Mailed Comments - Letters

Comment # 52

February 5, 2016

[redacted]

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

Dear Ms. Jacobson:

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

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

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

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

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

- If the Corps plans to dispose of dredged material in Mobile Bay (i.e., thin layer spreading, island creation, etc.) removed during initial deepening and widening of the ship channel and future maintenance, the Corps should prepare a Dredged Material Disposal Master Plan for Mobile Bay and make it part of the Study and EIS, with the extensive involvement of the public. No longer should the Corps hide behind the guise of the Interagency Working Group to secretly develop and

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

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

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

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

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

- The scientific literature is replete with numerous examples where navigation channels dredged through coastal inlets have interrupted the littoral drift of nearshore sands along the beach, causing beaches downdrift of the inlets to erode. This phenomenon is common along the entire US Gulf Coast, the rest of the nation, and around the world. Yet, the Mobile District has maintained this

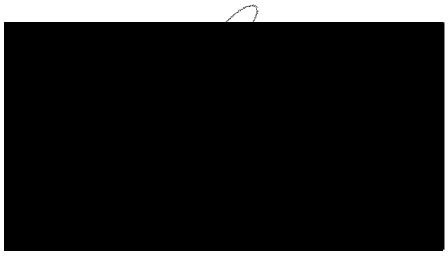
scientific model widely accepted by coastal scientists and engineers does not apply to dredging the Outer Bar Channel through the Mobile Pass Inlet and the erosion of Dauphin Island. The General Evaluation Study and EIS must devote considerable attention to this issue and provide convincing information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

- The Corps has dumped dredged sands in the Sand Island Beneficial Use Area (SIBUA) south of the lighthouse for years with the position being that these sands are moved by currents to Dauphin Island to counter erosion. However, the observed evidence indicates most of the sands are not moved, but accumulate at that location, while Sand Island has almost disappeared and Dauphin Island continues to erode. This leads to the conclusion that the SIBUA is failing to meet its intended purpose. The General Reevaluation Study and EIS should thoroughly evaluate why the SIBUA fails to meet its purpose.

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

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

Very truly yours,



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Your consideration of these issues is much appreciated.

Sincerely,

[redacted]

Comment # 54

February 5, 2016

[redacted]

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

Dear Ms. Jacobson:

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

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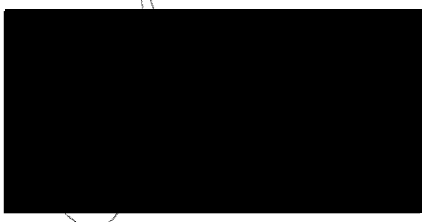

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Comment # 55

February 4, 2016

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

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

To Whom It May Concern:

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

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

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

- **Document why the Corps no longer agrees with its own agency's position (stated in its draft 1978 report on Dauphin Island's beach erosion) that concluded maintenance of the Outer Bar Channel is contributing to at least 40% of Dauphin Island's erosion problem**. The Corps not only ignores its own 1978 report, but is of the new position that maintenance dredging of the channel has no impact on the erosion of Dauphin Island. How can the Corps expect the public to believe the results of the impending Study and EIS, when its change in position on the erosion issue appears to have been influenced by its desire to win the 2000-2009 lawsuit with the Dauphin Island Property Owners Association as well as the desire to keep the non-federal share of the costs borne by the Alabama State Port Authority to maintain the Mobile Harbor project as low as possible?
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- The General Reevaluation Study and EIS should thoroughly evaluate why the SIBUA fails to meet its purpose. To this purpose, **establish a Citizen Advisory Committee that will meet at least two to four times a year with the Corps to assess how public concerns are being addressed in the General Reevaluation Study and EIS**. The next time the public hears from the Corps should not be when Draft EIS is released for review at the end of the 4-year study.

Your consideration of these issues is much appreciated.

Sincerely,

Comment # 56

February 4, 2016

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

Dear Ms. Jacobson,

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

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

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

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

Sincerely

[redacted]

Comment # 57

[redacted]

February 6, 2016

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

RE: Public Notice: FP15-MH01-10

Dear Ms. Jacobson:

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

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Thank you for your consideration.

Comment # 58

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RE: Public Notice: FP15-MH01-10

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

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

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

Thank you for your consideration of our concerns.

[redacted]

Comment # 59

February 24, 2016

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

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

Dear Ms. Jacobson:

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

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

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

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

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

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

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

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

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

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

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

Sincerely,

CITY OF BAYOU LA BATRE

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

Comment # 60

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

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

February 10, 2016

Ms. Jacobson,

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

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

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- Comply with Section 5 of the River and Harbor Act of 1935 that requires every Corps report involving an "improvement" to an inlet (i.e., Mobile Harbor Outer Bar Channel through Mobile Pass) to evaluate

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

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

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

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

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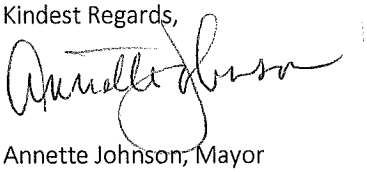
- In lieu of continuing to use the SIBUA, the Corps should adopt the same shallow water (<10 to 15 feet) deposition methods the Mobile District has recently recommended be used to build back Petit Bois Island's eroded Gulf shoreline west of Dauphin Island.

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

Kindest Regards,



Annette Johnson, Mayor

February 2, 2016

Comment # 61

[redacted]

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

Dear Sirs:

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

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

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

I am requesting the following issues be addressed:

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

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

Very truly yours,

Comment # 62

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

RE: Public Notice: FP15-MH01-10

Dear Ms. Jacobson:

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

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

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- In lieu of continuing to use the SIBUA, the Corps should adopt the same shallow water (<10 to 15 feet) deposition methods the Mobile District has recently recommended be used to build back Petit Bois Island's eroded Gulf shoreline west of Dauphin Island.
- Establish a Citizen Advisory Committee that will meet at least two to

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

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

Comment # 63

RE: Public Notice: FP15-MH01-10

Dear Ms. Jacobson:

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

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

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

Thanks for your time.

[redacted]

February 2, 2016

[redacted]

Comment # 64

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

Dear Sirs:

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

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

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

I am requesting the following issues be addressed:

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- Identify new dredged sand disposal sites nearer Dauphin Island. Apply the same shallow water deposition concepts that the Corps recommends be employed to build back Petit Bois Island's eroded shoreline west of Dauphin Island.

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

Very truly yours,

Comment # 65

[redacted]

February 4, 2016

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

Re: Mobile Ship Channel Study

Dear Ms Jacobson,

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

Thank you,

[redacted]

[redacted]

Comment # 66

Feb.9,2016

Corps of Engineers
P.O. Box 2288
Mobile, Al. 36628-0001
Attn:CESAM-PD-E

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

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

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

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

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

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

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

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

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

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

Sincerely,

[redacted]

Dr.,No.

Comment # 67

TOWN OF MAGNOLIA SPRINGS

February 8, 2016

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

Dear Ms. Jennifer Jacobson :

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

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

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

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

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

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

Sincerely,

Kenneth D. Underwood

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

12191 Magnolia Springs Highway | Post Office Box 890 | Magnolia Springs, Alabama 36555
phone: 251.965.9888 | facsimile: 251.965.9889 | www.townofmagnoliasprings.org

Comment # 68

January 22, 2016

PN No. FP15-MHOI-10
District Commander
US Army Engineer District Mobile
P.O. Box 2288
Mobile, Al. 36628-0001
ATTN:CESAM-PD-E
RE: DEIS -- ASPA PROPOSED WIDENING AND DEEPENING OF MOBILE BAY SHIP CHANNEL

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

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

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

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

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

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

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

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

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

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

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

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

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

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

[redacted]

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

Excuse the errors as my computer refused to behave

Pull out the 1986 EIS's as these will help identify some of the areas of concerns and issues that will be involved and need to be addressed and updated
These attached comments on the COE ,ASPA,Chamber of Commerce , and MBIWG latest proposal should be held in abeyance until the they are discussed in the new EIS and questions answered such as

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

WARRIOR-TOMBIGBEE WATERWAY ASSOCIATION

Comment # 69

January 12, 2016

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

Re: Public Notice No. FP15-MH01-10

To Whom It May Concern:

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

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

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

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

Respectfully submitted,

Larry Merrihew, President

International Trade Center, 250 North Water Street, Mobile, Alabama 36602
P.O. Box 2863, Mobile, Alabama 36652 * Phone (251) 431-9055, Fax (251) 431-9053
Email: warriortom@aol.com * Website: www.warriortombigbee.com

Island Watch
323 Polaris Street
Dauphin Island, AL 36528

Comment # 70

February 5, 2016

Dear Ms. Jacobson,

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

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

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

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

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

Respectfully,

[redacted]

Island Watch

Sunset Capital of Alabama

TOWN OF DAUPHIN ISLAND
1011 Bienville Boulevard Dauphin Island, Alabama, 36528
Phone: (251) 861-5525 Fax (251)-861-2154
http://TownOfDauphinIsland.Org

Date: January 20, 2016

Comment # 71

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

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

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

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

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

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

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

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

Respectfully,

Jeff Collier
Mayor

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

Comment # 72

Allen –

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

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

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

Hope I'm wrong
Want a history lesson - St Chronicle
Maneco-Warriors The Dawn
Book from library

[redacted]

as promised **Comment # 73**

January 8, 2016

Col Chytka, DE
Corps of Engineers
P.O. Box 2288
Mobile, Al.36628

Lance LeFleur,Dr.
ADEM
P.O. Box 301463
Montgomery, Al.36130

Heather McTeer Toney and others
USEPA Reg.IV
Atlanta Federal Center
61 Forsythe St. NW
Atlanta, GA 30303

