S. Army Corps of Engineers GRR/SEIS shows that, overall, no substantial environmental impacts in aquatic resources are anticipated due to channel modifications. Therefore, Advantage Coastal Alabama, a division of the Coastal Alabama Business Chamber, is providing our letter of support for the U.S. Army Corps of Engineers Tentatively Selected Plan for the Mobile Harbor Channel Expansion project. **We strongly believe that our local businesses and communities, together with those across our region, state, and country, will benefit from the implementation of this proposed project.**

Bill Tunnell
ACA Chairman

Nick Wilmott
Coastal Alabama Business Chamber Chairman

Advantage Coastal Alabama
251-968-7220

Coastal Alabama Business Chamber
251-968-7200

P.O. Box 3869, Gulf Shores Al, 36547
www.mygulfcoastchamber.com

Comment 212

From: [Brooks McClendon](#)
To: [Mobile Harbor GRR](#)
Subject: [Non-DoD Source] Public Comment Submission
Date: Wednesday, September 12, 2018 1:51:15 PM
Attachments: [2018-9-11 Mobile Harbor Public Comment ACE.pdf](#)

Good afternoon,

Attached for your review and consideration are comments regarding the Draft Integrated General Reevaluation Report with Supplemental Environmental Impact Statement for the Mobile Harbor expansion project. Please let me know if I can provide any additional information.

Thank you!

Brooks McClendon
Manufacture Alabama
Alabama Iron & Steel Council
401 Adams Avenue, Suite 710
Montgomery, AL 36104
(334) 386-3000 Office
(205) 903-9156 Cell



September 11, 2018

31 Adams Avenue, Suite 710
Montgomery, AL 36104
PH: 334.386.3000
FX: 334.386.3001
www.manufacturealabama.org

Ms. Jennifer L. Jacobson
U.S. Army Corps of Engineers, Mobile District
Post Office Box 2288
Mobile, AL 36628-0001

RE: EIS No. 20180168, Draft, USACE, AL, Mobile Harbor, Mobile, Alabama Draft
Integrated General Reevaluation Report with Supplemental, Comment

Ms. Jacobson:

Please accept the following comments regarding the Mobile Harbor Tentatively Selected Plan (TSP) as described in the July 2018 Draft Integrated General Reevaluation Report with Supplemental Environmental Impact Statement (Draft GRR/SEIS).

On behalf of industry and manufacturing in Alabama, and in consideration of businesses and consumers both in the Southeastern United States and across the globe who rely on commerce supported by the Port of Mobile, I offer full support of the expansion and modernization of the Mobile Harbor to accommodate the demands of an ever-growing global commerce system. As cargo shipping vessels continue to evolve and grow, so too must our ports and shipping terminals continue to evolve and grow.

As you likely know, the described TSP would deepen existing channels, ease bending of existing channels, widen an existing bay channel and expand an existing turning basin. These enhancements would greatly increase safety and efficiency by allowing two-way traffic and safer turning of large vessels. Specifically, these enhancements would alleviate the current primary challenge as described by the Draft GRR/SEIS: limited channel depth and width, coupled with the increasing number and size of vessels entering and departing Mobile Harbor, limit vessel cargo capability, restrict vessels to one-way traffic and limit the time of operations.

The Port of Mobile and Alabama's robust waterways transportation system are a key economic driver of the state and region. They are the lifeblood of many Alabama industrial operations. More than 13 percent of Alabama's workforce is engaged in manufacturing, and more than 25 percent of those jobs are engaged in manufacturing exports. Alabama recently boasted nearly \$20 billion in manufactured goods exports during a single calendar year. Finally, as stated in the Report: the TSP is economically justified with a benefit-to-cost ratio (BCR) of 3.0.

It is my hope that you will take these comments and these facts into consideration. Please do not hesitate to contact me should you have any questions or if I can provide any additional information.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'George N. Clark', written over a horizontal line.

George N. Clark
President, Manufacture Alabama

Comment 213

From: [Ashley Jones Davis](#)
To: [Mobile Harbor GRR](#)
Subject: [Non-DoD Source] Mobile Channel Widening // Letter of Support
Date: Wednesday, September 12, 2018 11:21:26 AM
Attachments: [Ship Channel Widening Letter of Support_NBCoC - SIGNED.pdf](#)

Good Morning,

Please find attached comments regarding the Mobile Channel Expansion submitted by the North Baldwin Chamber of Commerce

Thank you,

Ashley Jones Davis

Executive Director
North Baldwin Chamber of Commerce
North Baldwin Chamber Foundation
301 McMeans Ave / PO Box 310

Bay Minette, AL 36507
Phone 251 937 5665 ext 2
Cell 251 752 7933
Fax 251 937 5670

ashley@northbaldwinchamber.com <<mailto:ashley@northbaldwinchamber.com>>

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

Blockedwww facebook.com/northbaldwinchamberofcommerce <Blockedhttp://www facebook.com/northbaldwinchamberofcommerce>

<Blockedhttps://docs.google.com/uc?

export=download&id=0Bxxml_SVccFkaWV2dTluc111Z0U&revid=0Bxxml_SVccFkMctQSkdWd1RkUE80NzZ1aHNOeHoxMHhUeIiwPQ>

<Blockedhttps://docs.google.com/uc?export=download&id=1bHy62cAXe5os9FyAFBS9mu2c-

WArkSM_&revid=0Bxxml_SVccFkczA4WFnkNnZIMTJrSi80V0d2WHFXS3lwaDNnPQ>

<Blockedhttps://docs.google.com/uc?

export=download&id=1ak9_SLjfHvijm3XN1VoarQZmuFZj2jEO&revid=0Bxxml_SVccFkNXZROG5DMHV1Q1ZGcEdQRW9Sd1NZQUlmdXRBPQ>

<Blockedhttps://drive.google.com/a/northbaldwinchamber.com/uc?id=125GwFYngXNFTa4JIHCOAsp9L2Vy086ge&export=download>



Chairman, Ben Hansert • Vice Chairman, Jason Padgett • Secretary, Elizabeth Day • Treasurer, Charlotte England

September 10, 2018

To: U.S. Army Corps of Engineers

RE: Mobile Harbor GRR/SEIS – Comment Submission

On behalf of the Board of Directors for the North Baldwin Chamber of Commerce, representing nearly 300 members and more than 4,000 employees, I would like to submit the following comments in support of the Mobile Channel Expansion project:

The Alabama State Port Authority is vital to the economic success of Alabama and expansion of the Channel is vital in maintaining the Port's growth. With the expansion of the Panama Canal, ships traveling through are larger, the current Channel's dimensions place constraints on these larger container ships and restricts many of them to one-way traffic, thus reducing efficiency and increasing the cost of doing business. The container business has been a point of strong growth for the Port of Mobile in recent years, but the current channel conditions threaten to slow the growth, giving the advantage to other ports with deeper channels.

A deeper and wider channel will allow the port to accommodate larger ships; A deeper channel also allows ships to carry more weight, making the port more efficient for importers and exporters. These Channel improvement modifications will result in reduced transportation cost by allowing a more efficient future fleet mix and less congestion when traversing the port. With a deepened channel, carriers will be able to load vessels more efficiently and thereby reduce transiting costs.

Locally, for Coastal Alabama to continue its initiative in industry growth and to support already existing industries such as Airbus, Amazon, Walmart and more; the Port must be able to accommodate the needs of those industries—existing and future. In North Baldwin County, the Port plays a major role in Economic Development recruitment as the 3,000-acre South Alabama MegaSite is merely a train or truck ride away from the Port. Port accessibility and capability will play an essential role in recruiting the right industry to the shovel ready site.

The Alabama State Port Authority is one of the largest economic engines for the state, with a \$22.4 billion economic impact; it saw a record 20% container growth in 2017; it currently has \$350 million in planned and completed capital improvement projects; and early next year the Port will start construction on a new \$60 million automobile roll-on, roll-off terminal. The Port is growing and adapting as industries grow and change. Now that ships traversing the Panama Canal into the Gulf are growing and changing, it is time for the Mobile Channel to grow and adapt as well.

Thank you,

A handwritten signature in black ink that reads "Ashley Jones Davis".

Ashley Jones Davis
Executive Director
North Baldwin Chamber of Commerce
301 McMeans Ave, Bay Minette, AL 6507
Ph. 251-937-5665 ext 2
ashley@northbaldwinchamber.com

Comment 214

From: [Ouida Shears](#)
To: [Mobile Harbor GRB](#); [Ouida Shears](#)
Subject: [Non-DoD Source] WIDENING OF THE MOBILE HARBOR
Date: Tuesday, September 11, 2018 3:52:35 PM
Attachments: [widening of lha harbor 091118.docx](#)

I, Ouida T Shears, am in full support of the widening of the harbor. Please see attached

--

Ouida T Shears
NXRGlobal.com/o2leys

Ouida T. Shears
355 Cammel Street Mobile, AL 36610
251 229 0294

September 11, 2018

Mobile Harbor GRR
USA, CE

Dear Sir or Madam:

I am in full support of the widening of the harbor. I foresee the progress and commerce that this project will lend to the growth of our city and beyond.

Sincerely,

Ouida T. Shears
Secretary/Treasurer
Africatown Business and Community Panel
(ABCP)

From: [REDACTED]
To: [Mobile Harbor GRR](#)
Subject: [Non-DoD Source] Mobile Harbor deepening project report
Date: Tuesday, September 11, 2018 3:37:23 PM

We are unable to stand the re-scheduled meeting about the Mobile Harbor project scheduled for this evening in Mobile. We are writing once again to express our belief that a deepened Mobile Harbor ship channel has the real potential to worsen existing environmental impacts and to create new impacts within Mobile Bay, to Dauphin Island, and even to neighboring barrier islands in Mississippi.

Since 1980, when that year's Corps' report recommending the channel be deepened was deficient because the Dauphin Island erosion problem was not addressed, there has been SIGNIFICANT erosion of the Sand/Pelican Island complex and of Dauphin Island. Why has the Corps of Engineers ignored 38 years of shoreline erosion impacts?? It is a fact that Dauphin Island has been weakened and endangered. It is very distressing that the Corps seems to be using cost as the only consideration in determining how and where to lift and dispose of the dredged sand. It has become apparent (even to non-engineers like us) that the SIBUA only maintains the Bar Channel and contributes GREATLY to the erosion of Dauphin Island.

The Corps knew in 2009 that dredged sands accumulate in the SIBUA instead of moving to Dauphin Island as promised!! How can the Corps continue to violate the spirit and intent of the Settlement Agreement of 2009, knowing the sands in the SIBUA
DO NOT return to the littoral drift system to nourish Dauphin Island? How can the Corps let the cost and convenience of the old, failed way of removal and distribution override the lives and livelihood of the people in our area, and the habitat for ocean, marsh, and island plants and animals?? It is SHAMEFUL!!

My husband and I are volunteers with Share the Beach, an organization and program to find, secure, and monitor sea turtle nests. We are seeing fewer and fewer nests here on Dauphin Island, and we believe that fact is due to beach erosion. There appears to be no other reason why Dauphin Island should have so many fewer sea turtle nests than Orange Beach, Gulf Shores, and Ft. Morgan.

We are asking WHY our endangered barrier island is NOT the #1 PRIORITY in your considerations? You can still widen and deepen the Mobile channel while still placing dredged sands where they will replenish Dauphin Island, not cause further erosion. So, please, do the right thing.....and make the decision and effort to place dredged sands in shallow water in the littoral drift system.

Respectfully and hopefully,

[REDACTED]
Dauphin Island, AL. 36528

Sent from my iPad

Comment 216

From: [angela jones](#)
To: [Mobile Harbor GRR](#)
Subject: [Non-DoD Source] The Mobile Harbor Deepening and Widening
Date: Tuesday, September 11, 2018 2:35:44 PM

The AfricaTown Community Development Corporation (ACDC)

We are in full support of the deepening and the widening of the Mobile Harbor. We understand and know what this will do to boost the economy of Mobile and make our Mobile Harbor one of the best or the best Harbor in the world.

May the Lord bless this project.

Yours truly,

Cleon J. Jones, ACDC President

Angela M. Jones, Secretary

<Blockedhttps://www.avast.com/sig-email?utm_medium=email&utm_source=link&utm_campaign=sig-email&utm_content=webmail&utm_term=icon> Virus-free. Blockedwww.avast.com
<Blockedhttps://www.avast.com/sig-email?utm_medium=email&utm_source=link&utm_campaign=sig-email&utm_content=webmail&utm_term=link>

Comment 217

From: [REDACTED]
To: [Mobile Harbor GRR](#)
Subject: [Non-DoD Source] Please reconsider
Date: Tuesday, September 11, 2018 5:45:33 AM

To Whom it May Concern:

Please reconsider this dredging project.

Are you doing the right thing for the right reason? Will the goal you are trying to accomplish outweigh the potential negative effects, short term as well as into to the future?

After reading the data, it's difficult to imagine the benefit outweighing the potential damage to the fragile ecosystem, including the barrier islands.

Thank you.

[REDACTED]

Comment 218

From: [REDACTED]
To: [Mobile Harbor GRR](#)
Subject: [Non-DoD Source] Comments on Dauphin Island erosion
Date: Monday, September 10, 2018 5:26:13 PM

Dear Sir:

I attended your last open meeting at the Convention Center and was shocked and horrified at the calm statements from your scientific personnel regarding your plans to widen and deepen the ship channel in Mobile Bay. All models ASSURE them that there will be no negative impact on the sea life, salinity, erosion, you name it. Everything will just be fine and dandy.

This letter is not going to be technical. You will have received technical letters but I firmly and loudly protest the results of the Corps numerical modeling study results that allege maintenance of the Bar channel does not contribute to the erosion of Dauphin Island. The rejection is based on the clear fact that the model results do not match the actual observed shoreline losses that have occurred since the early 1970s. The Corps admitted at the February 22 public meeting that the use of the Sand Island Beneficial Use Area was preventing at least half of the sands that would naturally have been carried to Dauphin Island from reaching the island. In addition the Corps dredging records also indicate that as much as 72% of the sands dredged from the Bar Channel since 1980 have been lost from the nearshore littoral drift system because the Corps practice of disposing of the valuable beach sands in deeper Gulf waters.

THESE FACTS INDICATE THE LOSS OF MILLIONS OF CUBIC YARDS OF BEACH QUALIFY SANDS DUE TO THE UNWISE CHANNEL DISPOSAL PRACTICES THAT HAVE AND CONTINUE TO ADVERSELY AFFECT DAUPHIN ISLAND.

Many people have tried to work with you and complaints have fallen on deaf ears. You are ruining a beautiful and necessary barrier island that protects the mainland.

[REDACTED]
Dauphin Island, Alabama

Comment 219

From: [Tanner Jones](#)
To: [Mobile Harbor GRR](#)
Subject: [Non-DoD Source] Baldwin County EDA - Letter of Support and Comments
Date: Monday, September 10, 2018 4:46:19 PM
Attachments: [image001.png](#)
[Baldwin County EDA - Letter of Support and Comments.pdf](#)

See attached for a letter of support/comments from the Baldwin County Economic Development Alliance. If there are any technical issues with the letter, please let me know.

Thank you.

Tanner Jones, Research Analyst

Baldwin County Economic Development Alliance

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

Office: (251) 970-4003

Cell: (251) 504-3990



Jennifer L. Jacobson
U.S. Army Corps of Engineers, Mobile District
P.O. Box 2288
Mobile, AL 36628

Jennifer,

The Baldwin County Economic Development Alliance is a public-private partnership that represents Baldwin County to companies looking at locating in the region or expanding their existing Baldwin County operation. Our organizational focus revolves around growing and improving Baldwin County's economy and ensuring exceptional quality of life for everyone who lives and works in our county.

One of Baldwin County's greatest assets is our accessibility to the Port of Mobile, which provides local operations with the ability to serve international markets and ship raw materials used in their manufacturing process. Many companies that have chosen to locate in the Mobile-Baldwin region, have chosen to do so because of the potential for easy access to the Port of Mobile.

The Alabama State Port Authority has been consistent in making improvements to the Port of Mobile, in order to meet the needs of our region's businesses and prepare for new businesses in the future. Each time that these improvements have been made, Baldwin County has seen an increase in the number of companies that look at our region as a potential destination for their new or expanding operations.

Having a first-hand view of the port's impact on our local and regional economy, the Baldwin County Economic Development Alliance fully supports the deepening and widening of the Port of Mobile. We believe that these improvements at the port will not only increase the effectiveness of the port in serving its customers but also provide new opportunities for the Baldwin County economy.

If there is any additional information that we can provide to support these improvements at the Port of Mobile, feel free to contact us at any time.

Thank you,

Lee Lawson
President and CEO

Comment 220

From: [Blake Hardwich](#)
To: [Mobile Harbor GRR](#)
Subject: [Non-DoD Source] Energy Institute of Alabama Comments RE: Mobile deepening and widening environmental impact study
Date: Monday, September 10, 2018 3:43:08 PM
Attachments: [image001.png](#)
[EIA Comments RE Mobile EIS.pdf](#)

To whom it may concern:

Please find attached comments regarding the Mobile deepening and widening environmental impact study. Should you have any questions, please do not hesitate to contact me.

Thank you for your attention to this matter.

Sincerely,

Blake Hardwich

Blake Hale Hardwich

Executive Director

Energy Institute of Alabama

Blockedwww.energyinstituteofal.org <Blockedhttp://www.energyinstituteofal.org/>

Follow us on Twitter:

<Blockedhttps://twitter.com/EnergyofAL>



September 10, 2018

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

Re: Draft General Evaluation Report and Supplemental Environmental Impact Statement (GRR/SEIS)

Dear Colonel Joly:

On behalf of the Energy Institute of Alabama (EIA), I write to express our strong support for the U.S. Army Corps of Engineers' Draft GRR/SEIS and the proposed widening and deepening of the Mobile channel. We believe this project is essential to the robust, long-term economic success of our state and agree with the report's findings that it can be accomplished in an economically and environmentally feasible and responsible manner.

The Alabama Port Authority is the 10th largest full-service seaport in the United States, is responsible for 134,608 direct and indirect jobs in the state, and is one of the state's largest economic engines with an estimated \$22.4 billion economic impact. This project will create jobs, spur investment, and greatly enhance the ability of goods and commerce to flow through our port infrastructure, further improving the overall quality of life for those living throughout our region.

Over the years, Alabama's port has experienced substantial growth and dramatic increases in traffic and the existing dimensions of this channel place constraints on deeper drafting containerships and coal carriers, which result in reduced efficiency and increased costs. Expanding the Mobile channel is vital to maintaining port growth and accommodating post-Panamax vessels to meet the needs of our ever-changing global marketplace and the bulk carriers on which our energy industry heavily relies.

We believe the report was carefully and objectively performed and properly finds that this project can be accomplished. Deepening the channel by 5 feet to a depth of 50 feet and widening the channel for 3 nautical miles to allow for two-way traffic, is an excellent economic development opportunity for our state.

We are happy to support this report and project and look forward to working together to make it a reality.

Sincerely,

A handwritten signature in black ink that reads "E. Blake Hale Hardwich". The signature is written in a cursive style with a large initial "E".

Blake Hale Hardwich
Executive Director
Energy Institute of Alabama

Comment 221

From: [Blake Hale Hardwich](#)
To: [Mobile Harbor GRR](#)
Subject: [Non-DoD Source] CARIA Comments RE: Mobile deepening and widening environmental impact study
Date: Monday, September 10, 2018 3:29:02 PM
Attachments: [CARIA Comments re channel widening.pdf](#)

To whom it may concern:

Please find attached comments regarding the Mobile deepening and widening environmental impact study. Should you have any questions, please do not hesitate to contact me.

Thank you for your attention to this matter.

Sincerely,

Blake Hardwich

Blake Hale Hardwich

Executive Director

Coosa-Alabama River Improvement Association

Blockedwww.caria.org

770 Washington Ave., Suite 150

Montgomery, Alabama 36104

PO Box 388

Montgomery, Alabama 36101-0388

Blake Hale Hardwich
Special Counsel

<Blockedhttp://www.adamsandree.com>
1901 6th Avenue North, Suite 3000 | Birmingham, AL 35203
main 205.250.5000 | direct 205.250.5060 | mobile 334.235.1718
efax 205.488.8060 | fax 205.250.5034

770 Washington Avenue, Suite 150 | Montgomery, AL 36104

main 334.593.5560 | direct 334.593.3383

20 F Street, Suite 500 | Washington, DC 20002

main 202.737.3234 | fax 202.737.0264

blake.hardwich@arlaw.com <<mailto:blake.hardwich@arlaw.com>>

website <Blocked<http://www.adamsandree.com>> bio <Blocked<https://www.adamsandree.com/people/blake-hardwich>> vCard <Blocked<https://www.adamsandree.com/api/vcard/5a845f43901881002908cd35>> map

<Blocked<https://maps.google.com/maps/ms?msid=209405153191775749781.0004ca1332d970af45320&msa=0>>

<Blocked<http://www.linkedin.com/company/adams-and-reese-llp>> <Blocked<http://twitter.com/adamsandree>>

<Blocked<http://www.facebook.com/adamsandree>>

--



Coosa-Alabama River
Improvement
Association, Inc.

Over 125 years of service to State and Nation

770 Washington Avenue, Suite 150
Montgomery, AL 36104
PO Box 388
Montgomery, AL 36101-0388
(334) 265-5744
Email: info@caria.org
Website: www.caria.org

September 10, 2018

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

OFFICERS

Allen Henry
Chairman
Spanish Fort, Alabama

Greg Norris
Vice-Chairman - Alabama
Monroeville, Alabama

Charles Stover
Secretary-Treasurer
Montgomery, Alabama

ADMINISTRATION

Blake Hale Hardwich
Executive Director

Re: Draft General Evaluation Report and Supplemental Environmental Impact Statement (GRR/SEIS)

Dear Colonel Joly:

On behalf of the Coosa-Alabama River Improvement Association (CARIA), I am writing to express our strong support for the U.S. Army Corps of Engineers' Draft GRR/SEIS and the proposed widening and deepening of the Mobile channel. As an economic development organization that seeks to promote the multipurpose use of our waterways while at the same time preserving and protecting the ecological health of our river basins, CARIA firmly agrees with the report's findings that this project can be accomplished in an economically and environmentally feasible and responsible manner while at the same time supporting our state's and the federal government's overarching policy goal of enhancing economic competitiveness.

As evidenced by this letter, we are committed to the robust, long-term economic success of our state and recognize that this critical project not only significantly improves the movement of goods and commerce through our port, but also leverages the more than \$1 billion that has been invested in inshore waterways infrastructure which has greatly enhanced the condition and reliability of the same.

The proposed widening and deepening of the Mobile channel will create jobs, spur investment, and improve the overall quality of life for those living and working in and around our inland waterways, the critical commercial water corridors of our state. Without this project, trade, commerce, residents, and entire communities throughout the state will be at an economic disadvantage.

Additionally, a deeper and wider channel will allow the port to accommodate much larger ships helping to alleviate transportation delays and inefficiencies due to such limiting factors, which tend to have a cascading effect impacting our inland waterways and shoreside infrastructure. By reducing transportation costs and congestion and facilitating a more efficient future fleet mix, this project will create jobs and increase economic competitiveness, two of the primary goals of our organization.

Therefore, we are happy to support this project and the Corps' Draft GRR/SEIS, and look forward to working together to make this effort a reality.

Sincerely,

A handwritten signature in black ink that reads "E. Blake Hale Hardwich". The signature is written in a cursive style with a large initial "E".

Blake Hale Hardwich
Executive Director
Coosa-Alabama River Improvement Association

Comment 222

From: [REDACTED]
To: [Mobile Harbor GRR](#)
Subject: [Non-DoD Source] att: COL Sebastian P. Joly
Date: Monday, September 10, 2018 3:27:07 PM

COL Sebastian P. Joly

District Commander,

U.S. Army Corps of Engineers

Mobile District

Dear Sir;

As a resident of Dauphin Island for the past quarter of a century I have deep concerns about the proposed deepening and widening project for the Port of the City of Mobile.

In every other area of the country this type of project has been accompanied by a substantial mitigation project. Why should the Corps consider such a project to be any less important to Dauphin Island and the surrounding area? The report indicates a significant cost-to-benefit ratio, yet it appears that none of the monies will go toward such a mitigation project. There is a great deal at stake to our environment and way of life that the Corps fails to take into consideration or gloss over because it does not seem to mesh with its own plans.

I have personally watched the oyster population (and the industry itself) become almost decimated and as you are aware, oysters are a major indicator of our marine environment's health. I have personally raised thousands of spats in an effort to reseed the waters. I do not believe the effects of further dredging and sand placement on marine life in Mobile Bay has been adequately studied.

Early studies have left Dauphin Island out completely when it came to studying the Erosion Impact of further dredging. For years islanders have fought the Corps and tried to prove how the dredging practices were detrimental to our beaches. Yet the erosion continued and we were ignored.

A broken promise: As a result of a lawsuit settled in 2009, the Corps promised to place dredged sand in such a position that Dauphin Island would be nourished. The placement did not prove to have the intended results and despite the Corps' early knowledge of this fact, nothing was done to attempt a correction of the promised action.

It appears that the Corps has a pattern and practice of either ignoring, denying or totally dismissing the claims of those of us who have watched the results of dredging practices which have proved detrimental to the island. I have watched District Commanders come and go and with them any hope of the promises they made during their brief tenure.

There are others much more knowledgeable about the scientific facts regarding the studies and reports periodically spewed forth to try to appease residents as to the transparency of the Corps in language designed to inform only those with lofty degrees in those subject areas. Despite my extensive higher education in other fields, I find many of the Corps' reports difficult to comprehend. In my personal effort to have the general public understand the information I am disseminating in seminars, I break the information down to an appropriate level of my audiences' understanding. It would be appreciated if the Corps would do the same.

Please, do not ignore our island once again. Be the Commander who actually listens.

Thank you for your time,



Comment 223

From: [Julie C Alsup](#)
To: [Mobile Harbor GRR](#)
Cc: [Marlon Jones](#)
Subject: [Non-DoD Source] Comments re: Mobile Harbor project
Date: Monday, September 10, 2018 3:14:05 PM
Attachments: [International Paper Mobile Harbor Support Letter 9 10 18.pdf](#)

Please see the attached International Paper comments regarding the Mobile Harbor project. Specifically: Mobile Harbor, Mobile, Alabama Draft Integrated General Reevaluation Report with Supplemental EIS Number 20180168.

Thanks,

Julie

Julie Alsup | Government Relations Manager | International Paper

1101 Pennsylvania Avenue, NW, Suite 200 | Washington, DC 20004 | 202-628-7252 | ipgovernmentrelations.com

The first part of the paper discusses the general theory of the firm, focusing on the role of capital structure and the trade-off between debt and equity. It examines how the firm's investment opportunities and growth prospects influence its financing decisions. The second part of the paper provides empirical evidence on the relationship between capital structure and firm performance, using data from a large sample of firms. The third part of the paper discusses the implications of the findings for policy and practice, and offers some suggestions for further research.

