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SAVANNAH HARBOR EXPANSION PROJECT CHATMAN COUNTY, GEORGIA AND JASPER COUNTY, SOUTH CAROLINA: FINAL GENERAL RE-EVALUATION REPORT AND ENVIRONMENTAL IMPACT STATEMENT JANUARY 2012

COMMUNICATION

FROM

THE ASSISTANT SECRETARY OF THE ARMY, CIVIL WORKS, THE DEPARTMENT OF DEFENSE

TRANSMITTING

THE CORPS' FINAL GENERAL RE-EVALUATION REPORT AND ENVIRONMENTAL IMPACT STATEMENT

PART 12 OF 15

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FINAL
ENVIRONMENTAL IMPACT STATEMENT
SAVANNAH HARBOR EXPANSION PROJECT
Chatham County, Georgia and Jasper County, South Carolina

January 2012
(Revised July 2012)

Appendix A - Continued

Volume 3

US Army Corps of Engineers
Savannah District
South Atlantic Division

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25 January 2011

Colonel Jeffrey M. Hall
District Commander
U.S. Army Engineer District, Savannah
Attn: PD
P.O. Box 889
Savannah, GA 31402-0889

Re: Savannah Harbor Expansion Project
Draft Tier II E.I.S. and G.R.R.
Submittal to the Record

Dear Colonel Hall,

Subsequent to the 15 November 2010 Public Notice issued by the Savannah District, COE for comments regarding the above project, the City of Tybee Island has made two (2) submittals requesting additional clarifying or supplementary information (dated January 4th and January 13th, 2011). Moreover, along with representative(s) of the GA DNR, we met with both you and the District staff on 11 January 2011 seeking to receive data, analyses, or answers to questions posed by our 4 January 2011 Request for Additional Information (RAI). Unfortunately, it appears that the type, the extent and the nature of the responses requested for proper evaluation cannot be provided by the Savannah District to either the City of Tybee Island, or the GA DNR. At a 20 January 2011 Public Workshop on Tybee specifically held to address this issue, the City Council voted unanimously to *not* accept or support the present 13M cy disposal plan addressed by the above documents. For that reason, we are formally submitting the following information to the record in accordance with federal procedures required to solicit comment from private and public agencies, or parties directly adversely affected by the proposed federal actions.

PREFACE

The proposed deepening of Savannah Harbor to -48-ft in order to handle the new class of Panamax vessels will necessitate the removal of various types of material from the project entrance channel including varying amounts of beach quality sediment. Similarly, sediments containing some percentage of beach quality sand will be episodically removed with each subsequent maintenance dredging operation occurring within certain segments of the entrance channel. Up until the present time, very little beach quality material dredged has been returned to the littoral zone of the State of Georgia at this federal navigation project. Instead, most has historically been subject to incidental disposal at either the Jones-Oyster Bed upland spoil site, or in deeper offshore waters via the ODMDS.

Effective June 1, 2003 the *Georgia Law (O.C.G.A. 52-9-1, et. seq.)* was amended to specifically address impacts to the State's sand sharing system due to existing and future dredging operations. Previously, such operations were *not* consonant with appropriate regional sediment management and/or State policy. The Savannah Harbor Navigation Project construction, improvements and maintenance over the last century was a specific focal point for the enactment of this landmark legislation (*i.e.*, O.C.G.A. 52-9-1, et seq., amendments authored by Rep. Burke Day) due to its large-scale sediment budget impacts which have historically adversely affected Tybee Island.

Simplistically, the legislation requires that all *beach-quality sand* originating from the dredging of navigation channels within tidal inlets, as well as the improved entrances to harbors and rivers be required to be placed on the adjacent coastal beach, if possible. The law further requires that if such sand is placed elsewhere, an equivalent quality and quantity of sand from an alternate location be placed on the adjacent coastal beaches. Further, it requires the disposition of sand shall be completed by the person or entity undertaking the dredging.

For decades, the City of Tybee Island has maintained that the entrance channel portion of the federally maintained Savannah River Harbor Navigation Project was a root cause of beach erosion on Tybee Island. This opinion has been corroborated by numerous coastal engineers and geologists acting as consultants to the City over the years. More specifically, they have pointed out that the federal navigation project improvements at the mouth of the Savannah River which include rock jetties, a deep draft channel, and a submerged breakwater constitute a complete barrier to alongshore sediment transport. Many of these large scale improvements were initiated in the mid-1800's. Until 2006, the Savannah District's longstanding public position with respect to the City's claims as to impact has been that the navigation project was not at fault in causing beach erosion. In 2006, a channel specific impact study authorized by

Congress and performed by the Engineering Research and Development Center (ERDC), which is the in-house technical arm of the USACOE nationally, corroborated that the existing Savannah Harbor navigation project was responsible for an estimated 80% of Tybee Island's long-term erosion – both onshore and nearshore. The fundamental impact of the navigation project was the longstanding modification of the naturally occurring sediment budget for the region and ensuing large scale changes in ebb tidal platform and insular morphology.

Historical Precedents – The Savannah Harbor Navigation project, historically, has not included the beneficial disposal of *beach quality* sand on the adjacent coastal barriers or in the active littoral zone. This has been primarily due to the maintenance practices that were established by the Savannah District with the inception of the navigation project over 100 years ago. Dredging technology that existed during the early history of the project dictated maintenance procedures and dredged material disposal practices. As a result, the "Federal Standard" for maintaining certain navigation projects, like Savannah Harbor, initially became the cost and impacts associated with hopper dredging and ocean disposal of the dredged material in water depths of 30 feet or more. With the advent of regional sediment management within the COE hierarchy nationally, that type of a "standard" resulting in resource loss is presently prohibited in most States.

The early establishment of the "Federal Standard" for maintenance of the Savannah Harbor project did not consider the cumulative long-term impacts of removing beach quality sediment from the littoral system. This was due in part to the limited coastal development that existed in the mid-1800's when such projects were first constructed, but also due to lack of sufficient scientific understanding of coastal processes and the sand-sharing system associated with tidal inlets and adjacent beaches. Subsequent decades of research by the U.S. Army Corps of Engineers and practical knowledge gained from the operation of numerous coastal navigation projects around the country has resulted in the realization that littoral material must be conserved. Natural supplies from rivers and streams are not replenishing littoral sediments, particularly on the East Coast of the United States. *Accordingly, it is now recognized that the removal of a cubic yard of littoral sediment from a tidal entrance or inlet with deposition outside the active littoral zone of the beach will ultimately cause a cubic yard deficit somewhere within the sand-sharing system affected by that particular entrance or inlet.* The impact of continual removal of sediment from the active littoral zone through channel maintenance is identified as a major cause of man-induced erosion in the U.S. Army Corps of Engineers – Coastal Engineering Manual (CEM). From an engineering perspective, the primary requirement for the Savannah Harbor maintenance program, apart from assuring that the channel remains navigable year-round, should be to prevent project induced erosion of the adjacent beaches, by conserving the limited natural resource, sand, through deposition directly on the adjacent beaches, or as allowed by

O.C.G.A. 52-9-1 et. seq. from an alternate source if determined to be more cost-effective – or more appropriate quality.

In responding to a relatively recent State of Georgia observation (*i.e.*, S. Shipman, GA DNR – correspondence dated August 2009) that beneficial use of dredge material from the subject project has been neither forthcoming, nor in compliance with the Shore Protection Act (as modified by O.C.G.A. 52-9-1, et. seq.) the Savannah District's public position has been that –

"If the State prefers a sediment placement plan that is different from that proposed by the Corps, the Corps could implement the State's proposal after receipt of the incremented additional cost of that alternate placement plan".

That is to say, the Savannah District's historic position has been that if additional costs are incurred for resource recovery in the State of Georgia (*i.e.*, *beach quality* sand), or strategic and constructive implementation of regional sediment management practices that are in the public interest, a third party – other than the District – should pay for the incremental cost of the action. This position is inconsistent with State Law, State policy, and CZMP precepts codifying same – or practices of the Corps to the contrary in other States. The City of Tybee Island notes that even if the Savannah District determined that strategic beach disposal of *maintenance material* resulted in additional cost, the Corps of Engineers, under authority of Section 207 of the Water Resources Act of 1996, can elect to use a more costly disposal method if there are overriding environmental and erosion control benefits associated with the more costly disposal scheme.

Interestingly, the "position" historically embraced by the Savannah District is neither emulated nor interpreted similarly by either the Wilmington District USACOE, to the north, or the Jacksonville District to the south. In contrast, within the State of Florida for example, *all* beach quality sediment removed from all federal navigation projects, as well as the maintenance of the Atlantic Intracoastal Waterway, is placed *on* the State's Atlantic and Gulf coast shorelines at essentially no cost to the State or local government. This is standard procedure in keeping with State law, policy and the Florida Coastal Zone Management Plan. Accordingly, all such federal projects in Florida (for maintenance as well as new construction) are formulated by the Jacksonville District, USACOE with this precept in mind.

State of Georgia CZM Plan Compliance – *The City of Tybee Island, GA is of the opinion that ongoing maintenance activities of the Savannah District, USACOE, as performed for the Savannah Harbor Navigation Project entrance channel, fail to comply with the requirements of the Georgia law (O.C.G.A. 52-9-1, et seq. as amended).* This law necessitates the strategic recovery (or in-kind replacement) of

beach quality sand removed from the coastal zone by dredging operations, whether they be by federal or non-federal interests. Accordingly, the City of Tybee Island, GA likewise opines that the Savannah District, as the federal navigation project sponsor, is *not* currently in compliance with the State's Coastal Zone Management (CZM) Plan.

Similarly, it is the City's opinion that future dredging activities necessitated by the proposed Savannah Harbor Deepening Project – navigation channel expansion activities, if constructed as currently planned without direct mitigation to Tybee Island for non-replacement of *beach quality* sediment, will likewise be inconsistent with the State of Georgia CZM Plan. This inconsistency includes the stated position of the Savannah District that the assessment of project related impacts in the National Environmental Policy Act (NEPA) process need only be limited to those discerned by the District to be "incremental" in nature. Reinforcing the City's opinions in this regard is the fact that the recent study sponsored by the Savannah District, and performed by the USACOE's Engineering Research and Development Center (ERDC) in Vicksburg, MS, has documented the existing navigation project to be responsible for approximately 80% of Tybee Island's long-term erosion. Both failure to comply with the Statute referenced above and the State of Georgia CZM Plan could in all probability jeopardize the basis for the federal Environmental Impact Statement (EIS) for the pending Savannah Harbor Deepening Project. *It is the City's position that the project sponsors have ample options available to assure the placement of "beach quality" material in order to both comply with Georgia Law and likewise achieve consistency with the State's CZM Plan.*

Environmental Review – A Draft (Tier II) Environmental Impact Statement (DEIS) and General Re-Evaluation Report (GRR) have been formulated and were released on 15 November 2010 for public comment. The District documents have acknowledged that the proposed Savannah Harbor Deepening Project will include certain "mitigation" items to be both funded (at an estimated cost exceeding $220M) and constructed as part of the navigation project. These currently include, but are not necessarily limited to the following:

- Adverse impacts to tidal wetlands, marshes, etc.,
- Adverse impacts to the endangered short-nosed sturgeon,
- Adverse impacts to Striped Bass,
- Adverse impacts to the City of Savannah freshwater intake system, and
- Potential impacts to cultural resource (*i.e.*, shipwrecks).

All of these items, as addressed by the draft project documents are to be directly funded as distinct elements of the navigation project deepening program. That is to say, the costs for these items will be a part of the construction program and cost shared by the two (2) project sponsors. There is however,

presently no direct mitigation intended for downdrift damages, new or historical, to the sandy *beaches* of Tybee Island as part of the Harbor Deepening Project, irrespective of the 2006 federally sponsored study findings to the contrary. *This is unacceptable to the City of Tybee Island*

Instead, the Savannah District has formulated a large scale dredged material disposal program which proposes to dispose of varying quality sediments either immediately seaward of the island Mean Low Water Line (MLWL) or farther eastward in the form of offshore berms, or other similarly configured disposal sites. Unfortunately, none of the subject dredge material in aggregate can be classified as "beach compatible" due to the presence of varying quantities of non-sand constituents (*i.e.*, organics and in particular clays). As a result, direct mitigation to Tybee's beaches resulting from the current 13M cy entrance channel sediment disposal plan cannot occur without significant adverse and undesirable consequences to Tybee Island, its citizens, its businesses and the general public which is dependent upon access and usage of the State's largest and most accessible recreational beach resource.

As either a result of our evaluations, as well as a lack of supporting information provided to the contrary within either the DEIS or GRR, or supplementary information recently requested from the Savannah District, the City Council of the City of Tybee Island has adopted the following opinions and associated positions regarding proposed federal disposal activities.

ISSUE – DISPOSAL SEDIMENT QUALITY

The subject DEIS and GRR documents propose the placement of sediments excavated from the navigation project entrance channel along some 14,200 lineal feet of oceanfront shoreline on Tybee Island. As proposed, the "sediment would be deposited at the mean low water (MLW) line and be allowed to mound up to MSL or mid-tide". If constructed as proposed, option MLW 500 would effectively extend the majority of the oceanfront intertidal beach located northward of the Tybrisia Pier seaward by some 500-ft. MLW 200 proposed to be constructed westward of the north terminal groin, would extend the beach seaward of the MLW line by 200-ft. As a result, both of these options are considered to be *direct* beach disposal and would constitute an extension of the most active portion of the beach profile in a seaward direction by significant distances. It is well known from both previous experience with *attempted* beach disposal at Tybee Island with sediments derived from the previous 1993 Harbor Deepening Project, *as well as* the project specific geotechnical data and analyses provided by the DEIS and the GRR, that the placement of significant volumes of non-beach compatible material would occur during the construction of disposal options MLW 200 and MLW 500.