Dear sirs,

What a horrible way to start off the New Year ! On January 5th the Mobile Bay Sierra Club invited Glenn Coffee to present the secret, in-house, behind closed doors Corps of Engineers'(COE), Al. State Port Authority (ASPA) ,Chamber of Commerce (The Big Three) and Mobile Bay Interagency Working Group's (MBIWG) proposed **'boondoggle'** for Mobile Harbor / Mobile Ship Channel.
Their one track, self centered, boggled minds are focusing on another grandiose , extremely costly, **destructive island** that would fill over **1,200 acres** of very **productive bay bottoms** in the NW section of the bay and east of the Mobile Bay Ship Channel .Local sport and commercial fishermen have identified this **area as being rich in aquatic resources and heavily utilized.** The area should be receive every protection-not be destroyed for a disposal site.
The Worldwide Wildlife Fund and the Zoological Society have jointly determined that industrial-scale **overfishing, pollution and climate change have killed half of all marine life** over the last 40 years. The Living Blue Planet Report cites that species essential to the global food supply are among the hardest hit, particularly due to humans catching them faster than they reproduce. Coral reefs, mangroves, and sea grasses have died decimating fish populations. Tuna and mackerel have declined by 75% ,number of species are declining, a quarter of all shark and ray species face extinction, half of all coral reefs have disappeared and harbor a third of ocean species.
There is an international need for estuaries such as Mobile bay to continue to remain healthy as their natural resources -water surfaces, bay bottoms, benthic community organisms, submerged grass beds, and wetlands provide nursery areas, food and other biological and economic benefits for the marine and human factors. Mobile Bay is stressed enough and some worry the ecosystem will 'collapse. '
The large island will be bad enough, but with the potential of two additional islands planned in same area on the west side of the channel an additional 1,480 acres of bay bottoms will be destroyed. Placing unstable structures near the busy entrance of a highly traveled port show extremely bad planning and these people don't know or care what they are doing. There will be a costly and constant effort to try and stabilize and contain any islands in this **high energy area**.. The channel will need frequent 'emergency' maintenance dredging to re-dredge sediments that have eroded from the islands and flow back into the channel. **Read on as the Gaillard Island is a good example of plain stupidity in placing an island in the bay.**
Global climatic changes are occurring and placement of islands in this high energy area will act as a 'bottleneck ' as Mobile Harbor presently acts as a funnel and handles the frequent tropical storms and their northerly downriver flood waters that flow south through the harbor into the bay. The loads are presently and capably handled by the wide open bay surfaces in dispersing and assimilating the flood waters providing free benefits. They will become even more valuable with the sea level rises now occurring. These natural processes now provides protection and saves **Flood Insurance monies** for the hundreds of residential, commercial and industrial facilities existing in the northern flood prone areas in the port and city of Mobile.
The Big Three have been working on this project for two years and intended to bypass public participation , but they are in for a surprise. They also intend to bypass the NEPA process as they are

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

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

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

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

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

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

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

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

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

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

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

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

Others citizens who are concerned :

Comment # 74

17February 2016

[redacted]

Subject: Proposed Widening and Deepening of the Mobile Ship Channel

Dear Ms Jacobson:

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

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

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

Please do all you can to protect this vital area.

Thank you.

Sincerely,

[redacted]

9 Feb 2016

[redacted]

Subject: Proposed Widening and Deeping of the Mobile Ship Channel

Dear Ms Jacobson:

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

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

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

Sincerely,

,

[redacted]

Comment # 75

SIERRA CLUB
FOUNDED 1892

MOBILE BAY SIERRA CLUB

P.O. BOX 2682 MOBILE AL 36652

February 9, 2016

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

RE: Public Notice: FP15-MH01-10

Dear Ms. Jacobson:

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

The referenced ***study of navigation modifications for Mobile Harbor*** resulted in the 1980 Mobile District report and EIS Congress considered in its 1986 authorization to deepen and widen Mobile Harbor. However, the problem with the 1980 report is the commitment made in the Mobile District's July 9, 1975 letter to consider Dauphin Island's erosion in that report was not honored. In short, the 1980 report and EIS are both completely silent on the erosion issue. That means in the approximately 36 years that have passed since the 1980 report was prepared, erosion of Dauphin Island has been allowed to continue unabated, despite the fact the Mobile District's 1978 report concluded maintenance of the Outer Bar Channel was contributing significantly to the island's erosion issue[1]. That continues to be the situation today.

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

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

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

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

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

> "...After 1958, [Dauphin] Island entered into a net erosional phase that has persisted and most recently accelerated."
> "... [Maintenance dredging] practices conducted around the tidal inlets [including Mobile Pass] ...permanently removed large volumes of beach quality sand from the littoral drift system that otherwise would have nourished the adjacent barrier islands and mitigated land losses."
> "...Sand supply is also the only factor where the historical trend of...progressively increased reduction in sand supply attendant with increased dredging depths... temporally matches the trend of progressively increased land loss."[2]

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

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

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

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

Federal Standard. The Sierra Club is aware that in evaluating alternatives for the Mobile Harbor project, the Corps is required to select for implementation the National Economic Development (NED) plan – the plan that reasonably maximizes net economic benefits consistent with protecting the nation's environment. The Sierra Club is also aware ***the Mobile District can select a plan, other than the NED plan, if there is an important overriding reason for choosing an alternative that would not maximize net economic benefits.*** For navigation projects, part of the overall NED plan is the "Federal Standard", or base plan, for disposal of dredged material. All other alternative plans considered and their respective costs are measured against the "Federal Standard"[3]. The "Federal Standard" is defined as the least costly dredged material disposal alternative consistent with sound engineering practices ***and meeting applicable federal environmental requirements.*** The "Federal Standard" defines the disposal costs assigned to the navigation project. The project costs assigned to the navigation purpose are shared with the non-federal sponsor, with the ratio of federal to non-federal costs depending on the nature and depth of the navigation project[4].

Since ecosystem restoration is recognized as one of the primary missions of the Corps[3], the Sierra Club is further aware that factors beyond cost can contribute to decisions on disposal options for dredging projects. ***The selected disposal option for an ecosystem restoration project should maximize the sum of economic development and national environmental restoration benefits. Therefore, a beneficial use option may be selected for a project even if it is not the Federal Standard for that project.*** In such cases, the Sierra Club is aware that the Mobile District has the discretion (after considering the views of the ASPA, the agencies, and the interested public) of determining which of two options may be pursued to allocate costs based on the contribution of the beneficial use to meeting the navigation purpose of the purpose:

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

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

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

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

Option 2 – Where the beneficial use project is not (or is not part of) the Federal Standard to accomplish the project's navigation purpose, the plan serves as a reference point for measuring the incremental costs of the beneficial use project that are attributable to the environmental purpose. Such incremental environmental costs are shared in a different ratio than the navigation project costs[5].

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

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

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

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

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

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

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

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

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

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

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

being dispersed since the Mobile District found it necessary in 2008 to expand the limits of the disposal site farther south because the decreased depths in the original site were interfering with the operation of the hopper dredges[7]. Thus, the historic designation of this site as a true "beneficial use" is highly questionable and without scientifically documented merit. This leads to the conclusion that the SIBUA is failing to meet its intended purpose.

The Mobile District is pursuing a totally different approach to restore the eroded shorelines of Petit Bois Island and its sister Mississippi barrier islands according to the 2016 Final Comprehensive Barrier Island Restoration Report[8]. That $500 million restoration project is directed at mitigating the erosion of neighboring Mississippi's barrier islands that are in the same chain as Dauphin Island. The erosion of those islands, particularly Petit Bois Island, has been negatively affected in part by the same starvation of littoral drift sands created by the existing manner in which the Mobile Harbor Outer Bar Channel is maintained.

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

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

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

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

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

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

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

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

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

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

Sincerely yours,

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

Comment # 76

[redacted]

February 8, 2016

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

RE: Public Notice: FP15-MH01-10

Dear Ms. Jacobson:

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

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

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

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

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

[redacted]

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

Enclosures

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

Figure 3-10 showing Borrow sites

Figure ES-1 Project Area

January 22, 2016 public comments letter

January 22, 2016

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

1. **Pictures of Dauphin Island after Hurricane Camille and Frederic. Note the amount of sand on the shoreline. These hurricanes were devastating hurricanes but look at the amount of shoreline and houses compared with item #2 of the enclosures.**
   Camille: Camille, based upon Saffir/Simpson a Category 5 storm and on August 17, 1969, Hurricane Camille roared out of the Gulf of Mexico and smashed into Mississippi's twenty-six miles of coastline. There were no records of winds near the eye of the storm, but estimates ranged up to 190 mph. The tidal surge reached an unprecedented height of 22.6 feet above mean sea level at Pass Christian and was nearly 6 feet above mean sea level as far east as Gulf Shores, Alabama (USACE 1970).
   Frederic: Wednesday, September 12, 1979, making landfall at about 10 p.m. CDT, passing over Dauphin Island and crossed the coastline near the Alabama/Mississippi border. A wind gust of 145 miles per hour was measured on equipment atop the Dauphin Island Bridge. The bridge was destroyed. A wind gust of 139 mph was measured at the Dauphin Island Sea Lab before the equipment failed. A storm surge of 12 feet was observed in Gulf Shores.

2. **Pictures of Dauphin Island: 2003, 2005, 2015**
   February 2003: Picture shows view of Dauphin Island's West End with 3 tiers of lots/homes, but lacking shoreline.
   August 2005: Picture post Katrina. View of Dauphin Island's West End. Note loss of two most seaward tiers of lots/home which indicates magnitude of land loss.
   October 28, 2015: Remnant of Hurricane Patricia that hit Mexico. Note no shoreline and the severity of the erosion on the West End. This was a very low level storm that caused excessive over-wash of the gulf.