Variable	Mean	Standard Deviation	Minimum	Maximum
Debt to Capitalization Ratio	0.35	0.15	0.00	0.80
Return to Assets	0.12	0.03	0.00	0.25
Market-to-Book Ratio	1.50	0.50	0.50	3.00
Size (Log of Sales)	10.50	1.50	7.00	14.00
Age (Years)	15.00	5.00	1.00	30.00
Industry				
Manufacturing	0.40	0.40	0.00	1.00
Retail	0.20	0.40	0.00	1.00
Healthcare	0.10	0.30	0.00	1.00
Technology	0.15	0.35	0.00	1.00
Other	0.15	0.35	0.00	1.00

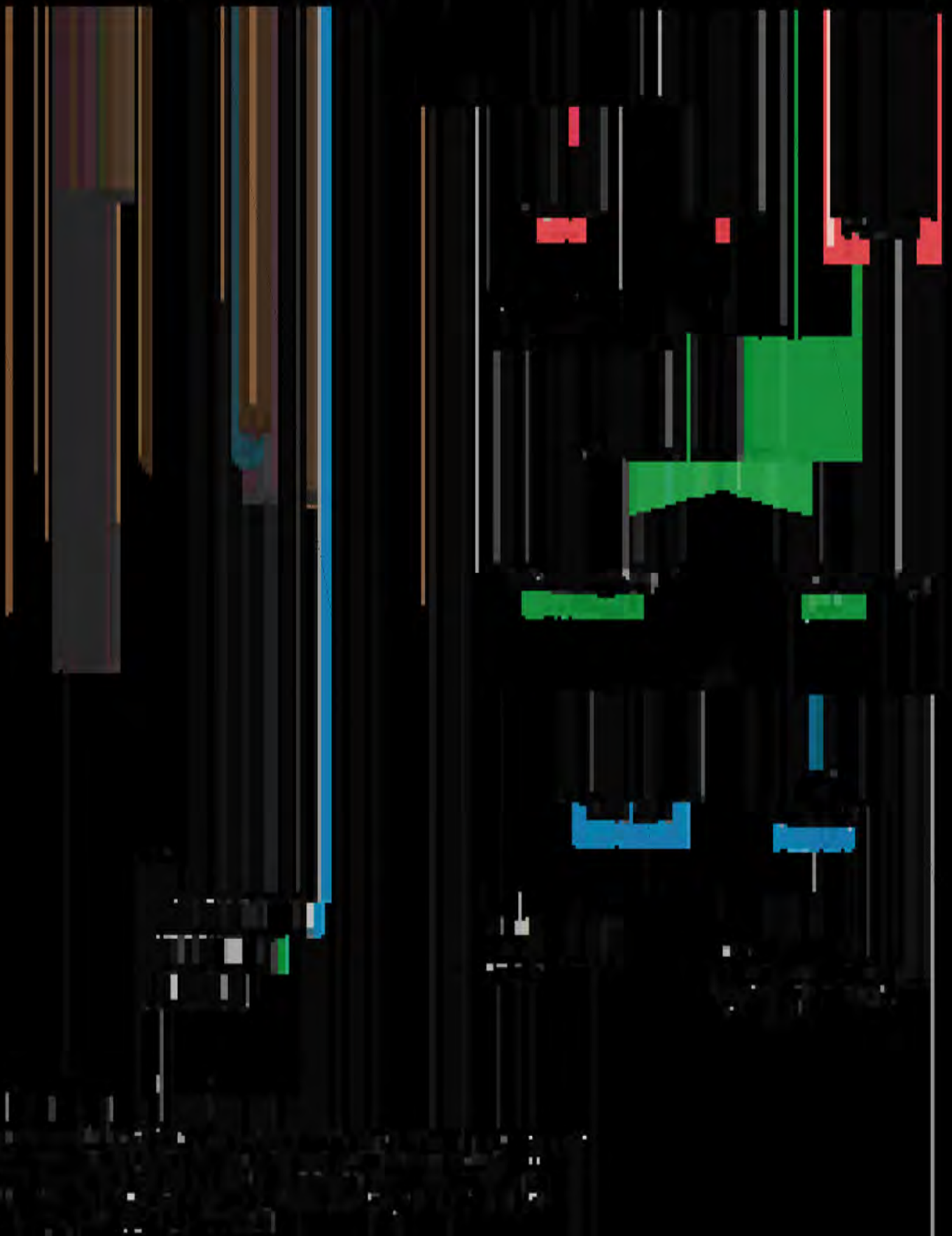


Figure 1. Schematic diagram of the mechanical assembly.



The figure is a 3D bar chart showing the distribution of the number of employees across the number of companies for three categories: All companies, Small companies, and Large companies. The x-axis represents the number of employees (1 to 100), the y-axis represents the number of companies (0 to 100), and the z-axis represents the number of employees (1 to 100). The chart shows that for All companies, the distribution is relatively uniform across the range of employee counts. For Small companies, the distribution is heavily skewed towards lower employee counts, with a peak at 1 employee. For Large companies, the distribution is heavily skewed towards higher employee counts, with a peak at 100 employees.

Comment 224

From: pattiorourke@gulftradingllc.com
To: [Mobile Harbor GRR](#)
Cc: [John Stimpson](#)
Subject: [Non-DoD Source] Deepening of Channel Ltr
Date: Monday, September 10, 2018 2:59:50 PM
Attachments: [Deepening of Channel Ltr.pdf](#)

Ms. Jacobsen,

Please find attached a letter in support of deepening the channel.

Thanks,

Patti

Patti O'Rourke

Gulf Trading, LLC

P.O. Box 305

Mobile, AL 36601

d. 251.281.1980

f. 251.281.1988

pattiorourke@gulftradingllc.com <Blocked<http://www.gulftradingllc.com/>>

Blockedwww.gulftradingllc.com <Blocked<http://www.gulftradingllc.com/>>



SOUTHERN INTERMODAL XPRESS, LLC

IMPORT / EXPORT CONTAINER SPECIALIST – SERVING THE SOUTHEAST

Post Office Box 929 • Mobile, Alabama 36601

September 10, 2018

Ms. Jennifer L. Jacobsen
U.S. Army Corps of Engineers, Mobile District
PO Box 2288
Mobile, AL 36628-0001
Email: MobileHarborGRR@usace.army.mil

To whom it May Concern:


I would like to write and express my support for the deepening of the ship channel.

I own and operate Southern Intermodal Xpress employing 200 in the mobile community.

Our operations rely on the container terminal as our revenue is 100% dependent on container traffic at APM Terminals. We are a local dray carrier running 160 trucks in the local market.

The deepening of the channel will allow us to continue growing and increase employment. This project is crucial for the continued success of the container terminal. It will allow us to compete with East Coast and other Gulf Coast ports.

Thank you again,



John Stimpson

Comment 225

From: [Mitch Mays](#)
To: [Mobile Harbor GRR](#)
Subject: [Non-DoD Source] TENN TOM WATERWAY DEVELOPMENT COUNCIL SUPPORT OF PORT OF MOBILE
Date: Monday, September 10, 2018 11:31:34 AM
Attachments: [TTWDC Support of Port of Mobile 2018.pdf](#)
[20018 001 Resolution to Support Port of Mobile Channel Harbor Improvements.pdf](#)

Dear Ms. Jacobson,

Please find attached a letter of support and a resolution of support for the proposed Port of Mobile improvements to their channel and harbor. Please let me know should you have any questions.

Mitch

Mitch Mays, Administrator

Tennessee-Tombigbee Waterway Development Authority

Post Office Drawer 671

318A Seventh Street North

Columbus, MS 39703

office (662) 328-3286 mobile (256) 577-8999

mays@tenntom.org

Blockedwww.tenntom.org



Tennessee-Tombigbee Waterway Development Council

August 21, 2018

Ms. Jennifer L. Jacobson
U.S. Army Corps of Engineers, Mobile District
P.O. Box 2288
Mobile, AL 36628-0001

Dear Ms. Jacobson,

The Tennessee-Tombigbee Waterway Development Council (the Council) strongly supports the proposed improvements to the harbor and channel of the Port of Mobile. The proposed improvements will enhance the economic benefits to the Port of Mobile and the Tennessee-Tombigbee Waterway in addition to increasing commerce. This project has the potential to generate new capital investment and job creation in the states of Alabama, Kentucky, Mississippi, and Tennessee, where the majority of members of the Tennessee-Tombigbee Waterway Development Council reside.

The Tennessee-Tombigbee Waterway Development Council was established in 1984 by resolution of the Tennessee-Tombigbee Waterway Development Authority, a four-state compact composed of the states of Alabama, Mississippi, Tennessee, and Kentucky and authorized by the U.S. Congress. The Council advises the governors of the states of Alabama, Kentucky, Mississippi, and Tennessee and serves as a liaison between the Tenn-Tom Waterway commercial users and federal and state agencies. The Council is a private non-profit organization with more than 200 dues paying members in 12 states and is composed of representatives of the private sector, states, counties, and local governments as well as other waterway related interests. In particular, the Council represents commercial users in the operation and maintenance of the Tenn-Tom Waterway and its potential impacts on their interests. The economic interests of our members are far ranging, including economic development, recreation, tourism, and trade.

Sincerely,

A handwritten signature in blue ink that reads "Mitchell B. Mays". The signature is written in a cursive style.

Mitchell B. Mays
President

Comment 226

From: [Walter Verneuille](#)
To: [Mobile Harbor GRR](#)
Subject: [Non-DoD Source] Mobile Harbor Project
Date: Monday, September 10, 2018 9:19:30 AM

Ms. Jennifer L. Jacobsen,

On behalf of our management team here at Bayou Concrete, LLC we herewith endorse the proposed project for the deepening and widening of the Mobile ship channel.

Bayou Concrete has been providing ready mix concrete on the Alabama and Mississippi Gulf Coast since 1980.

We have recently seen some tremendous industrial and commercial growth from some global companies, providing excellent employment and economic impacts from their locating in our region.

We feel confident from the feedback we hear, that these global companies are and will continue to spur more industry and commercial expansion given all the transportation resources our area has to offer.

On behalf of Bayou Concrete we endorse the project and solicit your consideration in approving this channel improvement expansion.

Best Regards,

Walter D. Verneuille

Email: wverneuille@bayouconcretellc.com

Bayou Concrete LLC

Comment 227

From: [REDACTED]
To: [Mobile Harbor GRR](#)
Cc: lackson@mobilebaykeeper.org
Subject: [Non-DoD Source] Serious concerns related to proposed deepening and widening of Mobile ship channel.
Date: Sunday, September 9, 2018 3:03:32 PM

To the USACOE, Mobile

Submitted during the open comment period on the proposal to deepen and widen the Mobile ship channel.

Dear Sir/Ms:

As a lifelong resident of Mobile and as a member of a family with waterfront property at Point Clear, Alabama for over 100 years, I have familiarity with Mobile Bay and sand migration and shore erosion.

I am extremely concerned that the proposed project would result in larger ships with larger wakes and heavier pounding of our shorelines resulting in even more erosion.

Our property's shoreline has eroded at least 50 feet in the past 35 years. (Data verifiable with coastal engineer reports, surveys, etc.)

The sand you intend to remove both on the initial work and the required periodic maintenance arrived into the ship channel area by migrating around the bay. If you continually remove sand from the channel without returning some to the eroding shorelines, those very shorelines will hasten to erode, damaging property values, making homes more susceptible to storm damage, etc.

You state that "more" ships will not come, but just "larger" ships. I challenge you to support that theory, and I suspect BOTH "more AND larger" ships will eventually come further eroding our shorelines and nearby wetlands.

Possible solutions? A MANDATORY speed reduction of ALL ships in the channel to prevent large wake shoreline erosion.

Also, relocate dredged sand to areas showing shoreline erosion. For example, the eastern shore at Zundel's wharf and northward. Also offer some to the municipalities of Fairhope and Daphne for public beach replenishment as needed.


I will attend the public forum this Tuesday, and look forward to receiving feedback from you on these issues.

Thank you.

[REDACTED]

Sent from my iPad

Comment 228

From: 
To: [Mobile Harbor GRR](#)
Subject: [Non-DoD Source] Mobile Bay deepening and expansion
Date: Saturday, September 8, 2018 7:01:05 PM

Col Sebastian Joly,

I am a landowner on Dauphin Island concerned about the ongoing problems with erosion and the obvious effects of the channel dredge. I understand that this channel will be widened and that citizens while given a voice at the meetings really hold no power in changing the minds or policies of the Army Corp of Engineers. I get that. However as interested owner I have hope that the Corp will do what is right by the Island and it's neighbors.

Multiple studies have been conducted over the years and solutions have varied but ultimately it has been proven that the ship channel has negative effects on the beaches, sand movement, etc. Millions have been spent on these studies and yet at this late date no resolution that is satisfactory to all parties has been found. May I suggest that the Corp admits that the islands health and the first line of hurricane defense for Mobile Alabama remains a priority as well as commerce into the Port. These two concerns do not necessarily have to be in conflict. Has any thought been given to an additional nominal tonnage fee for all channel traffic which will be used on an ongoing basis for a beach replenishment program? Such a program would go a long way towards a feeling that the Corp cares about it's pronounced effects to the island and cares about the impact to the citizens. While this service may not fall under the Corps ability to administer surely some agency can do this simple transaction.

The hope of course is and always has been that the Corp would do what is right by all concerned be it proper sand relocations which will naturally nourish the beaches, or provide assistance in a program of continued beach enrichment. Please don't just dredge and leave us hanging. That has always lead to legal action, which has always been absolutely futile for all concerned. I ask you to please consider doing what is right by all parties. A King Solomon approach is needed.

Thank you,



Comment 229

From: [REDACTED]
To: [Mobile Harbor GRR](#)
Cc: [REDACTED]@comcast.net; [REDACTED]; [REDACTED]@ellsouth.net
Subject: [Non-DoD Source] TSP Proposal
Date: Saturday, September 8, 2018 11:40:23 AM

As an owner of two properties on the east end on Dauphin Island, I am desperately appealing to your logic, to reconsider the TSP Plan. It has been proven that such actions can and will cause further erosion on Dauphin Island, especially the east end. The oyster industry will also suffer possible irreparable damage. No one really knows the effects that the disposal of dredged material will have on the other sea life but the prospect is not good.

I'm sure that you have gotten far more detailed and fact proving requests, but I am not an engineer or anyone who understands the reasons for the effect of this proposal. I am simply a property owner who in watching our island disappear! The effect of this erosion on the city of Mobile can also not be underestimated as we serve as a barrier island that serves to greatly protect the city.

I am not going to continue, or make this a lengthy appeal, in the hopes that it will actually be read! I know that there must be some rationale for the project, but I strongly believe the effects will only serve to cause many more problems for us and you than you are anticipating.

Thank you for your time and consideration,

[REDACTED]
Sent from my iPhone

Comment 230

From: [Warren, Carl](#)
To: [Mobile Harbor GRR](#)
Subject: [Non-DoD Source] Mobile Harbor Deepening Comments - CSX
Date: Friday, September 7, 2018 3:24:13 PM
Attachments: [V9225scan084609.pdf](#)

Dear Ms. Jacobsen:

CSX Transportation is pleased to have the opportunity to comment on the General Reevaluation Report (GRR) and the Supplemental Environmental Impact Statement concerning Mobile Harbor. Our comments are attached to this email in a .pdf file containing our letter.

Please do not hesitate to contact me if you have any questions.

Thanks!

Carl Warren

Carl Warren

CSX Transportation

Director Port Development

500 Water Street, J-915

Jacksonville, Florida 32202

Carl_Warren@csx.com <mailto:Carl_Warren@csx.com>

(904) 359-1148

This email transmission and any accompanying attachments may contain CSX privileged and confidential information intended only for the use of the intended addressee. Any dissemination, distribution, copying or action taken in reliance on the contents of this email by anyone other than the intended recipient is strictly prohibited. If you have received this email in error please immediately delete it and notify sender at the above CSX email address. Sender and CSX accept no liability for any damage caused directly or indirectly by receipt of this email.



CSX Transportation, Inc.
500 Water Street, J 915
12th Floor
Jacksonville, Florida 32202
Telephone 904-359-1148
Carl_Warren@csx.com

CARL WARREN
Director Port Development

September 7, 2018

Ms. Jennifer L. Jacobsen
U.S. Army Corps of Engineers, Mobile District
PO Box 2288
Mobile, AL 36628-0001

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

Dear Ms. Jacobsen:

CSX Transportation, Inc. ("CSXT") appreciates the opportunity to comment on the GRR and Supplemental Environmental Impact Statement concerning Mobile Harbor. CSXT provides an important link to the global supply chain with its 21,000 route mile rail network. CSXT serves Mobile, and its rail transportation product meets the needs of manufacturers, industrial producers, the automotive industry, construction companies, farmers and feed mills, wholesalers, retailers, and energy producers.

Because CSXT has a diverse customer base and international connectivity, the company is acutely aware of the vital importance of dredging to support efficient handling of the larger vessels now common in bulk and container shipping.

CSXT notes the following specific benefits to the project:

1. Based on the existing traffic and the delays caused by one way traffic when wide beam or passenger carrying ships are moving, the widening of a 3 mile segment from the current 400' width to 500' will allow ships to pass each other and reduce the delays of arrival and sailing significantly. Enhancements to safety and efficiency associated with a wider channel will also improve the ability of the port and its service providers to meet the growing needs of port customers.

2. The deepening of the channel from the sea buoy in the Gulf to the Mobile Container Terminal will allow additional tonnage to move via the McDuffie Coal Terminal and the Mobile Container Terminal. The added tonnage per vessel will result in economies of scale, enhancing port competitiveness. Larger container ships mean more available slots for Mobile containers as well as added empty containers for increased export shipments, creating opportunities for local businesses.
3. Increasing the size of the Choctaw Pass Turning Basin will allow the larger vessels to turn.

Thank you for the opportunity to comment in this important matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Carl Warren", followed by a long horizontal line extending to the right.

Carl Warren
Director Port Development
CSX Transportation

Comment 231

From: [REDACTED]
To: [Mobile Harbor GRR](#)
Subject: [Non-DoD Source] Mobile Harbor GRR Supplemental Environmental Impact Study
Date: Friday, September 7, 2018 2:41:04 PM

Good day Ms. Jacobsen,

The State of Alabama has experienced tremendous growth in the last several years. This is especially true in the automotive and aerospace industry. A key component to our growth has been the port.

I feel that a need for the widening of a 3 mile segment of the current channel of 400 feet to 500 feet and deepening of the channel from the sea buoy to The Mobile Container Terminal from the current 45 feet to 50 feet, will benefit all parties involved in the maritime industry and the state as a whole.

Please keep in mind that the post panamax vessels are larger and deeper now which means that they will require wider and deeper channels. If we do not keep up with the growing trend of the larger and deeper draft vessels, we will fall behind the commercial requirements of the maritime industry and the industries it serves.

In view of the above, I ask for your support for the widening of the channel for the "3 mile passing lane", the deepening of the channel to 50 feet as well increasing the size of the Choctaw Pass Turning Basin in order to allow the Port to continue to grow and stay competitive with the other ports in the US Gulf and East Coast.

Best Regards,

[REDACTED]

Comment 232

From: [Mitch Mays](#)
To: [Mobile Harbor GRR](#)
Subject: [Non-DoD Source] TENNESSEE-TOMBIGBEE WATERWAY DEVELOPMENT AUTHORITY
Date: Friday, September 7, 2018 2:24:29 PM
Attachments: [TTWDA Port of Mobile Support.pdf](#)
[Port of Mobile Channel Harbor Improvements.pdf](#)

Dear Ms. Jacobson,

Please find attached documents stating the Tennessee-Tombigbee Waterway Development Authority's support of the proposed improvements to the Port of Mobile Harbor and channel. Should you have any questions, please feel free to contact me. My contact information is below.

Thank you.

Mitch

Mitch Mays, Administrator

Tennessee-Tombigbee Waterway Development Authority

Post Office Drawer 671

318A Seventh Street North

Columbus, MS 39703

office (662) 328-3286 mobile (256) 577-8999

mays@tenntom.org

Blockedwww.tenntom.org



August 21, 2018

Administrator

Mr. Mitchell Mays

Chairman

Gov. Phil Bryant, Mississippi

Vice Chairman

Mr. Dale Pierce, Mississippi

Treasurer

Mr. T. L. Phillips, Mississippi

MEMBERS

State of Alabama

Governor Kay Ivy

Alternate: Mr. Ross Gunnells

Mr. Horace Horn

Mr. James Lewis

Mrs. Anna Laurie McKibbens

Mrs. Martha Stokes

Mr. Donald G. Waldon

State of Kentucky

Governor Matt Bevin

Alternate:

Lt. Gov. Jenean Hampton

Alternate: Rep. Kenny Imes

Mr. Brian Roy

Mrs. Carol Gault

Mr. Romey Holmes

Mr. Jerry Pace

State of Mississippi

Governor Phil Bryant

Alternate: Mr. Bobby Harper

Mr. Nick P. Ardillo, Jr.

Mr. Bill Cleveland

Mr. T. L. "Bud" Phillips

Mr. Dale Pierce

Mrs. Martha Segars

State of Tennessee

Governor Bill Haslam

Alternate: Mr. Jason Rich

Mr. John Bennett

Mrs. Cathy Holland

Mrs. Marty Mabry

Mr. Toks Omishakin

Mrs. Paula Sedgwick

Business Manager

Agnes Zaiontz

Colonel Sebastien P. Joly
Commander, Mobile District
U.S. Army Corps of Engineers
109 Saint Joseph St
Mobile, AL 36602-3630

Dear Colonel Joly,

The Tennessee-Tombigbee Waterway Development Authority strongly supports the proposed improvements to the harbor and channel of the Port of Mobile. The proposed improvements will enhance the economic benefits to the Port of Mobile and the Tennessee-Tombigbee Waterway in addition to increasing commerce. This project has the potential to generate new capital investment and job creation in the member states of the Tennessee-Tombigbee Waterway Development Authority.

The Authority is a four-state compact composed of the states of Alabama, Mississippi, Tennessee, and Kentucky and was authorized by the U.S. Congress in 1958 as an interstate compact. The Tennessee-Tombigbee Waterway Development Authority promotes the development of the Tenn-Tom Waterway and its economic and trade potential and serves as the central repository for data and research relating to all aspects of the Tenn-Tom Waterway. The Tennessee-Tombigbee Waterway Development Authority is the regional sponsor of the Tenn-Tom Waterway and addresses both growth opportunities as well as potential impediments to the waterway's public benefits. Funded solely by appropriations from the member states, membership is limited to the four governors and five gubernatorial appointees from each state.

Sincerely,

A handwritten signature in blue ink that reads "Mitchell B. Mays".

Mitchell B. Mays
Administrator

2018-001

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

By the

Tennessee-Tombigbee Waterway Development Authority

WHEREAS, the Tennessee-Tombigbee Waterway Development Authority is a four-state compact comprised of the States of Alabama, Kentucky, Mississippi, and Tennessee and ratified by the United States Congress; and

WHEREAS, the Tennessee-Tombigbee Waterway Development Authority is the sponsor of the Tennessee-Tombigbee Waterway, which provides a connecting navigable link between the Tennessee River and the Warrior-Tombigbee River system; and

WHEREAS, the Tennessee-Tombigbee Waterway provides the Port of Mobile access to over 4,500 miles of inland navigable waterways that serves twenty-three (23) states of the United States of America; and

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

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

WHEREAS, improving the channel and harbor of the Port of Mobile would benefit the compact states of the Tennessee-Tombigbee Waterway Development Authority and have the potential to enhance the economic benefits of the Tennessee-Tombigbee Waterway and increase its commerce; and

WHEREAS, the Port of Mobile is an invaluable asset to the compact states of the Tennessee-Tombigbee Waterway Development Authority; Now, therefore

BE IT RESOLVED, that the Tennessee-Tombigbee Waterway Development Authority strongly supports improvements to the channel and harbor of the Port of Mobile; and

BE IT FURTHER RESOLVED, that the Tennessee-Tombigbee Waterway Development Authority encourages the United States Army Corps of Engineers to favorably complete the study of improving the channel and harbor for the Port of Mobile and then execute said study; and

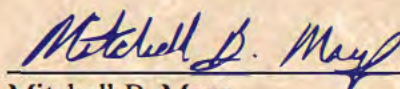
BE IT FURTHER RESOLVED, that a copy of this resolution be spread upon the minutes of the Tennessee-Tombigbee Waterway Development Authority; and

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

IN WITNESS THEREOF, the Tennessee-Tombigbee Waterway Development Authority has instructed us to affix our signatures to this resolution on the 21st day of August, 2018.



R. Dale Pierce
Vice Chairman



Mitchell B. Mays
Administrator



From: [REDACTED]
To: [Mobile Harbor GRR](#)
Subject: [Non-DoD Source] Dauphin Island, Mobile Ship Channel, and dredging by The Corps
Date: Friday, September 7, 2018 12:04:32 PM

Dear Colonel Joly,

My name is [REDACTED]

I first came to Dauphin Island during a family summer vacation in the late 1960's, and was so enamored of the island that I returned after high school graduation for the next seven summers. I worked my way through college thanks to the Dauphin Island Park and Beach Board. When I eventually decided that another summer spent on the island would not further my education but would merely be repeating lessons I'd already learned, I bought a parcel of land ensuring that I would someday return to this undiscovered paradise. That was 1977.

I returned to live on Dauphin Island 20 years later, and have lived on the island or in Mobile to the present day.

I spent a summer on the extreme east end of Dauphin Island living in the vacant storefront that remained there until a hurricane wiped it off the island in the 1980's. I spent a summer renovating the museum in Fort Gaines. I spent many summers running the concession stand on the still extant wooden pier—when it still had water beneath it. I was there when the state elected to drop “rip rap” around the pier to keep the storms from orphaning the pier from the island itself, as each new storm changed the shoreline and the pier was in danger of becoming marooned in the gulf with no functioning walkway to dry land.

I was there when the island was cut in half by Katrina. I was one of the islanders who had lobbied locally to prevent development on the extreme west end of the island for just that reason.

And I was there when the rip rap did its own part to reform Dauphin Island: to land lock the pier, to maroon Sand Island Lighthouse, to append Sand Island itself to Dauphin Island as easily as a child might kick a block down the sidewalk. I understand the power of man and how it stands against the power of nature. I have built my sand castles and have seen them wash away.

The island's history is part of my own history. I have grown from a young man into an almost-old man in the shadow of Dauphin Island, and I have learned that to fall in love with this island is to guarantee heartbreak. I have watched nature take its pieces of Dauphin Island away every fall. I have watched gulf beaches grow fatter both to the east (Gulf Shores) and the west (Biloxi) of Dauphin Island with each passing summer. It doesn't take a genius to realize something is amiss.

Any child building a sand castle will come to understand first-hand what happens when sand and waves interact. Natural movement of sand is, well, just that: natural. As natural as waves. What we all, those of us who call Dauphin Island home, came to realize as soon as we made any kind of investment in Dauphin Island is that we must also cope with an unnatural force, one the rest of the barrier islands, the whole gulf coast, doesn't have to cope with: we must cope with the dredging practices of the Corps of Engineers, who are in charge of keeping the ship channel to the mighty economic engine that is Mobile Bay, clear. The Corps has the job of overseeing the maintenance of the man-made canal that makes a shipping port possible. Really big ships come into the bay to dump off goods. Those really big ships need really deep water. Machines can create that really deep water in much the same way children scoop out a moat around their sand castle.

No one, I hope, pretends that this scooping out is a natural occurrence. Man intervenes in the pattern of nature in all kinds of ways, and dredging is merely one of them. In this particular case, the dredging of this particular canal does not take place in a closed loop. The sand that replenishes Dauphin Island, that helped form it in the beginning, is the same sand that falls into the canal. And it's the same sand that should be allowed to replenish Dauphin Island, but for some reason beyond mortal understanding, is now dumped outside the natural nourishing patterns of gulf coast currents. As the channel remains deep, Dauphin Island grows skinnier and skinnier.

You've been deluged with studies showing how your dredging practices are harming the island's renourishment. There's striations of politics, science, economics, and malignant design running through the saga like crude oil on a beach to the point that it's hard to separate truth and fiction. The economics run deep. The politics run deep. The motivations of the science used to determine Corps policy run deep. Yet at the end of the day Colonel Joly, the truth of the evidence is as plain to see as are the oil striations coursing through the white sand. Dauphin Island is suffering from the dredging practices of maintaining the ship channel. It always has. And now legislation is in front of you to right this wrong.

No one wants to see Mobile suffer economically. To pit the existence of the island against the success of Mobile Bay's shipping operations is not a battle we should ever engage in. What we want is to see Dauphin Island get the chance God and nature have intended without the interference of the giant metal hand of the Corps scooping into the sand castle and disrupting it on a constant basis.

I implore you to be fair and open with your consideration of the larger playing field you operate in. The ecological health of Dauphin Island isn't about politics or economics. The world will be here long after your plans and your name and our great great grandchildren are forever washed away. Leave the untoward, narrow and selfish interests out of your considerations and do your duty as a good steward of this earth: To the best of your ability Colonel Joly, help to design and implement a plan that will leave the place the way we found it, and let the larger playing field of natural history determine Dauphin Island's fate. The Corps of Engineers' Mobile Bay dredging plan has harmed Dauphin Island sand replenishment as long as I have been alive. Be the instrument for change, and create a solution that will take the natural gift of Dauphin Island into consideration. Your own great great great grandchildren will be the better humans for it, and in the big picture, your own take will also be that much larger. A solo walk on the beach will confirm everything I have said here.

Colonel, you have a hard job in front of you, and I don't minimize your obligations or the courage it takes to do the right thing. Not for a moment.

I wish you the benefit of real wisdom in making your decisions, and would be honored to help in any way I can. All you have to do is ask.

Kind regards,



From: [Tom Adger](#)
To: [Mobile Harbor GRR](#)
Cc: [Charles Boswell](#); [Charles Boswell](#); [Logan Boswell](#)
Subject: [Non-DoD Source] Mobile Harbor Project
Date: Friday, September 7, 2018 10:32:19 AM

Dear Ms. Jacobsen:

On behalf of our company, I am writing in reference to the US Army Corps of Engineers link involving the General Reevaluation Report (GRR) and the Supplemental Environmental Impact Statement, as printed documents published in the Federal Register, dated Friday, July 27th, and our response in support of recommendations to this study involving widening/dredging of the Mobile Ship Channel and Choctaw Pass Turning Basin as part of the Mobile Harbor Project.

Specifically, we represent, as owners, Tri State Maritime Services, Inc. and Alabama Steel Terminals, LLC, both privately owned port service entities. Tri State Maritime Services, Inc. (TSMS) a stevedore/terminal handling operator established in 1994, serves the ports of Mobile, Alabama, Panama City, Florida and Pascagoula, Mississippi. TSMS performs handling of various general cargo commodities, bulk grain, as well as, handling of sea going containers to include warehouse services for stuffing and unstuffing of these container units.

Alabama Steel Terminals, LLC (TSMS as partner), is a steel coil terminal facility, located in Mobile, Alabama serving ocean carriers, and wide array of steel customers providing throughput handling of the import/export steel coil trade. Alabama Steel Terminals, LLC inception of service operation began January , 2015.

As an vested company in the port industry, particularly as per determining main factors involving the GRR and Mobile Harbor, we fully support efforts concerning this study and the improvements of this harbor project for the following reasons.