The formulation of multiple disposal sites – for the currently proposed Harbor Expansion Project – appear to be heavily influenced by sediment quality analyses over the last decade or more performed originally for the assessment of annual maintenance related dredge material disposal. Moreover, sediment testing for new work does not appear to evaluate the probability of excavation of virgin material flanking the theoretical channel cross-section to be deepened which is prone to include seams or layers of marine clay. In this regard, sediment "quality" determinations have centered upon percentage of fines *only* and *not* grain size, probability of occurrence of consolidated layers or seams of marine clays, or other factors of concern influencing the quality of the dredge effluent proposed for beach disposal at or seaward of Tybee Island.

The same omissions, or mis-interpretation as to the probability of the nature of the sediments to be excavated and placed at Tybee Island likewise occurred in 1993 as part of the last federally sponsored Harbor Deepening Project. More specifically, in 1992 the GPA, their consultant, and the Savannah District, USACOE proposed to place some 1.2 M cy of Harbor Deepening sediment along the Tybee Island shorefront described at the time as being "beach compatible". As such, the overfill ratio for the sediment as computed by the District varied between 1.0 and 2.0. Had that been accurate, the material would have been of excellent quality and highly suitable for beach construction.

At the time, both the GA DNR and the City of Tybee Island accepted the project sponsors' determination and firm written assurances that the Harbor Deepening Project material *was* beach compatible and therefore suitable for constructing or re-nourishing the dry recreational beach within the limits of the authorized shore protection project.

Unfortunately several weeks after the initiation of beach disposal on Tybee, it was determined that the material being placed on the City shoreline was *not* as described by the COE or the GPA. That is to say, the fill berm that had been created by the dredge contractor over a several week period exhibited a very high percentage of non-beach compatible material and in particular significant quantities of clay (both mixed with sand and as varying sized "balls" or "clumps").

As a direct result, the federal 1993 beach disposal project operation (intended to be a 1.2 M cy "oceanfront beach fill") was terminated and the contractor was directed to fill only below the MLWL until the subject limited segment of channel widening/deepening was completed. In order to not result in a breach of contract between the COE and the dredge contractor, the City, the USF&WS and the GA DNR agreed to allow highly confined disposal directed seaward to the nearshore water to continue to occur. Accordingly, the remaining disposal work was reduced in scope and limited to the area north of and adjacent to the north terminal groin and *not* the more intensely utilized recreational beach southward thereof.

It is the opinion of the City of Tybee Island that insufficient analyses have been performed by the Savannah District to provide adequate assurances of sediment quality for the two (2) disposal options (i.e., MLW 200 and MLW 500) which are alleged by the two documents to be of "benefit" to the existing oceanfront shoreline.

ISSUE – NEARSHORE VS. ONSHORE (MLW 200 AND MLW 500) DISPOSAL OF DREDGED SEDIMENTS

The current COE disposal plan describes the Tybee Island MLW 200 and MLW 500 disposal sites as being "nearshore" fill operations (*i.e.*, not onshore). As such, the District has proposed the placement of sediment with up to 20% fines at the two (2) oceanfront shoreline locations. Similarly, the District has acknowledged the probable occurrence of clay balls. Documented experience with the 1993 Harbor Deepening Project necessitating disposal of similar materials from the dredging of the entrance channel likewise predicts the occurrence of a sandy/clay mix constituting the surface of the beach intertidal zone immediately after construction – in addition to clay balls.

It is the opinion of the City that the proposed two (2) MLW disposal sites intended for sediment placement along the Tybee Island shorefront are not "nearshore" as defined by the District but rather "onshore" disposal locations. That is to say, they propose to both widen and raise the existing intertidal beach. As such, any sediment placed at this location in the manner proposed must contain less than 10% fines (5% by State Standards), be free of clay balls, cobble or other objectionable material.

The DEIS, GRR and associated documents consistently confuse the concepts of "dry beach" construction and "nearshore" sediment placement. Conventionally, the latter is expected to occur seaward of the most dynamic portion of the beach profile at Tybee Island typically defined as the -10ft. (mol.) MLW contour – depending upon location along the island's shorefront. In its simplest sense, the seaward approximate limit of the active beach can be effectively defined as the seaward "toe of slope" of the existing beach profile. Nearshore disposal is considered to be seaward of the active beach but within the depth of closure where depositional features constructed can be moved by the local wave climatology.

It is extremely important to note that the Savannah District has clearly altered or revised their definitional scheme regarding the concept of "nearshore disposal" from what was previously presented in their report entitled *"Environmental Assessment – Savannah Harbor Advance Maintenance of Entrance Channel, Savannah, GA"* – dated December 2004. For example, pgs 9-11 of that document depict *beach nourishment* on Tybee Island as fill placement beginning at the MLW and extending seaward. Similarly,

that document defines *nearshore deposition* or disposal (as recommended at Tybee Island) as the placement of dredged material beginning some 1,000-ft. or more from the existing shoreline. These two (2) descriptions of varying forms, types or methods of sediment disposal at Tybee Island are therefore *not consistent* with those presently proposed in the DEIS and the GRR. As a direct result, the quality of the sediments proposed for construction of disposal options MLW 200 and MLW 500 is incorrect. The placement of material with up to 20% fines and with known quantities of clay balls is *not* appropriate at these two (2) locations.

It is the finding of the City of Tybee Island that as proposed, the nature of the new work sediments intended for direct disposal along the oceanfront shorefront is not of sufficient quality to be considered suitable for such an application. Simply changing the definition of the term "nearshore" does not justify the direct placement of inappropriate sediment along the oceanfront of Tybee Island.

ISSUE – OFFSHORE DISPOSAL OPTIONS

As part of a 13M+ cy disposal requirement for the expansion and deepening of the Savannah Harbor Navigation Project entrance channel (only), the DEIS and GRR documents propose the following additional disposal sites and sediment volumes located varying distances seaward of Tybee Island: ERDC nearshore (1.2M cy); Site 2 (3.2M cy); Site 2 Expansion (4.4M cy).

In justifying the proposed least-cost disposal and most operationally constructible plan for entrance channel dredged material, the subject documents consistently reference a 2003 numerical modeling study of offshore/nearshore sediment placement – seaward of Tybee Island performed for the Savannah District by the U.S. Army COE – Engineering Research and Development Center (ERDC). The latter modeling effort essentially addressed the currently authorized channel depth of 44-ft and the potential for beneficial use of an estimated 500,000 cy of material potentially dredged annually as channel maintenance. Accordingly, the subject numerical models and analyses did *not* address the currently considered disposal plan components for Harbor Expansion comprised of some 13M cy of sediment as described by the DEIS and GRR.

Furthermore, the 2003 ERDC study did not evaluate the placement of sediment along the MLW shoreline, such as proposed in the DEIS as the MLW200 and MLW500 disposal options. The DEIS proposed nearshore berm placement -- is 7 times greater in volumetric scale and significantly shallower in crest elevation than that modeled in the ERDC study. As such, it would magnify the predicted alongshore

effects of the berms many times over relative to that predicted in the 2003 ERDC study. Specifically, it is therefore logically expected that there could be much greater erosion along the north and south shorelines (and accretion at the north-central shoreline) than that predicted by ERDC.

The 2003 ERDC analysis did not consider the effect of the sediment properties in regard to its propensity to move onshore or offshore. Likewise, the ERDC analysis did not consider the granulometric size of the sand (non-cohesive) fraction of the material and its propensity to move shoreward versus seaward. The ERDC analysis did not specifically consider or compare the sediment quality – including granulometric size – of the berm material relative to the existing littoral environment; i.e., the beach or the nearshore seabed upon which the berms would be placed. Nonetheless, even if it the study had made such analysis – it would have pertained to maintenance dredged material and *not* the new-work dredged material proposed in the DEIS.

The City of Tybee Island is extremely disappointed to note that the Savannah District, COE has not provided any additional analyses (via numerical model) of the offshore berms, mounds or other offshore options beyond the initial study dated 2003. It is therefore the position of the City that neither the Corps nor the City can make an informed decision as to the extent and probability of littoral impacts resulting from the offshore disposal plan presented in the DEIS and GRR. The City therefore objects to their construction as proposed. This objection likewise extends to any and all disposal berms in use, or proposed for use, along the south side of entrance channel (in either State or Federal waters) until appropriate analyses have been performed.

ISSUE – BORROW SITE AND SAND RESOURCE IMPACTS

The City of Tybee Island presently has a federally authorized shore protection project which requires renourishment or maintenance on average every 8-years. The most recent renourishment was performed by the Savannah District, USACOE in 2008. Moreover, the last two (2) dredging operations implemented by the District utilized an offshore borrow site located approximately 6,000-ft seaward of the southern end of Tybee Island. Future development of that borrow site over time is expected to occur in a northerly direction. A significant concern raised by federal resource agencies in the permitting of the last borrow site extension utilized in 2008, was the potential for long-term change in the substrate of the borrow site excavation associated with alterations in sediment composition (*i.e.*, principally a potential accumulation of fines). It is presently the City's finding that the nature and extent of currently proposed offshore disposal of Harbor expansion project sediments with high percentages of non-sandy material (*i.e.*, fines consisting of organics and clays) will constitute a direct threat to the continued use of the subject borrow area. This potential phenomenon was not acknowledged by either the DEIS or the GRR. Interestingly,

any reference to the existence of the borrow site is completely omitted in the documents. As a result, the borrow site was not addressed by the 2003 ERDC modeling study noted above. The results of the ERDC report which do address magnitude and directionality of existing and future sediment transport seaward of Tybee Island clearly indicate that disposal material would be expected to move from one or more of the ERDC Disposal feature(s) in the direction of the borrow site.

Accordingly, the City is in opposition to any offshore disposal alternative which would adversely affect the subject borrow site and sand resource necessary for future beach restoration at Tybee Island. It is the City's opinion that the existing 2003 ERDC modeling study clearly indicates the probability of such an occurrence, considering the nature and extent of the disposal features proposed by the GRR and DEIS.

ISSUE – TIMING OF DISPOSAL OPERATIONS

The DEIS and GRR acknowledge and suggest that proposed disposal activities at/or immediately adjacent to Tybee Island may need to be performed in the summer months coincident with sea turtle nesting season. Since the initiation of beach restoration activities at Tybee Island in the 1970's, it has been the City's (and the GA DNR's) unwavering position to *not* allow any major beach construction activities to be performed during the annual tourist season (or sea turtle nesting season). As the largest and most intensely utilized publicly accessible beach resource in the State of Georgia, as well as a coastal community strongly influenced financially by a tourist based economy, the City has elected to only allow beach restoration to be performed in the low use (winter) months of the year -- outside of sea turtle nesting season.

The City is completely opposed to any beach disposal option (irrespective of compatibility of sediment) which would adversely affect recreational use of the publicly accessible beach during peak tourist season.

ISSUE – IMPACTS TO NAVIGATION

In addition to the predictable (but as yet unanalyzed) alteration of nearshore wave climatology at Tybee Island, the proposed elevations of several offshore disposal features will serve to adversely affect navigation – both recreational and commercial. The DEIS states that the limitation of sediment placement heights to -4 ft MLW at these locations would ensure "that recreational boats could pass over the sites". Similarly, the document states that "commercial fishing boats that draw more water would either have to time their passing (with the tide) or pass further oceanward in deeper water".

Records recently supplied by the GA DNR indicate that the areas of proposed offshore deposition are used by the local commercial shrimping industry. Hence, simple "passage" around the offshore depositional features may *not* be the sole issue of concern to shrimpers.

Furthermore, the District has failed to recognize that an elevation of -4 ft Mean Low Water (MLW) may not be sufficient to protect even the general boating public. For example, typical astronomical spring tides seaward of Tybee Island result in predicted spring tide water levels occurring almost monthly some 2-ft *below* MLW datum. Hence, effective depths over the disposal features would be essentially -2 ft at those times. It is also well documented that offshore winds can depress water levels another foot, mol. thereby further exacerbating the issue of boating safety.

The City of Tybee Island opposes any dredge disposal alternative (new work or continuing maintenance) which can be documented to be significantly detrimental to public or commercial navigation.

ISSUE – STATE OF GEORGIA COASTAL ZONE MANAGEMENT (CZM) PLAN CONSISTENCY

The City of Tybee Island, GA is on the record that ongoing channel maintenance activities of the Savannah District, USACOE, as performed for the Savannah Harbor Navigation Project entrance channel, have failed to comply with the requirements of the Georgia law (O.C.G.A. 52-9-1, et seq. as amended). This law necessitates the strategic recovery (or in-kind replacement) of *beach quality* sand removed from the coastal zone by dredging operations, whether they be by federal or non-federal interests. Accordingly, the City of Tybee Island, GA has likewise noted that the District, as the federal navigation project sponsor, is therefore *not* in compliance with the State's Coastal Zone Management (CZM) Plan.

Future dredging activities necessitated by the proposed Savannah Harbor Deepening Project – navigation channel expansion activities, if constructed as planned without direct mitigation to Tybee Island for non-replacement of *beach quality* sediment (only), will likewise be inconsistent with the State of Georgia CZM Plan. This inconsistency includes the stated position of the Savannah District that the assessment of project related impacts in the National Environmental Policy Act (NEPA) process need only be limited to those discerned by the District to be "incremental" in nature. Reinforcing the City's position in this regard is the fact that the recent (2006) study sponsored by the Savannah District, and performed by the USACOE's Engineering Research and Development Center (ERDC) in Vicksburg, MS, has documented the existing navigation project to be responsible for approximately 80% of Tybee Island's long-term erosion.