3. **Aerial picture of Dauphin Island 1950's Note shoreline**

4. **Aerial picture of Dauphin Island 1950's Note shoreline**

5. **March 31, 2014 Dauphin Island Property Owners Association (DIPOA) Board of Director's letter to Col. Jon Chytka, Commander, Mobile District.** This letter spells out and conveys the serious concerns of the DIPOA Board of Directors over the manner in which the Mobile District of the Corps is complying with the National Environmental Policy Act (NEPA) in the preparation of the Limited Re-evaluation Report (LRR) for widening of the Mobile Harbor Ship Channel. The concerns are associated with the longstanding view held by many interests that maintenance of the Mobile Harbor bar channel is contributing to the significant shoreline erosion problems that have plagued Dauphin Island for the last several decades. And the intent of the Mobile District to conduct an Environmental Assessment as opposed to a Supplement to the original 1980 EIS, which, at the September 2009 Fairness Hearing, Dr. Susan Rees stated, in testimony, would be required if there was any expansion of the Mobile Ship Channel.

   Contains Excerpts of Testimony of Dr. Susan Ivester Rees: September 15, 2009 Fairness Hearing, Mobile, Alabama; Questioned by Wells D. Burgess, US Department of Justice

6. **October 1980 Survey Report on Mobile Harbor:** Title Page, Content Page, and Excerpt of document. The referenced October 1980 Corps EIS that was prepared to analyze the environmental effects of deepening and widening the ship channel gave no consideration at all to the potential effects to Dauphin Island of the project and specifically on the erosion of Dauphin Island.

7. **November 1985 Supplemental Environmental Impact Statement Mobile Harbor, Alabama, Channel Improvements Offshore Dredged Material Disposal. Includes record of Decision and Listing of Contents:** As with the October 1980 EIS, this EIS also does not give consideration to the potential effects to Dauphin Island of the project and specifically on the erosion of Dauphin Island due to dredging.

8. **Corps of Engineers 1978 Feasibility Report for Beach Erosion Control and Hurricane Protection:** Excerpts of this 1978 study signed by Charlie L. Blalock, Colonel, CE District Engineer, sets forth that Chief of Engineers recommendation to modify the present maintenance dredging of the Mobile Ship Channel according to the Selected Plan; states that one of the primary causes of shore erosion is maintenance dredging; states that the Nearshore Nourishment Plan should be implemented.

9. **Corps February 1987 Beneficial Use of Dredged Material, Sand Island Bar, Al Beach Nourishment, Berm Creation test:** This test, conducted offshore of Sand Island, Alabama at certain depth was to determine whether the sand would be retained in the nearshore zone or lost seaward. It showed indications of migrating northwest, but it was too far offshore to directly influence beach volumes....

10. **Corps Excerpt from MsCIP about Impacts to Mississippi Barrier Islands and Processes (6.3.2), 2009:** Principal causes of Mississippi barrier island erosion and land loss are frequent intense storms, a relative rise in sea level, and a deficit in the sediment budget. Of these causes, the one that experienced the greatest change over the last 100+ years is the reduction in sand supply related to dredging of navigation channels. (Morton 2007).

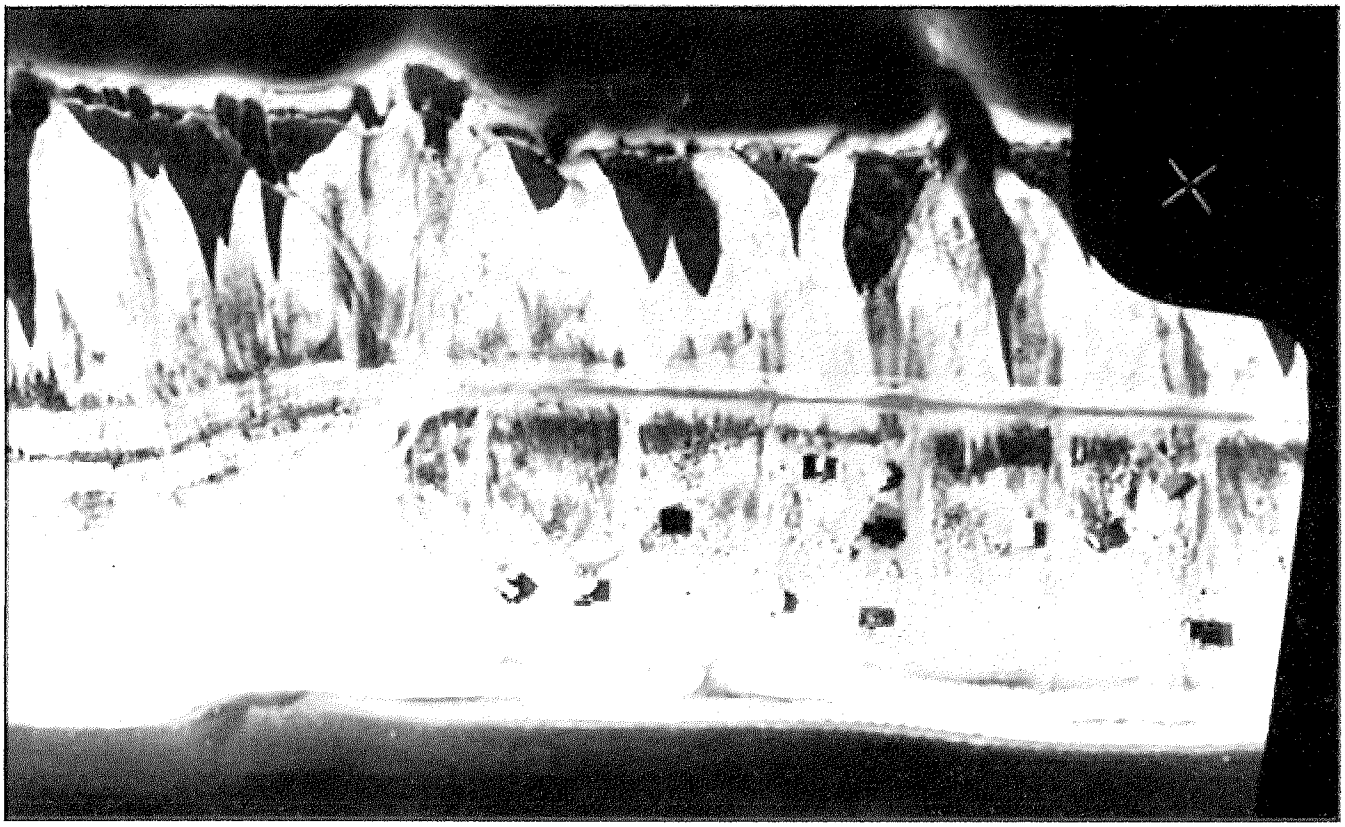
11. **December 15, 2011 US Army Corps of Engineers Mobile District Memorandum:** This elaborates on decision for the State of Alabama to receive information about available sand sources off of the Alabama Coast and selling sand to Mississippi and sand tests. USACE stated that USACE sand surveys that were provided for the sediment budget analysis were incorrect. The results were corrected and compared with uncorrected surveys. **This flawed data affected the Corps Byrnes 2008 & 2010 studies.**

12. **Summary of information concerning the Corps 2008 and 2010 Byrnes Studies:** This provides information about the sand sediment surveys that had incorrect data.

13. **Mobile Harbor Dredging History:** Summary of the Mobile Harbor Channel Dredging History that reflects how much dredged sand has been deposited to an Environmental Protection Agency's approved Ocean Disposal Area in the Open Gulf of Mexico.

14. **Fairness Hearing September 2009: Testimony of Jimmy Lyons, Alabama Port Authority.** This testimony discloses statements that Mr. Lyons made during the Fairness Hearing concerning the probability of the Widening and Deepening of the Mobile Ship Channel ever taking place. Excerpts of the testimony, at the Fairness Hearing, of Dr. Susan Rees, Corps of Engineers, are included in the letter providing input for the public scoping meeting.

A - Camile



B - Frederick

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

Dauphin Island

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

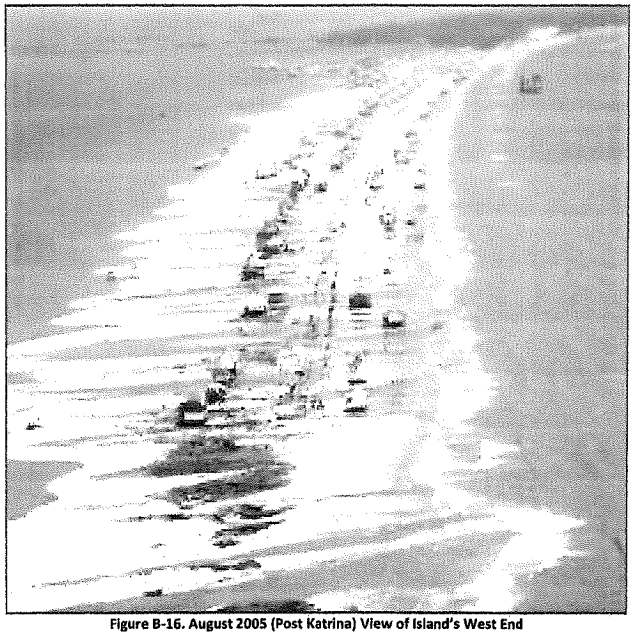


Figure B-16. August 2005 (Post Katrina) View of Island's West End
(Note loss of two most seaward tier of lots that indicate the magnitude of land loss.)