* Based on existing traffic and the delays caused by one way transit of wide beam vessels due to channel restrictions and limitations impacts our company by delaying vessels to the pier, causing such operating cost to increase and impacting shippers with overtime costs, and inefficiencies of scheduling due to pier congestion and handling of cargoes. It is our understanding that a 3 mile segment of channel is proposed from the current 400' width to 500' will allow certain vessels to pass each other, thus reducing the delay of vessel arrivals and sailings. All the while, creating safe passage of all vessel types, including barge traffic, and assuring operating efficiencies for all port users and their growing needs for handling various types of cargo and anticipated tonnage.

* Deepening of the Mobile Ship Channel from Gulf sea bouy to McDuffie Coal Terminal, Mobile Container Terminal and Pinto Terminal will enhance additional tonnage of cargo through the port impacting economy of scale as well as, providing shippers cheaper freight rates. Such impact of competitive rates (as example) will allow larger container vessels to serve Mobile Container Terminal, thus providing additional container units and thereby, increasing volumes of units handled for the import/export markets. This increase of container units will enhance revenues for industry business and transportation services for various services required in this market and specific needs. Additional impact of creating job employment, equipment and additional investment of these businesses will benefit for serving this expanded market.

* Increasing the size of Choctaw Pass Turning Basin will impact the Alabama State Port Authority in a positive manner by allowing larger ocean going vessels the ability to turn, thus creating the efficiency of placing vessels to the required berth. Such efficiency will improve time and reduce costs for handling laden vessels for departure, and minimize channel congestion of traffic within other areas of port.

The above comments represent a few points of discussion and consideration as per the impact of this study on our behalf, and a brief explanation of these interests as to the positive impacts, that per our opinion, could be attained by example of our business as related through the port transportation industry.

Thank you for accepting our comments in support of this project.

Sincerely

Thomas C. Adger

Tri State Maritime Services, Inc

Alabama Steel Terminals, LLC.

Comment 235

From: [Tennessee River Valley Association](#)
To: [Mobile Harbor GRR](#)
Subject: [Non-DoD Source] Draft GRR/SEIS
Date: Friday, September 7, 2018 8:31:31 AM
Attachments: [mobharltr.pdf](#)

Ms. Jacobsen,

The Tennessee River Valley Association is pleased to submit these attached comments related to the Mobile Harbor Draft Integrated General Reevaluation Report with Supplemental Environmental Impact Statement (Draft GRR/SEIS). Thank you for the opportunity to offer our views on this important matter,

Cline Jones
Executive Director
Tennessee River Valley Association
Tennessee-Cumberland Waterways Council
256-394-3433
trvassoc@hiwaay.net
Blockedwww.trva-tcwc.org
Blockedhttp://www.facebook.com/pages/Tennessee-River-Valley-Association/219651447941

TRVA *Tennessee River Valley Association*

September 6, 2018

Ms. Jennifer L. Jacobson
U.S. Army Corps of Engineers, Mobile District
P.O. Box 2288
Mobile, AL 36628-0001

In re: Mobile Harbor, Mobile, Alabama Draft Integrated General Reevaluation Report with Supplemental Environmental Impact Statement

Dear Ms. Jacobsen,

The Tennessee River Valley Association and its Tennessee-Cumberland Waterways Council supports the proposed improvements to the Mobile Harbor and its related navigation channel.

Based in Decatur, Alabama, the Tennessee River Valley Association was formed in 1967. The Membership of the Tennessee River Valley Association (TRVA) consists of towing companies, barge lines, port and terminal operators, municipalities, and concerned citizens from across the Valley region. TRVA encourages common sense water policies and promotes commercial navigation as a catalyst to economic growth.

The Port of Mobile, Alabama is a tremendous asset to our nation, to the southeastern United States, and to the Tennessee and Cumberland River Valleys region. The economy of the Twin Valley region relies on commercial navigation for efficient, environmentally friendly, and highway congestion mitigating bulk freight transportation. With a direct connection to the Port of Mobile via the Tennessee Tombigbee Waterway and the Black Warrior Tombigbee River, the region currently benefits economically from goods passing through Alabama's successful and growing ocean port and harbor infrastructure. The proposed improvements to the Mobile Harbor will ensure continued benefits and expanding opportunities for decades into the future.

Recognizing the need to balance the tremendous economic benefits and potential environmental impacts, TRVA has carefully reviewed the Draft Integrated General Reevaluation Report with Supplemental Impact Statement (GRR). It is our conclusion that the proposed improvements should be completed. It is clear that the economic benefits substantially outweigh the minimal impacts to the environment. In the report, the Army Corps noted: "Results of the detailed analyses suggest that, overall, no substantial impacts in aquatic resources within the study area are anticipated due to channel modifications."

Additionally, the Army Corps' modeling results presented in the study indicate minimal differences in morphologic change in the nearshore areas of Dauphin Island and Pelican Island as a result of the channel modifications; ship wake analysis associated with this study indicates a reduction in vessel generated wave energy when compared between the future with and without project conditions and; the study has found that the proposed project would not have disproportionately high and adverse impacts to any communities, including Environmental Justice communities or children.

With new global trade opportunities resulting from the recent Panama Canal expansion, our nation's competitiveness will rely on modern, efficient ocean port infrastructure. The Tennessee and Cumberland Valleys access to global markets via a modern and improved Mobile Harbor will result in increased benefits and opportunities to the entire region, and to our nation. For these reasons, in addition to the minimal impact to the environment, the TRVA strongly supports the proposed expansion of the Mobile Harbor and navigation channel as outlined in the GRR.

Sincerely,

A handwritten signature in cursive script, appearing to read "Cline Jones".

Cline Jones
Executive Director

Comment 236

From: [REDACTED]
To: [Mobile Harbor GRR](#)
Subject: [Non-DoD Source] Erosion
Date: Friday, September 7, 2018 7:24:19 AM

Dear Colonel Joly,

I am [REDACTED] and I have a home on dauphin island and I am concerned about removing sand from the ship channel and not placing it in the appropriate place where it will replenish DI beach. Please help us to restore our beaches. The cheapest way is not always the best and I prefer cooperation over law suits. Thanks for listening. [REDACTED]

Sent from my iPhone

From: [REDACTED]
To: [Mobile Harbor GRR](#)
Subject: [Non-DoD Source] Dauphin Island Erosion
Date: Friday, September 7, 2018 6:21:31 AM

Hello Colonel Joly,

I have been a resident on Dauphin Island for 18 years. I have been visiting the Island ever since I was nine when my family moved here in 1959. Since that time I have observed the progress of our fine city of Mobile and have been a supporter of its progress. However I have also been aware of the erosion problem CAUSED by the dredging of the Mobile ship channel. I have watched with my eyes the coastal area literally wash away from Dauphin Island and all along the Gulf coast. I understand that bigger ships and deeper channels for all those ships into our port means money to those who are in the business of importing/exporting. However, at the cost of the very land that makes our port a desirable and healthy place to live, is JUST PLAIN WRONG.

I was involved with the lawsuit that we won: agreeing that the dredged sand would be placed in an area that would enhance Dauphin Island. That has NOT happened. The Corps has breached that agreement. Consider these comments below which give accurate information concerning this problem and know that "We the people", will not give up or relent on having justice being served.

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

"The Corps admitted at the February 22, 2018 public meeting that the use of the Sand Island Beneficial Use Area (SIBUA) was preventing at least half of the sands that would naturally be carried to Dauphin Island from reaching the island. In addition, Corps dredging records also indicate that as much as 72% of the sands dredged from the Bar Channel since 1980 have been lost from the nearshore littoral drift system because the Corps practice of disposing of the valuable beach sands in deeper Gulf waters. These facts indicate the loss of millions of cubic yards of beach quality sands due to unwise channel disposal practices has and continues to adversely affected Dauphin Island."

"The public will no longer accept the Corps' verbal promises alone that the new site will function as suggested without being provided substantiated proof to support the promise."

"The impacts of shoreline erosion on sea turtle nesting should be discussed. Section 5.9.1 should be expanded to acknowledge that a consequence of the progressive erosion of Dauphin Island's Gulf Shoreline is the low success rate of sea turtle nesting on the island. The low percentage of successful nests on Dauphin Island compared to Baldwin County's beaches is believed to be associated with the deteriorated shoreline conditions attributable to erosion. This issue warrants coverage in the report because of the Endangered Species Act connection and because

Dauphin Island provides a substantial portion of Alabama's total Gulf shoreline used for nesting by sea turtles. It is possible that a "taking" type situation may exist as an indirect impact of the Bar Channel maintenance program and the Mobile Harbor project's role in contributing to the erosion of Dauphin Island and the lowered turtle nest success rates compared to other northern Gulf beaches. "

Colonel Joly, we will continue to stay informed and work together to have this breach of agreement corrected. Please take our voices seriously and "get this corrected!" You can either do what is right or be a hand in allowing wrong to continue. Wouldn't you rather be on the side of right and integrity?

Thank you for your consideration



From: [Allen, Wendy](#)
To: [Mobile Harbor GRR](#)
Subject: [Non-DoD Source] Comments on Dauphin Island Erosion
Date: Wednesday, September 5, 2018 3:35:51 PM

COL Sebastian P. Joly, District Commander,

Please consider the following comments related to the Mobile Harbor Draft Integrated General Reevaluation Report/Supplemental Environmental Impact Statement (Draft GRR/SEIS). It is my sincere hope that the Army Corps of Engineers is taking the concerns regarding environmental impacts seriously.

1. The Draft GRR/SEIS does not fully comply with §1508.25 of CEQ's NEPA Regulations because of Corps' practice of "segmenting" Mobile Harbor Project by preparing multiple separate NEPA documents. The Corps needs to develop a Master Plan and associated Environmental Impact Statement that would identify all work required to expand and maintain Mobile Harbor for at least the next 20 years. Such a plan should include all existing, recommended, and proposed future disposal sites so the complete impact of the Mobile Harbor project is disclosed to the public as required by NEPA.
2. The original 1980 report/EIS that originally recommended the ship channel be deepened was deficient because it completely ignored Dauphin Island's erosion problem. The GRR/SEIS is supposed to update the original 1980 report/EIS by analyzing changed conditions. The tremendous amount of erosion of the Sand/Pelican Island complex and Dauphin Island that has occurred since the 1980 report represents a significant "changed condition" in not only the Study Area, but also the immediate Project Area since the Sand Island Beneficial Use Area (SIBUA) is the Corps' only designated disposal area to maintain the Bar Channel and is intended to bypass littoral drift sands to the west side of the channel to nourish Dauphin Island. Despite numerous public inquiries during the planning process, the Corps has never explained its refusal to address the enormous amount of erosion that has occurred to these islands. Instead, the Corps has chosen to ignore the 38 years of past shoreline erosion impacts that have produced today's significantly weakened Dauphin Island. The GRR/SEIS MUST address the 38 years of erosion that has occurred since 1980.
3. The public does not accept the results of the Corps numerical modeling study results that allege maintenance of the Bar Channel does not contribute to the erosion of Dauphin Island. The rejection is based on the clear fact the model results do not match with the actual observed shoreline losses that have occurred since the early 1970s. The Corps admitted at the February 22, 2018 public meeting that the use of the Sand Island Beneficial Use Area (SIBUA) was preventing at least half of the sands that would naturally be carried to Dauphin Island from reaching the island. In addition, Corps dredging records also indicate that as much as 72% of the sands dredged from the Bar Channel since 1980 have been lost from the nearshore littoral drift system because the Corps practice of disposing of the valuable beach sands in deeper Gulf waters. These facts indicate the loss of millions of cubic yards of beach quality sands due to unwise channel disposal practices has and continues to adversely affected Dauphin Island.
4. The public is withholding support for the proposed Sand Island Beneficial Use Area (SIBUA) expansion to the northwest until the Corps provides conclusive information assuring upwards to 100% of the littoral drift sands intercepted by channel dredging and placed in the SIBUA expansion area will return to the littoral drift system to nourish Dauphin Island. After 20 years of use, the Corps' promises about the beneficial functioning of the existing SIBUA have all been proven to be wrong while Dauphin Island continued to erode. The public will no longer

accept the Corps' verbal promises alone that the new site will function as suggested without being provided substantiated proof to support the promise. Figure 8 on page ES-17 should be modified to clearly show water depths within the proposed SIBUA expansion. Also, the report should state that all dredged sands placed in the SIBUA expansion will be deposited at water depths much shallower than 15 feet MHW (mean high water). If the Corps is unwilling to make that disposal commitment, it is unlikely the outcome of use of the proposed expansion will be any different than the original SIBUA in countering the erosion problem. Because of that concern, a detailed risk and uncertainty analyses of the Corps projections about the effectiveness of the proposed SIBUA expansion should be conducted by an independent third party to assess the effectiveness of the new site to accomplish its intended purpose.

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

I can be reached at the number below if you would like to discuss further. Thank you for your consideration.

Alere is now Abbott.

Wendy Allen

Vice President of

Operations

Standing Stone, LLC

49 Richmondville Ave

Suite 307

Westport, CT 06880

Office +1 877-662-5013

Fax +1 877-662-5013

Wendy.allen@alere.com

This communication may contain information that is proprietary, confidential, or exempt from disclosure. If you are not the intended recipient, please note that any other dissemination, distribution, use or copying of this communication is strictly prohibited. Anyone who receives this message in error should notify the sender immediately by telephone or by return e-mail and delete it from his or her computer.

****Confidentiality Notice**** This email and any attachments accompanying this transmission may contain Protected Health Information. If you are not the intended recipient(s), you are hereby notified that the law strictly prohibits any disclosure, duplication, distribution or use of the contents of this transmission. If you have received this transmission in error, please contact Standing Stone immediately either by telephone (+1 203 227-8710) or electronic mail (sspostmaster@alere.com).

Comment 239

From: [REDACTED]
To: [Mobile Harbor GRR](#); [REDACTED] [att.net](#)
Subject: [Non-DoD Source] Mobile Bay Ship Channel
Date: Wednesday, September 5, 2018 11:24:30 AM

To COL. Sebastien P. Joly, District Commander

Dear Colonel Joly,

We are once again writing about your plans to deepen and widen the ship channel which is located just east of Dauphin Island. We are concerned that the removal of more sand usually migrating westerly will be interrupted even more in its normal flow. This east to west process is proven, and as a result the Corps has to remove sand in order to keep the ship channel open. These removals have had a catastrophic on our beaches.

We know that the plan to deepen and widen the channel will be approved. This removal of sands could benefit Dauphin Island if placed nearer to the island. Past deposits in other areas have proven ineffective as our beaches continue to erode.

Decisions you make will either make or break life on Dauphin Island. The long history of the island has been written without a deep and wide channel. Please don't do something that will adversely effect our island and destroy our way of life we enjoy. The future of Dauphin Island is in your hands. Do the right thing by making deposits of sand near Dauphin Island to guarantee continued flow of sand to our beaches.

Respectively yours,

[REDACTED]

Comment 240

From: [REDACTED]
To: mobilegrr@usace.army.mil; [Mobile Harbor GRR](#)
Subject: [Non-DoD Source] Comments on Draft SEIS
Date: Tuesday, September 4, 2018 8:02:50 PM
Attachments: [image.png](#)

Dear US Army Corp of Engineers,

Below is the letter that I emailed you earlier in the year concerning channel dredging and erosion on Dauphin Island. I did not know if I needed to send it again for it to be included in the comment period. I mention in the letter below about a street just west of the Dauphin Island Bird Sanctuary that is in extreme danger of being lost. A tropical storm or hurricane will hit Dauphin Island tonight, and there is a good chance that at least one of these houses below will be lost due to erosion. I am 55 years old, and have watched Dauphin Island slowly become smaller due to erosion from the channel dredging and storms. This island has been hit by severe storms for thousands of years, but it would repair itself with the help of the sand flowing from the east. But now, without a sufficient resupply of sand, it will continue to die a slow death. Just look at some of the historic pictures of Sand Island Lighthouse with its houses and livestock. Heck, just look at the picture below, and compare it to early satellite images and aerial photos.

Unfortunately, it is not just Dauphin Island. I grew up just north of Dog River Bridge near Alba Beach. There is an old sewer treatment plant at Alba Beach. When I was a child we used to walk through the woods between the sewer plant and Mobile Bay. We used to carry the mullet sack for our dad and be scared by the ship waves that would roll in while we were wading in the bay. When I grew up I came to realize that those ships waves were carrying the shore line away. The sewer plant that was in the woods is now being washed away, and the trees are but a memory.

Please do what you can to help.

Sincerely,

[REDACTED]

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

From: [REDACTED]@comcast.net>
To: MobileHarborGRR@usace.army.mil
Cc: jcollier@townofdauphinisland.org, board@dipoa.org, congressman.byrne@mail.house.gov,
mayorstimpson@cityofmobile.org, district3web@mobile-county.net, bill.hightower@alsenate.gov
Date: April 7, 2018 at 2:11 PM
Subject: Erosion of Dauphin Island

Dear US Army Corp of Engineers,

I am writing you about the erosion of the shore lines on Dauphin Island and Mobile Bay. When my friends and I sailed catamarans back in the 80s, we launched our boats on the beach in between the jetties on the south side of Fort Gaines. Until they were removed, those jetties stood out in the gulf as islands, reminding us how much the east end had eroded. Just down the beach west of the bird sanctuary there lies a subdivision that has an entire street waiting to be consumed by the gulf, with one house halfway in the water. Many of the roads on the gulf side of Bienville Boulevard that were once full of beach houses have been reduced to a single house due to the thinning of the island's west end. When I was growing up, there was Peavy Island on the south side of the old Dauphin Island draw bridge that was covered in campers. Now that island is merely a sand bar covered by shallow water.

These are only a few examples of the changes that have taken place in my lifetime. I have seen enough storms to realize that some of the changes are due to them. But storms are one time events, and the changes they cause are fairly obvious. What is not as obvious is the slow destruction caused by erosion. I can not imagine how anyone can say that every effort should not be made to protect our islands and coastline from this problem. The science is quite clear that sand travels westward along the coast, falls in the Mobile Ship Channel between Fort Gaines and Fort Morgan, is dredged up, and dumped too far out in the gulf for it to naturally make its way to the shoreline. Because of this man made problem, man should be required to do everything he can to fix it. I realize that it will cost more to put the sand closer to Dauphin Island to ensure that it makes it to the beaches. If the Corp of Engineers have their hands tied by law to dispose of the sand the cheapest way possible, then shame on our political leaders for allowing this to continue. Believe me, I am all for less government spending, but in my opinion this would be one of the last expenses I would ever consider cutting. Any American who has any awareness of the level of taxpayer money consumed by waste and fraud would agree that the added expense could be offset in a thousand different ways.

Now that the government wants to dredge an even wider channel in between the forts, this should be a wake up call to anyone who is not concerned, or unaware of this problem. This is not a bridge to nowhere, this is not a pork barrel project, this is doing the right thing to restore part of what has been lost. Depositing dredged sand closer to Dauphin Island would help to partly right a wrong that has been taking place since the ship channel was created. Don't get me wrong, I am all about balancing the need for jobs and the environment. I work for a local industry that relies on the ship channel. But just like the money grab for the BP oil spill funds, many times the most pressing environmental needs and political needs become separated like oil and water.

Sincerely,

A black rectangular redaction box covering the signature of the sender.

Mobile, AL

Comment 241

From: [Morgante, Douglas P](#)
To: [Mobile Harbor GRR](#)
Subject: [Non-DoD Source] Mobile Harbor Deepening and Widening Project
Date: Tuesday, September 4, 2018 3:57:46 PM
Attachments: [Mobile Harbor Deepening and Widening Project.pdf](#)

Dear Ms. Jacobsen,

Attached, please find a letter of support from Maersk Line.

Should anything require clarification, please feel free to contact me.

Sincerely,

Doug

Douglas P. Morgante

Senior Director – Government Relations

180 Park Avenue

P.O. Box 950

Florham Park, NJ 07932

The information contained in this message is privileged and intended only for the recipients named. If the reader is not a representative of the intended recipient, any review, dissemination or copying of this message or the information it contains is prohibited. If you have received this message in error, please immediately notify the sender, and delete the original message and attachments.

Maersk will as part of our communication and interaction with you collect and process your personal data. You can read more about Maersk's collection and processing of your personal data and your rights as a data subject in our privacy policy <[Blockedhttps://maersk.com/front-page-requirements/privacy-policy](https://maersk.com/front-page-requirements/privacy-policy)>

Please consider the environment before printing this email.



Maersk Services USA Inc.
180 Park Ave
Florham Park, NJ 07932

Phone: +1 973 514 5000
Fax: +1 973 514 5660

maersk.com

September 4, 2018

Ms. Jennifer L. Jacobsen
U.S. Army Corps of Engineers, Mobile District
P.O. Box 2288
Mobile, AL 36628-0001

Subject: Mobile, Alabama Harbor Deepening and Widening Project

Dear Ms. Jacobsen,

On behalf of Maersk Line, I am writing in support of the Mobile Harbor Deepening and Widening Project. Maersk Line is the world's largest container shipping company. The Maersk Liner business also includes Safmarine, Seago Line, SeaLand, MCC and Hamburg Süd. The company operates all over the world and has a fleet of more than 700 vessels which sail every major trade lane on the globe. We are glad to include Mobile as a port of call.

Alabama has become an attractive location to large cargo owners. Economic growth coupled with the expansion of the Panama Canal should result in increased containerized cargo volumes for the Port of Mobile. New volumes will mean larger vessels with greater economies of scale, if the facility can meet the demand. Should channel deepening reach 50+ feet, it will allow ocean carriers to justify larger vessels. Recommended improvements to the Choctaw Pass Turning Basin would also help meet the requirements of modern day cargo shipping.

Should you have any questions, please feel free to contact me at 973-514-5697 or via email at Douglas.P.Morgante@maersk.com.

Sincerely,

A handwritten signature in black ink, appearing to read "Douglas P. Morgante", written over a circular stamp.

Douglas P. Morgante
Senior Director – Government Relations

Comment 242

From: [Herb Malone](#)
To: [Mobile Harbor GRR](#)
Subject: [Non-DoD Source] Letter of Support Mobile Harbor GRR
Date: Tuesday, September 4, 2018 1:39:24 PM
Attachments: [SKM_C454e18090412000.pdf](#)

Please accept my letter of support for the Mobile Harbor GRR.

Herb Malone

<Blockedhttps://www.gulfshores.com/> Herb Malone
President/CEO
Office: 251-974-4627
GulfShores.com <Blockedhttp://www.gulfshores.com/> | OrangeBeach.com
<Blockedhttp://www.orangebeach.com>
<Blockedhttps://www.facebook.com/VisitALBeaches> <Blockedhttps://twitter.com/VisitALBeaches>
<Blockedhttps://www.instagram.com/visitalbeaches>
<Blockedhttp://signature.gulfshores.com/uc/5a6f56e9825be91c5ec704d3?
recipient=TW9iaWxlSGFyYm9yR1JSQHVzYWNLmFybXkubWls>



GULF SHORES &
ORANGE BEACH TOURISM

September 4, 2018

U. S. Army Corps of Engineers
Sent via MobileHarborGRR@usace.army.mil

RE: General Reevaluation Report and Supplemental Environmental Impact Statement
(GRR/SEIS)

Dear Sir or Madam,

As head of the destination marketing organization for Alabama's Gulf Coast, we would like to express our support of the U. S. Army Corps of Engineers tentatively selected plan for the following improvements:

- Deepening the channel by 5 feet to a depth of 50 feet.
- Widening the channel for 3 nautical miles to allow two-way traffic.
- Expanding the Choctaw Pass turning basin to accommodate safe turning of larger vessels.
- Bend easing in the Bar Channel.

This proposed channel expansion is vital to the continued growth and viability of the port and increasing the positive impact to the state of Alabama, especially to the those of us who depend on tourism and visitors to south Alabama beaches.

We respectfully request you move forward with the plan as outlined in the General Reevaluation Report and Supplemental Environmental Impact Statement (GRR/SEIS). Thank you for your consideration.

Yours truly,

Herbert J. Malone, Jr.
President/CEO

HJMj/cv

Comment 243

From: [Andrew Levert](#)
To: [Mobile Harbor GRR](#)
Cc: [Wiley C. Blankenship](#)
Subject: [Non-DoD Source] Coastal Alabama Partnership Comments on Draft GRR/SEIS
Date: Tuesday, September 4, 2018 12:56:22 PM
Attachments: [Coastal Alabama Partnership Draft GRR-SEIS Comments.pdf](#)
[CAP Letter in Support for Draft GRR-SEIS USACE.pdf](#)

Please see the attached letter from Wiley Blankenship the President of Coastal Alabama Partnership presenting comments to the Draft GRR/SEIS. Please let me know if you have any questions.

--

Andrew M. Levert
Vice President of Policy and Project Initiatives
Coastal Alabama Partnership
1 S. Royal Street, 2nd Floor <Blocked<https://maps.google.com/?q=1+S.+Royal+Street,+2nd+Floor+Mobile,+Alabama+36602+Office+251&entry=gmail&source=g>>
Mobile, Alabama 36602 <Blocked<https://maps.google.com/?q=1+S.+Royal+Street,+2nd+Floor+Mobile,+Alabama+36602+Office+251&entry=gmail&source=g>>
Office 251 <Blocked<https://maps.google.com/?q=1+S.+Royal+Street,+2nd+Floor+Mobile,+Alabama+36602+Office+251&entry=gmail&source=g>> .436.8822
Cell 251.753.1760
Blockedwww.coastalalabama.org <Blocked<http://www.coastalalabama.org/>>

<Blocked<http://coastalalabama.org/wp-content/uploads/2017/01/cap-web-logo.png>>



Vision, direction and action for the future of Baldwin and Mobile Counties.

August 31, 2018

U.S. Army Corps of Engineers, Mobile District
Colonel Sebastien P. Joly
P.O. Box 2288
Mobile, Alabama 36628
MobileHarborGRR@usace.army.mil

RE: Draft General Reevaluation Report & Supplemental Environmental Impact Statement (GRR/SEIS) to evaluate improvements to the Mobile Harbor Federal Navigation Channel, Mobile, AL.

Dear Colonel Joly,

On Behalf of Coastal Alabama Partnership, I am writing to present comments on the Mobile Harbor Draft General Reevaluation Report & Supplemental Environmental Impact Statement (GRR/SEIS), which evaluated widening and deepening the Mobile channel. The study conducted by the U.S. Army Corps of Engineers (USACE) fully examined the costs, benefits and environmental and economic consequences of enlarging the channel and evaluated a range of alternative plans that would improve the safety and efficiency of the existing navigation system.

Coastal Alabama Partnership (CAP) is a 501(c)(3) private sector-led, not-for-profit organization focused on providing a platform for regional leaders to convene, collaborate, build consensus and advocate for Coastal Alabama's top priorities. CAP's Board of Directors consists of representatives serving on behalf of thirteen regional entities, which include: Alabama Gulf Coast Area Chamber of Commerce, Alabama State Port Authority, Baldwin County Economic Development Alliance, Eastern Shore Chamber of Commerce, Mobile Airport Authority, Mobile Area Chamber of Commerce, Mobile Bay Convention and Visitors Bureau, North Baldwin Chamber of Commerce, Orange Beach – Gulf Shores Tourism, and South Baldwin Chamber of Commerce and represents a constituency base of over 150,000 people.

Coastal Alabama Partnership on behalf of its member entities fully supports what was presented in the U.S. Army Corps of Engineers Draft GRR/SEIS which examined the potential impacts of deepening and widening the federal navigation channel and provided the Tentatively Selected Plan (TSP) for navigation improvements. The Port of Mobile, managed by the Alabama State Port Authority is arguably our regions greatest economic driver, and the modernization of the federal channel is a paramount issue in CAP's regional legislative agenda. Specifically, CAP's support for infrastructure and economic development projects that will facilitate economic competitiveness, create jobs, and promote an environment in which businesses can prosper in Coastal Alabama.

The extensive information presented in the Draft GRR/SEIS and navigation improvements within the plan would continue the economic growth and improve transportation infrastructure in Coastal Alabama. CAP supports the completing the Final GRR/SEIS for the following considerations:

- The Alabama State Port Authority is one of the largest economic engines for the state, with a \$22.4 billion economic impact. Expansion of the channel is vital in maintaining the port's growth. The Panama Canal historically provided a limit on the size of container ships and other

vessels. But as the canal has been widened, the ships have gotten larger. The channels existing dimensions place constraints on deeper drafting containerships and other vessels, and restricts many vessels to one-way traffic, resulting in reduced efficiency and increased costs.