The Draft Environmental Impact Statement (DEIS) and General Re-Evaluation Report (GRR) as formulated for the Savannah Harbor Expansion Project have acknowledged that the proposed Savannah

Harbor Deepening Project will include certain "mitigation" items to be both funded and constructed as part of the navigation project. These currently include, but are not necessarily limited to the following:

- Adverse impacts to tidal wetlands, marshes, etc.,
- Adverse impacts to the endangered short-nosed sturgeon,
- Adverse impacts to Striped Bass,
- Adverse impacts to the City of Savannah freshwater intake system, and
- Potential impacts to cultural resource (*i.e.*, shipwrecks).

All of these items, as addressed by the draft project documents are to be directly funded as distinct elements of the navigation project deepening program. That is to say, the costs for these items will be a part of the construction program and cost shared by the project co-sponsors. Presently, the GRR indicates that such mitigation costs account for approximately 40% of the total project cost-to-construct. That is to say, over $221M will be spent initially to mitigate project impacts. Annual maintenance cost will be addition to that amount. There is however, presently no direct mitigation intended for downdrift damages, new or historical, to the sandy *beaches* of Tybee Island as part of the Harbor Deepening Project budget, irrespective of the 2006 federally sponsored study findings to the contrary.

Instead, the Savannah District has formulated a large scale dredged material disposal program which proposes to dispose of varying quality sediments either immediately seaward of the island Mean Low Water Line (MLWL) or farther eastward in the form of offshore berms, or other similarly configured disposal sites. Unfortunately, none of the subject dredge material can be classified as *wholly* "beach compatible" due to the presence of non-sand constituents (*i.e.*, organics and clays). As a result, direct mitigation to Tybee's beaches resulting from the current 13M cy entrance channel disposal plan will not occur. Rather, the current plan of disposal of variable quality new work sediments along Tybee's MLWL (if constructed) would significantly adversely impact the beach system as a recreational, economic and environmental resource.

Although, various elements of the proposed disposal program seaward of Tybee Island could serve to offset offshore deflation of the seabed at that location, resulting from multi-decadal impacts of the navigation works, both the volume and spatial distribution of the disposal sites (as currently defined) may serve to contaminate or otherwise adversely impact the City's sole offshore borrow site utilized for purposes of addressing beach re-nourishment.

It is the position of the City of Tybee Island that the Savannah District USACOE has not addressed the potential for impact to Tybee Island and its surrounding environs sufficient for the proposed project activities to comply with either State Law or State of GA CZM Plan Consistency requirements.

ISSUE – FUTURE CHANNEL MAINTENANCE

The project GRR indicates that all future maintenance dredging will be performed by hopper dredge and in all probability taken to the ODMDS. The same document however notes that some 325,000 cubic yards of sediment excavated annually between STA(s) -30+000B and -40+000B could be recovered and placed in a beneficial manner by a hopper dredge with pump-out capability. The City of Tybee Island concurs with this assessment for the following reasons: a.) the material would be washed by the dredging process and therefore exhibit probably less than 5% residual fines, and b.) the probability of marine clays which will occur during the new work construction will be eliminated, or at a minimum greatly reduced at that point in time.

The City's finding is that such material excavated by hopper dredge will be highly suitable for both offshore and potentially onshore disposal at Tybee Island. Moreover, it should be pointed out that 1.) the volume of sand potentially recovered each year is in keeping with the findings and recommendations of the 2003 ERDC study, and 2.) non-impactive offshore placement sites can be readily identified for the use intended.

It is the opinion of the City of Tybee Island that if future maintenance material from the above section of the entrance channel is strategically placed by hopper dredge, such an activity will be in conformance with State law and consistent with the State of Georgia Coastal Zone Management Plan.

ISSUE – RISK BASED ASSESSMENT

Both at the 11 January meeting at the COE offices in Savannah and as addressed by a 19 January 2011 letter (w/encl) sent to the Mayor of Tybee Island, the District has recommended that Tybee Island make a "risk-based" decision regarding the impacts and benefits potentially associated with the federal disposal options proposed for entrance channel deepening. Based upon the nature of the two (2) RAI's submitted by the City to the Savannah District, COE it should be abundantly clear that the City's opinion is that insufficient planning, analyses and engineering design have been performed sufficient for *either* the Savannah District or the City to make an educated "risk based" assessment. It is therefore both illogical and inequitable to put the onus and burden of addressing the inadequacies of the GRR, DEIS and associated federal harbor expansion disposal program for the improved entrance channel on the shoulders of the City. *As a result the City's only recourse at this time is to oppose all aspects of the 13M cy disposal program for the entrance channel and recommend for disposal of the subject material in the existing authorized ODMDS.*

SUMMARY

To date, the City of Tybee Island has two (2) separate standing requests for additional information (RAI's) intended to seek quantitative data, analyses or engineering insight sufficient to address numerous concerns and opinions regarding adverse impacts or undesirable conditions associated with the entrance channel sediment disposal plan outlined by the GRR and DEIS. As of 20 January 2011, insufficient information had been received from the Savannah District, USACOE in order to satisfactorily address the principal questions or issues of concern to the City. As a direct result, the City Council formally met on that date, allowed for public discussion and subsequently voted unanimously to oppose all aspects of the current federal plan for the disposal of some 13M cy of new work sediments to be excavated for purposes of deepening the Savannah Harbor entrance channel. The City has instead recommended for disposal of such material only within the authorized ODMDS.

Accordingly, the City of Tybee Island is in strong opposition to all elements of the 13M cy sediment disposal plan for the deepening of the navigation project entrance channel until the above discussed concerns and opinions have been suitably resolved to the satisfaction of the City through both comprehensive and applied engineering due-diligence performed by the COE for that express purpose. The City is of the opinion however, that future maintenance dredging operations can be performed in such a manner that" beach quality" material can be recovered and strategically placed in either offshore or onshore disposal sites which can be determined to be both environmentally acceptable and in the public interest.

We appreciate the opportunity to provide this information to the record pursuant to the Public Notice dated 15 November 2010. Thank you.

Sincerely,

Jason Buelterman
Mayor

CC: City Council
Brad Gane, GA DNR
Bubba Hughes, Esq.
William Bailey, P.E., COE
E. Olsen, P.E.

City of Tybee Island

Page 1

761-MM-21-EV01

Comment: *Subsequent to the 15 November 2010 Public Notice issued by the Savannah District, COE for comments regarding the above project, the City of Tybee Island has made two (2) submittals requesting additional clarifying or supplementary information (dated January 4th and January 13th, 2011). Moreover, along with representative(s) of the GA DNR, we met with both you and the District staff on 11 January 2011 seeking to receive data, analyses, or answers to questions posed by our 4 January 2011 Request for Additional information (RAI). Unfortunately, it appears that the type, the extent and the nature of the responses requested for proper evaluation cannot be provided by the Savannah District to either the City of Tybee Island, or the GA DNR. At a 20 January 2011 Public Workshop on Tybee specifically held to address this issue, the City Council voted unanimously to not accept or support the present 13M cy disposal plan addressed by the above documents. For that reason, we are formally submitting the following information to the record in accordance with federal procedures required to solicit comment from private and public agencies, or parties directly adversely affected by the proposed federal actions.*

Response: During the extended formulation period for SHEP, the District provided extensive information to the City of Tybee and GA DNR-CRD to provide those organizations with data that the District had obtained and analyses that had been performed on that data. This information was sufficient for a reasoned evaluation of the issues at hand. Additional data and analyses could always be obtained, but further information would not necessarily lead to more cogent decisions. The City of Tybee has been an active participant through the entire study process. The Corps has met and worked with its staff on these issues for several years. As noted in the comment, a joint meeting [January 11, 2011] was held with ERDC, Savannah District subject matter experts, the City of Tybee, and GA DNR-CRD to discuss outstanding requests and, more importantly, reach resolution on this question. The District is satisfied that the analyses performed and the data presented in the EIS and GRR are sufficient to reach decisions regarding the placement of dredged sediments.

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761-MM-21-EV02

Comment: *The proposed deepening of Savannah Harbor to -48-ft in order to handle the new class of Panamax vessels will necessitate the removal of various types of material from the project entrance channel including varying amounts of beach quality sediment. Similarly, sediments containing some percentage of beach quality sand will be episodically removed with each subsequent maintenance dredging operation occurring within certain segments of the entrance channel. Up until the present time, very little beach quality material dredged has been returned to the littoral zone of the State of Georgia at this federal navigation project. Instead, most has historically been subject to incidental disposal at either the Jones-Oyster Bed upland spoil site, or in deeper offshore waters via the ODMDS.*

Response: The amount of beach quality sand on the Savannah Harbor entrance channel is relatively low compared to neighboring ports in Florida and the Carolinas. However, new work material from the entrance channel extension is expected to be of beach quality. Unfortunately, its distance of over 10 miles from the beach would make its transport and placement in that location fairly expensive. As the

City of Tybee noted at the January 11, 2011 meeting, the remaining new work and O&M materials are highly variable [consolidated and unconsolidated in nature]. During a typical O&M cycle, large quantities of beach quality sand are not removed from the bar channel.

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761-MM-21-EV03, 761-MM-21-EV04

Comment: *That is to say. the Savannah District's historic position has been that if additional costs are incurred for resource recovery in the State of Georgia (i. e., beach quality sand), or strategic and constructive implementation of regional sediment management practices that are in the public interest, a third party - other than the District - should pay for the incremental cost of the action. This position is inconsistent with State Law, State policy, and CZMP precepts codifying same - or practices of the Corps to the contrary in other States. The City of Tybee Island notes that even if the Savannah District determined that strategic beach disposal of maintenance material resulted in additional cost, the Corps of Engineers, under authority of Section 207 of the Water Resources Act of 1996, can elect to use a more costly disposal method if there are overriding environmental and erosion control benefits associated with the more costly disposal scheme.*

Interestingly, the "position" historically embraced by the Savannah District is neither emulated nor interpreted similarly by either the Wilmington District USACOE, to the north, or the Jacksonville District to the south. In contrast, within the State of Florida for example, all beach quality sediment removed from all federal navigation projects, as well as the maintenance of the Atlantic Intracoastal Waterway, is placed on the State's Atlantic and Gulf coast shorelines at essentially no cost to the State or local government. This is standard procedure in keeping with State law, policy and the Florida Coastal Zone Management Plan. Accordingly, all such federal projects in Florida (for maintenance as well as new construction) are formulated by the Jacksonville District, USACOE with this precept in mind.

Response: Sedimentation patterns are unique to each harbor, and practices used elsewhere are not necessarily applicable to Savannah Harbor. As noted above, during a typical O&M cycle relatively small quantities of beach quality sand are removed from the Savannah entrance channel.

Maintenance of the Savannah Harbor Navigation Channel is fully compliant with the enforceable provisions of Georgia's Coastal Management Program.

As defined in Corps of Engineers policy, the *Base Plan* (Federal Standard) is the dredged material placement alternative that represents the least costly option consistent with sound engineering practices and appropriate environmental standards. For the Savannah Harbor Navigation Project, the Corps identified that plan through the 1996 Long Term Management Strategy. The LTMS (and its Base Plan) received approval from the State of Georgia, Corps Headquarters, and others. In conformance with that plan, Savannah District removes O&M sediments from the entrance channel on a yearly basis by hopper dredges and deposits those sediments in the Offshore Dredged Material Disposal Site (ODMDS) or existing upland confined disposal facility (CDF). Two nearshore sites (shown as Sites 2 and 3 in Figure 3-3) just south of the entrance channel are also available. If used, material would be placed into these sites to construct submerged feeder berms.

761-MM-21-EV05

Comment: *State of Georgia CZM Plan Compliance - The City of Tybee Island, GA is of the opinion that ongoing maintenance activities of the Savannah District, USACOE, as performed for the Savannah Harbor Navigation Project entrance channel, fail 10 comply with the requirements of the Georgia law (0. C. G.A. 52-9-1, et seq. as amended). This law necessitates the strategic recovery (or in-kind replacement) of beach quality sand removed from the coastal zone by dredging operations, whether they be by federal or non-federal interests. Accordingly, the City of Tybee Island, GA likewise opines that the Savannah District, as the federal navigation project sponsor, is not currently in compliance with the State's Coastal Zone Management (CZM) Plan.*

Response: Maintenance of the Savannah Harbor Navigation Project is fully compliant with the enforceable provisions of Georgia's Coastal Management Program. The Corps and Georgia DNR-CRD (who administers the Georgia CMP) meet and periodically discuss the Corps dredging activities in the coastal zone. CRD has not notified the District that the Savannah Harbor Navigation Project does not comply with the State's Coastal Zone Management Plan.

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761-MM-21-EV06, 761-MM-21-EV07

Comment: *Similarly, it is the City's opinion that future dredging activities necessitated by the proposed Savannah Harbor Deepening Project - navigation channel expansion activities, if constructed as currently planned without direct mitigation to Tybee Island for non-replacement of beach quality sediment, will likewise be inconsistent with the State of Georgia CZM Plan. This inconsistency includes the stated position of the Savannah District that the assessment of project related impacts in the National Environmental Policy Act (NEPA) process need only be limited to those discerned by the District to be "incremental" in nature. Reinforcing the City's opinions in this regard is the fact that the recent study sponsored by the Savannah District, and performed by the USACOE's Engineering Research and Development Center (ERDC) in Vicksburg, MS, has documented the existing navigation project to be responsible for approximately 80% of Tybee Island's long-term erosion. Both failure to comply with the Statute referenced above and the State of Georgia CZM Plan could in all probability jeopardize the basis for the federal Environmental Impact Statement (EIS) for the pending Savannah Harbor Deepening Project. It is the City's position that the project sponsors have ample options available to assure the placement of "beach quality" material in order to both comply with Georgia Law and likewise achieve consistency with the State's CZM Plan.*

Response: Savannah District prepared a Consistency Determination [with respect to the Georgia Coastal Management Program] for the SHEP [EIS Appendix I]. Through the DEIS, the Corps coordinated that Determination with the GADNR Coastal Resources Division for review and comment. GADNR-CRD's initial finding was that the SHEP is generally consistent with the enforceable provisions of the Georgia Coastal Management Program. However, certain changes were requested regarding the dredged material placement plan, viz., the State expressed concern about the proposed deposition in the nearshore sites and the two offshore [fish enhancement] sites. Consequently, proposed dredged material placement areas: Site MLW 200, Site MLW 500, ERDC Nearshore, Site 2, Site 2 Extension, and Sites 3, 4, 5, 6, 11, and 12, were deleted from the proposed action, and the Corps would not deposit new work dredged sediments in those locations as part of the Savannah Harbor Expansion Project.