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

Dauphin Island 1950's

Dauphin Island 1950's

OCTOBER 1980

VOL. 1

1980 EIS

SURVEY REPORT

on

Mobile Harbor, Alabama

United States Army
Corps of Engineers
... Serving the Army
... Serving the Nation

Mobile District

COPY NO. 111

SADPD-P (3 Nov 80) 1st Ind
SUBJECT: Mobile Harbor, Alabama - 55480

DA, South Atlantic Divison, Corps of Engineers, 510 Title Building, 30 Pryor Street, S.W., Atlanta, Georgia 30303 4 November 1980

TO: Board of Engineers for Rivers and Harbors, Kingman Building, Fort Belvoir, Virginia 22060

I concur in the recommendations of the District Engineer.

Pleasant Hubert

PLEASANT H. WEST
Colonel, Corps of Engineers
Acting Division Engineer

FOREWORD

This feasibility report presents a recommended plan and detailed alternatives for navigation improvements at Mobile Harbor, Alabama. All plans are compared based on October 1978 cost and benefit data. The cost and benefits of the recommended plan have been updated to August 1980 price levels and construction time shown as four and one-half years. This information is available in attachment 1 of the Summary Report.

MOBILE HARBOR, ALABAMA

FEASIBILITY REPORT

CHANNEL DEEPENING FOR NAVIGATION

VOLUME INDEX

SUMMARY REPORT
MOBILE HARBOR, ALABAMA

FEASIBILITY REPORT
CHANNEL DEEPENING FOR NAVIGATION

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RECOMMENDED PLAN

In view of overall evaluation, design criteria and planning objectives, the plan defined herein as the Brookley Expansion Area and Gulf Disposal Plan No. 1 (Modified) is considered the best plan for implementation. This plan, in combination with other structural endeavors to improve water quality that were identified in the report as requiring additional model studies, will best solve existing problems and meet the needs of the study area.

The recommended plan was analyzed in light of the requirements set forth in Section 150 of the Water Resources Development Act of 1976 (Public Law 94-587) to determine the feasibility of establishing wetland areas by using disposal material. About 70 acres of wetlands will be created for mitigation. The establishment of additional wetlands as provided for in Section 150 is currently being studied under the Mobile Harbor operation and maintenance program.

Fill of any wetland or water areas for expansion of port facilities is environmentally undesirable. Also, the responsibilities outlined in Executive Order 11988 for evaluating potential effects of actions on flood plains were considered in this study; however, there are no practical alternatives to the Brookley area in the upper harbor if significant additional port development areas are to be provided. Consideration of the area adjacent to Brookley Industrial Complex for fill and development is consistent with plans that are supported by the city of Mobile and the Alabama State Docks Department. The area would be adjacent to deeper channels and could be easily connected with existing highway, rail, and intra-harbor cargo transfer facilities. Physically, the area is characterized by submerged and emergent dredged material deposition mounds, borrow

are pulled into the area as the result of the shadowing of river flow by McDuffie Island and remains of the Arlington Pier. Although recent recovery trends have been noted in the area, it continues to have persistently low dissolved oxygen in the borrow depression, and marine life and water quality have been degraded from years of pollution from the Garrows Bend area. During initial dike construction for the Brookley fill resulting turbidities would be unavoidable. However, upon closure of the peripheral dike, all disposal within the area would be controlled and the material permanently contained. Model tests to date do not indicate any significant effects of the Brookley fill on circulation in Mobile Bay although more detailed tests would be conducted before any actual construction would be undertaken.

A southwesterly slant of the southern side of the fill could minimize entrapping effects such as presently exist as the result of McDuffie Island. The Brookley site would be the most beneficial to port and economic development and would represent the least environmental loss when compared to other bay bottom areas within Mobile Bay. The recommended plan would also provide for an opening in the McDuffie Island causeway as a mitigative measure to further enhance water circulation and biological productivity in the Garrows Bend area.

Model tests of overall bay effects of the channel enlargement indicate a slight increase in the average salinity in the northeast quadrant of the bay and a slight reduction in the Bon Secour Bay area. It is unclear at this time whether the changes are the result of more or less freshwater in the respective areas. Further model tests and evaluations of these effects will be a part of any recommendations for enlargement of the Mobile Harbor Channel. In view of the extreme natural fluctuations of Mobile Bay between fresh and saline conditions, assessments of the small variations in the averages have been inconclusive as to whether net impacts may be beneficial or adverse.

Essentially all material from past dredging of navigation channels in Mobile Bay has been deposited in open waters adjacent to the ship channel. Physical buildups have occurred in the upper portion of the bay but little long-term effects are indicated in the lower bay. The effects of these operations on the chemistry of the bay have been the subject of much hypothesis and conjecture. However, little scientific data exist to support any firm conclusions. Regardless of the available data that indicates only minor impacts of estuarine open-water disposal of dredged material, many agencies and other interests advocate deep ocean or gulf disposal of dredged material. Gulf disposal is recommended for most of the new work and all future maintenance for Mobile Harbor, although we have limited data on potential gulf impacts at this time. The data limitations are largely due to the still-emerging criteria for evaluating ocean disposal impacts. However, all appropriate studies would be accomplished before any ocean disposal of new work is initiated. In the interim much of the needed studies and evaluations may be accomplished by our dredged material disposal study for Mississippi Sound and Adjacent Areas. The scope of that study will include an evaluation of the impacts of both ocean and estuarine open-water disposal with either remaining a future option depending upon more detailed study outcomes.

Modification of the US Highway 90 Causeway across Mobile Bay will require additional studies in order to identify this measure as the most cost effective and environmentally desirable method of mitigating the loss of bay bottom taken for the Brookley expansion area.

Overall, many long-term and complex investigations have been performed in connection with our studies for Mobile Harbor. This information indicates that modifications to the recommended plan can be made within the scope of work identified in this study to correct or mitigate environmental damage related to the proposed harbor

improvements. However, due to the complexity of the affected resources, increasing knowledge of water resource behavior and changing policies and legislation regulating the planning process, additional studies will be required before some of the recommended harbor modifications can be identified in detail.

IMSAND

Filed w/ EPA
21 Feb 1986

FINAL

SUPPLEMENTAL ENVIRONMENTAL IMPACT STATEMENT

MOBILE HARBOR, ALABAMA, CHANNEL IMPROVEMENTS

OFFSHORE DREDGED MATERIAL DISPOSAL

US Army Corps
of Engineers
Mobile District

NOVEMBER 1985

PD-EC

RECORD OF DECISION
MOBILE HARBOR CHANNEL IMPROVEMENTS
MOBILE COUNTY, ALABAMA

I have reviewed the Corps of Engineers' Final Feasibility Report, the Chief of Engineers' Report and Environmental Impact Statement addressing the need to provide deep-draft navigation improvements to Mobile Harbor. Based on the review of these documents and associated correspondence received in response to coordination of these documents, the plan recommended by the Chief of Engineers was found to be needed, technically sound, economically justified and in the public interest, and was subsequently authorized by Congress in P.L. 99-88. This Record of Decision describes the project as authorized by PL 99-88. P.L. 99-662 would eliminate the Brookley disposal area and may require a supplement at a later date. This would not affect the first phase of project construction or the Local Cooperation Agreement. The authorized plan of improvement provides that Mobile Harbor be modified to provide deep-draft navigation improvements by constructing and maintaining the following:

*. Deepen and widen the entrance channel over the bar to 57 by 700 feet, a distance of about 7.4 miles to the mouth of Mobile Bay.

*. Deepen and widen Mobile Bay Channel to 55 by 550 feet from the mouth of Mobile Bay to a point about 3.6 miles south of Mobile River, a distance of about 27.0 miles.

*. From the above point south of Mobile River, deepen and widen an additional 4.2 miles of Mobile Bay channel to 55 by 650 feet.

*. Provide a 55-foot deep anchorage area and a 55-foot deep turning basin in the vicinity of Little Sand Island just south of the Interstate 10 Highway tunnel.

*. construct a 1,710-acre diked industrial expansion area from dredged material disposal adjacent to the Brookley industrial complex.

The project involves dredging and disposal of about 141.2 million cubic yards of new work material as well as all future maintenance material for a 50-year economic life. Of this total, approximately 63.4 million cubic yards of new work material in the upper bay reach would be excavated and placed in the 1,710-acre diked bay disposal area to be constructed in the vicinity of the Brookley waterfront area. Construction of the lower bay reach and bar channel would involve removal of about 77.8 million cubic yards of material with placement in a Gulf disposal area approved by the Environmental Protection Agency. All future maintenance material will be transported to this approved site for disposal.

The improvements for Mobile Harbor may be phased in justifiable increments, related to priority of needs and the local sponsors' willingness to participate.

From (name) Edwards Ofc Symbol CEMP-E Telephone No. (202)272-0137
To (name) McDonald Ofc Symbol SAM Telephone No. 205-690-2[illegible] Pages 3

1-12-8
10:5

The Mobile Harbor Deep Draft Navigation project will be cost shared in accordance with provisions authorized by Congress.

Along with a no-action plan, alternatives considered included changes in the width and depths of the existing channels and various methods of excavation and disposal of dredged material. Dredged material disposal alternatives included: constructing islands and fill areas in upper and lower Mobile Bay, open-water disposal in the bay and/or gulf, upland disposal, disposal in existing disposal sites after recycling material from these areas for off-site uses, and shoreline nourishment to abate erosion. These plans are described in the Corps of Engineers reports.

All practicable means to avoid or minimize environmental harm from the authorized plan will be adopted. Anticipated adverse impacts due to the establishment of the Brookley disposal area will be offset to a large extent by the recommended environmental mitigation measures contained in the Chief of Engineers' Report. Other potential environmental improvement measures will be studied prior to project implementation to determine their technical feasibility and cost effectiveness.