- According to an economic impact study from the University of Alabama’s Center for Business and Economic Research, the port is responsible for 134,608 direct and indirect jobs in the state with a direct and indirect tax impact of \$486.9 million. A deeper and wider channel will clear the way for the port to accommodate larger ships that are already starting to come through the expanded Panama Canal. The deeper channel will allow ships to carry more weight, making the port more efficient for importers and exporters—creating more jobs and the tax impact to the State of Alabama.
- The Alabama State Port Authority is the 10th largest full-service seaport in the United States, with over 28.7 million tons of goods and 318,889 shipping containers handled port-wide. The cargo transportation industry continues its shift to increased use of standardized containers used for multimodal (marine, rail, and truck) freight transportation systems. Additionally, the marine vessel fleet is trending to larger, deeper-draft vessels, particularly for containerships and dry bulk carriers. The container business has been a point of strong growth for the Port of Mobile in recent years, including a record 20% container growth in 2017. The Federal navigation channel’s existing dimensions place constraints on deeper drafting vessels and without improvements could negate the growth of the port’s container sector.
- Navigation concerns include three main types of problems: larger size vessels experience transit delays due to the current width of the channel; existing channel depths limit vessel cargo capacity; and, existing traffic congestion has increased safety concerns. The USACE Tentatively Selected Plan would include the following navigation improvements: Deepening the channel by 5 feet to a depth of 50 feet, Widening the channel for three nautical miles to allow two-way traffic, Expanding the Choctaw Pass turning basin to accommodate safe turning of larger vessels, and Bend easing in the Bar Channel.
- The GRR/SEIS study states the TSP presents a growth in containerized and other vessel traffic and is economically justified with a benefit-to-cost ratio of 3.0.

CAP is focused on gathering leadership of Mobile and Baldwin counties to advocate for coastal Alabama’s top priorities, and we will continue to be engaged with the U.S. Army Corps of Engineers throughout the public comment period and as it drafts the final GRR/SEIS report.

Sincerely,



Wiley Blankenship
President/CEO
Coastal Alabama Partnership

Comment 244

From: [REDACTED]
To: [Mobile Harbor GRR](#)
Subject: [Non-DoD Source] Ship Channel Deepening - Adverse Impacts to Dauphin Island's Drinking Water Sources
Date: Tuesday, September 4, 2018 10:55:39 AM
Attachments: [20180904104504857.pdf](#)

Ms. Jacobson,

Attached please find a letter from Attorney Jay Ross regarding the above referenced matter.

Thank you,
[REDACTED]

[REDACTED]

<Blocked<http://www.adamsandreese.com>>
11 North Water Street, Suite 23200 | Mobile, AL 36602
main 251.433.3234 | direct 251.650.0871 |
efax 251.650.2061 | fax 251.438.7733
[REDACTED][@arlaw.com](mailto:[REDACTED]@arlaw.com) [REDACTED] arlaw.com>
website <Blocked<http://www.adamsandreese.com>> map <Blocked<https://www.google.com/maps/d/viewer?mid=zITVc85TpFTYk6L5t5WxJRl4&hl=en&usp=sharing>> <Blocked<http://www.linkedin.com/company/adams-and-reese-llp>> <Blocked<http://twitter.com/adamsandreese>> <Blocked<http://www.facebook.com/adamsandreese>>

--

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

From: MOB-MPC5503SP-SWhall
Sent: Tuesday, September 04, 2018 9:45 AM
To: [REDACTED]
Subject: Message from "RNP0026738C0D65"

This E-mail was sent from "RNP0026738C0D65" (MP C5503).

Scan Date: 09.04.2018 10:45:04 (-0400)
Queries to: MOB-MPC5503SP-SWhall



Attorneys at Law
Alabama
Florida
Georgia
Louisiana
Mississippi
South Carolina
Tennessee
Texas
Washington, DC

September 4, 2018

VIA E-MAIL ONLY

MobileHarborGRR@usace.army.mil

Ms. Jennifer L. Jacobson
Chief, Environmental Resources
U.S. Army Corp of Engineers, Mobile District
Post Office Box 2288
Mobile, AL 36628-2724

Jay M. Ross
Direct: 251.650.0873
E-Fax: 251.650.2058
jay.ross@arlaw.com

RE: SHIP CHANNEL DEEPENING – ADVERSE IMPACTS
TO DAUPHIN ISLAND’S DRINKING WATER SOURCES

Dear Ms. Jacobson,

I have the pleasure of representing the Dauphin Island Water and Sewer Authority (DIWSA) and on behalf of the Board of Directors, the following is related to the Draft GRR/SEIS associated with the Mobile Ship Chanel-Deepening Project.

The DIWSA is the provider of drinking water and fire protection to the community of Dauphin Island, and the basis of this submittal is for protection of the island’s water resources. DIWSA notes that with deepening of the Mobile Ship Channel without a comprehensive study of the aquifers that cross-sect the channel, there is the potential for disastrous failures to the raw water sources that serve the community. Listed below are the comments and questions that DIWSA submits for the Corp:

Comment 1

There is a significant clay layer beneath Dauphin Island that extends across the Mobile Ship Channel and into Baldwin County. This clay prevents direct contact between the Gulf waters (saline) and Bay waters (brackish) with underlying brackish water aquifers that DIWSA is currently able to treat for the purpose of providing drinking-water to Dauphin Island. Anything that tilts the delicate balance of these aquifers from brackish to saline, rendering them unsuitable for treatment, would be disastrous to DIWSA and its customers. These aquifers are the only viable drinking water sources that exist for Dauphin Island.

Ms. Jennifer L. Jacobson
Chief, Environmental Resources
September 4, 2018
Page 2

Comment 2

A search of the Draft GRR/SEIS for the word “acquirer” reveals 45 notations of which most appear to be cut-and-paste references to old geology/hydrogeology reports, presenting no specific hydrogeology beneath the channel itself. A few references mentioned that the aquifers were already impacted from the 1991 channel deepening or that the aquifers and groundwater in the area are not used, disregarding the fact that Dauphin Island is “in the project area” as defined in the study.

Questions:

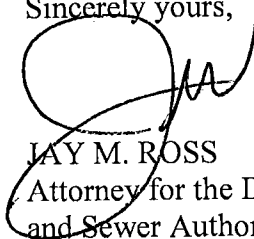
1. What specific hydrogeologic work has been completed for this project that defines the extent of clay and whether the deepening will breach this protective layer, and if breached where will this breach occur? If no specific hydrogeologic work has been done to define the extent of this clay, why not?
2. Was a well survey done to determine the number, types, and depths of water wells (domestic, industrial, and, as in our case, public supply) “in the study area”? If no survey has been completed, why not?
3. What was the extent of the 1991 deepening and its impact on aquifers? How was this impact determined? Is this impact monitored?
4. If the origin of the Draft GRR/SEIS is based on a request by the State of Alabama and or the Alabama Port Authority, does the Corp of Engineers (COE), State, and Port Authority have a mutual agreement for assisting adversely impacted entities and or remediating compromised water supplies?
5. What assurances will the COE, State, and Port Authority provide that the proposed deepening will not adversely affect, or continue to adversely affect, the existing quality of the aquifers that are used (domestic, industrial, and public supply wells) up and down the bay?

The Board feels the Draft GRR/SEIS presented for comment requires an area-specific hydrogeologic look into what impacts the 1991 deepening, as well as the proposed deepening, will have to the protective clay and to the aquifers underlying this clay. Further, the Board asserts that a methodology for protecting these aquifers must be established as well as COE, State, and Port Authority assurances that a mitigating response(s) will be fully implemented should the aquifers be adversely affected.

Ms. Jennifer L. Jacobson
Chief, Environmental Resources
September 4, 2018
Page 3

Thank you for your attention to this matter. The Board of Directors of the Dauphin Island Water and Sewer Authority looks forward to your response.

Sincerely yours,

A handwritten signature in black ink, appearing to read "JAY M. ROSS", is written over a circular stamp or seal.

JAY M. ROSS
Attorney for the Dauphin Island Water
and Sewer Authority

cc: The Honorable Kay Ivey, Governor of Alabama
Hon. Bradley R. Byrne, U.S. Representative
Hon. Richard Shelby, U.S. Senator
Hon. Doug Jones, U.S. Senator
Hon. Steve Marshall, Alabama Attorney General
Jimmy Lyons, CEO, Alabama State Port Authority
Jerry Carl, Mobile County Commissioner
Jeff Collier, Mayor of Dauphin Island

Comment 245

From: [Maeci Walker](#)
To: [Mobile Harbor GRR](#)
Subject: [Non-DoD Source] Letter of Support for Mobile Channel Widening - AL Railway Association
Date: Tuesday, September 4, 2018 10:53:21 AM
Attachments: [Mobile Shipping Channel Support - AL Railway Association.docx](#)

Please see the attached letter of support from the AL Railway Association for the widening of the Mobile Shipping Channel.

Thank you for your consideration.

Maeci Walker
Director of Public Affairs | Christie Strategy Group
334.264.0598 (o) | 205.915.7046 (c)
mwalker@christiestrategygroup.com

Check out our website: [Blockedhttp://christiestrategygroup.com/](http://christiestrategygroup.com/)



U.S. Army Corps of Engineers
General Reevaluation Report and Supplemental Environmental
Impact Statement (GRR/SEIS)

Dear Sir or Madam:

The Alabama Railway Association is a trade organization that represents all railroads in Alabama, from Short lines to Class I Railroads, along with many Associate Members that supply services and/or materials to support our operations.

We strongly support the U.S. Army Corps of Engineers Tentatively Selected plan.

Maeci Walker

Executive Director •

Executive Board Members

Cliff Melton

*Terminal Railway
President* •

Joe Arbona

*Genesee & Wyoming
Vice President*

Elizabeth Lawlor

*Norfolk Southern
Secretary/Treasurer* •

Jane Covington

*CSX Transportation
At Large Member* •

Jeremy Cole

*Southern Electric Railroad
At Large Member*

Steve Faulkner

*Birmingham Rail & Locomotive
Associate Voting Member*

Eddie Horton

*Stella-Jones
Associate Voting Member*

The Alabama State Port Authority is one of the largest economic engines for the state. According to an economic impact study from The University of Alabama's Center for Business and Economic Research, the port is responsible for 134,608 direct and indirect jobs in the state with a direct and indirect tax impact of \$486.9 million.

Expansion of the channel is vital to maintaining the port's growth. A deeper and wider channel will clear the way for the port to accommodate larger ships that are already starting to come through the expanded Panama Canal. A deeper channel also allows ships to carry more weight, making the port more efficient for importers and exporters.

With a deepened channel, carriers will be able to load vessels more efficiently, thereby reducing transiting costs.

Finally, the increase in the number and size of vessels entering and departing Mobile Harbor has led to transportation delays and inefficiencies due to limited channel depth and width. The existing channel depths and widths limit vessel cargo capability, restrict many vessels to one-way traffic, and, in some areas, limit transit operations to daylight hours only.

We strongly encourage you to move forward expeditiously with the Tentatively Selected Plan as outlined in the General Reevaluation Report and Supplemental Environmental Impact Statement (GRR/SEIS) and begin the expansion and deepening of the Mobile Ship Channel as soon as possible.

Our entire state will benefit from the implementation of this proposed project.

Sincerely,

A handwritten signature in blue ink that reads "Maeci Walker".

Maeci Walker

Executive Director, Alabama Railway Association

Comment 246


From: [REDACTED]
To: [Mobile Harbor GRR](#)
Subject: [Non-DoD Source] Mobile Channel/Dauphin Island
Date: Tuesday, September 4, 2018 9:53:40 AM
Attachments: [Sept. 4 2018 letter to Corps.pdf](#)

Dear Colonel Joly,

Please find my letter objecting to the proposed study and plan in the way it affects Dauphin Island.

[REDACTED]

Sent from my iPad


New Orleans, LA. 70116

September 4, 2018

Via email
MobileHarborGRR@usace.army.mil

Colonel Sebastian P Joly
District Commander, U.S. Army Corps of Engineers
Mobile District
109 St. Joseph St
Mobile, AL 36602

Re: Mobile Harbor project/Dauphin Island

Dear Col. Joly

I am a property owner of almost 30 years on Dauphin Island, on both the west and east ends.

For 23 years, from my first letter to the Corps on November 8, 1995 (the subject of Corps deliberations on Dec 1, 1995) to my most recent one on February 7, 2017, I have been objecting to the Corps' failure to address and fully mitigate the effect of its dredging on the littoral flow of sand.

I must do so once again.

The Corps record on this issue is one of consistently failing to take full responsibility for the natural consequences of its actions, and consistently adopting "least costly" solutions that invariably turn out to be the very opposite of "environmentally acceptable."

The Corps' recent, though painfully reluctant, admission that the SIBUA has fallen far short of capturing and returning sand to the littoral system is the clearest evidence of this long history of engineering failure and environmental degradation.

This really is very simple. Do no harm and do it right.

It is undisputed that the channel interrupts, disrupts, and removes sand from the natural littoral processes that sustain the barrier islands to the west, Sand and Pelican and Dauphin and Petit Bois and onward.

It is now conceded that the Corps' past record of "least costly" measures has failed to return a significant percentage of that sand to the littoral drift system. In other words those "least costly" measures have not in fact been "environmentally acceptable."

This experience counsels that the latest half measures proposed in the current report will similarly fail.

What is required, and what the report lacks, is a **total commitment** to recovering all the sand and placing all that sand back from where it came, the littoral system. Which is to say, directly upon, or so directly appurtenant to, the shores of Sand Island as to be indisputably within the system.

That commitment is lacking. But that commitment is the only one that assures that no harm is done. It is the only one that is “environmentally acceptable.”

The long running dispute as to the cause of erosion on Dauphin Island is beside the point. The very fact that the question remains disputed by the country’s most esteemed experts demonstrates that there is at least a likelihood that the Corps’ practices contribute to beach erosion and recession.

In these proceedings, unlike the POA lawsuit, the burden of proof falls on the Corps to demonstrate that it is doing no harm. Its reliance on disputed opinions, by its chosen experts, that fly in the face of common sense and real experience (and the Corps’ contrary conclusion in 1978) are inadequate to meeting that burden.

Do it right and do no harm.

And that requires rejection and redrafting of the present report and the adoption of specific, concrete, and enforceable measures (not just hopes, wishes and prayers), that guarantee that the sand that would otherwise have crossed from the east to the west is in fact recovered and returned into and onto the littoral system.

Only such an outcome is “environmentally acceptable” and therefore only such an outcome can qualify as “acceptable.”

Respectfully,

A rectangular black box with a thin red border, used to redact the signature of the author.

From: [REDACTED]
To: [Mobile Harbor GRR](#)
Cc: [REDACTED]
Subject: [Non-DoD Source] Mobile Harbor Study
Date: Monday, September 3, 2018 7:37:06 PM

COL Sebastien P. Joly, District Commander
U.S. Army Corps of Engineers, Mobile District
P.O. Box 2288 <x-apple-data-detectors://2>

Mobile, AL 36628-0001 <x-apple-data-detectors://2>

Dear Colonel Joly,

I am a property owner on Dauphin Island. While the Island is a wonderful place to live, the erosion of the beaches is something that needs to be addressed which I feel should be a top priority for the Corp of Engineers. Below are some notes about the most recent study I wish to share.

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

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

The public does not accept the results of the Corps numerical modeling study results that allege maintenance of the Bar Channel does not contribute to the erosion of Dauphin Island. The rejection is based on the

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

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

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

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

Thank you for your attention on these issues.

Best Regards,



Comment 248

From: [Audubon Place](#)
To: [Mobile Harbor GRR](#)
Cc: [REDACTED]
Subject: [Non-DoD Source] Mobile Harbor Study
Date: Monday, September 3, 2018 7:31:16 PM

COL Sebastien P. Joly, District Commander
U.S. Army Corps of Engineers, Mobile District
P.O. Box 2288 <x-apple-data-detectors://2>

Mobile, AL 36628-0001 <x-apple-data-detectors://2>

Dear Colonel Joly,

We represent 50 property owners on Dauphin Island in the subdivision of Audubon Place. While the Island is a wonderful place to live, the erosion of the beaches is something that needs to be addressed which we feel should be a top priority for the Corp of Engineers. Below are some notes about the most recent study we wish to share.

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

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

The public does not accept the results of the Corps numerical modeling study results that allege

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

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

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

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

Thank you for your attention on these issues.

Best Regards,

Audubon Place Board of Directors

From: [REDACTED]
To: [Mobile Harbor GRR](#)
Cc: [REDACTED]
Subject: [Non-DoD Source] Mobile Harbor Study
Date: Monday, September 3, 2018 7:28:59 PM

COL Sebastien P. Joly, District Commander

U.S. Army Corps of Engineers, Mobile District

P.O. Box 2288 <x-apple-data-detectors://2>

Mobile, AL 36628-0001 <x-apple-data-detectors://2>

Dear Colonel Joly,

I am a property owner on Dauphin Island. While the Island is a wonderful place to live, the erosion of the beaches is something that needs to be addressed which I feel should be a top priority for the Corp of Engineers. Below are some notes about the most recent study I wish to share.

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

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

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

quality sands due to unwise channel disposal practices has and continues to adversely affected Dauphin Island.

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

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

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

Thank you for your attention on these issues.

Best Regards,



From: [REDACTED]
To: [Mobile Harbor GRR](#)
Subject: [Non-DoD Source] The Corp's Draft GRR/SEIS and Dauphin Island Erosion
Date: Monday, September 3, 2018 4:14:23 PM

Dauphin Island is very dear to me because we vacationed there from the time our children, now 61 to 41 were young, and owned a homes there from 1989 till 2013. Like the migratory birds and sea turtles, I return there gladly. Though those creatures, and to the economy and ecology of the upper Gulfshoreline. If you will refer to your own mission, I think you can see that it deserves similar recognition and protection from the Corps. I object to the proposed Sand Island Beneficial Use Area (SIBUA) expansion to the northwest until the Corps provides conclusive information assuring upwards to 100% of the littoral drift sands intercepted by channel dredging and placed in the SIBUA expansion area will return to the littoral drift system to nourish Dauphin Island. After 20 years of use, the Corps' promises about the beneficial functioning of the existing SIBUA have all been proven to be wrong while Dauphin Island continued to erode. The public will no longer accept the Corps' verbal promises alone that the new site will function as suggested without being provided substantiated proof to support the promise. Figure 8 on page ES-17 should be modified to clearly show water depths within the proposed SIBUA expansion. Also, the report should state that all dredged sands placed in the SIBUA expansion will be deposited at water depths much shallower than 15 feet MHW (mean high water). If the Corps is unwilling to make that disposal commitment, it is unlikely the outcome of use of the proposed expansion will be any different than the original SIBUA in countering the erosion problem. Because of that concern, a detailed risk and uncertainty analyses of the Corps projections about the effectiveness of the proposed SIBUA expansion should be conducted by an independent third party to assess the effectiveness of the new site to accomplish its intended purpose.

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

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



Atlanta Ga 30319

From: [REDACTED]
To: [Mobile Harbor GRR](#)
Subject: [Non-DoD Source] Mobile Harbor Draft Integrated General Reevaluation Report/Supplemental Environmental Impact Statement (Draft GRR/SEIS)
Date: Monday, September 3, 2018 11:56:11 AM

Col. Joly,

Here are my comment on the Draft GRR/SEIS.

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

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

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

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

The public is withholding support for the proposed Sand Island Beneficial Use Area (SIBUA) expansion to the northwest until the Corps provides conclusive information assuring upwards to 100% of the littoral drift sands intercepted by channel dredging and placed in the SIBUA expansion area will return to the littoral drift system to nourish Dauphin Island. After 20 years of use, the Corps' promises about the beneficial functioning of the existing SIBUA have all been proven to be wrong while Dauphin Island continued to erode. The public will no longer accept the Corps' verbal promises alone that the new site will function as suggested without being provided

substantiated proof to support the promise. Figure 8 on page ES-17 should be modified to clearly show water depths within the proposed SIBUA expansion. Also, the report should state that all dredged sands placed in the SIBUA expansion will be deposited at water depths much shallower than 15 feet MHW (mean high water). If the Corps is unwilling to make that disposal commitment, it is unlikely the outcome of use of the proposed expansion will be any different than the original SIBUA in countering the erosion problem. Because of that concern, a detailed risk and uncertainty analyses of the Corps projections about the effectiveness of the proposed SIBUA expansion should be conducted by an independent third party to assess the effectiveness of the new site to accomplish its intended purpose.

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



Huntsville, Alabama

<Blockedhttps://www.avast.com/sig-email?utm_medium=email&utm_source=link&utm_campaign=sig-email&utm_content=webmail&utm_term=icon> Virus-free. Blockedwww.avast.com
<Blockedhttps://www.avast.com/sig-email?utm_medium=email&utm_source=link&utm_campaign=sig-email&utm_content=webmail&utm_term=link>

From: [REDACTED]
To: [Mobile Harbor GRR](#)
Subject: [Non-DoD Source] Channel widening Mobile Bay
Date: Monday, September 3, 2018 10:56:14 AM

Dear Sirs:

I am opposed to the proposed widening until issues affecting Dauphin Island have been more thoroughly considered.

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

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

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

Regards,
[REDACTED]

Comment 253

From: [Donna Watts](#)
To: [Mobile Harbor GRR](#)
Subject: [Non-DoD Source] Letter of Support
Date: Friday, August 31, 2018 4:24:27 PM
Attachments: [Letter to the Corps of Engineers.docx](#)

Please see our attached letter of support.

<Blockedhttps://assets-production-webvanta-com.s3-us-west-2.amazonaws.com/000000/45/01/original/sbcc-logo-web.png>

Donna H. Watts, IOM, AACE

President/CEO

o. 251.943.5540

c. 251.609.1173

112 West Laurel Avenue

Foley, AL 36535

mylocalchamber net <Blockedhttp://mylocalchamber net>



August 31, 2018

U.S. Army Corps of Engineers
General Reevaluation Report and Supplemental Environmental Impact Statement

To whom it may concern:

The South Baldwin Chamber of Commerce Board of Directors strongly supports the U.S. Army Corps of Engineers Tentatively Selected plan that includes the following improvements:

- Deepening the channel by 5 feet to a depth of 50 feet.
- Widening the channel for 3 nautical miles to allow two-way traffic.
- Expanding the Choctaw Pass turning basin to accommodate safe turning of larger vessels and Bend easing in the Bar Channel.

The Alabama State Port Authority is one of the largest economic engines in our state, with a \$22.4 billion impact that is felt across Alabama and throughout our nation. This proposed channel expansion is vital to the continued growth and viability of the port and increasing the positive economic impact to the state of Alabama.

In late July, the U.S. Army Corps of Engineers released its four-year \$7.8 million feasibility study on expanding the Mobile Ship Channel. The recommended plan provides for significant improvements and expansion of the Mobile Ship Channel.

We strongly encourage you to move forward with the Tentatively Selected Plan as outlined in the General Reevaluation Report and Supplemental Environmental Impact Statement and begin the expansion and deepening of the Mobile Ship Channel as soon as is reasonably possible.

Respectfully yours,

Sue Alford
Chairman of the Board

Comment 254

From: [Maeci Walker](#)
To: [Mobile Harbor GRR](#)
Cc: [Anthony Kaiser](#); [Donna Watts](#); [Martin Christie](#)
Subject: [Non-DoD Source] Mobile Channel Widening - GUMBO Support letter
Date: Friday, August 31, 2018 3:16:14 PM
Attachments: [Ship Channel Support Letter.docx](#)

See the attached letter of support from Gulf United Metro Business Organization (GUMBO) regarding the widening of the Mobile Shipping Channel.

Thank you.

Maeci Walker
Director of Public Affairs | Christie Strategy Group
334.264.0598 (o) | 205.915.7046 (c)
mwalker@christiestrategygroup.com

Check out our website: [Blockedhttp://christiestrategygroup.com/](http://christiestrategygroup.com/)



U. S. Army Corps of Engineers
General Reevaluation Report and Supplemental Environmental Impact Statement (GRR/SEIS)

Dear Sir or Madam:

Gulf United Metro Business Organization (GUMBO) is a coalition of business leaders, governmental officials, chambers of commerce and other local interests on Alabama's beautiful gulf coast.

We **strongly support the U. S. Army Corps of Engineers Tentatively Selected plan** that includes the following improvements:

- Deepening the channel by 5 feet to a depth of 50 feet.
- Widening the channel for 3 nautical miles to allow two-way traffic.
- Expanding the Choctaw Pass turning basin to accommodate safe turning of larger vessels and Bend easing in the Bar Channel.

The Alabama State Port Authority is one of the largest economic engines in our state, with a \$22.4 billion impact that is felt across Alabama and throughout our nation. This proposed channel expansion is vital to the continued growth and viability of the port and increasing the positive economic impact to the state of Alabama.

A deeper and wider channel will clear the way for the Port to accommodate larger ships that are already coming through the expanded Panama Canal. A deeper channel also allows ships to carry more weight, making the port more efficient for importers and exporters.

The cargo transportation industry continues to shift to increased use of standardized containers used for multimodal (marine, rail and truck) freight transportation systems. Additionally, the future of marine vessels fleets is trending to larger, deeper draft vessels, particularly for containerships and dry bulk carriers.

In late July, the U. S. Army Corps of Engineers released its four-year \$7.8 million feasibility study on expanding the Mobile Ship Channel. The recommended plan provides for significant improvements and expansion of the Mobile Ship Channel.

Importantly, the study also concludes through a series of detailed analyses that no substantial environmental impacts in aquatic resources are anticipated due to channel modifications.

This fact is critically important to those of us who depend on tourism and visitors to our south Alabama beaches. We strongly believe that our Alabama gulf coast tourism related economy and the expansion of our port and ship channel can co-exist and are not mutually exclusive.

We strongly encourage you to move forward expeditiously with the Tentatively Selected Plan as outlined in the General Reevaluation Report and Supplemental Environmental Impact Statement (GRR/SEIS) and begin the expansion and deepening of the Mobile Ship Channel as soon as possible.

Our local communities, region, state and from the implementation of this proposed



country will all benefit plan.

Sincerely,

Anthony Kaiser
Chairman

GUMBO | P.O. Box 658 Foley, AL 36536 | www.gumbogroup.org

Comment 255

From: [Judith Adams](#)
To: [Mobile Harbor GRR](#)
Subject: [Non-DoD Source] FW: Tri Rivers Support
Date: Friday, August 31, 2018 2:03:14 PM
Attachments: [Port of Mobile Support Letter.pdf](#)

Jenny: Tri-Rivers sent this to me and mailed the original snail mail. I am forwarding to ensure it is received prior to the 10 September deadline. Best, Judy

Judith Adams

Alabama State Port Authority

+1 251-441-7003

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

From: Charles Stover <cmstover@outlook.com>
Sent: Friday, August 31, 2018 1:31 PM
To: MobileHarborGRR@usace.army.mil
Cc: billyturner@troy.edu; Judith Adams <JAdams@asdd.com>
Subject: Tri Rivers Support

Attached is a letter of support from our organization, the original of which has been mailed to your office.

Charles Stover

President

205-540-3128



August 30, 2018

Via email to MobileGRR@usace.army.mil

Ms. Jennifer L. Jacobson
U.S. Army Corps of Engineers, Mobile District
P.O. Box 2288
Mobile, AL 36628-0001

Re: Support for the Port of Mobile Proposed Channel and Harbor Improvements

Dear Ms. Jacobson:

Tri-Rivers is a non-profit organization founded in 1960 to improve and promote the economic wellbeing of the Apalachicola-Chattahoochee-Flint (ACF) River Basin through education, promotion, and public advocacy. Tri River's members include local government agencies, large and small businesses, lake associations, and individuals who support efforts to maintain and improve the federal waterway project that enhance the quality of life for the citizens of the ACF River Basin. Among the goals of the association are to maintain, create, and develop economic use of the Apalachicola, Chattahoochee and Flint Rivers; to generate and sustain adequate funding for the operation of the federal navigation project; and to raise awareness of the benefits of the river system through contact with the general public, business community, and government officials. Members of Tri Rivers include cities and counties located from Columbus, Georgia to Apalachicola, Florida; businesses and industry such as Columbus Water Works, Westrock, Georgia Pacific and Farley Nuclear Plant, economic development agencies such as the Dothan Chamber of Commerce and the Bainbridge Chamber of Commerce; and businesses located throughout the basin.

The ACF navigation system connects to Mobile harbor through the intracoastal waterway and links eight Georgia counties, four Alabama counties and six Florida counties. Many of these counties are economically depressed and are in need of economic development.

The Alabama State Port Authority of Mobile seeks to improve the Port of Mobile's channel and harbor to serve the larger vessels that now traverse the improved Panama Canal and thereby

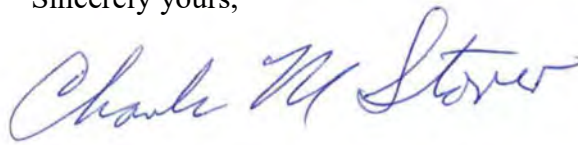
Ms. Jennifer L. Jacobson
August 30, 2018
Page 2

making the Port of Mobile more attractive as a port of call for larger ships. This harbor improvement expands the opportunity for economic development in the ACF area.

Tri Rivers strongly supports improvements to the channel and harbor of the Port of Mobile. We encourage the U.S. Army Corps of Engineers to favorably complete the study of improving the channel and harbor for the Port of Mobile and then execute said study.

Thank you for your consideration of these comments. Please feel free to contact me if I may provide additional information or assistance.

Sincerely yours,

A handwritten signature in blue ink that reads "Charles M. Stover". The signature is written in a cursive, flowing style.