761-MM-21-EV08

Comment: *All of these items, as addressed by the draft project documents are to be directly funded as distinct elements of the navigation project deepening program. That is to say, the costs for these items will be a part of the construction program and cost shared by the two (2) project sponsors. There is however, presently no direct mitigation intended for downdrift damages, new or historical, to the sandy beaches of Tybee Island as part of the Harbor Deepening Project, irrespective of the 2006 federally sponsored study findings to the contrary. This is unacceptable to the City o/Tybee Island*

Response: The District recognizes that the City of Tybee disagrees that the SHEP authorization does not include the ability to mitigate for adverse impacts that may occur as a result of the existing Savannah Harbor Navigation Project. Nonetheless, the cumulative impacts of the Savannah Harbor Navigation Project are fully addressed in the EIS and its cumulative impacts analysis [Appendix L]. The Corps is willing to identify, quantify and mitigate (if appropriate) for such impacts, but it must comply with Congressional laws and follow established procedures in doing so. The Tybee Channel Impacts Study provides authorization for the District to examine the extent of these impacts (Phase I) and determine appropriate mitigation measures (Phase II). Phase I of the study was completed in 2008. The technical studies (ERDC 2008) identified the existing Savannah Harbor Navigation Project as being the cause of nearly 80% [78.5%] of the loss in sand volume on the Tybee Island shelf and its shoreline, with the remainder of the erosion being attributed to natural processes. The District was working with the City of Tybee to continue with Phase II of the study. However, in September 2010, the City of Tybee Island stated that it did not have the matching funds required of a non-federal cost-sharing partner to complete the study. The District is disappointed that the City has been unable/unwilling to fund the Phase II studies needed for the Corps to identify and evaluate the best way to mitigate those effects. If the City of Tybee secures matching funds, the District would seek Federal funding to resume the study. Under the civil works process, a feasibility report, Record of Decision, and Chief of Engineer's Report would be completed. In turn, the Chief's Report would be provided to Congress, which could authorize the District to implement the determined mitigation measures.

The Corps evaluated potential impacts from the SHEP on Tybee Island. The reports that describe the coastal engineering studies are included in the Engineering Appendix to the GRR. The studies found that the project's incremental effects to the Tybee shoreline do not warrant mitigation.

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761-MM-21-EV09

Comment: *Instead, the Savannah District has formulated a large scale dredged material disposal program which proposes to dispose of varying quality sediments either immediately seaward of the island Mean Low Water Line (MLWL) or farther eastward in the form of offshore berms, or other similarly configured disposal sites. Unfortunately, none of the subject dredge material in aggregate can be classified as "beach compatible" due to the presence of varying quantities of non-sand constituents (i.e., organics and in particular clays). As a result, direct mitigation to Tybee's beaches resulting from the current 13M cy entrance channel sediment disposal plan cannot occur without significant adverse and undesirable consequences to Tybee Island, its citizens, its businesses and the general public which is dependent upon access and usage of the State's largest and most accessible recreational beach resource.*

Response: In general, the District agrees with the City's characterization that materials to be excavated from the entrance channel are not beach compatible. However, the District does not concur with the premise that the entrance channel sediment placement plan would result in significant adverse and undesirable consequences to Tybee Island, its citizens, its businesses, and the general public. Based on extended coordination and correspondence with GA DNR-CRD and the City of Tybee Island, the Corps has revised the dredged material placement plan. Placement of all sediments excavated from the entrance channel would now be restricted to previously-approved areas, viz., in the Offshore Dredged Material Disposal Site or an upland confined disposal site. The Final EIS describes these revisions to the sediment placement plan.

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761-MM-21-EN01

Comment: *It is the opinion of the City of Tybee Island that insufficient analyses have been performed by the Savannah District to provide adequate assurances of sediment quality for the two (2) disposal options (i.e., MLW 200 and MLW 500) which are alleged by the two documents to be of "benefit" to the existing oceanfront shoreline.*

Response: The data obtained and analyses performed and presented in the EIS and GRR are sufficient to reach decisions regarding the placement of dredged sediments. However, in light of GA DNR-CRD and the City of Tybee Island's concerns about the quality of the sediments, the Corps has revised the dredged sediment placement plan to delete use of the MLW 200 and MLW 500 sites.

761-MM-21-EV10

Comment: *It is the opinion of the City that the proposed two (2) MLW disposal sites intended for sediment placement along the Tybee Island shorefront are not "nearshore" as defined by the District but rather "onshore" disposal locations. That is to say, they propose to both widen and raise the existing intertidal beach. As such, any sediment placed at this location in the manner proposed must contain less than 10%fines (5% by State Standards), be free of clay balls, cobble or other objectionable material.*

Response: The District characterized dredged material placement sites MLW 200 and MLW 500 as nearshore [in nature] since sediments would have been restricted below the MLW line. Regardless, the Coastal Resources Division of the Georgia Department of Natural Resources requested that the Corps eliminate these sites from the SHEP plan. The District agreed and the sediments would now be deposited in the Jones/Oysterbed Island CDF or the ODMDS.

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761-MM-21-EV11

Comment: *It is the finding of the City of Tybee Island that as proposed, the nature of the new work sediments intended for direct disposal along the oceanfront shore/rant is not of sufficient quality to be considered suitable for such an application. Simply changing the definition of the term "nearshore" does not justify the direct placement of inappropriate sediment along the oceanfront o/Tybee Island.*

Response: The City of Tybee's position regarding placement of material at Sites MLW 200 and MLW 500 is acknowledged. In light of GA DNR-CRD and the City of Tybee Island's concerns about the quality of the sediments, the Corps has revised the dredged sediment placement plan to delete use of the MLW 200 and MLW 500 sites.

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761-MM-21-EV12

Comment: *The City of Tybee Island is extremely disappointed to note that the Savannah District, COE has not provided any additional analyses (via numerical model) of the offshore berms, mounds or other offshore options beyond the initial study dated 2003. It is therefore the position of the City that neither the Corps nor the City can make an informed decision as to the extent and probability of littoral impacts resulting from the offshore disposal plan presented in the DEIS and ORR. The City therefore objects to their construction as proposed. This objection likewise extends to any and all disposal berms in use, or proposed for use, along the south side of entrance channel (in either State or Federal waters) until appropriate analyses have been performed.*

Response: The District is satisfied that the analyses performed and the data presented in the EIS and GRR are sufficient to reach reasoned decisions regarding the placement of dredged sediments. Additional data and analyses could always be obtained, but that additional information is not necessarily needed to reach more cogent decisions.

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761-MM-21-EV13

Comment: *Accordingly, the City is in opposition to any offshore disposal alternative which would adversely affect the subject borrow site and sand resource necessary for future beach restoration at Tybee Island. It is the City's opinion that the existing 2003 ERDC modeling study clearly indicates the probability of such an occurrence, considering the nature and extent of the disposal features proposed by the GRR and DEIS.*

Response: The District does not agree with the allegation that the borrow site would in some fashion become "contaminated". However, with elimination of the nearshore placement of sediments, the issue is irrelevant.

761-MM-21-EV14

Comment: *The City is completely opposed to any beach disposal option (irrespective of compatibility of sediment) which would adversely affect recreational use of the publicly accessible beach during peak tourist season.*

Response: The District does not agree with the allegation that nearshore deposition of sediments would have adversely affected recreational use of the publicly accessible beach during peak tourist season. However, with elimination of the nearshore placement of sediments, the issue is irrelevant.

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761-MM-21-EV15

Comment: *The City of Tybee Island opposes any dredge disposal alternative (new work or continuing maintenance) which can be documented to be significantly detrimental to public or commercial navigation.*

Response: The District would also oppose any sediment placement alternative (new work or continuing maintenance) that was documented to be detrimental to public or commercial navigation. In this instance, the District believes that the sediment placement plan, as initially proposed, would not have been detrimental to public or commercial navigation.

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761-MM-21-EV16

Comment: *It is the position of the City of Tybee Island that the Savannah District USACOE has not addressed the potential for impact to Tybee Island and its surrounding environs sufficient for the proposed project activities to comply with either State Law or State of GA CZM Plan Consistency requirements.*

Response: The EIS contains a comprehensive discussion of the impacts expected to occur from the Savannah Harbor Expansion Project (Section 5). As discussed in the main document and in Appendix L (Cumulative Impacts), the existing navigation project has played a significant role in the long-term erosion of the Tybee Island beach and adjacent shelf. The documents clearly show that all of the channel alternatives would have only negligible impacts on the Tybee Island beach and its adjacent shelf. Savannah District prepared a Consistency Determination [with respect to the Georgia Coastal Management Program] for the SHEP [EIS Appendix I]. Through the DEIS process, the Corps coordinated that determination with the GA DNR Coastal Resources Division for review and comment. CRD's initial finding was that the SHEP is generally consistent with the enforceable provisions of the Georgia Coastal Management Program.

716-MM-21-EV17

Comment: *It is the opinion of the City of Tybee Island that if future maintenance material from the above section of the entrance channel is strategically placed by hopper dredge, such an activity will be in conformance with State law and consistent with the State of Georgia Coastal Zone Management Plan.*

Response: The Federal standard (least cost, environmentally acceptable) for disposal of O&M sediments from Stations -30+000B to -40+000B is to place the material into the ODMDS. If GA-DNR CRD or the City of Tybee wish to pursue changes to the existing O&M practices, environmental surveys could be pursued for nearshore placement and a demonstration project performed. However, a non-Federal entity would have to pay the cost differential above the Federal Standard.

For your information, the preliminary cost estimate for the Federal standard is $2.5 million to place the 700,000 cubic yards of sediment from Stations -30+000 to -40+000 in the ODMDS. It is estimated to cost an additional $4.4 million to pump the same material into the nearshore or intertidal zone. The quantities used in the estimate are those to clean the entire dredging prism, including over depth. The amount removed during a typical O&M cycle, however, is about one third of the total estimated amount

available due to budget constraints. See the summary table below for a breakdown of estimated dredging costs. Note that the table does not include the costs to pursue the additional environmental clearances required to place sediment in areas not previously approved. Environmental clearances would at a minimum include side scan sonar and hard bottom surveys in new nearshore disposal sites.

Summary Table of Dredging Costs Comparisons for Alternate Placement Areas

Station Range	Type of Material	Placement Site	Unit Price	Quantity (cubic yards)	Total Cost	Variation From Federal Standard	
						Unit Price	Total Cost
-30 to -40	*O&M*	*ODMDS*	*$3.50*	*700,000*	*$2,450,000*	*N/A*	*N/A*
-30 to -40	O&M	ERDC Near shore/ Intertidal	$9.75	700,000	$6,825,000	$6.25	$4,375,000

Note: Quantities listed are amounts to clean dredging prism, including overdepth. For a typical O&M cycle, about 1/3 the quantity is actually removed.
Note: Red Italics text indicates current placement method (Federal Standard)

761-MM-21-EV18

Comment: *Both at the 11 January meeting at the COE offices in Savannah and as addressed by a 19 January 2011letter (w/encl) sent to the Mayor of Tybee Island, the District has recommended that Tybee Island make a "risk-based" decision regarding the impacts and benefits potentially associated with the federal disposal options proposed for entrance channel deepening. Based upon the nature of the two (2) RAI's submitted by the City to the Savannah District, COE it should be abundantly clear that the City's opinion is that insufficient planning, analyses and engineering design have been performed sufficient for either the Savannah District or the City to make an educated "risk based" assessment. It is therefore both illogical and inequitable to put the onus and burden of addressing the inadequacies of the GRR, DEIS and associated federal harbor expansion disposal program for the improved entrance channel on the shoulders of the City. As a result the City's only recourse at this time is to oppose all aspects of the 13M cy disposal program for the entrance channel and recommend for disposal of (he subject material in the existing authorized ODMDS.*

Response: The City of Tybee's position regarding placement of sediment at the subject sites is acknowledged. The Corps revised the sediment placement plan in the Final EIS to show all sediments excavated from the entrance channel would be deposited in previously-approved areas: Offshore Dredged Material Disposal Site or an upland confined disposal site.

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761-MM-21-EV19

Comment: *To date, the City of Tybee Island has two (2) separate standing requests for additional information (RAI's) intended to seek quantitative data, analyses or engineering insight sufficient to address numerous concerns and opinions regarding adverse impacts or undesirable conditions associated with the entrance channel sediment disposal plan outlined by the GRR and DEIS. As of20 January 2011, insufficient information had been received from the Savannah District, USACOE in order to satisfactorily address the principal questions or issues of concern to the City. As a direct result, the City*

Council formally met on that date, allowed for public discussion and subsequently voted unanimously to oppose all aspects of the current federal plan for the disposal of some 13M cy of new work sediments to be excavated for purposes of deepening the Savannah Harbor entrance channel. The City has instead recommended for disposal of such material only within the authorized ODMDS.