The social and environmental concerns for the authorized plan and alternative plans have been evaluated and coordinated with Federal, state and environmental agencies and the public. The proposed discharge of dredged material into the Brookley disposal area has been specified in accordance with the 404 (b) (1) guidelines. The dredged material proposed for discharge into a gulf disposal site has been evaluated in accordance with 11 January 1977 Ocean Dumping Criteria, developed pursuant to the Marine Protection, Research and Sanctuaries Act of 1972. The authorized plan in in full compliance with the National Environmental Policy Act; the Clean Air Act; the Clean Water Act; the Fish and Wildlife Coordination Act; the Coastal Zone Management Act; the Endangered Species Act; National Historic Preservation Act; the Marine Protection, Research and Sanctuaries Act; and Executive Orders 11988 and 11990. Certification of compliance with the Coastal Zone Management Program was granted by the State of Alabama for an indefinite period conditioned upon the continued compliance with the management program and the development of an acceptable mitigation plan.

The adverse effects of the plan recommended by the Chief of Engineers have been minimized to the extent practicable, and the proposed action is consistent with national policy, statutes and administrative directives. The total public interest would best be served by the implementation of navigation improvements to the Mobile Harbor Project as authorized by Congress. Phased or incremental improvement is an acceptable and prudent approach toward achieving the overall plan in which each phase is incrementally justified and meets all requirements for environmental compliance. The original decision document was preempted by Congressional authorization (P.L. 99-88). This record of decision completes the NEPA process.

8 Jan '87
DATE

H. J. Hatch
for Major General, USA
Director of Civil Works

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MOBILE COUNTY, ALABAMA
(Including Dauphin Island)

FEASIBILITY REPORT FOR

BEACH EROSION CONTROL AND HURRICANE PROTECTION

SEPTEMBER 1974 126

1978 Corps study about Dauphin Island

204, Studies *herein* indicate that the only acceptable measures that would be economically feasible that would partially resolve any of the flooding or erosion problems of the area would be the nearshore Nourishment Plan defined herein as The Selected Plan. This plan would produce net economic benefits, is considered environmentally acceptable and subject to EPA approval of the disposal site designation, could be implemented under the authority of the Chief of Engineers for operation and maintenance of Mobile Harbor without additional authority tram the Congress. Accordingly, the District Engineer recommends Chat the Chief of Engineers modify the present maintenance dredging practice for the entrance channel to Mobile Harbor to conform to the procedures outlined herein for the Selected Plan as soon as practical with such other modifications as he may deem appropriate.

CHARLIE L. BLALOCK
Colonel, CE
District Engineer

183. The principal causes of shore erosion along the westernmost 11 miles of Dauphin Island are attributable to rise in *sea* level and maintenance dredging of the Mobile Bay entrance channel. Based on sea level stages recorded at Biloxi, Miaaissippi, the rates of rise of sea level between 1896 and 1972 and between 1940 and 1972 were .009 feet per year and .012 feet per year respectively. These data are shown on Place II. Per Brunn, in the reference, Sea-Level Rise *as a* Cause of Shore Erosion, proposed the following formula for computing the rate of shoreline recession from the rate *of* sea level *rise:*

108. By letter·, dated 21 July 1975, the Mobile County Commission, it was proposed that, in view of the indications from the workshop meeting,the ongoing beach erosion and hurricane study for Mobile County should be terminated. The Commission was also advised that the feasibility of placing dredged material from the Mobile ship channel onto the eroding shore would be pursued as part of the ongoing survey study for modifications of the existing Federal Navigation Project for Mobile Harbor. By letter, dated 1 October 1975, the Mobile Commission advised the District Engineer that the Commission concurred with the action stated in the 21 July 1975 letter.

110. In a letter dated 11 February 1977, the Mayor of Mobile requested that the Corps of Engineers investigate the feasibility of providing hurricane protection for the City of Mobile and shoreline erosion protection for the western shoreline of Mobile Bay. It was suggested that hurricane protection could be provided by construction seawalls or a series of ungated barriers strategically positioned in the Bay.

169. Effect assessment identifies the effects of all considered plans to determine the impacts that can he expected. Further. Section 122 of **Public Law 91-611 supplements end extends the requirement of the** National **Environmental Policy Act of 1969 (PL 91-190)** by requiring that the **effect assessment identify the economic, social, and environmental factors associated with plans under consideration. Section 404 of Public Law 92-500 and Section 103 of Public Law 532 also requires that certain impacts on water quality** be **investigated and quantified before undertaking any action involving the discharge of dredged material into waters of the United Staten or ocean waters. Further criteria are eatablished by Executive Orders. 11990 and 11988 which direct that a11 Federal water resource planning minimize destruction, loss or degradation of wetlands and development in the flood plain. Therefore, the effect assessment process is carried out to assure that all significant effects have been identified and their impacts evaluated.** A **summary of the effects of the considered plans is given in the following paragraphs.**

116. Socioeconomic and Environment Criteria - The criteria for socioeconomic and environment consideration in water resource planning are prescribed by the National Environmental Policy Act of 1969 (PL 91-190), section 122 of the River and Harbor and Flood Control Act of 1970, (PL-611), and Section 404b of the Federal Water Pollution Control Act Amendments of 1972. The criteria prescribed that all significant adverse and beneficial economic, social and environmental effects of planned developments be considered and evaluated during formulation.

175. The No Action Alternative perceives a continuation of present conditions and practices without any provisions to reduce potential hurricane flooding or occurring beach erosion. Under this alternative

dredged material would continue to *be* deposited in the closest suitable area to the entrance channel. No monetary or other resources would be expended to transfer the dredged material to Dauphin Island's littoral system, and erosion along the western end of the island could be expected to continue at its present pace. Erosion would continue to claim valuable property on the island, ultimately causing hard-ships for island property owners and a lessening of the area's attractiveness for recreational activities.

176. The Nearshore Nourishment Plan should significantly reduce the present rate of erosion along the western 11 miles of bauphin Island producing a net savings in land values over the additional coat for implementing the plan, While not eliminating, it would delay the ultimate effects of the No Action Plan. The savings realized from the Nearshore Nourishment Plan should beneficially of National economic development; local property values, employment, business activities, **tax** revenues, and general *economic* growth; public services and facilities; natural and manmade resources; recreation and aesthetic values; and community and regional cohesion ***and growth***. The plan should have no effects on air quality, noise, known archaeological remains, municipal water supply. or threatened or endangered species. As previously noted the Nearshore Nourishment Plan would have temporary, adverse effects on water quality, benthic life, fisheries, and other marine life similar to the present (No Action Plan) method of operations. No known vegetation or wetlands other than submerged bottoms would be affected. The plan is considered acceptable to local interests and would be completely reversible. It is reasonably certain **that** benefits for the considered plan will be achieved; however, the effectiveness of the considered plan cannot be fully documented. The area of geographical impact would be limited to the southern shoreline ***of*** Dauphin Island and adjoining offshore waters.

Sand Island Bar, AL

Beneficial Uses:	Beach Nourishment,Berm Creation
Lead Agency:	Mobile District, South Atlantic Division
Placement Date(s):	February 1987
Location:	4 miles (6.5 km) south of the eastern end of Dauphin Island and 1.5 miles (2.5 km) west of the Mobile Bay entrance channel.
Placement Method:	Split-hull, shallow draft hopper dredge
Substrate Type:	Sand (0.22 mm)
Energy Source:	Open ocean (Gulf of Mexico)
Project Size:	*Volume*: 464,000 cy (355,000 cu m); *Length*: 6000 ft (1,830 m); *Width (crest)*: 150 ft (46 m); *Thickness*: 6 ft (2m); *Side Slopes*: 1V:25H; *End Slopes*: 1V:20H to 1V:50H; *Plan View*: L-shaped; *Water Depth*: 20 ft (6 m)
Monitoring:	Parameters measured included bathymetry, sediment samples, side-scan sonar.
Comments:	This test, conducted in 1987 offshore of Sand Island, Alabama, expands experience using fine sand in intermediate depths, i.e., below depths where onshore transport has already been demonstrated, but shallow enough for potential movement. The major question is whether sand at this depth will be retained in the nearshore zone or lost seaward. The berm showed indications of migrating northwest. It was too far offshore to directly influence beach volumes, but the sand was apparently becoming part of the littoral system.

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unnecessary or undue reduction of wilderness values, and applying the "minimum requirement" concept of the 1964 Wilderness Act to all proposed projects involving these islands.

Based on federal statutes such as the National Park Service Organic Act and the Seashore's enabling legislation, NPS Management Policies, and management plans, the NPS is mandated to preserve and protect the natural conditions and processes affecting the barrier islands, and to preserve the significant cultural resources existing on the islands. In addition, the Seashore's enabling statute directs that beach erosion control measures and spoil deposition activities in the park undertaken by the U.S. Army Corps of Engineers must be carried out in a manner that is acceptable to the NPS and consistent with the park's purposes (16 U.S.C. § 459h-5). NPS decision-making must also integrate the results of scientific study (16 U.S.C. § 5936).

6.3.2 Impacts to Mississippi Barrier Islands and Processes

Net longshore sand transport is from east to west along the Mississippi barrier islands, although local reversals in the net transport occur adjacent to the tidal passes. Based on analysis of historical shoreline and bathymetry data, Ship Island is the terminus to the longshore sand transport system in this region. Modern Cat Island beaches, located west of Ship Island, appear to be affected by littoral processes not directly related to those of the islands to the east. Thus, the regional shortage of littoral sand for barrier island maintenance is best observed at Ship Island (Rosati et al., 2007).