Charles M. Stover
President

cc (via email): Honorable Martha Roby, 2nd district Alabama

Honorable Mike Rogers, 3rd district Alabama

Honorable Neal Dunn, 2nd district Florida

Honorable Al Lawson, 5th district Florida

Honorable Sanford Bishop, 2nd district Georgia

Honorable Drew Ferguson, 3rd district Georgia

Brian Atkins, Director Office of Water Resources Alabama

Comment 256

From: [Steve Spencer](#)
To: [Mobile Harbor GRR](#)
Subject: [Non-DoD Source] Mobile Port
Date: Thursday, August 30, 2018 3:58:13 PM
Attachments: [DOC016.PDF](#)

Please see attachment. Let me know if you have any questions.

Steve Spencer | President

Economic Development Partnership of Alabama

1320 1st Avenue South, Birmingham, AL 35233

phone 205.943.4704 | sspencer@edpa.org <<mailto:sspencer@edpa.org>>

August 30, 2018

Ms. Jennifer L. Jacobson
U.S. Army Corps of Engineers, Mobile District
P.O. Box 2288
Mobile, AL 36628-0001

Dear Ms. Jacobson:

The Economic Development Partnership of Alabama is a private, non-profit organization that was established in 1991 to enhance the state's competitiveness in economic development. Supported by leading businesses in Alabama, EDPA works with state and local allies to attract new investment, retain existing industry and work to address issues that have an impact on the state's economic growth.

I am writing to offer comment on the **Mobile Harbor, Mobile, Alabama U.S. Army Corps of Engineers Draft Integrated General Reevaluation Report with Supplemental Environmental Impact Statement**. We strongly support the widening and deepening of Mobile Harbor and consider it vitally important to the state's current and future economic development.

EDPA views the Mobile Shipping Channel as Alabama's most important transportation infrastructure asset for international trade. We have always promoted the Port of Mobile as one of Alabama's most significant economic development advantages -- one that is certainly essential to the sustainability and future growth of industry in Alabama.

We awaited the completion of the Panama Canal expansion with great anticipation, believing that it would create significant opportunities to increase international trade and contribute to Alabama's economic growth. And, based on reports of the initial traffic increase, we believe that the Panama Canal expansion presents an opportunity for the Port of Mobile -- already one of the nation's largest in terms of annual tonnage handled -- to become an even more prominent port in the U.S. shipping network.

However, we understand that at its current depth and width, Mobile Harbor is limited in its ability to fully accommodate larger Post Panamax ships, resulting in congestion, transit delays and limitations on cargo capacity.

EDPA appreciates the opportunity to provide input and sincerely hopes the project to widen and deepen the Shipping Channel will be approved, enabling the Port of Mobile to become an even greater contributor to the economy of our state and nation.

Sincerely,


Steve Spencer
President

bcc: EDPA Board of Directors

Comment 257

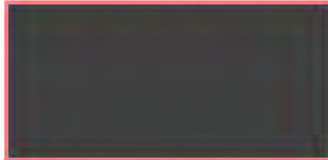
From: [REDACTED]
To: [Mobile Harbor GRR](#)
Cc: [Jeff Collier](#); [REDACTED]@ol.com
Subject: [Non-DoD Source] Ship Channel Widening
Date: Sunday, August 26, 2018 12:17:50 PM

As a Dauphin Island resident, I am greatly concerned about the lack of consideration the Corps has given to the impact on Dauphin Island of the deepening and widening of the ship channel. The Corps, by its' own admission, has concluded that the dredging of the ship channel currently has negatively impacted the sand which would normally replenish Dauphin Island were it not for the dredging of the ship channel. Widening and deepening the channel will only exacerbate this problem.

Your report also does NOT address where the spoils will be placed but instead puts it into a category of "unresolved issues". How can you make a decision about such a major issue without addressing where and how the spoils will be placed. Leaving this major issue in an unresolved state simply could lead to further damage of our natural resources and to major damage to Dauphin Island.

Please don't conclude the study until further consideration of these issues and resolution of them has been made.

Thank you and please feel free to contact me about this issue.



Sent from my iPad

Comment 258

From: [Jim](#)
To: [Mobile Harbor GRR](#)
Subject: [Non-DoD Source] Letter of Support for Mobile Bay (Draft Integrated General Reevaluation Report and the Environmental Impact Study)
Date: Friday, August 24, 2018 4:04:18 PM
Attachments: [Mobile Harborv GRR Letter.pdf](#)

Please find attached the Economic Development Association of Alabama's letter in support of improvements to Mobile Bay. Please don't hesitate to contact me if you have any questions.

Thank You,

Jim Searcy

Executive Director

Economic Development Association of Alabama

2 North Jackson Street

Suite 302

Montgomery, AL 36104

Office: (334) 676-2085 / Mobile: (334) 303-7994

jim@edaa.org



2 North Jackson Street, Suite 302
Montgomery, AL 36104
Office – 334.676.2085
Fax – 334.676.2087
E-mail – info@edaa.org
Web Site – www.edaa.org

Economic Development Association of Alabama

August 24, 2018

Ms. Jennifer L. Jacobson
U.S. Army Corps of Engineers, Mobile District
P.O. Box 2288
Mobile, AL 36628-0001

Ms. Jacobson,

On behalf of the Board of Directors and the 475 members of the Economic Development Association (EDAA), I am writing in support of the proposed improvements to the Mobile Bay. The Port of Mobile and the Alabama State Docks are essential to Alabama's continued economic growth and the members of EDAA recognize that the improvements outlined in the Draft Integrated General Reevaluation Report and the Environmental Impact Study will enhance the viability of one of Alabama's greatest assets. Further it will allow Alabama economic developers to incorporate economic recruitment and retention strategies that will help grow and diversify the State's economy.

Alabama has been successful in growing a robust and diverse economy focusing on the automotive, aerospace, and advanced manufacturing. At the same time we continue to support the expansion of our existing industrial base and natural resources. Improvements to the Port would allow that to continue. Ultimately, the proposed changes to Mobile Bay mean more jobs for Alabama citizens and a vibrant, sustainable economy.

Finally, as Alabama continues to develop foreign markets and become a larger presence in a global economy, we must have facilities that offer the necessities of world commerce. Please let me know if you need additional information.

Sincerely,

A handwritten signature in black ink, appearing to read "Jim Searcy". The signature is fluid and cursive, with a large, sweeping flourish at the end.

Jim Searcy

Comment 259

From: [REDACTED]
To: [Mobile Harbor GRR](#)
Subject: [Non-DoD Source] Port of Mobile Harbor Deepening and Widening
Date: Friday, August 24, 2018 1:56:12 PM

I wish to convey my full support for the deepening and widening of the Mobile Harbor Channel.

Ships serving the port are getting bigger to realize the economies of scale. These are not just container ships. They include bulk and breakbulk ships as well.

Deepening and widening of the channel will allow the larger ships to have two-way traffic safely pass one another, adding efficiency to the port, and to the overall safety to ship movements in the harbor.

Thank you for your consideration in this matter.

Sincerely,

[REDACTED]

Fairhope, Alabama

Comment 260

From: [Shelly Mattingly](#)
To: [Mobile Harbor GRR](#)
Cc: [Kellie Hope](#); [Brian Willman](#); [Daniel Dennis](#); [Judith Adams](#)
Subject: [Non-DoD Source] Letter of Support from the Mobile Area Chamber of Commerce
Date: Friday, August 24, 2018 8:14:14 AM
Attachments: [letter_of_support.pdf](#)

Shelly Mattingly, IOM

Executive Assistant to the

President and CEO

Mobile Area Chamber of Commerce

P.O. Box 2187

Mobile, AL 36652-2187

251-431-8655 Fax – 251-432-1143

smattingly@mobilechamber.com

Blockedwww mobilechamber.com

Twitter: @MobileChamber

Facebook: Blockedwww facebook.com/MobileChamber <Blockedhttp://www facebook.com/MobileChamber>

August 23, 2018

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

Dear Sirs:

As President and CEO of the Mobile Area Chamber of Commerce, and on behalf of our nearly 2,000 business members and their 110,000 employees, I wish to express our support for the U.S. Army Corps of Engineers' project to increase the depth and width of the Mobile Harbor Channel.

The Mobile Area Chamber of Commerce serves as the lead economic development agency for the City of Mobile and Mobile County. One of our key strategic advantages lies in the capabilities of our deep water Port of Mobile. Most recently, the Port played a critical part in Walmart's decision to invest \$135 million in a 2.5 million-square-foot distribution facility in Irvington. Based on the Chamber's current project activity, there is growing interest in the distribution sector in Mobile, and we can certainly expect additional investment.

As import/export activity continues to grow and drive our economy, it's critical our ship channel and turning basin be widened and deepened to accommodate more and larger ships to keep our port competitive in the future.

Therefore, the Chamber supports and encourages the Corps to issue a Record of Decision and move forward with deepening and widening of the Mobile Harbor Channel.

Sincerely,



William B. Sisson
President and CEO

sm

cc: Brian Willman
Daniel Dennis
Kellie Hope

Comment 261

From: [MITTENZWEI Kurt - ERU](#)
To: [Mobile Harbor GRR](#)
Subject: [Non-DoD Source] Mobile Harbor Deepening and Widening Project
Date: Thursday, August 23, 2018 2:27:57 PM
Attachments: [Mobile Dredging Project.docx](#)

Ms. Jennifer L. Jacobsen

U.S. Army Corps of Engineers, Mobile District

Please note attached letter outlining CMA CGM America's support of the Mobile Harbor Deepening & Widening Project.

Best Regards

Kurt Mittenzwei

Vice President, Marine & Terminal Operations

Direct Line: +1 (201) 806-9540

Cell: +1 (908) 361-5498

CMA CGM (America) LLC

Blockedwww.cma-cgm.com <Blockedhttp://www.cma-cgm.com/>



CMA CGM (America) LLC
as Agent of CMA CGM SA

Ms. Jennifer L. Jacobsen
U.S. Army Corps of Engineers, Mobile District
Mobile, AL 36628-0001

Dear Ms. Jennifer L Jacobsen

I am writing this letter to express my sincere support on behalf of CMA CGM America LLC endorsing the proposed project for the deepening and widening of the Mobile Harbor. With continued container growth in the Gulf, CMA CGM will be deploying larger vessels to meet customer demand. It's essential that the Port of Mobile has the infrastructure in place to ensure our vessels can continue to call the Port with efficiency and safety at the forefront.

1. Based on the existing traffic and the delays caused by one-way traffic when wide beam or passenger carrying ships are moving, the widening of a 3-mile segment from the current 400' width to 500' will allow ships to pass each other and reduce the delays of arrival and sailing tremendously. The safety and efficiency of the wider channel will be assured and the Port Users growing needs can be met.
2. The deepening of the channel from the sea buoy in the Gulf to the Mobile Container Terminal will allow the added tons that can be moved via the McDuffie Coal Terminal and the Mobile Container Terminal. The added tonnage per vessel will result in economy of scale and cheaper freight rates. Larger container ships provide more available slots for Mobile containers as well as added empty containers for increased export shipments.
3. Increasing the size of the Choctaw Pass Turning Basin will allow the larger vessels to turn.

The Port of Mobile remains a key strategic partner to CMA CGM America. The deepening and widening of the Mobile Harbor will ensure we are able to service our customers and allow all port Users the ability for continued growth & success in the region.

Your consideration and support in this matter would be greatly appreciated

Sincerely,
Kurt Mittenzwei

Kurt Mittenzwei
VP, Marine & Terminal Operations
CMA CGM (America) LLC

Comment 262

From: [Bob Collins](#)
To: [Mobile Harbor GRR](#)
Subject: [Non-DoD Source] Mobile Harbor Project
Date: Thursday, August 23, 2018 8:48:41 AM

Ms. Jacobsen,

As a customer of the Alabama State Docks for over forty years, I can't stress enough how important it is for us to deepen and widen the Mobile Ship Channel. Jimmy Lyons and his administrators have done a fantastic job of peering into the future in order to keep the ASDD on the cutting edge of worldwide shipping and commerce. The growth and sustainability of McDuffie Coal Terminal, general cargo operations, as well as APM Terminals, depend heavily on the ability to compete on a global level. The completion of this project will help keep the Port of Mobile viable for many years to come.

Thank you for your time,

H R Collins, President

Bay Steel Corp

bayinc@bellsouth.net <<mailto:bayinc@bellsouth.net>>

251-433-0514 ph

251-433-1918 fax

Comment 296

From: [Tom Tisa](#)
To: [Mobile Harbor GRR](#)
Cc: [Chuck Camp](#)
Subject: [Non-DoD Source] CN letter of support - Mobile EIS
Date: Thursday, August 23, 2018 8:10:55 AM
Attachments: [MOBILE LETTER OF SUPPORT.pdf](#)

Ms. Jennifer Jacobsen, please find attached CN's letter of support for the Mobile Harbor GRR Supplemental Environmental Impact Study. Tom



Thomas J. Tisa
Director – Corporate Development
17641 South Ashland Avenue
Homewood, Illinois 60430

August 23, 2018

Ms. Jennifer L. Jacobsen
U.S. Army Corps of Engineers, Mobile District
PO Box 2288
Mobile, AL 36628-0001

RE: Mobile Harbor, Mobile, Alabama Draft Integrated General Reevaluation Report with Supplemental Environmental Impact Statement, Mobile County, Alabama

CN is an active participant in freight transportation to/from the Port of Mobile. We support this project as a way to maintain Mobile's competitiveness and promote the growth of intermodal shipments.

1. Based on the existing traffic and the delays caused by one way traffic when wide beam or passenger carrying ships are moving the widening of a 3-mile segment from the current 400' width to 500' will allow ships to pass each other and reduce the delays of arrival and sailing tremendously. The safety and efficiency of the wider channel will be assured and the Port Users growing needs can be met.
2. The deepening of the channel from the sea buoy in the Gulf to the Mobile Container Terminal will allow the added tons that can be moved via the McDuffie Coal Terminal and the Mobile Container Terminal. The added tonnage per vessel will result in economy of scale and competitive freight rates. Larger container ships means more available slots for Mobile containers as well as added empty containers for increased export shipments.
3. Increasing the size of the Choctaw Pass Turning Basin will allow the larger vessels to turn.

Sincerely,

A handwritten signature in black ink that reads "Tom Tisa". The signature is written in a cursive style with a large, sweeping 'T' and 'I'.

Tom Tisa

Comment 264

From: [Rodriguez, Cristina](#)
To: [Mobile Harbor GRR](#)
Subject: [Non-DoD Source] MOBILE HARBOR DEEPENING AND WIDENING PROJECT
Date: Tuesday, August 21, 2018 10:47:51 AM

Ms. Jennifer L. Jacobsen

U.S. Army Corps of Engineers, Mobile District

Mobile, Alabama

Dear Ms. Jacobsen,

We have been costumers of the Mobile Port for the past 20 years and have always benefited from its outstanding services. Our shipments from the Port of Mobile greatly support our operations in Latin America therefore we would like to endorse the widening and deepening of the Mobile Ship Channel provided all environmental and social issues are well founded and considered. Thank you.

Cristina N. Rodriguez

Buyer

...

Smurfit Kappa The Americas

1301 International Parkway, Suite 550, Sunrise, Florida 33323, USA

...

Tel: +1 (954) 514-2584

Fax: +1 (954) 514-2599

cristina.rodriguez@smurfitkappa.com <<mailto:cristina.rodriguez@smurfitkappa.com>>

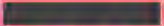
Blockedwww.smurfitkappa.com <Blockedhttp://www.smurfitkappa.com>

Check out our microsite: Blockedwww.openthefuture.info <Blockedhttp://www.openthefuture.info/>

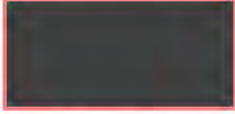
IF YOU PRINT THIS EMAIL, PLEASE RECYCLE IT. PAPER IS RENEWABLE AND RECYCLABLE

This email and any files transmitted with it may be confidential and intended solely for the use of the individual or entity to which they are addressed. If you have received this email in error please notify the sender.
Smurfit Kappa Group plc. Registered in Ireland No. 433527. Registered office: Beech Hill, Clonskeagh, Dublin 4.

Comment 265

From: 
To: [Mobile Harbor GRR](#)
Subject: [Non-DoD Source] Personal comments
Date: Tuesday, August 21, 2018 9:28:42 AM
Attachments: [Channel comments.docx](#)

Thanks for the opportunity



Mobile, AL 36695

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

Channel comments

The **Mobile Harbor, Mobile, Alabama Draft Integrated General Reevaluation Report with Supplemental Environmental Impact Statement** does digitally integrate an “updated” EIS with the several USACOE reports dating back to 1980. Many of those efforts use descriptive data from even earlier studies of the Bay. More recent work has been included but it remains somewhat limited in terms of confidence in the baselines. Obviously, it would be impossible to re-do all this work.

However, the TSP established a hydrologic baseline largely with data from the **past**, largely from a single year’s weather data and a variety of episodic events. Unfortunately, the concept of “shifting baselines” has been beautifully articulated by both Daniel Pauly and Jeremy Jackson. This is a serious issue since the average conditions of 2025, and beyond, will be influenced by climate change, population growth, etc., and things that we haven’t even thought of! Given the potential problems, they could have made two runs, one an average "high/flood" regime and another using an average "low/drought" year. That is not a huge statistical obstacle. Those results (e.g. salinity changes) would allow us to make better-informed projections of impacts on biota and everything that depends on it. The current conclusions may prove to be accurate, but they are flawed by the assumption of constancy.

I suppose that the expansion of the Panama Canal virtually forces them to follow suit with the channel deepening. It's interesting to speculate on the future of coal, both coming and going through the channel, as a factor. The economic arguments are strong, but they were for the Tenn-Tom project too - how did that work out for them?

The volume available in relic shell excavation sites is based on 30+ year old surveys. These volumes could have been reduced by normal settling of bed load. A more recent assessment would seem appropriate – easily and quickly done.

My cynical side clearly acknowledges that it's going to "get done" and the system will almost certainly adjust. It's simply unclear how to predict the winners and losers in the resource base.

Comment 266

From: [Atul Sabharwal](#)
To: [Mobile Harbor GRR](#)
Cc: [Christy Alvord](#); [Edmund Redd](#)
Subject: [Non-DoD Source] Mobile Harbor Deepening and Widening Project
Date: Monday, August 20, 2018 3:21:01 PM

To

Ms. Jennifer L. Jacobsen

U.S. Army Corps of Engineers, Mobile District

PO Box 2288

Mobile, AL 36628-0001

Dear Ms. Jacobsen ,

We, Vulcan Materials, operate a bulk terminal a Blakely Island where we import anywhere from 500,000 - 1,000,000 tons of construction aggregates to serve the construction needs of the greater Mobile market. We import the aggregate using specialized panamax sized self discharging belted self unloaders which are significantly more expensive than the conventional bulk carriers mainly due to their efficiency of discharge and short port stay.

We have been operating this terminal from the early 90's and now with the increased traffic of wide beam vessels calling the port of Mobile our ships often have to wait on these wide beam ships to clear the channel significantly impacting our cost structure. As you can appreciate, aggregates being a commodity, these costs are not a pass through to the end user and have to be absorbed by us.

We are of the opinion that deepening and widening of the channel to allow wide beam ships to pass each other will reduce the waiting time for all ships due to such movements thus improving the efficiency of the port and position the Port of Mobile favorably for the future as the place to do business.

Please reach out to me if you need additional information.

I remain yours sincerely.

Atul Sabharwal
Off: +1 281 276 4954
Cell: +1 713 824 5426

From: [Wild, Kevin](#)
To: [Mobile Harbor GRR](#)
Subject: [Non-DoD Source] Mobile Harbor Project
Date: Friday, August 17, 2018 9:38:11 AM

Ms. Jennifer L. Jacobson :

Good day Ms. Jacobson, I hope this note finds you doing well. My name is Kevin Wild, President of CG Railway LLC (CGR), and I would like to express my support for the deepening and widening of the Mobile Ship channel.

CGR operates two wide beam rail ferry vessels between the Port of Mobile and the Port of Coatzacoalcos , Mexico. This is the only rail ferry service using vessels and having the capacity for 115 railcars in operation in the United States. The service has been in operation since 2001 and has completed over 1,200 voyages . Fast and consistent transit is a key component for our liner service to compete against the more traditional land bridges. As the number of port calls by wide beam vessels have increased our delays have increased and thereby our operations are not as consistent. As I know you can appreciate, vessel delays not only impact our ability to compete but it has great financial impact on CGR and has a negative economic impact on the region. The fewer voyages CGR is able to complete reduces the services and products we purchase from local vendors/service providers and the less reliable the service is makes it difficult for manufacturers in the region to take full advantage of the growing NAFTA market.

We are committed to the Port of Mobile . Our operation requires special built rail terminal , the new double deck terminal (\$30million) was completed in 2007, and connectivity to multiple US railroads (Mobile provides 5 connecting railroads) . We are committed to this service. We have proven that this mode of transportation works and that it work best via the Port of Mobile. Our commitment to the service is clearly illustrated in that we are in discussions with shipyards for the construction of two new rail ferry vessels . These two vessels would be coming on line in the first half of 2021 and they will be wide beam vessels as well. The growing trend to larger and deeper vessels will continue and therefore it is critical that steps are taken to make sure that the Port of Mobile is able to effectively handle the volume so that the Port and the serving carriers can remain competitive.

Best regards

Kevin Wild

President

CG Railway , LLC

504-249-6228 or 251-599-4125

Comment 268

From: [Byrd, Bruce](#)
To: [Mobile Harbor GRR](#)
Subject: [Non-DoD Source] SSAB Letter of Support for Harbor Widening Project
Date: Thursday, August 16, 2018 8:50:29 AM
Attachments: [image001.png](#)
[SKM_C36818081608460.pdf](#)

Please find attached comments and letter of support for the Mobile harbor widening project. Any questions or comments please feel free to contact me directly.

Thanks

Bruce

Bruce Byrd
Director of Transportation
SSAB Americas
D 251-264-3294 M 251-581-4101
bruce.byrd@ssab.com <<mailto:bruce.byrd@ssab.com>>

Please note new direct line #: 251-264-3294

SSAB is a Nordic and US-based steel company. SSAB offers value added products and services developed in close cooperation with its customers to create a stronger, lighter and more sustainable world. SSAB has employees in over 50 countries. SSAB has production facilities in Sweden, Finland and the US. SSAB is listed on the NASDAQ OMX Nordic Exchange in Stockholm and has a secondary listing on the NASDAQ OMX in Helsinki.
Blockedwww.ssab.com <Blockedhttp://www.ssab.com/> .

This message and any thereto attached electronic files are for the designated recipient only and may contain privileged or confidential information. Any unauthorized use, disclosure or copying of this message or its contents by persons other than the designated recipient is strictly prohibited. If you have received the message in error, please notify the sender immediately and delete the original and any copies thereof.



August 15, 2018

Ms. Jennifer L. Jacobsen
U.S. Army Corps of Engineers
Mobile District
P.O. Box 2288
Mobile, Alabama 36628-0001
mobileharborGRR@usace.army.mil

Re: Mobile Harbor Project

Dear Ms. Jacobsen

On behalf of SSAB Americas, I am pleased to extend our support for the deepening and widening of the Mobile harbor and channel. This project will go a long way to increase capacity and efficiency within the harbor, and improve safety for the region.

SSAB is a global leader in value added, high strength steel. SSAB offers products developed in close cooperation with its customers to attain a stronger, lighter and more sustainable world. We are proud to manufacture steel in Axis, Alabama where we convert scrap metal to finished steel plate for increasingly demanding applications, including military ships, heavy machinery, rail cars, and pipelines.

Located just 16 miles from the Port of Mobile, Axis was an ideal greenfield site for a steel investment in 2001. We depend on a safe, reliable and efficient waterborne transportation system to receive the raw materials used in our manufacturing process, and to carry finished steel products to our customers. The Port is now one of the fastest growing harbors in the nation- in any given year, between 52-67 million tons of cargo move annually through the harbor. Deepening and widening the navigation channel is necessary to meet the increased capacity of the Port.

The Mobile ship channel is critically important to SSAB's operations in Southwest Alabama. Our mill is dependent on both barges and cargo ships in moving our finished products and raw materials. In 2017, SSAB shipped 118K tons of finished plate and coil and brought in 557K tons of ferrous scrap on 497 barges. We also exported 49K tons of finished product over 68 different vessels that had called on the Port of Mobile. We expect 2018 to surpass these levels in all areas. It is crucial that the port of Mobile be a dependable link for Alabama manufacturers to our customers throughout the country and around the globe.

SSAB Enterprises, LLC

801 Warrenville Road, Suite 800
Lisle, IL 60532

T +1 630 810 4800
F +1 630 810 4600

Toll-free +1 877 594 7726
www.ssab.com

We appreciate the opportunity to comment on the proposed project and thank you for your work to support America's infrastructure. If you have any questions, please contact me at bruce.byrd@ssab.com or Katie Larson at katie.larson@ssab.com.

Sincerely,

A handwritten signature in black ink, appearing to read 'Bruce Byrd', written in a cursive style.

Bruce Byrd
Director of Transportation
SSAB Americas

Comment 269

From: [REDACTED] ellsouth.net
To: [Mobile Harbor GRR](#)
Cc: [REDACTED] CIV (US); [Newell, David P CIV CESAM CESAD \(US\)](#); jcollier@townofdauphinisland.org; [Dennis Knizley](#)
[REDACTED]
Subject: [Non-DoD Source] Berm extension,, Mobile District Public Notice
Date: Wednesday, August 15, 2018 8:06:18 PM
Attachments: [08082018_SIBUA_PUBLIC_NOTICE_SIGNED_LETTER_.pdf](#)

I just received this public notice about the SIBUA extension, but it did not come through the Mobile Harbor Group. Curious when will the Mobile Harbor Group release the public notice to the general public through its normal distribution list for the Mobile Harbor GRR/SEIS? In addition, since the announcement does not elaborate on the depth of the extension, would please advise me of the depth of the Gulf of Mexico where the SIBUA will be extended at this location?

Thanks,

[REDACTED]



REPLY TO
ATTENTION OF

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

CESAM PD-EC
PUBLIC NOTICE NO. FP18-MH01-09

August 8, 2018

JOINT PUBLIC NOTICE

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

AND

ALABAMA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

**SAND ISLAND BENEFICIAL USE AREA EXPANSION
MOBILE HARBOR NAVIGATION PROJECT**

MOBILE COUNTY, ALABAMA

A FEDERALLY AUTHORIZED NAVIGATION PROJECT

Interested persons are hereby notified that the U.S. Army Corps of Engineers (USACE), Mobile District, is proposing to further expand the existing Sand Island Beneficial Use Area (SIBUA) by approximately 3,305 acres (to the west towards Dauphin Island) for the continued placement of Mobile Harbor Federal Navigation Channel operations and maintenance (O&M) material. This action would provide for the continued return of sediment into the littoral system as well as increasing placement capacity in the SIBUA, consistent with established regional sediment management implementation principles and goals. The placement activities may be accomplished by using hopper dredges, hopper dredges with pump out capabilities, mechanical dredges (clamshell, etc.) or hydraulic pipeline dredges. The characteristics of the sediment being dredged and placed range from fine to medium-grained quartz sand from the Mobile Harbor Federal Navigation channel(s).

This public notice is issued in accordance with rules and regulations published in the Federal Register on April 26, 1988. These regulations provide for the review of the dredging programs for federally authorized projects. These laws are applicable whenever dredged or fill material may enter navigable waters. The recipient of this notice is requested specifically to review the proposed action as it may impact water quality, relative to the requirements of Section 404(b)(1) of the Clean Water Act. We also request comments on any other potential impacts.

WATERWAY AND LOCATION: Mobile Harbor Federal Navigation Channel, Sand Island Beneficial Use Area, and the Gulf of Mexico, Mobile County, Alabama.

PROJECT AUTHORIZATION: The navigation channel dredging in Mobile Bay and Mobile River began in 1826 with enactment of the River and Harbor Act of 1826. Over subsequent years, the Federal project at Mobile River and Mobile Bay was expanded to include adjoining channels within the bay. Section 104 of the River and Harbor Act of 1954 (House Document 74, 83rd Congress, First Session, as amended, and previous acts) authorized a 40-foot channel. Improvements to the existing Federal project were authorized in the Water Resources Development Act of 1986 (PL 99 – 662, Ninety-ninth Congress, Second Session), which was approved November 17, 1986, and amended by Section 302 of the Water Resources Development Act of 1996.

The federally-authorized Mobile Harbor, Alabama navigation project consists of the following:

- a. A 57-foot deep by 700 feet wide channel from the Gulf of Mexico for approximately eight miles to Mobile Bay;
- b. A 55-foot deep by 550 feet wide channel from the mouth of the Mobile Bay for a distance of approximately 29 miles to near the mouth of Mobile River, including a passing lane two miles long and 625 feet wide at mid-bay;
- c. A 55-foot deep by 750 feet by 4,000 feet wide anchorage area just south of McDuffie Island;
- d. A 55-foot deep by 1,500 feet by 1,500 feet wide turning basin opposite McDuffie Island;
- e. A 40-foot deep channel with the width varying from 700 feet, near the Mobile River mouth, to 500 feet, near the Cochrane Bridge (U.S. Highway 98), a distance of approximately four miles;
- f. A 40-foot deep by 800 feet to 1,000 feet by 2,500 feet wide turning basin opposite the Alabama State docks between river miles 1.0 to 1.5;
- g. A 40-foot by 1,000 feet by 1,600 feet wide turning basin just south of the Cochrane Bridge.