Response: The District acknowledges receipt of the City of Tybee Island's RAIs and has either held meetings to discuss the data in detail or provided answers based on existing information available at the time of the request. However, the analyses performed and the data presented in the EIS and GRR are sufficient to reach decisions regarding the placement of dredged sediments.

761-MM-21-EV20

Comment: *Accordingly, the City of Tybee Island is in strong opposition to all elements of the 13M cy sediment disposal plan for the deepening of the navigation project entrance channel until the above discussed concerns and opinions have been suitably resolved to the satisfaction of the City through both comprehensive and applied engineering due-diligence performed by the COE for that express purpose. The City is of the opinion however, that future maintenance dredging operations can be performed in such a manner that" beach quality" material can be recovered and strategically placed in either offshore or onshore disposals which can be determined to be both environmentally acceptable and in the public interest.*

Response: The City of Tybee Island's opposition to the placement plan for entrance channel material is acknowledged. In light of GA DNR-CRD and the City of Tybee Island's concerns about the quality of the sediments, the Corps has revised the dredged sediment placement plan and intends to deposit all sediments from the entrance channel in either the Ocean Dredged Material Disposal Site or approved upland confined sediment placement sites. The Final EIS has been revised accordingly.

January 24, 2011

Mr. William G. Bailey
Savannah District,
US Army Corps of Engineers
100 West Oglethorpe Avenue
Savannah, GA 31401

RE: Savannah Harbor Expansion Project
Draft Tier II Environmental Impact Statement
Review Comments

Mr. Bailey,

The City of Savannah appreciates the opportunity to review and provide relevant comments concerning the Draft Tier II Environmental Impact Statement for the Savannah Harbor Expansion dated November 2010. Savannah understands the vital role that the Georgia Ports Authority plays not only on a local level, but also on the state and national levels. As such, Savannah has great interest in the successful operation of the Georgia Ports Authority and very much wants to support the efforts of the Georgia Ports Authority to expand their capabilities of handling the larger vessels soon to passing through the Panama Canal.

Unfortunately, and after 14 years of study, the issue of increasing chlorides within the area of Savannah's water supply intakes remains. The draft Tier II EIS, with regard to projected chloride increases, is based on a chloride model and analyses that were rejected by the Corps own technical reviewers and has subsequently been replaced with an updated model and analyses. Unfortunately, the updated model and analyses were not released and only vaguely mentioned as part of the draft Tier II EIS documents. The updated model shows that increases in chloride levels at Savannah's intakes will not be negligible, but will instead be significant to Savannah and its customers. However, most readers of the draft Tier II EIS would not be aware of this issue and would easily be mislead by the inclusion and recommendations of the original model and results. This is particularly true with respect to the adequacy and reasonableness of the principle of "Adaptive Management".

While Savannah has no desire to impede the legitimate progress or efforts of the Georgia Ports Authority to deepen the Harbor, it is imperative that Savannah insist that its water supply and quality be protected. Therefore, the use of "Adaptive Management" for this portion of the SHEP project is not acceptable. Based on the updated model's projections of increased chlorides, Savannah must insist that

[1]

the mitigation measures (i.e. construction of a supplemental intake and associated transmission lines) be included and funded as an integral part of the SHEP project. It is also necessary for this work to be scheduled such that its completion will coincide with the completion of the channel deepening.

A more detailed discussion of the City's concerns and comments are provided as follows:

1. Savannah has been involved in discussions with the Georgia Ports Authority and the Corps of Engineers from essentially the inception of the project. The majority of Savannah's concern has focused on the potential for increases in chlorides at the City's raw water intakes along Abercorn Creek. Over the course of that time, Savannah has voiced its concerns repeatedly in both open meetings and letters with regard to the potential of the project to increase the concentration of chlorides at the City's raw water intakes.

   The Draft Feasibility Report and EIS; Enclosure H – Responses to Comments Received as a Result of Public Review of the Draft Feasibility Report and EIS; pages H-304 thru H-325 and dated 08/11/98 includes letters from the Office of the City Manager dated June 7, 1998 and June 12, 1999 providing the requested comments. The Corps response to the City's comments included the following statement:

   "The additional studies and resulting mitigation plan will be subject to a Tier II EIS."

   Since the time that responses to the City's 1998 and 1999 comments were provided, the Corps of Engineers has embarked on several occasions to obtain acceptable data and to develop a usable model for projecting potential chloride increases. Unfortunately, most of the attempts did not result in either suitable data or model.

   In a letter to Mr. Bill Bailey of the Corps of Engineers and dated July 18, 2007, Savannah provided review and comment to the first chloride modeling report entitled Savannah Harbor Expansion Project – Chloride Data Analysis and Model Development, dated November 15, 2006 as well as the Chloride Impact Evaluation dated February 2007, the Chloride Mitigation Evaluation dated March 2007, the Memorandum of Record entitled Acceptability of Savannah Harbor Chloride Model dated January 10, 2007 and revised February 13, 2007. Savannah's comments included strong concerns regarding the acceptability of the data used and the foundational algorithm employed in the development of the model. The Draft General Re-Evaluation Report for Savannah Harbor Expansion Project Chatham County, Georgia and Jasper County, South Carolina; Section 8.2.4 Chloride Impacts to Savannah's Municipal and Industrial Water Intake and dated November 2010 includes the following statement:

   "...substantial uncertainty has been expressed about the ability of the model to make reliable predictions at such low chloride concentrations. The City expressed such concerns, as did the USGS Independent Technical Reviewer and Wilmington District Engineering Division in their final assessment of the chloride model. Additional chloride data collection followed by reanalysis of

[2]

the chloride modeling with the new data was authorized in order to address those concerns. This reanalysis has not yet been complete but will be included in the final report."

Savannah acknowledges that an updated draft chloride study and model have now been made available to Savannah for review. However, this draft was not made available until December 15, 2010. In addition, it should be noted that as of January 6, 2011 the updated draft chloride study had not been disseminated to the regulatory agencies of the State of Georgia. It is Savannah's understanding that the latest modeling and associated results could have been made available, at least in draft form, for review and discussed as early as September, 2010. However, the entire updated modeling and associated results were withheld awaiting final technical review on the basis of protocol. As a result, the draft Tier II EIS uses the original chloride analysis report, which was known to the Corps of Engineers to have already been rejected by the technical reviewer and their own Wilmington District, as the basis for all conclusions relative to potential chloride impacts. In addition, the Tier II EIS makes only cursory mention that additional studies of potential chloride impacts were underway leading the reader to gloss over the very real potential for serious consequences to Savannah's water supply. Savannah acknowledges that there are several places throughout the draft Tier II EIS that mention our concerns regarding the adequacy of the predictive model. However, the concurrence with Savannah's concerns by the technical reviewer and the Wilmington District Engineering Division are mentioned only twice in a document containing over 11,600 pages of report and attachments.

The release of the Tier II EIS based on a modeling effort known to be unacceptable and with full knowledge that the additional chloride investigations were essentially complete and could have been issued in draft form in September will unnecessarily mislead all readers except those most intimate with the chloride issues. This action has also caused Savannah to necessarily respond with comments to both the discussion of chlorides as provided in the officially released draft Tier II EIS document as well as the draft chloride document received on December 15, 2010, but not included within the draft Tier II EIS document.

Comments on Draft Tier II EIS as issued:

2. **Table 3-6 SUMMARY OF HYDRODYNAMIC-RELATED IMPACTS WITHOUT MITIGATION; Page 3-20**

The table provides results based on the original chloride study which is known by the Corps to be in error and is anticipated to be replaced with an updated study dated December 15, 2010. Therefore, the results indicated in this table are incorrect and must be updated accordingly.

3. **Table 3-7 SUMMARY OF HYDRODYNAMIC-RELATED IMPACTS WITH MITIGATION; Page 3-21**

The table provides results based on the original chloride study which is known by the Corps to be in error and is anticipated to be replaced with an updated study dated December 15, 2010. Therefore, the results indicated in this table are incorrect and must be updated accordingly.

[3]

4. **Section 5.1.2.2 Impacts Without Mitigation**

The draft Tier II EIS states the following:

"State water resource managers have capped the total volume of water that can be withdrawn from the main water-bearing aquifer..."

This is a correct statement. However, it should be noted that not only have available groundwater withdrawals been capped, but have also been reduced to 2004 withdrawal levels. In addition, discussion continues via special councils appointed by the governors of Georgia and South Carolina concerning saltwater intrusion on Hilton Head Island and the potential for further reductions. These efforts have been underway since 2005 to find amicable solutions to the saltwater intrusion problem and to avoid interstate law suits such as currently exists between Georgia, Alabama, and Florida. Initial groundwater modeling efforts have shown that reductions in groundwater withdrawals as high as 90 percent may be needed to stop saltwater intrusion altogether. Therefore, the reliance upon the Savannah River may be much greater than anyone has anticipated to date.

5. **Section 5.2.3 Chloride Concentrations**

The draft Tier II EIS states the following:

"The Corps had an Independent Technical Review performed of the chloride model by a staff member of the USGS in Columbia, SC. The reviewer expressed [concerns] about the ability of the model to make reliable predictions at the low chloride concentrations occurring at the City's intake. The Corps technical staff expressed similar views in their final assessment of the chloride model. The Corps' technical decision-makers stated that the predictive tool was the best one that could be developed using the information which was available, including data collected as part of the project specifically for development of this tool. ... The basic evaluation indicates that no changes to chloride levels would occur under drought flow conditions (1999 flows; 8-year drought). Under average flows (1997), the 48-foot depth alternate would increase chloride concentrations by 0.01 ppm. Under a severe drought flow conditions (similar to 2001; 20-year drought), chloride levels would increase marginally across the entire chloride frequency distribution. With those flows, the 48-foot depth alternative would increase the maximum chloride concentration by 3% or 0.13 ppm (14.58 to 14.71 ppm)."

In spite of concerns with the Corps own technical reviews, the decision-makers chose to recommend continued use of the original model outputs while stating *"...the predictive tool was the best one that could be developed using the information which was available..."*. It is most difficult to understand how the decision-makers could possibly have reached this conclusion knowing that a subsequent refining of the model had been completed with the exception of a final technical review. Not only was the updated model available, at least in draft form, but it revealed that increases in chloride increases and associated mitigation will not be marginal, but will instead be substantial. Base chloride concentrations will increase from approximately 10 ppm to approximately 20 ppm with periodic increases reaching into the 50 to 70 ppm range. Unfortunately, the entire draft Tier II EIS with regard to chlorides has been based on this initial recommendation and thus all discussion, results, and mitigation recommendations are flawed and invalid.

6. **Section 5.2.4 Mitigation Techniques for Chloride Concentrations**

The draft Tier II EIS states the following:

[4]

"[NOTE: The City had informed the Corps that the capacity of their plant was roughly 30 MGD. Since the analyses were performed, the City has indicated that the plant's capacity is now 62.5 MGD.]"
This is incorrect. The question posed to the City was with regard to the production volume and not the capacity. At the time of the question, production was in-fact roughly 30 MGD. The capacity of the plant has been 62.5 MGD since its expansion in 1998.

7. **Appendix D – Monitoring and Adaptive Management Plan, Section 5.C(4) – Chloride Monitoring**

The draft Tier II EIS proposes to employ Adaptive Management with regard to increased chloride levels at the City's raw water intakes along Abercorn Creek. In spite of concerns with the Corps own technical reviews, the decision-makers chose to recommend continued use of the original model outputs including the results which indicated no significant impact to chloride levels. As a result, mitigation was limited to Adaptive Management which would be based on eight years of monitoring.

However, subsequent refining of the model has been completed and reveals that increases in chlorides will not be marginal, but will instead be substantial. Therefore, all discussion, results, and mitigation recommendations are flawed and invalid and the Adaptive Management plan, including associated monitoring, is no longer a sufficient or acceptable resolution.

8. **Appendix D – Monitoring and Adaptive Management Plan, Section 7.B – Post Construction Monitoring**

The draft Tier II EIS states the following:

"Continue to monitor chloride levels in groundwater at the wells that the Corps installed to identify any large/unforeseen adverse impacts to the Floridan drinking water aquifer."

Savannah is not opposed to the continued monitoring. However, Savannah questions how the Corps would mitigate any large/unforeseen adverse impacts should they occur, as the removal of several feet from the top of the upper confining layer cannot be undone?

9. **Appendix I – Federal Consistency Determination Georgia Coastal Zone Management Program, Section 6.26.3 – Consistency**

A. The draft Tier II EIS states the following:

"Studies conducted for this project predict that deepening the navigation channel would slightly increase chloride levels in Abercorn Creek at the intake of the City of Savannah's Water Treatment Plant during low flow conditions. Impacts would not occur under normal or high river flows. The expected impacts are less than 5% and would not increase chloride levels above 50 ppm, well below the drinking water standard of 250 ppm."

In spite of concerns with the Corps own technical reviews, the decision-makers chose to recommend continued use of the original model outputs. A subsequent refining of the model has been completed

and reveals that increases in chlorides will not be marginal, but will instead be substantial. Base chloride concentrations will increase from approximately 10 ppm to approximately 20 ppm with periodic increases reaching into the 50 to 70 ppm range. Unfortunately, the entire draft Tier II EIS with regard to chloride increases and associated mitigation has been based on this initial recommendation and thus all discussion, results, and mitigation recommendations are flawed and invalid.

B. The draft Tier II EIS states the following:

"If chloride levels in Abercorn Creek become unacceptable, project funds would be used to install a supplemental water line further up river to near Georgia Pacific."

It would not appear that the draft Tier II EIS includes funding for the installation of supplemental water lines and new intake structure. If these funds are not appropriated as part of the total project as approved by Congress, a separate request for these funds will be required. Actual construction of the mitigation measures described will therefore be subject to an independent approval by Congress which may or may not be granted.