Between the late 1840s and 2005, all of the Mississippi barrier islands managed by the NPS have eroded and migrated appreciably. Petit Bois Island lost about 56% of its surface area, Horn Island lost approximately 24%, East and West Ship Islands have cumulatively lost about 64%, and Cat Island lost approximately 26% (Morton, 2007). Furthermore, island erosion rates have increased more than three fold between 1847 and 2000/2002. For example, Ship Island lost about 0.9 hectares/year between 1848 and 1917, increasing to approximately 2.5 hectares/year between 1917 and 2000 (Rosati, et al., 2007). Additionally, ***between*** 2000 and 2005, a period of significant storm events, the Ship Islands lost about 22 hectares/year (Morton, 2007). In 1847, Ship Island had a surface area of approximately 603 hectares (Rosati, et al., 2007), but by 2005 the total surface area for East and West Ship Islands had decreased to about 216 hectares (Morton, 2007).

The principal causes of Mississippi barrier island erosion and land loss are frequent intense storms, a relative rise in sea level, and a deficit in the sediment budget Of these causes, the one that experienced the greatest change over the last 100+ years is the reduction in sand supply related to dredging of navigation channels through the outer bars of the tidal inlets near the islands (Morton 2007). According to Rosati et al. (2007), maintenance dredging operations conducted between 1897 and 1948 in the Horn Island Pass Outer Bar Channel removed sediment at a rate of approximately 34000 cubic yards per year (cy/yr). After the channel was modified to 38-feet deep by local interests in 1949 at their expense, maintenance dredging quantities continued to increase as authorized channel depths increased. Maintenance dredging rates increased to161,104 cy/yr in 1949-1965, increased again to 515,320 cy/yr in 1965-1993, and decreased to a rate of 245,483 cy/yr in 1993-2005.

Therefore, between 1909 and 2005, a total of approximately 22 million cubic yards of sand were removed from the Horn Island Pass Outer Bar Channel by maintenance dredging (Rosati et al., 2007). Much of the sand dredged from the outer bar channel during maintenance dredging operations likely originated from littoral zone transport east of the channel. Offshore disposal of sand dredged during channel maintenance operations conducted in the past may have removed such sand from the barrier island sediment budget downdrift of the channel. However, a detailed analysis

MEMORANDUM

US Army
Corps of Engineers
Mobile District

DATE: 15 December 2011

SUBJECT: Mississippi Coastal Improvements Program Comprehensive Plan - Multi-Agency Working Group
LOCATION: Teleconference
TIME: 10:00 am – 11:00 am CDT

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1. Introduction:

a. Attendees.

U.S. Army Corps of Engineers (USACE), Mobile District: Justin McDonald, Elizabeth Godsey, Megan Alesce, Michael FitzHarris, Tom Smith, Susan Rees, and Larry Parson.

USACE Engineering Research and Development Center (ERDC): Alison Sleath

Mississippi Department of Marine Resources (MDMR): Jeff Clark and Jan Boyd

National Park Service (NPS): Bruce McCraney, Jolene Williams, Steve Wright, Rick Clark, Pam Marsh, Rebecca Beavers, and Jodi Eshleman

CH2MHill: Steven Layman and David Stejskal

U.S. Fish & Wildlife Service (USFWS) – Paul Necaise

Applied Coastal Research & Engineering – Mark Byrnes

University of Southern Mississippi – Mark Peterson

USGS - Mickey Plunket.
NMFS - Mark Thompson

David Spatk
Nick Windstead
Jody NPS
Todd Slack
Alision Sleath

USGS - ???
Jolene and Pam Gulf Islands
Barry Vittor
Linda York
NPS
Andy Sanderson Mississippi Science Musem

Any problems getting agenda let us know. Some have had issues.

2. Barrier Island Restoration:

a. North Shore West Ship Island Restoration:

USACE (*Justin McDonald*): The contractor is approximately 65% – 70% complete with the dredging/placement work at West Ship Island. The work is taking longer than originally anticipated due to bad weather conditions. He was only able to dredge for 6 or 7 days in the month of November. The work is anticipated to be finished early next year. The contractor estimates that the work can be completed in 2.5 weeks if the weather cooperates. Draft plans and specs have also been completed for the revegetation contract. USACE is currently working with NPS to finalize this plan.

At stat 62 430,000 cy placed and accepted. Apprxo, 75% complete with work. Started back last night. Not sure either last night or two day should have 4 to 5 days of good weather.

Barrier holding up really well. Can't see barrier but good photos of the progressioin. Will send ot whole group.

P&S for west ship island north shore. Design complete within the next few weeks. Garry Hopkins and Jolene working with on P&S. Mid to later part of March for work. 1st will place sand fencing to start establishing dunes. Plant stock from Mississippi. Will come from other islands other than ship. Discussed on Tuesday beside area of west ship east ship and western end of horn island as dissuced with Jolene and garry. Looking to start planting this fall 350,000 plants.

Jolene - Question related to sand. Looking to pull from another borrow source?

No same channel just deeper. Susan says 34 plus 2 plus 2. Originally 34 elimited. 0+00 to 9+00 not suitable material on western side. We are confident on stat 9+00 and 19+00. 70,000 to 80,000 left to -34. He was asking to go west we said no lets just go deeper since this is shoaled material. Have directed josh to stop contractor is we hit unsuitable material.

b. Camille Cut and East Ship Island Restoration:

USACE (*Justin McDonald*): No additional information to report on the design of Camille Cut and East Ship Island restoration at this time. USACE is currently working on providing Patty

Powell, the Director of the Alabama Department of Conservation and Natural Resources, the information she requested which shows all of the available sand sources off the coast of Alabama. This effort should be complete by the end of next week. USACE will deliver this information to Patty the first week of January and hopes to have a final decision from Alabama by the end of January. USACE will begin preparing plans and specs the first phase of the Camille Cut and East Ship Island Restoration once the Alabama sand issue is resolved.

USACE met with NPS and CH2MHill last week to discuss the Wetlands Statement of Findings (WSOF). USACE is currently working on computing the impacted areas for the WSOF. This effort should be complete next week.

Kick off meeting phase 1 plans and specs last week. Some work to be done to get go head from state of Alabama to get sand from petit bois.

Data base and report wrapping up this week will discuss with patty Kelly next week to discuss.

Will proceed with SEIS and plans and specs if go ahead from state is received.

Wetland statement of findings - Camille Cut. Equilibrium of DA 10.

Jetty on south side west end. Barrier on south side on west ship. Groin?// Current no plans for groin or jetty on west south end of ship.

c. Cat Island East Beach Restoration status:

USACE (*Justin McDonald*): As discussed at last month's meeting, a preliminary Cat Island restoration plan has been developed which includes the placement of approximately 1.8 MCY of sand with approximately 2.1 MCY from an offshore borrow area. The average cut depth in the borrow area is approximately 5 feet. The fill elevation along the eastern face from the northern and southern tip is approximately +5 feet NAVD88 with the northern segment including a foredune with an elevation of approximately 7.5 feet NAVD88. USACE is currently working on computing the impacted areas for the Wetland Statement of Findings for the NPS. This effort should be complete next week.

Draft design and borrow area design. BP still owns. Wetland statement of findings completed.

d. Upland River Sand Field Test – Located at the east end of Dauphin Island:

USACE (*Megan Alesce):* Sampling event #10 has been completed, except for the hydrographic survey portion, and the sand appears to be lightening up. The hydrographic survey for sampling event #10 has not been performed yet due to the bad weather but it should be completed soon. USACE will start computing the quantity change for each sampling event this month and the information can be provided to those who are interested. The PowerPoint presentation will be updated this month as well.

EPA – SEIS update - larry mentioned next version of preliminary draft. Is there a schedule. Larry no waiting on the state of Alabama. Would not be before the end of Feb. Stated susan.

Todd met on 5th of January. Gulf sturgeon update at that time had 21 recevers on 20th of sept in pass Camille cut and either ends. 11 gs. Recorded at ship 4 from peral 3 black 3 pascagoula 1 blackwater.

At that time no 13 gulf stergon with 1 additonal from black and Pascagoula. 7731 decetions. We are seeing hits on all receives but go hot spots on end of islands and in the pass.

Turbidity and dredging records provided from Mobile.

LTMP - Mickey Don sends her regards. Aylysia science coordinator for ecosystem she sits in dons position. Mickey is holding this for the time. All review comments on the draft plan. Short work week . Scanned over the comments. The significant portion of the adaptive management piece.

No suprises. Setting aside next week to go through the comments.

Susan and Justin would like to get with you to discuss water quality and wave direction mointoring. Any questions on item 12?

Any other comments or questions.

USACE (*Justin McDonald*): Asked NPS if they had been to the site to see the sand.

NPS (*Jolene Williams*): Said they went to the site and the sand still looked to orange.

e. Geotechnical Report:

USACE (Michael FitzHarris): No work has been completed this month because he was pulled off the report to work on the Alabama sand location database. He plans on getting back to work on the report after the first of the year.

f. Sediment Budget Update:

Applied Coastal *(Mark Byrnes):* The final sediment budget report has been completed and will be published by ERDC during the first quarter of next year.

USACE *(Justin McDonald)*: Stated that the USACE surveys that were provided for the sediment budget analysis were incorrect. They have been corrected and a comparison of the corrected and

uncorrected surveys is being performed to determine the magnitude of the difference. The results will be provided to Mark Byrnes so that he can decide if any additional analysis is needed to correct for the "busted" USACE surveys.

Applied Coastal *(Mark Byrnes)*: He used mostly the USGS data, not the USACE data, so he doesn't think that there will be an issue.

f. ERDC Modeling Update:

ERDC (Alison Sleath): All storm runs have been completed on the recommended alternative. ERDC is currently finalizing the draft report and will have it ready for USACE (Mobile) review by the end of the year.

g. Delft 3D Modeling Update:

USACE (*Elizabeth Godsey*): Work under task 3 Evaluation of barrier island restoration alternatives of the current Task Order is almost complete. They anticipate being complete on January 5, 2012. Work has also begun on the additional modeling services that were added to their effort under a contract modification last month.

h. SEIS Update:

USACE (*Larry Parson):* USACE is waiting on a final decision from the State of Alabama regarding the Petit Bois sand before proceeding forward with the SEIS. USACE is currently incorporating the NPS comments on the preliminary draft as well as working on the WSOF and draft BA. The schedule for the completion of the SEIS needs to be revised to reflect the most recent decreased review requirements. Next step is the multi-agency review, but this will be held until further decision is made from the state of Alabama.