Approval for advanced maintenance for the Federal Mobile Harbor navigation project was received from South Atlantic Division in the mid-1990s as per the Navigation Regulations ER1130-2-520, November 29, 1996. As such, the navigation channels have associated advanced maintenance to accomplish dredging in an efficient, cost-effective, and environmentally responsible manner. In addition to the federally-authorized channel dimensions providing for navigation, two sediment basins in the lower Mobile River and three sediment basins in the bay channel have been previously authorized and approved.

These sediment basins are to provide improved channel maintenance efficiency. Each of the basins are several thousand feet long and have depths ranging from four feet to 10 feet lower than the existing navigation channel bottom. The basins decrease frequency of dredging to provide a more cost effective and reliable channel. In addition to sediment basins, an advanced widening feature is authorized for the bar channel.

Dredged material may be removed from the channels by dragline/clamshell, hydraulic pipeline and/or hopper dredge, and all material would be placed in previously-approved upland disposal areas (DAs), open water disposal areas, the SIBUA or the Mobile Harbor Ocean Dredge Material Disposal Site (ODMDS). See the following table for placement designations by channel section.

Mobile Harbor Channel Segment	Approved Placement Areas
River Channel	Upland DAs, Mobile Harbor ODMDS
Bay Channel	Mobile Harbor ODMDS, Open-water DAs
Bar/Entrance Channel	SIBUA, Mobile Harbor ODMDS

DESCRIPTION OF PROPOSED ACTION: The USACE, Mobile District is responsible for the O&M of the federally-authorized Mobile Harbor Federal navigation project. Three federally-authorized navigation channels cross the bay, the Mobile Ship Channel from north to south, the Gulf Intracoastal Waterway from east to west, and the Theodore Industrial Park from northwest to southeast. The southern-most portion of authorized navigation channel, known as the Mobile Bar Channel, extends approximately seven miles from the Gulf of Mexico into Mobile Bay, and is typically maintained by a hopper dredge, with the sandy material placed in the authorized SIBUA as shown in **Figure 1**.

The SIBUA, located west of the channel on the ebb tidal shoal, was evaluated to determine whether capacity exists to accommodate projected increases in maintenance dredged material. An additional level of analysis to evaluate transport rates leaving SIBUA as well as capacity available within depth constraints of dredging equipment was performed in an effort to balance safe and efficient dredged material placement practices, while ensuring sandy material dredged from the Bar Channel is maintained within the littoral system. An estimate using USACE 2018 surveys shows the site capacity in the existing SIBUA boundaries is inadequate using current placement practices.

Under the Proposed Action, the USACE, Mobile District is proposing to further expand the existing SIBUA by approximately 3,305 acres (to the west towards Dauphin Island) for the continued placement of Mobile Harbor Federal Navigation Channel O&M material as shown in **Figure 2**. This action would provide for the continued return of sediment into the littoral system as well as increasing placement capacity in the SIBUA, consistent with established regional sediment management implementation principles and goals. The placement activities may be accomplished by using hopper dredges, hopper dredges with pump out capabilities, mechanical dredges (clamshell, etc.) or hydraulic pipeline dredges.

The characteristics of the sediment being dredged and placed range from fine to medium-grained quartz sand from the Mobile Harbor Federal Navigation channel(s).

WATER QUALITY CERTIFICATION: Pursuant to the requirements of the Clean Water Act, a state water quality certification will be requested from Alabama Department of Environmental Management (ADEM) to cover the activities associated with the proposed removal of material from the SIBUA for placement and construction of the island. A decision relative to water quality certification will be made by ADEM upon completion of the required comment period for this public notice and other coordination with the appropriate agencies.

COASTAL ZONE CONSISTENCY: Pursuant to the Coastal Zone Management Act, the proposed action is consistent with the Alabama Coastal Management Program to the maximum extent practicable. Upon completion of the required comment period and completed coordination with the appropriate agencies, a decision relative to coastal zone consistency will be made by ADEM.

USE BY OTHERS: The proposed action is not expected to create significant impacts on land and water use plans in the vicinity of the project. Use of the waters in the vicinity of the project area includes commercial shipping, fishing and recreational boating.

NATIONAL ENVIRONMENTAL POLICY ACT (NEPA) CONSIDERATIONS:

In accordance with the requirements of the NEPA impacts associated with the Proposed Action, an Environmental Assessment (EA) has been prepared and is available upon request. Based on the conclusion presented in the EA, it is determined that the implementation of the proposed action would not result in long-term adverse impacts and that no significant cumulative impacts would occur. The EA is available at <http://www.sam.usace.army.mil/Missions/Planning-Environmental/Environmental-Assessments/>. The EA will be updated should comments be provided that necessitate inclusion. Upon finalization of the EA, a Finding of No Significant Impacts (FONSI) will be prepared.

SECTION 404 (B)(1) EVALUATION REPORT: A Section 404(b)1 evaluation has been prepared to evaluate impacts associated with the proposed action in accordance with guidelines promulgated by the Environmental Protection Agency under Section 404(b)(1) of the Clean Water Act. Impacts associated with this action include a temporary increase in turbidity and suspended solids concentrations in and adjacent to the dredging and placement areas, short-term loss of benthic organisms and localized short-term degradation of esthetics near the placement area. A 404(b)(1) Evaluation Report has been prepared and is available at <http://www.sam.usace.army.mil/Missions/Planning-Environmental/Environmental-Assessments/>. Recent sediment quality investigations performed in the channel demonstrate the material to be substantially free of contaminants of concern and suitable for placement in the SIBUA.

ENDANGERED/THREATENED SPECIES: Coordination for the proposed action is being conducted with the U.S. Department of the Interior, Fish and Wildlife Service (USFWS), and the U.S. Department of Commerce, National Marine Fisheries Service (NMFS). Several species of marine mammals, turtles, fish and birds listed as endangered or threatened occur in the Gulf of Mexico off the coast and in upland areas of Alabama. In addition, critical habitat for piping plover has been designated in most northerly portion of the SIBUA. However, this area is submerged. The USACE, Mobile District has determined that the proposed action may affect, but is not likely to adversely affect those protected species.

ESSENTIAL FISH HABITAT (EFH): EFH is defined in the Magnuson-Stevens Fishery Conservation and Management Act as "those waters and substrates necessary to fish for spawning, breeding, feeding or growth to maturity." The designation and conservation of EFH seeks to minimize adverse effects on habitat caused by fishing and non-fishing activities. The NMFS, Habitat Conservation Division (HCD) has identified EFH habitats for the Gulf of Mexico in its Fishery Management Plan Amendments. These habitats include estuarine areas, such as estuarine emergent wetlands, seagrass beds, algal flats, mud, sand, shell, and rock substrates, and the estuarine water column. The habitat in the project area, which is located just outside the mouth of Mobile Bay, consists of Gulf of Mexico waters and sandy substrate consistent with sediment along the northern Gulf of Mexico. The NMFS, HCD has management plans for brown shrimp (*Penaeus aztecus*), white shrimp (*P. setiferus*), red drum (*Sciaenops ocellatus*), and Spanish mackerel (*Scomberomorus maculatus*) within the project area. The proposed activities would not adversely impact intertidal wetlands nor vegetated waterbottoms. Impacts would be temporal in nature associated with the dredging and placement activities. The proposed activities would not significantly affect coastal habitat identified as EFH in the project area. Based on the extent of this habitat in the general vicinity of the project (small in size compared to the much larger Mobile Bay as a whole) and the short-term nature (approximately 2-3 months for each placement event) of the impact, the overall impact to fisheries resources is considered negligible.

CULTURAL RESOURCES CONSIDERATION: Section 106 of the National Historic Preservation Act (NHPA) of 1966, as amended and implementing regulations 36 Code of Federal Regulation (CFR) Part 800 requires the USACE, Mobile District to consider the effects of its undertakings upon historic properties (which includes but is not limited to) historical, architectural, archaeological, and cultural resources and to consult with other agencies and Tribal Nations to avoid or minimize or mitigate adverse effects upon those resources. A preliminary cultural resources evaluation revealed a high potential for submerged prehistoric and historic archaeological resources in the project area. As such, a formal maritime Phase I cultural resources survey has been conducted. The survey identified anomalies, and project activities associated with dredging and placement of material will avoid those anomalies. Coordination will be conducted with the Alabama

State Historic Preservation Officer and the appropriate Tribal Nations regarding the results of the survey and the effects of the project on historic properties.

EVALUATION: The decision whether to proceed with the proposed action would be based on an evaluation of the overall public interest. That decision would reflect the national concerns for both protection and utilization of important resources. The benefits that may be expected to accrue from this proposal must be balanced against its reasonably foreseeable detriments. The decision whether to proceed and the conditions under which the activity would occur would be determined by the outcome of this general balancing process. All factors that may be relevant to the proposed action would be considered. Among these are conservation, economics, esthetics, general environmental concerns, wetlands, historic properties, fish and wildlife values, flood hazards, flood plain values, land use, navigation, shoreline erosion and accretion, recreation, water supply and conservation, water quality, energy needs, safety, food and fiber production, mineral needs, considerations of property ownership, and in general, the needs and welfare of the public. The proposed action would proceed unless it is found to be contrary to the overall public interest. Inasmuch as the proposed work would involve the discharge of materials into navigable waters, specification of the proposed placement sites associated with this Federal project is being made through the application of guidelines promulgated by the Administrator of the Environmental Protection Agency in conjunction with the Secretary of the Army. If these guidelines alone prohibit the specification of any proposed placement site, any potential impairment of the maintenance of navigation, including any economic impacts on navigation and anchorage that would result from the failure to use this site would also be considered.

COORDINATION: Among the agencies receiving copies of this public notice are:

Region 4, U.S. Environmental Protection Agency
U.S. Department of the Interior, Fish and Wildlife Service, Daphne, Alabama
Regional Director, National Park Service
U.S. Department of Commerce, National Marine Fisheries Service, Baton Rouge,
Louisiana
U.S. Department of Commerce, National Marine Fisheries Service, Protected Species
Branch, St. Petersburg, Florida
Commander, Eighth Coast Guard District
Alabama State Historic Preservation Officer
Alabama Department of Environmental Management
Alabama Department of Conservation and Natural Resources
Gulf of Mexico Fishery Management Council
U.S. Department of Agriculture, Natural Resources Conservation Service

August 8, 2018

Other Federal, State, and local organizations, affiliated Indian Tribe interests, and U.S. Senators and Representatives of the State of Alabama are being sent copies of the notice and are being asked to participate in coordinating this proposed work.

CORRESPONDENCE: Any person who has an interest that may be affected by the proposed activity may request a public hearing. Any comments or requests for a public hearing must be submitted in writing to the District Engineer within 30 days of the date of this public notice. A request for a hearing must clearly set forth the interest that may be affected and the manner in which the interest may be affected. You are requested to communicate the information contained in this notice to any other parties who may have an interest in the proposed activities. Correspondence concerning the public notice should refer to Public Notice No. **FP18-MH01-09** and should be directed to the Commander, U.S. Army Engineer District Mobile, P.O. Box 2288, Mobile, Alabama 36628-0001, ATTN: CESAM-PD-EC. For additional information please contact Ms. Caree Kovacevich at (251) 690-3026.



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



Figure 1: Mobile Harbor Federal Navigation Channel currently-authorized project

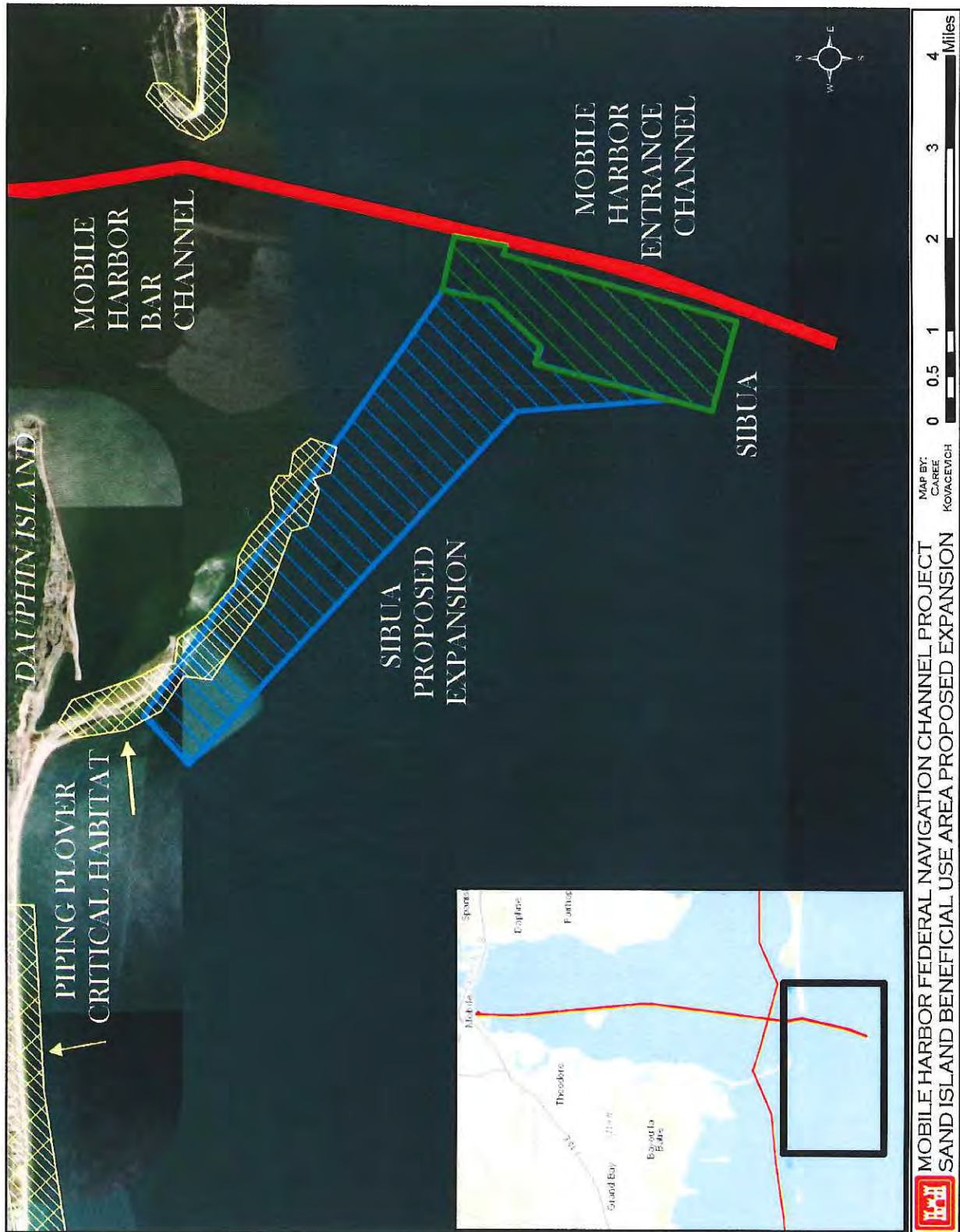


Figure 2: SIBUA Proposed Expansion Area

Comment 270

From: [Shirley Parmer](#)
To: [Mobile Harbor GRR](#)
Cc: ljackson@mobilebaykeeper.org
Subject: [Non-DoD Source] Letter From Jack V. Greer, Sr.
Date: Wednesday, August 15, 2018 11:40:58 AM
Attachments: [SKM_80818081511200.pdf](#)

From: xerox
Sent: Wednesday, August 15, 2018 10:20 AM
To: Shirley Parmer
Subject: Message from KM_808



AUTRY GREER & SONS, INC.

2850 West Main Street
Prichard, Alabama 36612
Office: 251-457-8655 Fax: 251-456-3744

Barton Greer, Jr., Chairman
Jack V. Greer, President
Robert A. Greer, VP & Secretary
Jack V. Greer, Jr., VP & Treasurer
O. M. Otts, III, VP & CFO

August 13, 2018

U.S. Army Corps of Engineers
District, Mobile
109 Saint Joseph Street
Mobile, AL 36602-3620

SAM.USACE.ARMY.MIL/MISSIONS/PROGRAM –
AND – PROJECT – MANAGEMENT/CIVIL PROJECTS/
MOBILE – HARBOR-GRR

MobileHarborGRR@usace.army.mil

Dear Folks,

My name is Jack V. Greer. I was one of the originators and first President of The Fowl River Protective Association predecessor to Mobile Bay Watch (Casi Calloway, Executive Director). We hired her 20 years ago.

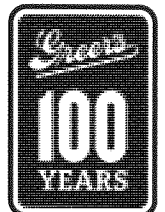
I just retired as President of Autry Greer & Sons, Inc., a family owned 102 year old, 5th generation grocery supermarket company with 30 supermarkets operating in Alabama, Mississippi and Florida.

I have lived all my life since 1927 on the western shore of Mobile Bay at Belle Fontaine about half way between Dog River and Fowl River and opposite Gilliard Spoil Island.

We have seen all the good and bad developments on and for the bay. I walked through the new Bankhead Tunnel on crutches at age 13; I hunted ducks in front of the house and on the original Ammunition Dump Islands and saw the grass beds eliminated and the duck flyways gone. I saw the brown pelicans almost all gone and come back in mass because of Gilliard Island. I saw the Bay be great to play in and gradually fall prey to upstream pollution and out fall. I saw the proposed out fall pipe be eliminated and the management of Degussa develop affluent systems to make it unnecessary. I saw the oil into the Bay from the B.P. oil spill in the nearby Gulf.

I've see the western shore of Mobile Bay take a tremendous hit from hurricanes and ship channel dredging and action. I've seen stone benches and stone barbeque pits, land and trees fall into the Bay. I've seen the road in front of our houses fall into the Bay.

According to the appraiser for the Mobile County Tax Assessor's office, looking at his aerial photo, we have lost 50 feet of land in front of the house and according to Judy Haner of The Nature Conservancy, the same thing has generally occurred from above Dog River to the north and below Fowl River to the south.



Greer's Got It! We Guarantee It!

Here for Good.

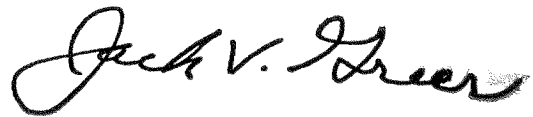
According to the scientists at the Sea Lab on Dauphin Island, dredging of the channel causes the shoreline to slough off in the Bay and the gradual loss of front property as I stated.

Therefore, perhaps part of the spoil from this new dredging can be sensibly used to replace everyone's Bay front property if done right with a proper plan and funding.

In addition, I've seen the wave action from the very large ships eat into the shoreline.

In summary, I am for the dredging because when Mobile grows it helps my grocery business grow. However, if it isn't done in a way to protect the property on the west side of the Bay and done properly, I am totally against it.

Cordially,

A handwritten signature in black ink that reads "Jack V. Greer". The signature is written in a cursive, flowing style.

Jack V. Greer, Sr.
9525 Sunny Cove Road
Theodore, AL 36582

/sp

CC: ljackson@mobilebaykeeper.org

Comment 271

From: [Zemmie Murray](#)
To: [Mobile Harbor GRR](#)
Subject: [Non-DoD Source]
Date: Tuesday, August 14, 2018 11:09:40 AM
Attachments: [20180814104120564.pdf](#)

We are attaching our letter to Ms. Jennifer L. Jacobson in support of the widening and deepening of the Mobile ship channel.

Thank you,

Zemmie Murray

**RICHARD MURRAY & COMPANY, INC.
109 N. CONCEPTION STREET
P.O. DRAWER 30
MOBILE, AL 36601**

TELEPHONE: (251)432-5549

FAX: (251)432-2810

August 14, 2018


**To: Ms. Jennifer L. Jacobson
U.S. Army Corps of Engineers, Mobile District**

We are customs brokers and international freight forwarders and have been in the business in Mobile since 1923. We feel the widening and deepening the Mobile ship channel is vital to allow our customers to remain competitive. We handle many import containers on various steamship lines that call the Mobile Container Terminal from ports all over the world and particularly the Far East. We also handle a good volume of import steel and coal which would also greatly benefit from widening and deepening the channel.

I feel this is more important than ever because of our new trade policies of increasing tariffs on many import products. Importers and exporters will be looking for every advantage to keep their cost as low as possible. The widening and deepening of the channel will result in lower ocean freight rates for them.

In addition to the above many new large companies have located to our area because of the new steamship services that are now calling the Mobile Container Terminal and we must stay competitive with the other Gulf and South Atlantic ports, so they will continue to call at Mobile. This will allow us to keep attracting more of these large companies producing more jobs and a better economy for our area. We strongly support the widening and deepening of the Mobile ship channel as soon as possible.

Very truly yours,


**Edward F. Murray, Jr.
President**

From: [Harold, Brian](#)
To: [Mobile Harbor GRR](#)
Subject: [Non-DoD Source] Attn: Jennifer L. Jacobsen - re: Mobile Harbor Deepening and Widening Project
Date: Monday, August 13, 2018 2:42:38 PM
Attachments: [image001.png](#)

Dear Ms. Jacobsen,

I am writing you this letter in support of the Mobile Harbor Deepening and Widening Project. APM Terminals operates one of the world's largest and most comprehensive port and integrated inland services networks. Our network includes 76 port facilities and 117 inland services operations across 58 countries. APM Terminals is part of the AP Moller - Maersk Group, a global leader in container shipping and ports which also includes Maersk Line, the world's largest container shipping company. Maersk Line operates a fleet of 611 vessels and ships 12 million containers per year to 343 ports around the world. APM Terminals Mobile, LLC is our major container terminal located on Choctaw Point in the Port of Mobile, AL. The facility opened in 2008 and its construction and subsequent upgrades and expansions have been done via significant capital investments by APM Terminals and the Alabama State Port Authority.

Several steamship carriers connect Mobile to various trade routes around the world. The steamship carriers calling Mobile, among others, include the world's 4 largest (Maersk Line, Mediterranean Shipping Co., CMA CGM, and China Ocean Shipping Co.) The volume of containerized cargo has grown significantly since opening the container terminal in 2008, and over the past two years we have seen growth levels of around 20%. The demand for containerized cargo moving via the Port of Mobile will continue to grow in coming years due to the Panama Canal expansion and Alabama's recruitment in the manufacturing and retail/distribution sectors. That growth is highlighted by the recent opening of a 2.6 million sq. ft. import distribution center by Walmart, the largest importer of containerized goods into the United States. This growth is triggering the upsizing of container vessels that call in Mobile. Other regional economic development investments in the works include: Airbus' announced production of the Bombardier Ceries at its manufacturing facility; Toyota Mazda announced auto assemble facility at Huntsville, AL; and ongoing expansions at Mercedes, Honda and Hyundai in Alabama totaling \$1.4 billion. Just this year we have seen one Trans-Pacific service upgrade from 4,200 TEU capacity vessels to 6,500 TEU vessels and another upgrade from 5,500 TEU to as large as 8,700+ TEU capacity vessels. While these upgrades will help meet the growing demand, the depth of the ship channel inhibits these larger vessel's capabilities to fully utilize their overall capacity. Major exports in this area include very heavy commodities such as forestry products, steel and frozen poultry so increases in volumes and associated increase in tonnage require a deeper ship channel. When fully utilized, these larger vessels provide economies of scale to the carriers which can provide lower freight rates to shippers. Additionally, increased import shipments into Mobile will ensure sufficient empty containers are available for export shippers in the market.

While currently APM Terminals Mobile is servicing vessels up to 8,700 TEU, our infrastructure such as our recently-added ship-to-shore cranes, as well as our stacking yard and truck gate, enable the terminal to service much larger vessels. In fact, steamship carriers calling the Port of Mobile are already inquiring

about our willingness to service up to 13,000+ TEU capacity vessels. Without added channel deepening allowing vessels to reach a depth of around 50 feet, it would be very difficult for a steamship carrier to justify such a vessel call. I would also like to highlight the fact that Miami is a subsequent port of call for two weekly services after they

depart Mobile. Both of these services utilize 8,000+ TEU vessels. The Port of Miami, having recently deepened their port to 50ft, cannot be fully utilized by steamship services following a Mobile call as they need to load these ships lighter so they can navigate the more shallow Mobile ship channel. This makes the Port of Mobile less attractive to steamship carriers and will continue to challenge the feasibility of the Mobile call as vessels continue to upsize.

This increased demand, which projects increased vessel calls, as well as the increased vessel sizes, require expanding the Choctaw Pass Turning Basin and constructing a passing lane on the lower channel to alleviate vessel delays and improve safety.

As such, I would like to express APM Terminals' support of the Mobile Harbor Deepening and Widening Project's recommendations for the turning basin improvements as well as the widening of a three-mile segment of the ship channel from 400 to 500 feet. Given APM Terminals' experience in the Port of Mobile and our constant direct interaction with steamship carriers, beneficial cargo owners and other port users, we strongly feel that these improvements are vitally necessary to the Port of Mobile's ability to continue to service the demands of U.S. shippers in this growing market.

Sincerely,

Brian Harold

Managing Director

APM Terminals Mobile, LLC.

901 Ezra Trice Blvd.

Mobile, AL 36603

Office - 2514106090

Cell - 9089661841

Blockedwww.apmterminals.com

The information contained in this message is privileged and intended only for the recipients named. If the reader is not a representative of the intended recipient, any review, dissemination or copying of this message or the

information it contains is prohibited. If you have received this message in error, please immediately notify the sender, and delete the original message and attachments.

Please consider the environment before printing this email.

Comment 273

From: [Ed Bastian](#)
To: [Mobile Harbor GRR](#)
Subject: [Non-DoD Source] Port of Mobile Dredging project
Date: Monday, August 13, 2018 7:59:48 AM

As a global ocean carrier that frequently utilizes the Port of Mobile for our vessel operations. We fully support the efforts of those working toward the widening and deepening of the Mobile ship channel.

Sincerely,

Edwin Bastian

BBC Chartering USA, LLC

Houston, Texas

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

From: [Host Agency - Mobile](#)
To: [Mobile Harbor GRR](#); [Host Agency - Mobile](#)
Subject: [Non-DoD Source] Mobile Harbor Deepening and Widening Project
Date: Thursday, August 9, 2018 10:16:56 AM
Importance: High

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

Attn: Ms. Jennifer L. Jacobsen

Fm: T. Parker Host a.k.a. Host Agency, LLC

Good day Ms. Jacobsen,

We are a local company who are involved with the daily movements of vessels calling on The Port of Mobile, Alabama. We are what you would call a vessel Agent. We act as the representative of a vessel by way of the Owners, Charterers, Shippers, Receivers or sometimes we act as agent for them all at one time. We are responsible for all of the vessels requirements and pay all the bills for the vessels port call. To sum it up we control the vessels as would the Owners of the vessels who are in Foreign Countries and who do not have offices or authority to operate in the United States.

As you may or may not know the vessels are very costly and every second is accounted for and paid for by someone involved in the movement of the vessels. So with that said, In doing our job we coordinate closely with The Port Authority, Mobile Bar Pilots and the two (2) tug companies here in Mobile to get our vessels in and out of The Port in the most timely manner possible. When vessels are delayed by wide beam vessels (one way traffic) then the cost of the delay is passed onto the various parties involved. When this happens it makes the various parties involved question the commercial lose due to the delay, which in turn makes them question the viability of doing business in The Port of Mobile.

Based on the above, we greatly feel that a need for the widening of a 3 mile segment of the current channel of 400 feet to 500 feet and deepening of the channel from the sea buoy to The Mobile Container Terminal from the current 45 feet to 50 feet, will benefit all parties involved in the maritime industry and not just The Port of Mobile. Just this year The Port of Mobile was able to assist the over flow from Mississippi River when the shoaling of the South West Pass caused the bar to become unpassable to vessels of drafts over 42 feet. We handled several vessels by bringing them into McDuffie Coal Terminal and lightering these vessels from a deep draft of 45 feet to the 42 feet or less in order to save money and time for these vessels to go back to New Orleans to complete their commercial contracts. If our channel would have been at 50 feet then we could have assisted move commercial vessels as we turned away many vessels with drafts of 47 feet due to the fact that our channel was only 45 feet.

Please keep in mind that the post panamax vessels are larger and deeper now which means that they will require wider and deeper channels. If we do not keep up with the growing trend of the larger and deeper draft vessels then we will fall behind the commercial requirements of the maritime industry and as such The Port and it's various industries that are calling on The Port will look elsewhere for product and supplies.

The Port and it's various tenants, vendors and customers have been working diligently to increase the tonnage volumes and logistics of moving commodities from The Port to stay as competitive in the maritime market as possible. If we, The Mobile Maritime Community and the local U.S. Army Corps of Engineers "Mobile District" do not do our due diligence to stay ahead of the growing need for deepening and widening our channel to provide a solution to the ever changing needs of the larger vessels then we will be left behind by The Port's which take the initiative to create growth.

In view of the above, we kindly ask for your support for the widening of the channel for the "3 mile passing lane", the deepening of the channel to 50 feet as well increasing the size of the Choctaw Pass Turning Basin in order to allow The Port to continue to grow and stay competitive with the other ports in the US Gulf and East Coast. In doing so you will give value to the Owners, Charterers, Shippers and Receivers of the commodities being moved in and out of The Port of Mobile as this will allow them to increase the tonnages being moved on a daily basis which in turn means more revenue, jobs and growth for The Port of Mobile and The State of Alabama as a whole.