It is the City's opinion that all funding necessary for the construction of potential mitigation shall be included in the final document to be sent forth to Congress for approval.

10. Appendix L – Cumulative Impact Analysis, Section 11 – Groundwater

The draft Tier II EIS states the following:

"The EPA has established drinking water standards of 500 mg/l for total dissolved solids and 250 mg/l for the chloride ion. Water having chloride levels of less than 250 mg/l is considered safe and palatable to drink."

While this statement is technically correct, it fails to consider that the secondary limit of 250 mg/l for chloride is specific only to the direct consumption of chloride. However, this secondary limit does not account for the resulting impacts increased chlorides will have on the corrosivity of the water. As chlorides increase, corrosivity will also increase. Increased corrosivity will subsequently lead to increases in lead and copper at the customers tap. Lead and Copper have primary maximum contaminate levels of 0.015 mg/l and 1.3 mg/l respectively. It should be noted that lead and copper are the only substances required by EPA for a water purveyor to sample and control within a consumer's home and at their tap. It should also be noted that where lead and copper are above the maximum contaminate levels, the water purveyor is required to take action specifically to reduce water corrosivity.

Therefore, to continually state that anticipated increases in chlorides are below the secondary limit of 250 mg/l is both misleading and short sighted.

11. Draft General Re-Evaluation Report for Savannah Harbor Expansion Project Chatham County Georgia and Jasper County South Carolina, Section 9.8 – Chloride Mitigation Plan Development

The draft Tier II EIS states the following:

"These impacts would only affect industrial uses of water and would not affect residential users, as the chloride levels would not approach the drinking water standard."

This statement is incorrect. In addition to the numerous verbal discussions on this issue, the following has been provided to the Corps in writing:

Reference Savannah's June 12, 1998 letter to Mr. Myron Yuschishin of the Corps of Engineers in response to the Draft Environmental Impact Statement as follows:

"6. Although current regulations set a Maximum Contaminant Level (MCL) of 250 ppm for chlorides, increased distribution system corrosion (thus increased lead and copper levels) as well as future regulations—including current scheduling for phased regulations of Trihalomethanes and Disinfection By Products—may also be effected without raw water chlorides actually exceeding the current MCL.

Reference Savannah's September 22, 2008 letter to Colonel Edward Kertis Jr., Commander, US Army Corps of Engineers in response to information requested by the Colonel as follows:

"However, it is well regarded within the water and corrosion industries that a direct cause and effect relationship exists between increases in chloride levels and subsequent increases in corrosivity. It is also well known that the more corrosive a water supply is, the more the materials such as iron, lead, and copper leach from the water piping and plumbing into the water. Of particular concern is lead and copper which do have Primary MCLs of 0.015 mg/l and 1.3 mg/l respectively. Lead and Copper are the only MCLs that are regulated in such a manner as to place the burden of meeting these limits on the water supplier all the way to the customer's tap. Therefore, Savannah must insure that the corrosivity of the water will not cause lead and/or copper to exceed the MCL at customer's tap.

While it is recognized that increased levels of chlorides may not constitute a direct violation of the federal Secondary MCL it must be understood that increases in chlorides will increase the water's corrosivity and thus a potential for causing the failure of the federal Primary MCLs for lead and copper."

It is very difficult to understand how the Corps of Engineers, whose expertise is not in drinking water treatment, can summarily dismiss the impacts of increased chlorides on drinking water supplied to Savannah's residential population.

[7]

12. **Draft General Re-Evaluation Report for Savannah Harbor Expansion Project Chatham County Georgia and Jasper County South Carolina, Section 9.8 – Chloride Mitigation Plan Development**

The draft Tier II EIS states the following:

"Impacts at those levels do not warrant the expenses shown above."

In spite of concerns with the Corps own technical reviews, the "decision-makers" chose to recommend continued use of the original model outputs. A subsequent refining of the model has been completed and reveals that increases in chloride increases and associated mitigation will not be marginal, but will instead be substantial. Base chloride concentrations will increase from approximately 10 ppm to approximately 20 ppm with periodic increases reaching into the 50 to 70 ppm range. Unfortunately, the entire draft Tier II EIS with regard to chlorides has been based on this initial recommendation and thus all discussion, results, and mitigation recommendations are flawed and invalid.

13. **Draft General Re-Evaluation Report for Savannah Harbor Expansion Project Chatham County Georgia and Jasper County South Carolina, Section 10.3.3 – Incremental Mitigation Costs**

It is recognized that the discussions, results, mitigation measures and costs contained within the draft Tier II EIS are based on a flawed model that should not have been used. Table 10-4 does not include the costs for mitigation of increased chlorides at Savannah's raw water intakes. This table must be amended to include the full cost of mitigation.

14. **Draft General Re-Evaluation Report for Savannah Harbor Expansion Project Chatham County Georgia and Jasper County South Carolina, Section 11.5.1 – Environmental Effects of the Maximum Authorized Plan**

It is recognized that the discussions, results, mitigation measures and costs contained within the draft Tier II EIS are based on a flawed model that should not have been used. Table 11-6 includes *"Chloride @ City's Water Intake"* as an un-mitigated environmental effect of the maximum authorized plan. This is unacceptable. The full cost for chloride mitigation must be included in the maximum authorized plan.

15. **Draft General Re-Evaluation Report for Savannah Harbor Expansion Project Chatham County Georgia and Jasper County South Carolina, Section 11.5.2 – Maximum Authorized Plan Mitigation Details**

It is recognized that the discussions, results, mitigation measures and costs contained within the draft Tier II EIS are based on a flawed model that should not have been used. Chloride mitigation must be included as part of the maximum authorized plan mitigation details.

16. **Draft General Re-Evaluation Report for Savannah Harbor Expansion Project Chatham County Georgia and Jasper County South Carolina, Section 11.5.3 – Maximum Authorized Plan Mitigation Costs**

[8]

It is recognized that the discussions, results, mitigation measures and costs contained within the draft Tier II EIS are based on a flawed model that should not have been used. Table 11-7 must be modified to include the full cost for chloride mitigation.

17. Draft General Re-Evaluation Report for Savannah Harbor Expansion Project Chatham County Georgia and Jasper County South Carolina, Section 11.6 – Maximum Authorized Plan Construction

It is recognized that the discussions, results, mitigation measures and costs contained within the draft Tier II EIS are based on a flawed model that should not have been used. Table 11-8 must be modified to include construction of chloride mitigation. Scheduled timing must be such that chloride mitigation is completed and in service not later than reaching final proposed harbor depth.

18. Draft Engineering Report, Section 8.1.7

The Draft Engineering Report states the following:

"Impacts to chloride concentrations at the City of Savannah's freshwater intake are currently unclear....Currently, the predicted increases in chloride levels at the City of Savannah's surface water intake in Abercorn Creek do not warrant mitigation. No chloride increases would occur on high and average river flows. A small increase would occur on low flows, but those increases would be relatively minor and not preclude any existing use of the water.

The City of Savannah questioned the reliability of the Corp's impact prediction tool, so Savannah District recently obtained additional field data to enhance its reliability. That additional data has not yet been incorporated into the prediction tool. The Final GRR will contain either a confirmation of the existing impact prediction or a new prediction based on a more reliable impact prediction tool."

It is most difficult to understand how on one hand the impacts to chloride concentrations are unclear, but on the other hand those same impacts do not warrant mitigation, would not exist on high and average flows, and will be negligible during low flows.

It is Savannah's understanding that with the exception of the final technical review, the updated prediction tool was ready for use in September. While it is certainly desired to complete the technical review, the likely results of the updated prediction tool would also have been known during that time frame. As these results would have indicated a much larger increase in chlorides than those predicted by the original tool, it is difficult to understand why these improved results were not mentioned even as a footnote. Instead all discussions, results, mitigation measures, costs, and etc. are based on the prediction tool known to be unacceptable.

19. Savannah Harbor Expansion Project- Chloride Data Analysis and Model Development; November 15, 2006

This document is the basis for all discussion, results, mitigation measures, costs, and etc. as relates to potential increases in chlorides at Savannah's raw water intakes along Abercorn Creek. This document has been determined by the USGS and the Corps of Engineers to be unacceptable and should be so noted in the EIS. The document has been replaced with a document entitled Chloride Modeling

Savannah Harbor Expansion Project Savannah, Georgia and dated December 15, 2010. Subsequently, all discussions, results, mitigation measures, costs, and etc. based on the November 15, 2006 document are invalid and should either be so noted in the EIS or removed altogether. It is understood that it may be desirous to retain this document as a historical appendix for the purposes of record completeness. However, it should be noted as such and not be used or referenced for any manner other than historical record.

Comments on Savannah Harbor Expansion Project – Chloride Impact Evaluation; December 15, 2010

20. Background

The draft report states the following:

"There is a concern that the potential deepening of Savannah Harbor may increase salinity and chloride concentrations in the upper reaches of the Lower Savannah River Estuary, including Abercorn Creek. However, this concern is primarily for industrial water supply, not drinking water."

It is true that Savannah is concerned with regard to increased chloride at its raw water intakes. However, it is not correct that this concern is primarily for industrial water supply, not drinking water. It is most difficult to understand how the Corps can reach this conclusion. As has been explicitly expressed in numerous meetings, there are a number of potential problems associated with higher chloride levels including but not limited to serious economic impacts on industrial customers, increased corrosion rates for all municipal customers including residential, and increased levels of lead and copper for all municipal customers including residential. The following written references are also noted:

- Reference Savannah's June 12, 1998 letter to Mr. Myron Yuschishin of the Corps of Engineers in response to the Draft Environmental Impact Statement as follows:

  "6. Although current regulations set a Maximum Contaminant Level (MCL) of 250 ppm for chlorides, increased distribution system corrosion (thus increased lead and copper levels) as well as future regulations—including current scheduling for phased regulations of Trihalomethanes and Disinfection By Products—may also be effected without raw water chlorides actually exceeding the current MCL.

- Reference Savannah's September 22, 2008 letter to Colonel Edward Kertis Jr., Commander, U.S. Army Corps of Engineers in response to information requested by the Colonel as follows:

  "However, it is well regarded within the water and corrosion industries that a direct cause and effect relationship exists between increases in chloride levels and subsequent increases in corrosivity. It is also well known that the more corrosive a water supply is, the more the materials such as iron, lead, and copper leach from the water piping and plumbing into the water. Of particular concern is lead and copper which do have Primary MCLs of 0.015 mg/l and 1.3 mg/l respectively. Lead and Copper are the only MCLs that are regulated in such a manner as to place the burden of meeting these limits on the water supplier all the way to the customer's

tap. Therefore, Savannah must insure that the corrosivity of the water will not cause lead and/or copper to exceed the MCL at customer's tap.

While it is recognized that increased levels of chlorides may not constitute a direct violation of the federal Secondary MCL it must be understood that increases in chlorides will increase the water's corrosivity and thus a potential for causing the failure of the federal Primary MCLs for lead and copper."

As has been stated both verbally and in written form on multiple occasions there are numerous impacts that increased chloride concentrations will have on Savannah's water system. These impacts include both long term operation and maintenance costs, as well as the need to make immediate capital expenditures by Savannah and its industrial customers. A short discussion of these is provided as follows:

Approximately 60 percent of Savannah's water distribution system is composed of ferrous based piping. Using the projected increases in chloride levels and durations provided in the draft report, Savannah anticipates that increased corrosion will translate directly into a reduction in the useable life of the ferrous based portion of the distribution system. Therefore, Savannah will be required to expend additional funds to offset the lost usable life of these assets. The expenditures necessary to offset the value of this lost useable life for the ferrous based portion of the water distribution system has been determined to be $25,650,000.

In addition to the lost value of Savannah's water distribution system, lead and copper levels will be negatively impacted. The following is excerpted from the Home Page of the USEPA's Office of Groundwater and Drinking Water http://water.epa.gov/drink/index.cfm.

"Lead and copper enter drinking water primarily through plumbing materials. Exposure to lead and copper may cause health problems ranging from stomach distress to brain damage. On June 7, 1991, EPA published a regulation to control lead and copper in drinking water. This regulation is known as the Lead and Copper Rule (also referred to as the LCR or 1991 Rule).

The treatment technique for the rule requires systems to monitor drinking water at customer taps. If lead concentrations exceed an action level of 15 ppb or copper concentrations exceed an action level of 1.3 ppm in more than 10% of customer taps sampled, the system must undertake a number of additional actions to control corrosion. If the action level for lead is exceeded, the system must also inform the public about steps they should take to protect their health and may have to replace lead service lines under their control."

The issue of lead and copper is not so much the concentrations of these elements as delivered to the customer within the water matrix itself, but it is instead the leaching of these elements into the water from the customer's plumbing. This leaching is a direct result of 1) the materials from which plumbing and fixtures are made and 2) the corrosivity of the water. It should be noted from the USEPA statement, that the required action for high levels of lead and copper is enhanced corrosion control. It should also be noted that the issue of lead in drinking water was addressed and passed by Congress under the

Reduction of Lead in Drinking Water Act (SB 3874) in December, 2010. This bill was signed into law by President Obama on January 4, 2011.

In previous documents the Corps responded to Savannah's concerns regarding the potential of increased chlorides as follows:
"Further, the USACE Office of Counsel reports that the City has no legal right to water with chloride levels below those established under the Safe Drinking Water Act, in this case 250 mg/L. Thus, even if a cause and effect relationship is found, there is no legal obligation for the GPA or the federal government to remedy the situation as long as concentrations remain below established Safe Drinking Water Standards. ...".
Does the Corps intend to stand firm on its legal interpretation that the citizens and customers of Savannah have no legal right to water with lead and copper levels below those established under the Safe Drinking water act and even if a cause and effect relationship is found, there is no legal obligation for GPA or the federal government to remedy the situation?