USACE met with NPS yesterday about Section 106 coordination. USACE will draft the initial coordination letter to SHPO and NPS will coordinate with the tribes. USACE anticipates performing shoreline archeology surveys in February.

i. Benthic Study Update:

USACE (*Larry Parson*): Vittor & Associates is finalizing the processing of the first 3 sampling events and wrapping up the draft monitoring report. They have begun preliminary processing of the sturgeon monitoring and collected the first set of samples for this effort.

j. Sturgeon Monitoring

USM *(Mark Peterson):* One of the monitoring buoys located south of the west end of West Ship Island was lost last week. They plan on replacing it tomorrow. He asked USACE and NPS to be on the lookout for the lost buoy.

The monitoring results show the sturgeon are spending a lot of time around the tip of West Ship Island as well as Camille Cut. They have identified 11 different sturgeon around Ship Island – 4 from the Pearl River, 3 from the Pascagoula River, 3 from the Blackwater River, and 1 from the Yellow River.

USACE *(Justin McDonald):* Said that he would make the contractor and USACE staff working on the West Ship Island North Shore Restoration Project aware of the lost buoy.

k. Adaptive Management and Long Term Monitoring

USACE *(Justin McDonald):* Dawn Lavioe sent the draft plan out to the group after last month's call.

USFWS *(Paul Necaise):* Requested that language be inserted for sea turtle monitoring. He should have this language to Dawn within the next couple of weeks.

3: Other Discussion and Closing:

a. Meetings:

Next meeting tentatively scheduled for 10:00 am CST January 19, 2012.

MOBILE HARBOR DREDGING HISTORY

Based on data provided by the Corps, the Bar Channel requires maintenance dredging approximately every other year. However, dredging can be required yearly and sometimes more than once in a single year if accelerated shoaling occurs caused by tropical cyclonic events that can strike the North Central Gulf Coast between June and November each year. Table D-1 identifies the quantities of material removed from the Bar Channel from 1974 through 2006, along with the total cost of dredging, the average price per cubic yard dredged, and the disposal area within which the material was placed.

Hopper dredges are used to maintain Mobile Harbor's Bay Channel and Bar Channel. This type of equipment is used to contain the material dredged from the channel for transport

Table D-1. Summary of Mobile Harbor Bar Channel Dredging History

Dredge Date	Gross Quantity Dredged (yd^3)	Total Cost ($)	Cost/ Gross (yd^3)	Disposal Area Used 2/
Jul-Aug1974	349,260	209,556.00	0.60	Ocean DA
Feb 1975	982,829	599,525.69	0.61	Ocean DA
May-Jun 1976	1,364,113	844,693.00	0.62	Ocean DA
May-Jun 1976	1,272,432	307,907.00	0.24	Ocean DA
Oct 1979	707,142	375,245.36	0.53	Ocean DA
Feb-Mar 1980	190,300	775,755.50	4.08	Ocean DA
Jan-Mar 1981	610,623	488,498.40	0.80	Ocean DA
Dec 1982-Jan 1983	312,408	573,697.83	1.84	Ocean DA
Jan 1984	218,672	570,050.80	2.61	Ocean DA
Oct-Nov 1984	340,935	557,960.00	1.64	Ocean DA
Aug-Oct 1985	1,386,536	2,215,696.24	1.60	Ocean DA
Jan-Feb 1987	656,089	1,279,493.58	1.95	Ocean DA
Feb 1989-May 1990	1/ 6,755,352	5,813,101.00	0.86	Ocean DA
Aug-Sep 1992	466,607	900,551.51	1.93	Ocean DA
Sep 1995-Mar 1996	662,244	1,278,130.92	1.93	Ocean DA
Dec 1996-Feb 1997	530,456	1,023,780.08	1.93	Ocean DA
Mar-Oct 1998	443,761	856,458.73	1.93	Ocean DA
Nov 1997-Aug 1998	180,540	348,442.20	1.93	Ocean DA
Oct 1998	836,054	1,613,584.22	1.93	Ocean DA
Oct 1998-Jul 1999	70,980	136,991.40	1.93	Ocean DA
Oct 1998-Jul 1999	54,600	105,378.00	1.93	Ocean DA
May-Sep 1999	1/ 3,061,598	3,806,525.84	1.24	SIBUA
Apr-Jul 2000	758,280	1,486,228.80	1.96	Ocean DA
Mar 2002-May 2002	92,820	282,067.51	3.04	SIBUA
Jun 2004	230,110	424,584.40	1.85	SIBUA
Oct 2004-Jan 2005	1,808,765	-	-	SIBUA
Oct 2004-Nov 2004	1,184,817	2,991,147.61	1.00	Lighthouse
Apr 2006-Jun 2006	487,975	848,919.38	1.74	SIBUA

Source: U.S. Army Corps of Engineers
1/ Not maintenance material
2/ Ocean DA - EPA approved open water disposal site in the offshore Gulf of Mexico
SIBUA - Sand Island Beneficial Use Area

to an approval disposal site at which it is discharged. Typically, hopper dredges are designed with bottom gates that are opened to allow the material to fall to the bottom. A variety of hopper dredges are available in the commercial dredging fleet, having different draft requirements to allow them to operate in different water depths.

Until 1999, all material dredged from the Bar Channel was transported to the Environmental Protection Agency's approved Ocean Disposal Area in the open Gulf of Mexico several miles to the southwest of the Sand Island Lighthouse. In the mid 1990s, a second site was approved for disposal of dredged material removed for the Bar Channel. This broad area comprising approximately 1,000 acres located to the west of the Bar Channel is collectively referred to as the Feeder Berm and Sand Island Beneficial Use Areas. The location of the beneficial use areas are shown on Figure D-2.

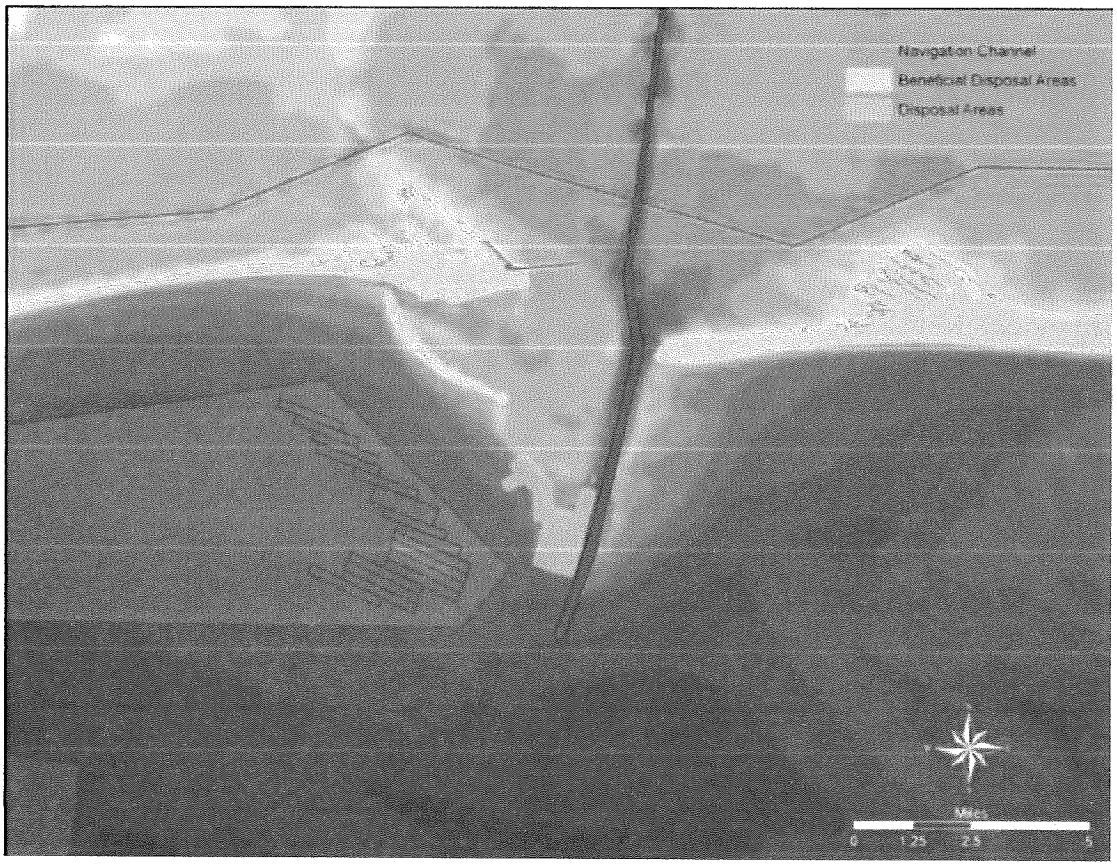
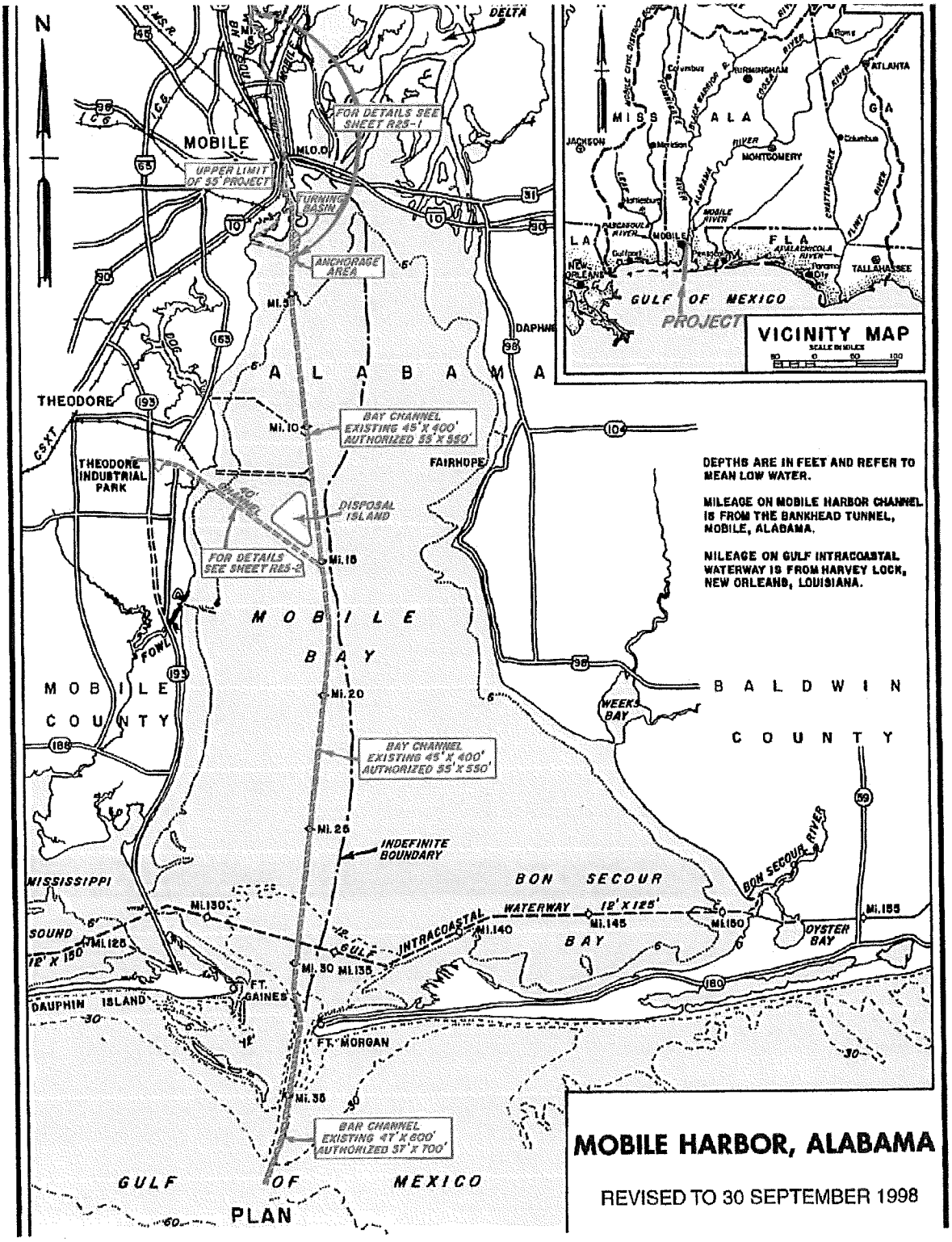