I hope that the above is found to be in good order and if you have any questions of concerns, please feel free to reach out to me at any time.

Thank you again for your consideration in hearing my opinion on this subject matter.

Best Regards,

Alexander S. May (Alec)

Mobile@HostAgency.com <<mailto:Mobile@HostAgency.com>>

Host Agency, LLC

200 South Royal Street <x-apple-data-detectors://2/0>

Mobile, AL 36602 <x-apple-data-detectors://2/0>

Office: 251.433.1536 <tel:251.433.1536>

Mobile: 251.287.5722 <tel:251.287.5722>

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

From: [Mike Lee](#)
To: [Mobile Harbor GRR](#)
Subject: [Non-DoD Source] Mobile Harbor Deepening & Widening Project
Date: Wednesday, August 8, 2018 5:04:19 PM
Attachments: [image001.png](#)

To: Ms. Jennifer L. Jacobsen

U.S. Army Corps of Engineers, Mobile District

Re: Mobile Harbor Deepening & Widening Project

Our company has been closely following the progress of the study and plan to deepen and widen the Mobile ship channel for several years now. We have seen this type of project over the many years our company has served the vessels, importers, and exporters in the very large region served by the Port of Mobile. We believe that past projects to deepen the channel, have been done with care, after much study, and with all environmental factors respected and impacts minimized. We are confident this same care and detailed analysis has been applied to this project as well, and have closely followed the Port Authority and the Corps' efforts to insure all things have been considered and the best path selected.

In our 126 years in the trade, we have seen the steady growth and economic development this area has enjoyed, largely built around our maritime industry. Almost every new project, and the many jobs they have created for the workers in a multistate area, have relied on the port for their import supplies and raw materials, and as a path for exports to a worldwide market. No single economic engine drives the success of our region more than the Port of Mobile. To insure this vitally important aspect of trade and jobs remains viable, and continues to fuel our successes, our port must keep pace with the increase in volumes needed by our industries, and be able to accommodate the ever growing vessel size required to economically serve these growing markets. The number of wide beam and cruise vessels calling Mobile make the widening critical to avoid costly delays to vessel traffic. The deepening is just as critical to the larger overall vessels, and the increased tonnages, and resulting reduction in freight costs, that they realize with the additional draft.

For the reasons stated above, we and the many shippers we represent, strongly support this deepening and widening project. We encourage the State of Alabama and the Corps to act as expeditiously as proper and possible, to move this project forward.

Thank you for your consideration,

Respectfully,

Page & Jones, Inc.

Michael B. Lee

President/CEO

125 Years of Service

Michael B. Lee

President / CEO | Page & Jones, Inc.

T (251) 287-8701 | E mlee@pagejones.com <<mailto:mlee@pagejones.com>> | W Blockedwww.pagejones.com
<Blockedhttp://www.pagejones.com/>

This e-mail, including any attachments, is for the sole use of the intended recipient and may be a confidential communication or a communication privileged by law. If you received this e-mail in error, any review, use, dissemination, distribution, or copying of this e-mail is strictly prohibited. Please notify the sender by return e-mail and delete this message and reply from your system. Page & Jones, Inc. is neither liable for the proper and complete transmission of the information contained in this communication nor for any delay in its receipt.

From: [REDACTED]
To: [Mobile Harbor GRR](#)
Subject: [Non-DoD Source] Extension for 3094-page GRR/SEIS
Date: Saturday, August 4, 2018 8:52:36 PM

Public Comment period needs to be extended.

----- Forwarded Message -----

From: [REDACTED]@yahoo.com>
To: Joly Sebastien P COL USARMY CESAM (US) <sebastien.p.joly@usace.army.mil>; "diana.m.holland@usace.army.mil" <diana.m.holland@usace.army.mil>; "todd.t.semonite@usace.army.mil" <todd.t.semonite@usace.army.mil>
Sent: Tuesday, July 31, 2018 10:53 PM
Subject: Extension for 3094-page GRR/SEIS

Dear Col. Joly,

I am requesting that the public comment period for the draft Mobile Harbor GRR/SEIS be extended to 90 days, at the least.

The report for the massive expansion to the Mobile Harbor is 3094 pages long, which means the document is over 12 inches high.

That means that you are requiring the common man to read and understand over 68 pages a day before he can comment.

Since this project will affect the properties and livelihood of hundred of thousands of people in the Mobile Bay area and on Dauphin Island, you need to extend the public comments to at least 90 days and appoint someone with the Mobile Corps that can be emailed to answer the technical questions from the public.

The public needs their technical questions answered, so they have a clear understanding of all parts of the project before they comment.

Please make sure that the Corps meeting about this project is going to be long enough to cover questions concerning a 3094-page document that is over 12-inches high.

What I do not understand is why the Corps was able to produce the Mobile Harbor GRR/EIS, but not finish the Alabama Barrier Island Restoration Assessment and the Alabama Coastal Comprehensive Plan. Especially, since the two reports were studying all of the same things and both of the reports and their documentation were used in the Mobile Harbor GRR/EIS. Is the Mobile District Corps hiding something from the public?

Have all tiers and attorneys of the US Army Corps of Engineers verified that everything in the Draft Mobile Harbor GRR/SEIS is correct and truthful? Will all of the Corps' tiers and attorneys sign a document stating that everything in the Draft Mobile Harbor GRR/SEIS report is true and accurate. If not, why not?

With best regards,

[REDACTED]

Comment 277

From: [Matt Sparks](#)
To: [Mobile Harbor GRR](#)
Cc: [Bobby Smith](#); [Tom Leatherbury](#); [Alice C. McKeever](#)
Subject: [Non-DoD Source] Mobile Harbor Project Endorsement Letter
Date: Friday, August 3, 2018 11:00:48 AM
Attachments: [donotreply@ssamarine.com_20180803_120340.pdf](#)

Ms. Jacobsen.

Good morning.

Attached you will find SSA Marine's endorsement letter for proposed project for the deepening and widening of the Mobile ship channel.

Best Regards,

Matt Sparks

SSA Gulf, Inc.

Marketing/Sales

Cell: 251-259-8701

Off: 251-441-0100

Email: matt.sparks@ssamarine.com



SSA Gulf
A Carrix Enterprise

Ms. Jennifer L. Jacobsen
U.S. Army Corps of Engineers, Mobile District
PO Box 2288
Mobile, AL 36628-0001

Ms. Jacobsen, SSA Marine, founded by Fred R. Smith in 1949 is a family owned stevedoring company based out of Seattle, WA. We began our first cargo handling operations in Washington State and today, we have become a global enterprise spanning more than 250 locations across five continents. Currently, SSA Marine handles 28 million container TEU's, 115 million tons of conventional cargo and 7 million cruise passengers each year.

SSA Marine's U.S. Gulf Regional office is located in Mobile, AL with operations spanning six states throughout the Southeast. Along with our joint venture partner, Cooper/T. Smith, we provide stevedoring and terminal operations under the name CSA Equipment Co. here at the Port of Mobile. SSA Marine and CSA Equipment Co. employs 50 full time salaried personnel and up to an additional 200 International Longshoreman Association (ILA) labor workers with \$20 million of rolling stock equipment handling in excess of 1.3 million tons of cargo annually here at the Port of Mobile.

SSA Marine and CSA Equipment Co. fully endorses proposed project for the deepening and widening of the Mobile ship channel. Increased vessel sizes, added freight volume and high efficiencies for ocean going vessels to ingress/egress Mobile's modern port facilities is critical to long-term success of the local and state economy.

Best Regards,

Robert M. Smith
SSA Gulf, INC.
Regional Vice President
251-441-0325
Bobby.smith@ssamarine.com

Comment 278

From: [NSS Mobile](#)
To: [Mobile Harbor GRR](#); [NSS Mobile](#); [Bill Inge](#); [Smitty Thorne](#)
Subject: [Non-DoD Source] Mobile Harbor Project Endorsement
Date: Thursday, August 2, 2018 4:55:27 PM
Attachments: [USCOE GRR Letter.pdf](#)

Attention Ms. Jennifer L. Jacobsen

Please find attached our letter supporting the project for the deepening and widening of the Mobile Ship Channel.

Please contact the undersigned should you have any questions in regards to the above or attached.

Sincerely,

Nord-Sud Shipping acts in the capacity of "as agents only". Any information transmitted is intended only for the person or entity to which it is addressed and may contain confidential and/or privileged material. Any review, retransmission, dissemination or other use of, or taking of any action in reliance upon, this information by persons or entities other than the intended recipient is prohibited. If you received this in error, please contact the sender and delete the material from any computer.



Phone: (251) 431-7274

Fax: (404) 348-4380

Office: 605 St. Francis Street, Mobile, Alabama 36602 (USA)

Email: nordsudmobile@nordsudshipping.com

Web: www.nordsudshipping.com



August 2, 2018

Ms. Jennifer L. Jacobsen
U.S. Army Corps of Engineers, Mobile District
P.O. Box 2288
Mobile, AL 36628-0001

Re: Port of Mobile GRR (General Reevaluation Report)

Ms. Jacobsen,

It is our understanding that the GRR has been ongoing for about 3 years now and an exhaustive study of all the data including vessel sizes, tonnage moved, frequency of movements as well as environmental impact, has been conducted. Please accept this letter as our endorsement of the proposed project for the widening and deepening of the Mobile Ship Channel basis the following findings:

1. Based on the existing traffic and the delays caused by one-way traffic when wide beam or passenger carrying ships are moving the widening of a 3 mile segment from the current 400' width to 500' will allow ships to pass each other and reduce the delays of arrival and sailing tremendously. The safety and efficiency of the wider channel will be assured and the Port Users growing needs can be met.
2. The deepening of the channel from the sea buoy in the Gulf to the Mobile Container Terminal will allow the added tons that can be moved via the McDuffie Coal Terminal and the Mobile Container Terminal. The added tonnage per vessel will result in economy of scale and cheaper freight rates. Larger container ships mean more available slots for Mobile containers as well as added empty containers for increased export shipments.
3. Increasing the size of the Choctaw Pass Turning Basin will allow the larger vessels to turn.

Respectfully Yours,



Robert L. Harrison

Nord-Sud Shipping, Inc.

(As Agents Only)

Cc :

Comment 279

From: [REDACTED]
To: [Mobile Harbor GRR](#)
Subject: [Non-DoD Source] Impact from channel widening in Mobile Bay
Date: Sunday, July 29, 2018 7:39:17 AM

To whom it may concern:

I am alarmed at the lack of attention the Corps has given to the impact that channel dredging and this widening has and will have on Dauphin Island beach erosion. Many of our area citizens will be negatively affected if this goes forward without realistically trying to find a solution that is satisfactory for all concerned.

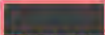
Until this is fully addressed(remove impact on beach erosion on Dauphin Island) I am opposed to this project.

Regards,

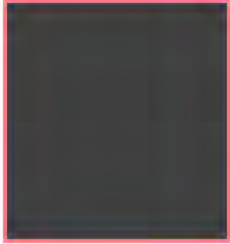
[REDACTED]

Mobile, Al 36608

Comment 280

From: 
To: [Mobile Harbor GRR](#)
Subject: [Non-DoD Source] Port dedging
Date: Saturday, July 28, 2018 4:05:08 PM

I am against it because of the coal dust polluting our skies, our bay, our homes, and our lungs. Jimmy Lyons doesn't even want a commuter train through here because it might hold up one of the 6 to 8 trains a day coming and going. We want restaurants and condos on Mobile River, not coal dust and oil tanks. Thank You -



Comment 281

From: [REDACTED]
To: [REDACTED]
Subject: [Non-DoD Source] Corps presents facts in misleading way about Dauphin Island
Date: Wednesday, June 27, 2018 9:53:21 PM
Attachments: [1993 sand berm January 4 MEM Bar Channel.pdf picture.png](#)
[Slides GRR 22 Feb 2018 Public Meeting - Final - \(SLIDES\) copy.png](#)

I sent the following email to the Mobile District's Colonel DeLapp showing further evidence how the Corps has been lying to the public about their different sand dumpsite to help Dauphin Island.

I wanted to show him a picture of the Corps' designated 2018 "near shore" dumpsite to help Dauphin Island, was the same dumpsite, the Corps proposed in 1993, to trick and mislead Congressman Bevill into believing that the pictured 1993 "near shore" dumpsite would be used to protect Dauphin Island.

After reading my letter to Col. DeLapp, I think you will be disgusted to find out that not one of the sand dumpsite the Corps has used in the past 31 years, has helped Dauphin Island's erosion. It is just a huge pack of lies, and it shows the Corps' abuse of power and control over Dauphin Island.

Even during the settlement of the 2009 Corps' Lawsuit, the Corps led the people in to believing that dumping sand into the feeder berm and SIBUA would help the erosion on Dauphin Island

Per the Joint Notice of the Proposed Settlement... Dated July 15, 2005 guarantees the following: In this original documentation under III Settlement Agreement Terms, it states "Concomitant with the initiation of these studies, and in addition to the above, the Corps agrees to certain dredging and disposal practices. Specifically, the Corps agrees to conduct its ongoing Channel maintenance operations to deposit material dredged from the Channel into the shallowest alternate site currently available.... Such practices will continue even if the case were dismissed."

DOJ 1-34 NRS-#586101-v1-DIPOA_U_S__Fairness_Memorandum_as_filed Approval Op. at 6. ("[T]he entire island will benefit from the mitigation and prevention of further erosion.")...., the Second Addendum re-affirms the Corps' commitment to deposit dredged material in the beneficial use areas designated originally under the LSA. Moreover, these legally binding commitments are consonant entirely with the Corps' "national policy for both beneficial use and regional sediment management that stresses that [the Corps] identify areas that . . . can keep the sediment in[] the system as much as possible." Tr. at 148:11- 14 (Rees).

The Corps has a pattern of confusion, omissions and repeating the same things over and over in a different way, in hopes that the people of Dauphin Island do not know what is happening, until it is too late.

The facts about Mobile District Corps treatment of Dauphin Island has never been disclosed in detail, before now. I have provided you with the information to please help save the Island.

We can not tolerate the Corps' employees knowingly harming the Dauphin Island and the Mobile District's lies about Dauphin Island, anymore

With warmest regards,



Dear Col. DeLapp,

I am putting you on notice of the Federal Laws governing the 2018 Draft Supplemental EIS/GRR for the Mobile Harbor.

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

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

I wanted to make sure that the Draft Supplement Environmental Impact Statements for the Mobile Harbor and channels discloses all major points of the Corps' past and present maintenance dredging and the environmental and erosional impacts to Dauphin Island.

Since there has been no transparency of the Corps mitigating the erosion on Dauphin Island, and the Corps not fully answering the public questions at the Corps' meetings before the 2018 Supplemental Environmental Impact Statement/Mobile Harbor GRR and the Corps not disclosing any details about the Island's erosion in the Draft Alabama Barrier Island Restoration Assessment Report for Dauphin Island. Nor has the Corps answers significant questions about the Mobile Harbor project or the past consequences of the Corps action. The Corps must fully disclose all things pertaining to the maintenance dredging of the Outer Bar Channel and Dauphin Island's environmental and erosional impacts, in the 2018 Draft Supplement Environmental Impact Statement.

Col. DeLapp, once again, I am informing you that the Mobile District employees are not telling you the truth.

A 1993 document shows the same picture of a “near shore” dumpsite as the Corps' picture of the dumpsite shown at the February 2018 meeting.

The 1993 picture was shown to Congressman Beville and other, as the “near shore” dumpsite for dredged sand to protect Dauphin Island, but in a Corps' internal document relating to the picture, the Corps employees stated:

“As I understand it, a presentation was made recently (included Mr. Bevil) indicating that when the Corps dredges the Mobile Bar (maintenance) in the future both the “off shore” and “near shore” berms would be offered in our

contract as disposal areas. This does not mean we would direct the Contractor to use one over the other, but rather give him that choice."

1993 picture of "near shore" site shown to Congressman Bevill

The Corps knew that Congressman Bevill was extremely concerned about the erosion to Dauphin Island from the District Colonel's letter in 1992. In Oct. 1992, the Corps briefed Congressman Bevill on the severe erosion on Dauphin Island.

Why did the Corps show the picture of the "near shore" site to Mr. Bevill, if the Corps was not going to use "near shore" site to protect Dauphin Island?

The Corps made Congressman Bevill falsely rely on the Corps' pictures of the "near shore" site, including putting his trust that the Corps would use the "near shore" dumpsite to protect Dauphin Island.

The Corps showing the picture of the "near shore" dumpsite and then countering the picture with a Corps' internal memo stating "This does not mean we would direct the Contractor to use one over the other" to deliberately deceive Congressman Bevill is beyond incredible.

Col. DeLapp, how does the Corps explain that at the 2018 Corps' public meeting on new massive expansion to the Mobile Harbor Channels, the Corps showed the same "near shore" dumpsite in one of their poster, The poster also showed the outline of SIBUA and the feeder berm.

Corps' 2018 poster of "near shore" site for Dauphin Island

I hope the Corps is not going to try trick the public again, and use the same deceptive practices as they used in 1993, to get out of mitigating to the erosion on Dauphin Island; that the site can be used as dumpsite, but the Corps would not require their dredging contractors to use it.

If the "near shore" site did not work over 25 years ago, why does the Corps think it will work now?

Col. DeLapp, the Corps employees are not telling you the truth that either the feeder berm or the Sand Island Beneficial Use Area (SIBUA) has helped the Corps' mitigation of the erosional impacts to Dauphin Island.

According to Corps documents, the feeder berm did not help Dauphin Island and the Corps dumpsite SIBUA, is in too deep of water and was only changed from the feeder berm site to SIBUA to save the Alabama State Port Authority \$73 thousand dollars, NOT TO HELP DAUPHIN ISLAND.

According to a Corps' 1997 document, the Feeder Berm (Sand Island Bar) does not work, because it broke into three segments.

The northernmost segment migrated northeastward, the middle segment gradually lost volume and disappeared, and part of the southern segment remained where placed initially.

That means that none of the sand in the Feeder berm has made it to Dauphin Island.

According to a Corps' 1996 document, the Corps wanted to change the dumpsite to SIBUA to decrease hauling distance and use "greater depths for equipment suitability" and "Potential for significantly reducing the local cost share and could eliminate it" the cost to the Port Authority of \$73 thousand dollars.

The Corps did not tell the people of Dauphin Island that they were changing the site to SIBUA so that the Port Authority did not have to pay any money to protect Dauphin Island, according to the Corps documents, they told the people that the SIBUA would help nourish the beaches of Dauphin Island.

In the Corps' March 1997 Joint Public Notice Sand Island Beneficial Use Area were untrue statements:

"Erosion has occurred in the vicinity of Dauphin Island and suitable material placed in the proposed Sand Island Beneficial Use Area would aid in beach nourishment through the littoral transport process."

The Corps statement about SIBUA in 1997:

"We agree that the rate of disposal material migration would be increased by placement of the material in shallower depths. Our intentions for designation of this beneficial use area generally included cost-efficient disposal within the littoral zone. The operational cost to place the material in average depths of 15 feet as suggested in the comments will likely be increased over that expected for disposal of the material in deeper water"

In 1998, the Corps lies in their statement,

"Additional efforts to provide for beneficial uses of the material dredged from the main ship channel started in 1995 with the proposed designation of the Sand Island Beneficial Use Area. The characteristics of this area are similar to those of the 'feeder berm' site and therefore material placed within this area should augment the littoral drift system of Sand - Pelican Islands as well as western Dauphin Island."

In a 2001 Corps' document about SIBUA:

"Dredge disposal material from the Mobile bar channel was composed of fine sand material and was placed on the upper part of the SIBUA above the -7.6-m (-25-ft) contour. There is little evidence that this material moved very far from the placement site based on the bathymetric changes and grain-size analysis"

The Corps finally admitted they do not know where the sand in SIBUA goes, in a December 12, 2017 meeting, and they admitted that only one-half of the sand has moved out of SIBUA in over 20 years, in the Corps' public meeting in February 2018, but again the Corps didn't say where the 7.5 million cubic yards of sand went.

I sure hope the Corps employees are not relying on the feeder berm or the SIBUA dumpsite in the 2018 SEIS/GRR for the Mobile Harbor, to restore sand to Dauphin Island, because according to Corps' documentation neither one helps the erosion to the shoreline.

I am putting you on notice of the Federal Law for the 2018 DRAFT SEIS/GRR for the Mobile Harbor and to make sure the Corps puts in their reports, all of their options and costs to place sand to mitigate the erosion to the adjacent shoreline of Dauphin Island, caused by the Corps maintenance dredging of the Federally Authorized Mobile Harbor Project.

In the 2018 Mobile Harbor Draft SEIS/GRR, the Mobile District Corps needs to disclose that the Corps is not following the Federal Laws, which state that the non-Federal interests is responsible for paying their part of the costs to mitigate the erosion on Dauphin Island.

33 U.S. Code § 2211 – Harbors

(b) Operation and maintenance

(c) Erosion or shoaling attributable to Federal navigation works: Costs of constructing projects or measures for the prevention or mitigation of erosion or shoaling damages attributable to Federal navigation works shall be shared in the same proportion as the cost sharing provisions applicable to the project causing such erosion or shoaling. The non-Federal interests for the project causing the erosion or shoaling shall agree to operate and maintain such measures.

Col. DeLapp, I hope the Corps will not rely on its only one single study, the Byrnes 2008, paid-for-by-the-Corps Lawsuit study, as the basis to not mitigate the erosion and not give sand to Dauphin Island.

The Corps' single study, Byrnes 2008, is contradicted by all other studies including:

- * All of the past US Geological Survey studies that state the Corps dredging of the Mobile Pass is the cause of the erosion to the Dauphin Island's shoreline, Morton's 2004, 2007, 2008, and 2013.
- * All of Scott Douglass' studies on Dauphin Island
- * All of Robert Dean's statements and studies on Dauphin Island.

In addition, the Corps knew that during the lawsuit, the eminent Coastal Engineer, Dr. Robert Dean, University of Florida (Plaintiffs) "indicated that the [Byrnes 2008] Final Report was fundamentally flawed, not reliable and at best inconclusive." The Corps knew that in Dr. Dean's "Concluding Report", he questioned multiple facts about the Corps' sediment data in the "2008 Final Report" for the lawsuit.

Also, the Corps refuses to admit, Dr. Robert Dean, DID NOT AGREE WITH BYRNES 2008 STUDY during the lawsuit and the fact that Dr. Dean's report is still part of the lawsuit.

Furthermore, according to an internal Corps' 2011 Memo, the Corps' sediment budget analysis was incorrect and it was used in the 2008 Byrnes lawsuit study.

For your information, District Engineer, COL Drake Wilson who was one of the most revered and respected District Engineers to have led the Mobile District over the last +40 years stated in 1975:

"We take this material out to sea about 10 to 15 miles and dump it. We have in inventory some equipment that can take this material out and pump it onto the beach approximately there near Fort Gaines, and our studies thus far indicate that the littoral drift, that is the drift of the current, would generally carry that material on down along the island. This solution appeals to us because it costs nothing. That is, we have to dredge the harbor anyway - - we pay for that under the maintenance of the harbor expenditures and we can pump it out and put it onto the beach for just about the same price that we could take it out into the Gulf and dump it... We have already set in motion those steps necessary to get the proper type of equipment that would do this. It will probably be a year and a half or two years before we would have all that ready."

Col. DeLapp, the facts shows the Corps' blatant dishonesty. The Corps' deception surrounding Dauphin Island is too deep, and I hope you have the courage and strength of character to take a stand against the Mobile District's Corps' past and present exploitation of Dauphin Island.

Sincerely,

[REDACTED]

From: [Marbut, Wade](#)
To: [Mobile Harbor GRR](#)
Subject: [Non-DoD Source] Mobile Harbor Project - Support!
Date: Wednesday, August 1, 2018 4:57:45 PM

To: Ms. Jennifer L. Jacobsen

U.S Army Corps of Engineers, Mobile District

PO Box 2288

Mobile, AL 36628-001

Via email

Good afternoon Ms. Jacobsen

This email is confirm support of the proposal to widening of a 3 mile segment of the Mobile River Channel.

Our customers and associated parties would greatly benefit from the expansion in order to allow vessels to pass each other and reduce delays in arrivals and departures. It is almost immeasurable the amount of money that is currently lost due to delays, taking into consideration that it is often a domino effect down the supply chain line as well as impacting other ports (a delay in Mobile affects New Orleans affects...). Increasing throughput at the Port of Mobile will have a positive effect on local economy by allowing more vessel movements, larger cargo movements, etc. which would lead to greater investment into the local workforce to meet the additional tonnages in and out that is afforded by increasing the efficiency of the port.

Additionally, and perhaps most importantly, we feel that the added safety margin even for vessels that currently are able to pass during transit would be of even greater benefit to the marine industry, as well as the wildlife, and population surrounding the Mobile River Channel. It cannot be stated enough that any increase in safety is paramount to all involved, and should be supported fully.

The net effect of positively affecting trade while simultaneously increasing safety margin by reducing chance for a marine casualty is a win/win for all involved.

"As Agents Only"

Best regards,

Wade F Marbut
Wilhelmsen Ships Service
Mobile, AL USA

Tel: +1-251-471-2661 | Mobile: +1-251-599-0025

wade.marbut@wilhelmsen.com <<mailto:wade.marbut@wilhelmsen.com>>

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

Marine Products | Maritime Logistics | Marine Safety | Ships Agency

Follow us on Twitter | Facebook | LinkedIn | Instagram

Unless otherwise agreed in writing, all business is conducted in accordance with Wilhelmsen Ships Service Standard Terms and Conditions
<Blocked<http://www.wilhelmsen.com/services/maritime/companies/buss/customercentre/termsandconditions/Pages/termsandconditions1.aspx>>

From: [REDACTED]
To: [Semonite, Todd T LTG USARMY HODA OCE \(US\)](#); [Diana M. Holland BG](#); [c.david.turner@usace.army.mil](#); [Baker, Karen J SES USARMY CEHO \(US\)](#); [Sanchez, Jose E SES USARMY CEHO \(US\)](#); [Dalton, James C SES USARMY USACE \(US\)](#); [Pittman, David W SES USARMY CEERD \(US\)](#); [Flakes, Curtis M CIV \(US\)](#); [Yoder, Andrew P LTC USARMY CESAM \(US\)](#); [Sowell, Stephen L CIV USARMY CESAM \(US\)](#); [Rooney, Katherine T CIV USARMY CESAM \(US\)](#); [Newell, David P CIV CESAM CESAD \(US\)](#); [McDonald, Justin S CIV USARMY CESAM \(US\)](#); [lisa.hunter@usace.army.mil](#); [Taylor, Peter F Jr CIV USARMY CESAM \(US\)](#); [Paine, Joseph W CIV USARMY CESAM \(US\)](#); [Boatman, Todd H CIV USARMY CESAM \(US\)](#); [Creswell, Michael W CIV \(US\)](#); [Jacobson, Jennifer L CIV USARMY CESAM \(US\)](#); [Kleinschrodt, Ashley N CIV USARMY CESAM \(US\)](#); [Dyess, Carl E CIV USARMY CESAM \(US\)](#); [CEIG](#); [Bush, Eric L CIV USARMY CESAD \(US\)](#); [Mobile Harbor GRR](#); [REDACTED]@gmail.com; [d.r.sessions@att.net](#); [bill.hightower@alsenate.gov](#)
Subject: [Non-DoD Source] Fwd: Dauphin Island
Date: Sunday, June 3, 2018 8:05:20 AM
Attachments: [1993 sand berm January 4 MEM Bar Channel.pdf picture.png](#)
[Slides GRR 22 Feb 2018 Public Meeting - Final - \(SLIDES\) copy.png](#)

I am putting you on notice of the Federal Laws governing the 2018 Draft Supplemental EIS/GRR for the Mobile Harbor.

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

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

I wanted to make sure that the Draft Supplement Environmental Impact Statements for the Mobile Harbor and channels discloses all major points of the Corps’ past and present maintenance dredging and the environmental and erosional impacts to Dauphin Island.

Since there has been no transparency of the Corps mitigating the erosion on Dauphin Island, and the Corps not fully answering the public questions at the Corps’ meetings before the 2018 Supplemental Environmental Impact Statement/Mobile Harbor GRR and the Corps not disclosing any details about the Island’s erosion in the Draft Alabama Barrier Island Restoration Assessment Report for Dauphin Island. Nor has the Corps answers significant questions about the Mobile Harbor project or the past consequences of the Corps action. The Corps must fully disclose all things pertaining to the maintenance dredging of the Outer Bar Channel and Dauphin Island’s environmental and erosional impacts, in the 2018 Draft Supplement Environmental Impact Statement.

Col. DeLapp, once again, I am informing you that the Mobile District employees are not telling you the truth.

A 1993 document shows the same picture of a “near shore” dumpsite as the Corps’ picture of the dumpsite shown at the February 2018 meeting.