Obviously, Savannah is also concerned with the long term viability of its large industrial customers. As has been stated on numerous occasions, the industries served by Savannah's surface water plant are vital to the economic well being of the entire southeast Georgia region. These industries not only provide over 1,000 direct well paying jobs, but also a wide range and number of jobs associated with the many small business that provide direct and indirect support and services. In addition, these industries use approximately 80 percent of the total water produced by Savannah's surface water system and therefore pay the lion's share of the cost to operate that system. A loss of these industries would require an immediate and substantial increase in water rates to the residential customer base throughout Chatham and Effingham Counties.

21. Data Collection

A. The draft report states the following:
"Literature searches have not yielded documentation of a threshold for chloride concentration for industrial water supply use."

The lack of a threshold for chloride concentration for industrial water supply use is not surprising. The variability of uses for water throughout the generic base described as "industry" is far too broad to lend itself to such a focused threshold. Even individual plant sites manufacturing the exact same product under the umbrella of a single parent company will have variations in processes each with their own unique needs. Each "industry" will consist of many processes which for a variety of reasons will have their own demands not only for water, but also for power, chemicals, operation, maintenance and any other resources that can be imagined. Determination of the chloride threshold will be process dependent for each specific industrial site.

B. The draft report states the following:

"References located suggested that 100 mg/l is the greatest chloride concentration acceptable for irrigation water for some sensitive crops."

It is not clear the relevance or exactly what this statement is supposed to convey within the context of the report.

C. The draft report states the following:

"As previously discussed, 250 mg/l is the EPA drinking water standard."

It is most distressing that the Corps continues in its attempts to circumvent the issue of chloride impacts by over stressing the importance of the 250 mg/l secondary standard for chloride as established by EPA under the federal Safe Drinking Water Act. The 250 mg/l secondary standard is stated three times in this one 11 page report contrasted with the fact that only twice in the entire 11,600 page draft Tier II EIS was it mentioned that the Corps own technical evaluations of the chloride study were not acceptable.

This issue of the 250 mg/l secondary limit for chlorides was raised in the Feasibility Report For Savannah Harbor Expansion Feasibility Study, Section 7, page17, Rev. A and dated April 26, 1998, which reads as follows:

"Subsequent to the deepening, chloride concentration readings ranged from highs of 20 mg/L to lows of 6 mg/L. These readings are well below the EPA's Safe Drinking Water Act standards of 250 mg/L... Further, the USACE Office of Counsel reports that the City has no legal right to water with chloride levels below those established under the Safe Drinking Water Act, in this case 250 mg/L. Thus, even if a cause and effect relationship is found, there is no legal obligation for the GPA or the federal government to remedy the situation as long as concentrations remain below established Safe Drinking Water Standards. ..."

Likewise, the Memorandum of Record dated January 10, 2007 and Revised February 13, 2007 states the following:

"The values of chloride that are a concern at the industrial water plant are far below drinking water standards. EPA drinking water standards for chloride, a secondary contaminant, are 250 mg/L. In this study, we are concerned with chloride levels of about 10% of the drinking water standard."

As stated in Savannah's response of July 18, 2007, there are a number of potential problems associated with higher chloride levels including but not limited to serious economic impacts on industrial customers, increased corrosion rates for all municipal customers including residential, and increased levels of lead and copper for all municipal customers including residential. Also, as previously stated, EPA defines the Maximum Contaminant Level (MCL) as *"the maximum permissible level of a contaminant in water which is delivered to any user of a public water system."* We believe that the intent of the MCL is to establish a maximum level which we are not to exceed. We do not believe that the intent of the Safe Drinking Water Act MCL is to establish a level to which we may increase contamination. While the USACE Office of Counsel may be correct within the confines of strict legal definitions, it is Savannah's opinion that avoidance of proper mitigation by hiding behind strict legal definitions is wrong and is a disservice to the residents, businesses, and industries of Savannah and

Chatham County. While this report of December 15, 2010, does not specifically reject a lack of responsibility on the part of the Corps as has been stated in the past, there is no question that the text is constructed in such a manner and with multiple references to the 250 mg/L MCL so as to imply to the reader that the levels of chloride are negligible, regardless of the increases. This is factually incorrect and misleading to the reader.

22. Mitigation Options

A. Increasing Freshwater Supply through Bear Creek. To the knowledge of Savannah, no modeling has been conducted to determine the volume of flow through Bear Creek and Abercorn Creek that would be necessary to offset the effects of increased chlorides from the Savannah River or even if the necessary volumes can be made available through these Creeks. Savannah would agree that this option would require a high level of maintenance to reliably mitigate the increased chlorides. It is also Savannah's opinion that the on-going cost and management of such maintenance would not be borne by Savannah.

B. Groundwater supplementation. Discussions continue via special councils appointed by the governors of Georgia and South Carolina concerning saltwater intrusion on Hilton Head Island and the potential for further reductions. These efforts have been underway since 2005 to find amicable solutions to the saltwater intrusion problem and to avoid interstate lawsuits such as currently exist between Georgia, Alabama, and Florida. Initial groundwater modeling efforts have shown that reductions in groundwater withdrawals as high as 90 percent may be needed to stop saltwater intrusion altogether. Therefore, the reliance upon the Savannah River may be much greater than anyone has anticipated to date. In addition, Savannah's water distribution system is configured to provide some areas with surface water and some areas with groundwater. Although interconnections between these systems do exist, the infrastructure does not lend itself to moving sufficient volumes of either surface water or groundwater throughout its entire service area. Construction of sufficient infrastructure would be extremely costly and would have to be given the utmost attention to geometry and operation to prevent maintenance and water quality issues that would arise from seldom used and reverse flow portions of a modified distribution system.

   Therefore, this alternative does not meet with the goal and intent of the State of Georgia EPD with regard to groundwater reductions, nor is it practical or feasible to supplement those portions of the distribution system normally fed by surface water with groundwater.

C. Freshwater Flow Supplementation. It would appear that the Corps does not recommend such an alternative. Savannah questions whether it is within the Corps of Engineers' authority or ability to guarantee sufficient supplemental releases from Thurmond Dam under all conditions to allow this alternative to be a reliable mitigation measure. When coupled with the potential problems for users upriver such as Augusta, Savannah River Site, and Plant Vogtle, Savannah is

opposed to such an alternative that has the potential to leave Savannah with unacceptable consequences.

D. A combination of increased groundwater withdrawal and greater releases from Thurmond Dam as described above. Savannah does not accept that these alternatives are viable regardless of whether they are independent or in combination. Independently, the reasons have been stated above. The efforts required for routine coordination between Savannah's need to supply acceptable water quality on demand and the Corps need to control releases for all of the upstream requirements would prove extremely arduous. In addition, as the largest increases in chlorides will occur during periods of low river flows, the timing and need by Savannah to have releases increased by the Corps will most often be counter to the need by the Corps to reduce those releases.

Therefore, Savannah finds this to be an unacceptable alternative.

E. The draft report references the wording of the 2009 draft General Re-Evaluation Report as follows:

"If the proposed deepening project is found to produce sustained chloride concentrations that adversely affect the City of Savannah's Municipal and Industrial water intake on Abercorn Creek, then the USACE would construct this supplemental intake line at a cost of $35.9 million. The supplemental water withdrawal intake would be located above the zone of project influence. The City supports this concept."

It is correct that Savannah supports the concept of locating a supplemental water withdrawal intake upstream of the zone of project influence. However, Savannah does **NOT** support the concept of chloride mitigation based on the Adaptive Management strategy as proposed. Although, adaptive management may be a very useful tool under particular circumstances, it is Savannah's opinion that it will not be an acceptable alternative with regard to the mitigation of chlorides for the Savannah Harbor Expansion Project based on the following issues:

1) The monitoring time frames provided for in Draft Tier II EIS does not guarantee that monitoring will occur during periods of either moderate drought and certainly not during a period of extreme drought as was experienced in Georgia during 2007. Under the proposed plan, monitoring would occur for a specific time frame regardless of the conditions. Beyond that time frame no additional funding is available. Therefore, any additional funding and as well as the burden of proof to show impact due to the deepened harbor will necessarily fall on Savannah. This is unacceptable.
2) The cost of mitigation is not currently included as part of the draft plan to be authorized by Congress. Therefore, even if the proposed monitoring determines that unacceptable impacts occur, a separate request including detailed justifications must be made to Congress for approval and subsequent supplemental funding. Regardless of the reasoning, failure of

Congress to approve such subsequent supplemental funding will place the full cost on the citizens, customers, and businesses of Savannah. This is unacceptable.

3) The time requirement for design, bidding, construction, and placing a supplemental intake into operation will be no less than three years. It cannot be expected for Savannah to ask its citizens, customers, and industries to forego their need of water supply for even one day much less three years. Delaying the construction of the supplemental intake until such time problems are actually encountered, proving that the SHEP project has caused the problems, and design and construction of a supplemental intake can take place places Savannah's citizens, customers, and industries in peril in terms of both economics and health/safety. This is unacceptable.

Savannah has no desire to unnecessarily own or bear the long term cost for operations and maintenance for an additional 16 miles of raw water piping and an addition raw water intake structure. However, this most recent draft chloride report clearly shows increases in chlorides to unacceptable levels. As water supply cannot be stopped even for one day during periods of high chlorides, it is imperative that chloride mitigation for the worst case scenario be included as a specific project component which is both authorized and funded by Congress as an integral part of the Savannah Harbor Expansion Project. In the case of chloride mitigation, the principles or use of Adaptive Management are unacceptable.

Again, the City of Savannah appreciates the opportunity to provide input on this very important project. Savannah is well aware of the significant positive impacts that the SHEP will have locally, statewide, and nationally. As such it is Savannah's very strong desire to support the Georgia Ports Authority in the timely efforts to bring this project to fruition, provided that the issue of increased chlorides and the associated mitigation measures are included and funded as an integral part of the project. Savannah must insist that the quality of its water supply be protected from the negative impacts of increased chlorides and that its citizens and customers do not shoulder the economic burden of these detrimental impacts.

If you have any questions or if we can be of any assistance in bringing this issue to closure, please contact me at 651-4241.

Respectfully,

John L. Sawyer, P.E.
Water and Sewer Director

[16]

City of Savannah

Page 1

657-MR-21-EV01

Comment: *While Savannah has no desire to impede the legitimate progress or efforts of the Georgia Ports Authority to deepen the Harbor, it is imperative that Savannah insist that its water supply and quality be protected. Therefore, the use of "Adaptive Management" for this portion of the SHEP project is not acceptable. Based on the updated model's projections of increased chlorides, Savannah must insist that the mitigation measures (i.e. construction of a supplemental intake and associated transmission lines) be included and funded as an integral part of the SHEP project. It is also necessary for this work to be scheduled such that its completion will coincide with the completion of the channel deepening.*

Response: Savannah District revised SHEP's chloride mitigation plan based on a suite of recent empirical measurements and modeling projections. Using this expanded/more accurate information [as noted in detail: City of Savannah Seawater Effects Study, November, 2011], the District fundamentally reassessed the project's forecast chloride effects at the City's water intake [and by extension the whole system]. Namely, the conclusion was reached that certain SHEP design elements [channel deepening] could, in fact, have more of an impact on the City's drinking water compliance than initially thought. Specifically, this work presented evidence that increased chlorides would exacerbate lead corrosion and promote formation of adverse disinfectant byproducts. Industrial users [Weyerhaeuser/International Paper] may also experience problems in terms of interference with bleaching processes and reduced lifespan of its water distribution, respectively.

Numerous mitigation measures were examined during the course of the NEPA process, e.g., desalinization, groundwater and various surface water supplementation options, pipelines, and chemical treatment processes. After a great deal of deliberation, it was determined that an appropriately sized raw water impoundment would provide the most effective/efficient mitigation. A number of sites were examined for this facility; however, Parcel #3 in the Savannah International Trade Park received the highest objective ranking. Particularly compelling in its selection was the fact that since it was owned by GPA, the site would be available when needed. While the Trade Park is located in an upland area, the treatment impoundment and its associated infrastructure may adversely impact some small remnant wetlands therein. If this proves to be the case, the District's Regulatory SOP will be used to determine wetland mitigation needs.

Statistical analyses determined that a 35-acre impoundment [97 million gallons] would have sufficient usable volume [77.5 million gallons] to address any incremental elevation in chloride levels attendant to channel deepening [-47' NED alternative]. Operation of the storage impoundment would require that water from the existing Abercorn Creek intake be pumped to the impoundment during periods of low chlorides. When high chloride levels occur, water from the impoundment will be pumped to the City's water treatment plant via a new pump station. During high chloride episodes at the intake, the intake pumps will be stopped and the plant will draw water from the storage impoundment, thereby avoiding the high chlorides occurring in Abercorn Creek. When chloride concentrations on Abercorn Creek return to acceptable levels during low tide, the storage impoundment can be refilled and made ready for use during the next tidal cycle [as necessary].

Page 3

657-MR-21-EN01

Comment: Table 3-6 SUMMARY OF HYDRODYNAMIC-RELATED IMPACTS WITHOUT MITIGATION; Page 3-20 *The table provides results based on the original chloride study which is known by the Corps to be in error and is anticipated to be replaced with an updated study dated December 15, 2010. Therefore, the results indicated in this table are incorrect and must be updated accordingly.*

Response: The chloride study included in the draft report presented the best information available at that time. Since the Draft EIS was released, additional data has become available and the Corps has conducted additional evaluations to update its impact predictions. As noted in detail in the previous comment, the Corps initiated additional monitoring to refine and update the prediction of water quality impacts at the City's water intake during chloride spikes. The updated chloride study is included in the Final GRR-Appendix C and clarifies this issue and the necessary mitigation.