Figure D-2. Location of Mobile Outer Bar Channel in Relation to the Sand Island Beneficial Use Area and Dauphin Island (from Byrnes et al, 2008)


N
MOBILE
UPPER LIMIT OF 55' PROJECT
TURNING BASIN
ANCHORAGE AREA
FOR DETAILS SEE SHEET R25-1
THEODORE
THEODORE INDUSTRIAL PARK
BAY CHANNEL EXISTING 45' X 400' AUTHORIZED 53' X 550'
DISPOSAL ISLAND
FOR DETAILS SEE SHEET R25-2
FAIRHOPE
DAPHNE
ALABAMA
MOBILE BAY
MOBILE COUNTY
BALDWIN COUNTY
WEEKS BAY
BAY CHANNEL EXISTING 45' X 400' AUTHORIZED 55' X 550'
INDEFINITE BOUNDARY
MISSISSIPPI SOUND
INTRACOASTAL WATERWAY 12' X 125'
BON SECOUR BAY
BON SECOUR RIVER
OYSTER BAY
DAUPHIN ISLAND
FT. GAINES
FT. MORGAN
BAR CHANNEL EXISTING 47' X 600' AUTHORIZED 51' X 700'
GULF OF MEXICO
PLAN
DEPTHS ARE IN FEET AND REFER TO MEAN LOW WATER.
MILEAGE ON MOBILE HARBOR CHANNEL IS FROM THE BANKHEAD TUNNEL, MOBILE, ALABAMA.
MILEAGE ON GULF INTRACOASTAL WATERWAY IS FROM HARVEY LOCK, NEW ORLEANS, LOUISIANA.
VICINITY MAP
PROJECT
GULF OF MEXICO
MOBILE HARBOR, ALABAMA
REVISED TO 30 SEPTEMBER 1998

Testimony Excerpts of Jimmy Lyons: Fairness Hearing Sept 2009

Questioning by Wells Burgess, Natural Resources Section Environmental & Natural Resource Division U.S. Department of Justice

Q. Okay. All right. Now, we talked about an expansion of the outer bar, the bar channel to the authorized limits. Are you familiar with any estimates of how much that would cost to do?
A. Well, I heard $2.7 billion here today. But I have not really seriously looked at it. When When I first got to the board in 1999, that was an issue. The channel extensions was probably the number 1 issue. But the Corps had done some work and I saw some of the work that had been done on deepening and widening and the numbers that were just so far out of line, I've never really given them any serious consideration.

Q. You don't remember how much it was?
A. Oh, it was, you know, 150, 200 million. Very, very -- pretty high number.

Q. Annually. Well, all right. How would the assumption of the debt and the service on the debt on this $100 million that you might have to come up with and also the payment of the 50 percent of the dredging maintenance costs, how would that affect your budget as it is right now?
A. It would bankrupt us. We couldn't do it. I mean, there's no way we could do it.

Q. What is your understanding of the percentages that have to be paid by the State for their costs of that project that's extending the dredging to the authorization?
A. It gets very, very bad. It goes up to -as far as the construction goes, it goes up to 50 percent and then all of a sudden we would have to pick up half of the maintenance.
Right now the maintenance of the Mobile ship channel runs -- for the whole channel, I don't know what's attributed to the bay or the bar or upper harbor, how the percentage breaks out -- but right now we need from the federal budget, we need to get appropriated almost every year between 20 and $25 million. So we would pick up at least half that much I would think.

Q. You're saying the cost of current dredging is 20 to $25 million and you would be asked to pick up half of that?
A. At least on the 55-foot portion of the channel, yes. Quite honestly, there's not going to be -- anything else would be the 40-foot channel that runs above the Mobile Container Terminal.

Q. And the estimated cost of that, $200 million, you would be asked to pick up a hundred million of that?
A. Correct. But I think the number would be much more than 200 today. I think it would probably be approaching -- could be well over double that.

Q. So you would say you have over $400 million in debt you're servicing?
A. Correct. We debt service on the 300 million, the 22 million. We haven't done a long-term issue on the other, but probably would be in the vicinity of 7 to $8 million, depending on where we end from interest rates. So we'll have a debt service -- when we finally do the long-term, we'll probably have a debt service somewhere in the vicinity of 28, $29 million, annually.
Q. Annually. Well, all right. How would the assumption of the debt and the service on the debt on this $100 million that you might have to come up with and also the payment of the 50 percent of the dredging maintenance costs, how would that affect your budget as it is right now?
A. It would bankrupt us. We couldn't do it. I mean, there's no way we could do it.

Q. Okay. So you feel like you have a lot of economic gain or economic benefit from the turning basin?
A. Absolutely. You know, that was a big, big point in the negotiations on our second agreement for the container terminal. In fact, we had to actually commit to our best efforts to construct this turning basin, because they felt the length of the ship in Mobile would be a limitation for us in the future and that was actually written into the concession agreement. It said that we would make the best efforts and if we didn't get it done in five years that they would have the ability to walk away from the deal.

Q. Okay. Compare that to the economic benefit you see -- you can foresee from the expansion of the ship channel to the authorized limits.
A. I really don't see any. The only time it's really ever been discussed is one of my board members asked me I did see any benefit in the deepening of the channel and I said I really don't. It's such a huge number. They said well, check it out. So the obvious, biggest driver in Mobile tonnage-wise is the coal. As far as deep draft, we do have a lot of petroleum here, but it's all north of the tunnel, so it'll never be any deeper than 40 feet. But I talked to a couple of my coal customers, I said: Is there anything benefit of bringing anything more than 45 feet, and the answer was no, and that was pretty much the end of it.

Q. All right. Given what you've said about the economic benefit or lack thereof, of dredging to the authorized limits and given what you said about the cost to the State of Alabama -- excuse me -- to the Port Authority, of its share of financing that project, do you feel like it's likely that the Port Authority is going to ask that that dredging be done anytime soon?
A. No, I really don't. It's one of these things that -- in fact, I looked at a lot of
things. Part of my job is to do a lot of what-if'ing and strategic planning, that sort of thing. I have to try to look to the future and talk to people and try to look at things and where they're going. The trends in ship design. The controversy here in Mobile is about the bridge over the Mobile River; and we ended up taking a position on that based on what we felt like was going to be the maximum ship size to ever come in here and none of those have ever indicated a need for anything more than 45 feet. Yeah, there might be a few ships, but I don't think there would be enough business to justify it. I don't think I would even ask the Corps or try to even spend any money on trying to study it.