The 1993 picture was shown to Congressman Beville and other, as the “near shore” dumpsite for dredged sand to protect Dauphin Island, but in a Corps’ internal document relating to the picture, the Corps employees stated:

“As I understand it, a presentation was made recently (included Mr. Beville) indicating that when the Corps dredges the Mobile Bar (maintenance) in the future both the “off shore” and “near shore” berms would be offered in our contract as disposal areas. This does not mean we would direct the Contractor to use one over the other, but rather give him that choice.”

1993 picture of “near shore” site shown to Congressman Bevill

The Corps knew that Congressman Bevill was extremely concerned about the erosion to Dauphin Island from the District Colonel’s letter in 1992. In Oct. 1992, the Corps briefed Congressman Bevill on the severe erosion on Dauphin Island.

Why did the Corps show the picture of the “near shore” site to Mr. Bevill, if the Corps was not going to use “near shore” site to protect Dauphin Island?

The Corps made Congressman Bevill falsely rely on the Corps’ pictures of the “near shore” site, including putting his trust that the Corps would use the “near shore” dumpsite to protect Dauphin Island.

The Corps showing the picture of the “near shore” dumpsite and then countering the picture with a Corps’ internal memo stating “This does not mean we would direct the Contractor to use one over the other” to deliberately deceive Congressman Bevill is beyond incredible.

Col. DeLapp, how does the Corps explain that at the 2018 Corps’ public meeting on new massive expansion to the Mobile Harbor Channels, the Corps showed the same “near shore” dumpsite in one of their poster, The poster also showed the outline of SIBUA and the feeder berm.

Corps’ 2018 poster of “near shore” site for Dauphin Island

I hope the Corps is not going to try trick the public again, and use the same deceptive practices as they used in 1993, to get out of mitigating to the erosion on Dauphin Island; that the site can be used as dumpsite, but the Corps would not require their dredging contractors to use it.

If the “near shore” site did not work over 25 years ago, why does the Corps think it will work now?

Col. DeLapp, the Corps employees are not telling you the truth that either the feeder berm or the Sand Island Beneficial Use Area (SIBUA) has helped the Corps’ mitigation of the erosional impacts to Dauphin Island.

According to Corps documents, the feeder berm did not help Dauphin Island and the Corps dumpsite SIBUA, is in too deep of water and was only changed from the feeder berm site to SIBUA to save the Alabama State Port Authority \$73 thousand dollars, NOT TO HELP DAUPHIN ISLAND.

According to a Corps’ 1997 document, the Feeder Berm (Sand Island Bar) does not work, because it broke into three segments.

The northernmost segment migrated northeastward,
the middle segment gradually lost volume and disappeared,
and part of the southern segment remained where placed initially.

That means that none of the sand in the Feeder berm has made it to Dauphin Island.

According to a Corps’ 1996 document, the Corps wanted to change the dumpsite to SIBUA to decrease hauling distance and use “greater depths for equipment suitability” and “Potential for significantly reducing the local cost share and could eliminate it” the cost to the Port Authority of \$73 thousand dollars.

The Corps did not tell the people of Dauphin Island that they were changing the site to SIBUA so that the Port Authority did not have to pay any money to protect Dauphin Island, according to the Corps documents, they told the people that the SIBUA would help nourish the beaches of Dauphin Island.

In the Corps' March 1997 Joint Public Notice Sand Island Beneficial Use Area were untrue statements:

"Erosion has occurred in the vicinity of Dauphin Island and suitable material placed in the proposed Sand Island Beneficial Use Area would aid in beach nourishment through the littoral transport process."

The Corps statement about SIBUA in 1997:

"We agree that the rate of disposal material migration would be increased by placement of the material in shallower depths. Our intentions for designation of this beneficial use area generally included cost-efficient disposal within the littoral zone. The operational cost to place the material in average depths of 15 feet as suggested in the comments will likely be increased over that expected for disposal of the material in deeper water"

In 1998, the Corps lies in their statement,

"Additional efforts to provide for beneficial uses of the material dredged from the main ship channel started in 1995 with the proposed designation of the Sand Island Beneficial Use Area. The characteristics of this area are similar to those of the 'feeder berm' site and therefore material placed within this area should augment the littoral drift system of Sand - Pelican Islands as well as western Dauphin Island."

In a 2001 Corps' document about SIBUA:

"Dredge disposal material from the Mobile bar channel was composed of fine sand material and was placed on the upper part of the SIBUA above the -7.6-m (-25-ft) contour. There is little evidence that this material moved very far from the placement site based on the bathymetric changes and grain-size analysis"

The Corps finally admitted they do not know where the sand in SIBUA goes, in a December 12, 2017 meeting, and they admitted that only one-half of the sand has moved out of SIBUA in over 20 years, in the Corps' public meeting in February 2018, but again the Corps didn't say where the 7.5 million cubic yards of sand went.

I sure hope the Corps employees are not relying on the feeder berm or the SIBUA dumpsite in the 2018 SEIS/GRR for the Mobile Harbor, to restore sand to Dauphin Island, because according to Corps' documentation neither one helps the erosion to the shoreline.

I am putting you on notice of the Federal Law for the 2018 DRAFT SEIS/GRR for the Mobile Harbor and to make sure the Corps puts in their reports, all of their options and costs to place sand to mitigate the erosion to the adjacent shoreline of Dauphin Island, caused by the Corps maintenance dredging of the Federally Authorized Mobile Harbor Project.

In the 2018 Mobile Harbor Draft SEIS/GRR, the Mobile District Corps needs to disclose that the Corps is not following the Federal Laws, which state that the non-Federal interests is responsible for paying their part of the costs to mitigate the erosion on Dauphin Island.

33 U.S. Code § 2211 – Harbors

(b) Operation and maintenance

(c) Erosion or shoaling attributable to Federal navigation works: Costs of constructing projects or measures for the prevention or mitigation of erosion or shoaling damages attributable to Federal navigation works shall be shared in the same proportion as the cost sharing provisions applicable to the project causing such erosion or shoaling. The non-Federal interests for the project causing the erosion or shoaling shall agree to operate and maintain such measures.

Col. DeLapp, I hope the Corps will not rely on its only one single study, the Byrnes 2008, paid-for-by-the-Corps Lawsuit study, as the basis to not mitigate the erosion and not give sand to Dauphin Island.

The Corps' single study, Byrnes 2008, is contradicted by all other studies including:

- * All of the past US Geological Survey studies that state the Corps dredging of the Mobile Pass is the cause of the erosion to the Dauphin Island's shoreline, Morton's 2004, 2007, 2008, and 2013.
- * All of Scott Douglass' studies on Dauphin Island
- * All of Robert Dean's statements and studies on Dauphin Island.

In addition, the Corps knew that during the lawsuit, the eminent Coastal Engineer, Dr. Robert Dean, University of Florida (Plaintiffs) "indicated that the [Byrnes 2008] Final Report was fundamentally flawed, not reliable and at best inconclusive." The Corps knew that in Dr. Dean's "Concluding Report", he questioned multiple facts about the Corps' sediment data in the "2008 Final Report" for the lawsuit.

Also, the Corps refuses to admit, Dr. Robert Dean, DID NOT AGREE WITH BYRNES 2008 STUDY during the lawsuit and the fact that

Dr. Dean's report is still part of the lawsuit.

Furthermore, according to an internal Corps' 2011 Memo, the Corps' sediment budget analysis was incorrect and it was used in the 2008 Byrnes lawsuit study.

For your information, District Engineer, COL Drake Wilson who was one of the most revered and respected District Engineers to have led the Mobile District over the last +40 years stated in 1975:

"We take this material out to sea about 10 to 15 miles and dump it. We have in inventory some equipment that can take this material out and pump it onto the beach approximately there near Fort Gaines, and our studies thus far indicate that the littoral drift, that is the drift of the current, would generally carry that material on down along the island. This solution appeals to us because it costs nothing. That is, we have to dredge the harbor anyway - - we pay for that under the maintenance of the harbor expenditures and we can pump it out and put it onto the beach for just about the same price that we could take it out into the Gulf and dump it... We have already set in motion those steps necessary to get the proper type of equipment that would do this. It will probably be a year and a half or two years before we would have all that ready."

Col. DeLapp, the facts show the Corps' blatant dishonesty. The Corps' deception surrounding Dauphin Island is too deep, and I hope you have the courage and strength of character to take a stand against the Mobile District's Corps' past and present exploitation of Dauphin Island.

Sincerely,



Sent from my iPhone

Comment 284

From: [REDACTED]
To: [Mobile Harbor GRR](#)
Subject: [Non-DoD Source]
Date: Saturday, June 2, 2018 3:23:14 PM

To whom it may concern:

We support [REDACTED] recent letter to Col.

De Lapp concerning the placement of sand dredged from Mobile Ship Chanel. We have seen damage done to Dauphin Island for the past 40 years. For the preservation of the island we hope you will take the proper action.

Sincerely,

[REDACTED]

Sent from my iPhone

Comment 285

From: [REDACTED]
To: [Mobile Harbor GRR](#)
Subject: [Non-DoD Source] Dauphin Island
Date: Thursday, May 31, 2018 5:33:23 PM

Dear Corps,

Me and my family come to Dauphin Island every year for vacation. I am worried about the future of Dauphin Island because of the erosion. Please place the dredged sands closer to Dauphin Island. Thank you for your time to read my email.

Sincerely,

[REDACTED]

September 12, 2018

Colonel Sebastian Jolly
District Engineer
Corps of Engineers
P.O. Box 2288
Mobile, Alabama 36628-0001

Additional Comments on COE/ASPA Mobile Harbor GRR & SEIS

Dear Colonel Jolly,

I read somewhere the COE was interested in doing more recycling of dredged material...maybe in the Draft SEIS, as that was the reason for discussing the 35 million cubic yards recycled from Mobile Harbor in the 70's and for 35 years in the reclamation of Alcoa's toxic mud lakes into wildlife refuge acreage. They were beautiful birding sites ... then Jimmy Lyons, Director of the Port bulldozed the 700 acres a few years back without notice of any kind... violating Governor Wallace's Agreement in 1976.

Today I came across the COE article that "published request for proposals for beneficial use of dredged material" dated February, 2018- **enclosed**. I placed a call and plan to suggest they consider reclaiming all of the barrier islands in the Gulf of Mexico using dredged material starting with Dauphin Island, Ship and Pelican. See also enclosed **article** 'Racing to save the barrier islands, "Press Register August 3, 2018'

There was another attempt made by the F&WS and the Audubon Society in trying to promote the recycling of dredge material. It was during the construction of the Theodore Ship Channel and the development of the 5 sq. mile Gaillard Island in Mobile Bay. We believed the material should be stored onshore, recycled and sold as a commodity for building roads and dikes, but the ASD's was GREEDY and wanted another Port site, believing they have a right to continue to destroy public lands with **no mitigation!!** Recycling is definitely the way to go, not dump it anywhere the Corps decides as they have made too many bad 'costly' decisions in the past and never seem to learn. They stopped dumping in the Gulf because it was too costly and there were heavy impacts on water quality, marine life, mounding the bottom killing benthic communities, but they believe it to be a large ocean-unbelievable !Now they plan to repeat their costly errors again?

The Corps has the responsibility of protecting the environment and human health, but they aren't doing a very good job, as they focus too much on providing the ASPA a deeper and wider channel in order for huge Chinese ships to be unloaded quickly---the only reason for spending taxpayer dollars.

In the meantime Dauphin Island, Sand and Pelican are disappearing. How much are we losing in continuing to allow this to happen? They need to spend our money properly showing beneficial uses for the public! Start pumping the material longer distances and place these precious loads on the disappearing sinking islands. How can a federal agency make so many mistakes and pass it onto the unsuspecting taxpayer. Quit sucking up the sand off the shallow Gulf beaches in beach restoration projects, as this is probably causing unknown problems and use dredge material with caution as there is the potential for the sediment to contain toxic and hazardous chemicals.

In a Corps report it states that capturing the tons of white sand from the littoral drift caused DI to lose there much needed sand and helped cause the erosion of the beach. It

costs 7 million dollars to restore the mile of public beach and the Mayor said they identified the sand needed in the recovery... stored in the SIBUA!

The COE's SIBUA is a multi million dollar **dismal failure**, as it wasn't properly planned in allowing the littoral drift to pick up the loads and no one knows where the sand is going. It certainly isn't flowing onto DI's beaches ...but it cost 7 million dollars and that **expense** must be **considered** in the **ASPA widening and deepening**. This would make it less likely to be so beneficial. The Corps continues to disrespect Mother Nature's beautiful closed natural systems. To prove a point they want to enlarge the SIBUA...this is idiotic...when do we stop them or they stop themselves?

Since the COE is too **chintzy** to spend the extra money in using the proper dredging equipment in piping and placing the material closer to or even on DI... the public wouldn't mind spending the money, if it was proved to be beneficial... as it is **our resource!**

The COE doesn't consider the environmental costs it is causing in allowing our major and vital barrier island Dauphin Island to completely erode and disappear, just to accommodate one industry...the maritime industry!. When it disappears Mobile's coastal protection and benefits will disappear as well!

Another problem ...In the 70's and 80's we became involved when open water disposal was impacting and destroying Mobile Bay's water quality... people were scared to swim and fish in the muddy waters. Marine life and submerged grass beds were being smothered and you know what happened...**people stopped it!**

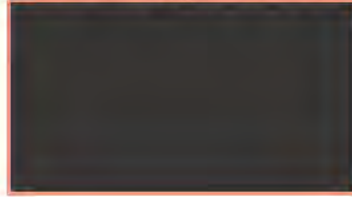
The COE **isn't basing** their **spraying and layering** the stuff over the water surfaces of the Bay **on scientific basis**, just **conjecture**... and are violating the Clean Water act and the Endangered Species Act in doing this horrible process in our Bay. Residents wonder why there are dead fish in the water where they are swimming and why are the bottoms so mucky? Has anyone identified just how many '**dead zones**' there are in Mobile Bay? The Corps numerous disposal spots all along and adjacent to the channel on both sides are identified areas for placement of open water material. This is outmoded or should be, as the material has the potential for rolling right back into the channel, especially with no speed controls on the huge propellers going back and forth in the channel—again costly and destroys benthic communities.

Its way past time in requiring **Compensatory Mitigation in Section 404 of the Clean Water Act** to be activated in the Mobile COE permitting process, as time is a wasting. Dauphin Island's precious white sand is being diverted frequently and DI, Sand and Pelican Islands are being seriously victimized in the Corps lack of responsibility and bad planning. The unidentified potentially serious water quality impacts have impacted heavily on seafood productivity and livelihoods, people refuse to recreate in the waters and the dredged material is being mishandled in every way posing serious threats to the health of Mobile Bay... a major national estuarine treasure.

Hopefully for the public good and in Mobile Bay's numerous environmental interests, the Corps will choose the **No Project Alternative** and continue business as usual for the Port. **Topping Off** in the Gulf has proven to be economically feasible for the Port and environmentally safer for the Bay. This will hopefully encourage the ASPA to spend money to improve the unloading of the vessels in the Gulf, save taxpayers monies and keep Mobile Bay healthier. The Corps should consider recycling and be more innovative

in the handling of the dredge material, get into the 21st Century. Don't allow these huge foreign ship in our sensitive bay as this increases the potential for releasing exotics which will be deadly.

The air pollution loads in coastal Alabama are considered very dangerous especially for the young children and elderly people and allowing these huge vessels will threaten them many times more, as these vessels will release increasingly more toxic loads if allowed in the Harbor. This hasn't been properly considered in the Corps/ASPA documents, as I know this for a fact!



Racing to save the barrier islands

Press Registrar
8/13/18

Why 5 Key Island
+ Chain of Islands

15.5 mcrds - costing 3,000
Ac. of beach + marsh

Plus 100 week 1.5 billion
over next 50 years
A protective use of barrier
islands

Tristan Baurick NOLA.com

Ten miles from Louisiana's receding shore, on an island that was on the verge of sinking away, new land is growing at a rate of 200 feet per day.

A slurry of sand blasts from a 30-inch-wide pipe with the force of a fire hose. In foaming sheets, it spreads across the beach of Whiskey Island, making it thicker and wider by the minute. Backhoes and bulldozers finish the job, sculpting the sand into something resembling the island's younger self, before storms, oil spills and erosion took a heavy toll.

"Where we're standing was nothing but water — 12 feet deep — when we started this," said project manager John Huit, suppressing a pained grin, standing in rubber boots next to the gushing pipe.

The \$118 million restoration of Whiskey Island is one of the world's biggest land building projects. More than 15.8 million cubic yards of dredged sand — enough to fill the Superdome three times — have been spread across the island, creating nearly 2,000 acres of new

FIRST LINE OF DEFENSE

Whiskey Island's restoration, which is set to wrap up in early fall, amounts to only a fraction of the money and sand that Louisiana is pouring into the rescue of its chain of barrier islands. And for good reason: Growing smaller and fewer in number by the year, the more than two dozen barrier islands are Louisiana's first line of defense against hurricanes and storm surges. Gov. John Bel Edwards said,

The slim, sandy islands act as speed bumps, absorbing wind and wave power that would otherwise travel unimpeded through fragile wetlands and into south Louisiana's heartland.

Behind barrier islands, watery worlds meet and blend into something more complex. The sea, calmed by protected bays, mixes with river water rich in sediment and nutrients, giving rise to a third kind of ecosystem — one that teems with fish, shrimp and oysters. Suspended river sediment is slowed long enough to sink, eventually stacking into new land or building into new land or building

taken away.

"Some of these islands have a tiny footprint of land," said Erik Johnson, Audubon Louisiana's director of bird conservation. "They might seem to have very little value, but from a bird perspective they're irreplaceable."

Some bird species nest nowhere else, one being Louisiana's icon, the brown pelican. Seven barrier islands host 60 percent of the state's population of nesting pelicans.

Over the past 20 years, nearly \$817 million has been spent restoring the islands, bulking up 75 miles of beach and back-island marsh, according to a recent assessment by the state Coastal Protection and Restoration Authority. The state plans to invest another \$1.5 billion over the next 50 years.

'PERFECT HURRICANE'

On a warm August night in 1856, a raging hurricane made a direct hit on Isle Derniere, a 24-mile-long barrier island that guarded Terrebonne Parish's soft, marshy middle. French for "last island," Isle Derniere hosted a sprawling resort

popular with New Orleans' wealthiest families. Gale winds and towering waves broke the island in two and tore away the hotel, casinos, summer homes and all the island's trees.

"The wind blew a perfect hurricane; every building upon the island giving way, one after another, until nothing remained," an eyewitness told The Daily Picayune on Aug. 14, 1856. "The sea waved over the whole island. Those who were fortunate to find some object to cling to were seen floating in all directions."

More than 200 people drowned or were crushed by wreckage. The island, cut through, began to splinter further, eventually giving shape to Whiskey and three other islands — East Point and Racoon.

Had Derniere not been in the hurricane's path, the destruction would have been far worse on the mainland, savaging a mosaic of fishing communities. But the protective role of barrier islands wasn't understood for another century, when, tragically, they were in danger of slipping away.

sity oceanographer Joe Suhayda sounded the alarm in the early 1990s. With the help of computer scientist Vithas Aravamudan, Suhayda produced models that showed what might happen in storms if the islands were gone.

A Category 3 hurricane thrown at the Louisiana coastline of 1930 would have left Houma high and dry, according to their model. The same hurricane let loose in 2020, when much of the barrier chain would have eroded away, put the city under three feet of water.

CHALLENGES ALL AROUND

Change is a constant for barrier islands. They begin life not as islands but as the outer edges of river deltas, dynamic landscapes that naturally shift and retreat and build anew. Louisiana's barrier islands took shape some 6,000 years ago as the Mississippi River altered course and abandoned sections of its much wider delta. The delta's sandy edges turned into islands.

The Gulf of Mexico has never been gentle with barrier islands. Waves and wind are constantly scraping at

their sides, and storms occasionally break them into bits. But what the Gulf took away, the big river always restored. That changed after humans began to alter the Mississippi, hardening its banks and channeling its flow, sending its sediment pouring straight off the continental shelf at the river's mouth.

Meanwhile, rising global temperatures have contributed to the slow upward creep of sea levels. Subsidences, the gradual sinking of soft delta land, is also at play. Grand Isle, Whiskey and other large barrier islands are dropping by a half inch each year.

Then there's the oil industry, which has cut some barrier islands into pieces in the search for untapped reserves. Oil companies have tried fixes to shore up islands that support their infrastructure, but their preferred solution — rock embankments — has only sped up erosion, according to Darin Tee, a coastal resource scientist who manages state-backed barrier island projects.

Wave energy bounces off the rock and scours out sand under the water line. "Even-

Harvest 1.5 billion
next 50 years
inter role of barrier
islands

their sides, and storms occasionally break them into bits. But what the Gulf took away, the big river always restored. That changed after humans began to alter the Mississippi, hardening its banks and channeling its flow, sending its sediment pouring straight off the continental shelf at the river's mouth.

Meanwhile, rising global temperatures have contributed to the slow upward creep of sea levels. Subsequently, the gradual sinking of soft delta land, is also at play. Grand Isle, Whiskey and other large barrier islands are dropping by a half inch each year.

Then there's the oil industry which has cut some barrier islands into pieces in the search for untapped reserves. Oil companies have tried fixes to shore up islands that support their infrastructure, but their preferred solution — rock embankments — has only sped up erosion, according to Darin Lee, a coastal resource scientist who manages state-backed barrier island projects.

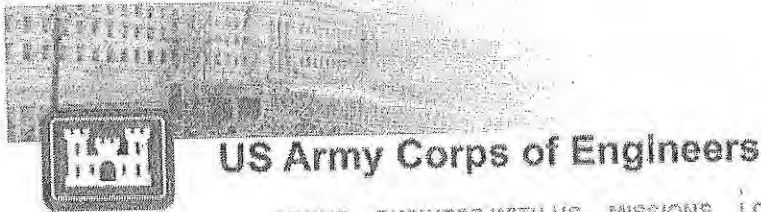
Wave energy bounces off the rock and scours out sand under the water line. "Eventually the rocks collapse, and they sit there, preventing recovery because, no new sand can get back to the island," Lee said.

Oil spills also take a toll. The BP Deepwater Horizon disaster in 2010 saturated several barrier islands. Cat Island on the edge of Barataria Bay soaked up BP oil like a sponge, killing the roots of grasses and mangrove trees.

Before the spill, Cat Island spanned six acres. Two years later, less than one lifeless acre remained. Now the island is a 10-foot-wide strip of sand.

Now!

MOBILE



News Releases By Month

2018 (13)

2017 (57)

2016 (17)

2015 (12)

2014 (5)

2013 (12)

2012 (12)

2011 (15)

U.S. Army Corps of Engineers publishes request for proposals for beneficial use of dredged materials

SHARE Email Print

Posted 2/9/2018

Release no. 18-014

Contact

Gene Pawlik
202-761-7690
Eugene.A.Pawlik@usace.army.mil

or

Doug Garman
202-761-1807
Doug.M.Garman@usace.army.mil

Washington (February 9, 2018) - The U.S. Army Corps of Engineers today published in the Federal Register its request for proposals for beneficial use of dredged material pilot projects pursuant to Section 1122 of the Water Resources Development Act (WRDA) of 2016, Beneficial Use of Dredged Material.

Proposals must be submitted to USACE on or before March 12, 2018. More information on the program and solicitation can be found in the Federal Register notice, 83 Fed. Reg. 5763 (Feb. 9, 2018). It is available on line at <https://www.federalregister.gov/documents/2018/02/09/2018-02613/request-for-proposals-for-beneficial-use-of-dredged-material-pursuant-to-section-1122-of-the-water>.

Section 1122 requires USACE to establish a pilot program to carry out 10 projects for the beneficial use of dredged material. The pilot program can include projects for the purposes of:

1. reducing storm damage to property and infrastructure;
2. promoting public safety;
3. protecting, restoring and creating aquatic ecosystem habitats;
4. stabilizing stream systems and enhancing shorelines;
5. promoting recreation;
6. supporting risk management adaptation strategies; and
7. reducing the costs of dredging and dredged material placement or disposal, such as projects that use dredged material for:
 1. construction or fill material;
 2. civic improvement objectives; and,
 3. other innovative uses and placement alternatives that produce public economic or environmental benefits.

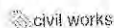
Projects identified under Section 1122 must maximize the beneficial placement of dredged material from federal and non-federal navigation channels and ensure that the use of dredged material is consistent with all applicable environmental laws. USACE is required to carry out the pilot program in consultation with relevant state agencies and to establish regional teams to assist in the evaluation of the proposals.

USACE implementation guidance (including selection criteria) for carrying out the provisions of Section 1122 and information on submitting a proposal can be found at http://www.usace.army.mil/Missions/Civil-Works/Project-Planning/Legislative-Links/wrda2016/wrda2016_impguide/.

The ASA(CW) is required to submit a report to the Congress within two years that includes:

1. a description of the projects selected under the pilot program;
2. documentation supporting each of the projects selected;
3. the findings of regional beneficial use teams regarding project selection; and
4. any recommendations of the ASA(CW) or regional beneficial use teams with respect to the pilot program.

The program terminates after completion of the 10 beneficial use pilot projects.



September 4, 2016


Codon, Alabama 36523

COL Sebastien P. Joly, Commander
US Army Corps of Engineers
PO Box 2288
Mobile, Alabama 36628-0001

Dear COL Joly:

This is to provide you with the results of my review of the August 8, 2018 Environmental Assessment (EA) entitled "Sand Island Beneficial Use Area Expansion". In reviewing the EA, I applied the expertise I have gained through 45 years experience as a biologist and project manager with the Corps of Engineers and in the private sector preparing numerous National Environmental Policy Act (NEPA) documents. My review raised what I professionally believe to be two major deficiencies with the EA.

First, the EA does an inadequate job of both describing the environmental resources that actually occur within the proposed SIBUA expansion area, as well as the impacts of the proposed action on those resources. The ongoing work of the Corps on the GRR Study appears to have caused the Corps to hurriedly prepare the EA to cover the proposed SIBUA expansion so the Corps could state the expanded area is already approved and is an existing feature of the Mobile Harbor Without Project alternative, as the proposed expansion is now treated in the Draft GRR/SEIS currently out for a separate public review. The hurried nature of EA's preparation is evidenced by the inappropriate inclusion of a considerable amount of information excerpted from previously completed NEPA documents that have no place in the current EA. The inappropriate information consists of extensive environmental setting descriptions of resources and impact scenarios concerning the interior of Mobile Bay which have no relevance or application to the impact evaluations that should have been conducted on the proposed action to expand the SIBUA by 3,305 acres in nearshore Gulf waters. The environmental conditions (i.e., bottom substrate, depth, water quality, etc.) are much different for the 3,305-acre impact area from much of the narrative now included in the setting and impact discussions in the EA. The EA should be revised to delete that information and replaced with more relevant and applicable information for the actual area impacted by the SIBUA expansion.

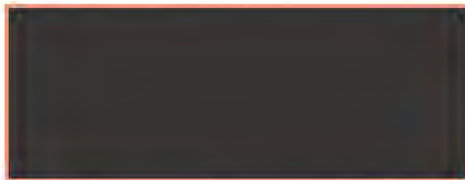
Second, the EA fails to adequately address some of the most important environmental impact topics associated with the proposed SIBUA expansion. According to EA, the proposed action has two purposes: (1) "provide the return of sediment [i.e., 624,000 cy of sands dredged from the Bar Channel on an average annual basis] into the local littoral system..."; and (2) increase the disposal capacity of the SIBUA to receive maintenance dredged sands in the future. The EA contains no substantitive information to disclose to either the Corps decision-maker or concerned public if and how well the proposed SIBUA expansion accomplishes either project purpose. The EA alleges the Corps conducted analyses to evaluate transport rates leaving the SIBUA to ensure sands dredged from the Bar Channel are retained within the littoral drift system and that

adequate disposal capacity is provided. If such analyses were conducted for the proposed SIBUA expansion, the results should be summarized in the EA since the effectiveness of the proposed action to accomplish its two primary purposes is required to adequately answer the following directly applicable project impact-related questions:

- Will the percentage of sand that moves out of the proposed SIBUA expansion be the same, higher, or lower than the 50% now moving out of the existing SIBUA?
- Because of the large size of the proposed SIBUA expansion area, what degree of uncertainty exists with the confidence of any predictions made as whether the sand that would move out of the expanded disposal site returns to the littoral drift system or simply just moves in any number of directions from the disposal area?
- Is any of the sand placed in the proposed SIBUA expansion expected to accumulate? If so, what volume will accumulate on an average annual basis?
- What affect will the proposed SIBUA expansion have on the existing erosion rates for the Pelican-Sand Island complex and Dauphin Island.
- What is the dredged material disposal capacity now available within the proposed SIBUA expansion and how will that capacity be reduced over 50 years use of the site

Given the fact that the present EA does not provide answers to the above important and relevant impact-related questions and to the intense interest the concerned public has consistently demonstrated over the historic ineffectiveness of the SIBUA to counter Dauphin Island's erosion, the Corps should hold a public hearing on the island to give all residents, property owners, and the general public the opportunity to ask questions and to learn more about the proposed SIBUA. Therefore, I repeat my above request that a public hearing be held as soon as possible on the proposed SIBUA expansion.

Thanks in advance for considering my views.



CC:
Sen Doug Jones
Sen Richard Shelby
Rep Bradley Byrne