657-MR-21-EN02

Comment: Table 3-7 SUMMARY OF HYDRODYNAMIC-RELATED IMPACTS WITH MITIGATION; Page 3-21 *The table provides results based on the original chloride study which is known by the Corps to be in error and is anticipated to be replaced with an updated study dated December 15, 2010. Therefore, the results indicated in this table are incorrect and must be updated accordingly.*

Response: See previous response.

Page 4

657-MR-21-EV02

Comment: *This is a correct statement. However, it should be noted that not only have available groundwater withdrawals been capped, but have also been reduced to 2004 withdrawal levels. In addition, discussion continues via special councils appointed by the governors of Georgia and South Carolina concerning saltwater intrusion on Hilton Head Island and the potential for further reductions. These efforts have been underway since 2005 to find amicable solutions to the saltwater intrusion problem and to avoid interstate law suits such as currently exists between Georgia, Alabama, and Florida. Initial groundwater modeling efforts have shown that reductions in groundwater withdrawals as high as 90 percent may be needed to stop saltwater intrusion altogether. Therefore, the reliance upon the Savannah River may be much greater than anyone has anticipated to date.*

Response: Agree. The District appreciates that all parties are seeking practical measures to limit saltwater intrusion. In the noted study of potential project effects on the Floridan aquifer, pumping rates were held at a constant level of 80 MGD [which admittedly is high from an historical perspective]. However, the use of this elevated rate constant would yield a comparably higher value of groundwater intrusion. The District used this conservative approach in order to realize the most robust assessment of potential project impacts on the aquifer. Further, the District agrees that future reliance upon the Savannah River as a regional water source may be greater than is currently recognized. With this in mind, the District has sought to reduce [to a zero sum] any perturbation[s] from SHEP on water quality during the NEPA analysis.

Page 5

657-MR-21-EV03

Comment: ***[NOTE: The City had informed the Corps that the capacity of their plant was roughly 30 MGD. Since the analyses were performed, the City has indicated that the plant's capacity is now 62.5 MGD.]"*** *This is incorrect. The question posed to the City was with regard to the production volume and not the capacity. At the time of the question, production was in-fact roughly 30 MGD. The capacity of the plant has been 62.5 MGD since its expansion in 1998.*

Response: This issue was clarified in the FEIS, i.e., distinguishing between production volume and plant capacity.

657-MR-21-EV04

Comment: *However, subsequent refining of the model has been completed and reveals that increases in chlorides will not be marginal, but will instead be substantial. Therefore, all discussion, results, and mitigation recommendations are flawed and invalid and the Adaptive Management plan, including associated monitoring, is no longer a sufficient or acceptable resolution.*

Response: See explanation in EV01

657-MR-21-EV05

Comment: *Savannah is not opposed to the continued monitoring. However, Savannah questions how the Corps would mitigate any large/unforeseen adverse impacts should they occur, as the removal of several feet from the top of the upper confining layer cannot be undone?*

Response: Based on the revised impact predictions, the GRR and FEIS have been revised and now include mitigation for expected impacts to chloride levels in Abercorn Creek during low river flows and high tides. The SHEP will include monitoring during and after SHEP's construction to measure chlorides levels (1) at the City's water intake in Abercorn Creek, and (2) in several other locations in the harbor complex. This monitoring will be conducted to verify that predictions of project effects forecasted to occur are not materially exceeded.

657-MR-21-EV06

Comment: *In spite of concerns with the Corps own technical reviews, the decision-makers chose to recommend continued use of the original model outputs. A subsequent refining of the model has been completed and reveals that increases in chlorides will not be marginal, but will instead be substantial. Base chloride concentrations will increase from approximately 10 ppm to approximately 20 ppm with periodic increases reaching into the 50 to 70 ppm range. Unfortunately, the entire draft Tier II EIS with regard to chloride increases and associated mitigation has been based on this initial recommendation and thus all discussion, results, and mitigation recommendations are flawed and invalid.*

Response: The Final EIS has been revised to reflect the outcome of the updated analyses. Using the expanded/more accurate information [as noted in detail: City of Savannah Seawater Effects Study, November, 2011], the District fundamentally reassessed the project's forecast chloride effects at the

City's water intake [and by extension the whole system]. Namely, the conclusion was reached that certain SHEP design elements [channel deepening] could, in fact, have more of an impact on the City's drinking water compliance than initially thought. Specifically, this work presented evidence that increased chlorides would exacerbate lead corrosion and promote formation of adverse disinfectant byproducts. Industrial users [Weyerhaeuser/International Paper] may also experience problems in terms of interference with bleaching processes and reduced lifespan of its water distribution, respectively.

Numerous mitigation measures were examined during the course of the NEPA process, e.g., desalinization, groundwater and various surface water supplementation options, pipelines, and chemical treatment processes. After a great deal of deliberation, it was determined that an appropriately sized raw water impoundment would provide the most effective/efficient mitigation. A number of sites were examined for this facility; however, Parcel #3 in the Savannah International Trade Park received the highest objective ranking. Particularly compelling in its selection was the fact that since it was owned by GPA, the site would be available when needed. While the Trade Park is located in an upland area, the treatment impoundment and its associated infrastructure may adversely impact some small remnant wetlands therein. If this proves to be the case, the District's Regulatory SOP will be used to determine wetland mitigation needs.

Statistical analyses determined that a 35-acre impoundment [97 million gallons] would have sufficient usable volume [77.5 million gallons] to address any incremental elevation in chloride levels attendant to channel deepening [-47' NED alternative]. Operation of the storage impoundment would require that water from the existing Abercorn Creek intake be pumped to the impoundment during periods of low chlorides. When high chloride levels occur, water from the impoundment will be pumped to the City's water treatment plant via a new pump station. During high chloride episodes at the intake, the intake pumps will be stopped and the plant will draw water from the storage impoundment, thereby avoiding the high chlorides occurring in Abercorn Creek. When chloride concentrations on Abercorn Creek return to acceptable levels during low tide, the storage impoundment can be refilled and made ready for use during the next tidal cycle [as necessary].

FIGURE 1

Percent of Time Calculated Chloride Levels Above 25 mg/l

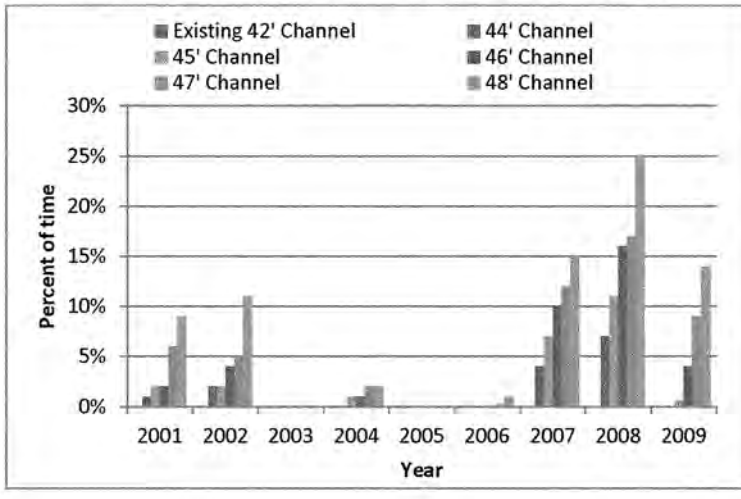
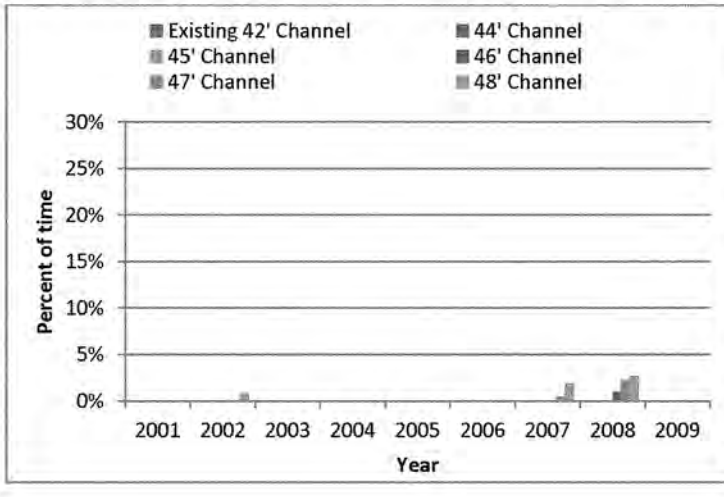


FIGURE 2

Percent of Time Calculated Chloride Levels Above 50 mg/l



Page 6

657-MR-21-EV07

Comment: *It is the City's opinion that all funding necessary for the construction of potential mitigation shall be included in the final document to be sent forth to Congress for approval.*

Response: Funding necessary for construction of the proposed mitigation [impoundment] is specified in the Final GRR and Final EIS. See EV01 for details regarding this facility.

657-MR-21-EV08

Comment: *While this statement is technically correct, it fails to consider that the secondary limit of 250 mg/l for chloride is specific only to the direct consumption of chloride. However, this secondary limit does not account for the resulting impacts increased chlorides will have on the corrosivity of the water. As chlorides increase, corrosivity will also increase. Increased corrosivity will subsequently lead to increases in lead and copper at the customers tap. Lead and Copper have primary maximum contaminate levels of 0.015 mg/l and 1.3 mg/l respectively. It should be noted that lead and copper are the only substances required by EPA for a water purveyor to sample and control within a consumer's home and at their tap. It should also be noted that where lead and copper are above the maximum contaminate levels, the water purveyor is required to take action specifically to reduce water corrosivity.*

Response: The quoted section is from EPA Safe Drinking Water Act, National Secondary Drinking Water Regulations (http://water.epa.gov/drink/contaminants/index.cfm), which have been adopted by the State of Georgia. The District's updated analysis considered potential changes in the water's corrosion coefficient, along with subsequent lead and copper contamination issues and concluded [see GRR Appendix C] mitigation was warranted. See EV01 details regarding how this issue will be resolved.

Page 8

657-MR-21-EV09

Comment: *It is recognized that the discussions, results, mitigation measures and costs contained within the draft Tier II EIS are based on a flawed model that should not have been used. Table 10-4 does not include the costs for mitigation of increased chlorides at Savannah's raw water intakes. This table must be amended to include the full cost of mitigation.*

Response: See GRR Appendix C for details regarding the raw water impoundment [cost/design] which will be constructed to address this issue.

657-MR-21-EV10

Comment: *It is recognized that the discussions, results, mitigation measures and costs contained within the draft Tier II EIS are based on a flawed model that should not have been used. Table 11-6 includes "Chloride @ City's Water Intake" as an un-mitigated environmental effect of the maximum authorized plan. This is unacceptable. The full cost for chloride mitigation must be included in the maximum authorized plan.*

Response: See previous discussion on this issue.

Page 9

657-MR-21-EV11

Comment: *It is recognized that the discussions, results, mitigation measures and costs contained within the draft Tier II EIS are based on a flawed model that should not have been used. Table 11-7 must be modified to include the full cost for chloride mitigation.*

Response: See previous discussion regarding this issue.

657-MR-21-EV12

Comment: *It is recognized that the discussions, results, mitigation measures and costs contained within the draft Tier II EIS are based on a flawed model that should not have been used. Table 11-8 must be modified to include construction of chloride mitigation. Scheduled timing must be such that chloride mitigation is completed and in service not later than reaching final proposed harbor depth.*

Response: See previous discussion regarding how this issue will be resolved. Note: the raw water impoundment will become operational concurrent with harbor deepening.

657-MR-21-EV13

Comment: *It is Savannah's understanding that with the exception of the final technical review, the updated prediction tool was ready for use in September. While it is certainly desired to complete the technical review, the likely results of the updated prediction tool would also have been known during that time frame. As these results would have indicated a much larger increase in chlorides than those predicted by the original tool, it is difficult to understand why these improved results were not mentioned even as a footnote. Instead all discussions, results, mitigation measures, costs, and etc. are based on the prediction tool known to be unacceptable.*

Response: This issue has been resolved via the revised chloride analysis and mitigation plan which is presented in Appendix C of the GRR and summarized in the GRR and FEIS.

657-MR-21-EV14

Comment: *This document is the basis for all discussion, results, mitigation measures, costs, and etc. as relates to potential increases in chlorides at Savannah's raw water intakes along Abercorn Creek. This document has been determined by the USGS and the Corps of Engineers to be unacceptable and should be so noted in the EIS. The document has been replaced with a document entitled Chloride Modeling Savannah Harbor Expansion Project Savannah, Georgia and dated December 15, 2010. Subsequently, all discussions, results, mitigation measures, costs, and etc. based on the November 15, 2006 document are invalid and should either be so noted in the EIS or removed altogether. It is understood that it may be desirous to retain this document as a historical appendix for the purposes of record completeness. However, it should be noted as such and not be used or referenced for any manner other than historical record.*

Response: The Final GRR and FEIS include the results of the recent refinement of the chloride predictive tool. The original document [2006] remains in the supplemental materials to Appendix C solely to bolster SHEP's historical record, but is no longer relevant in the decision-making process for chloride mitigation.

Page 10

657-MR-21-EV15

Comment: *It is true that Savannah is concerned with regard to increased chloride at its raw water intakes. However, it is not correct that this concern is primarily for industrial water supply, not drinking water. It is most difficult to understand how the Corps can reach this conclusion. As has been explicitly expressed in numerous meetings, there are a number of potential problems associated with higher chloride levels including but not limited to serious economic impacts on industrial customers, increased corrosion rates for all municipal customers including residential, and increased levels of lead and copper for all municipal customers including residential. The following written references are also noted:*

Response: The District is aware of the potential for secondary impacts to drinking water [for all users] due to increased solubility of lead and copper. The Final EIS was revised to reflect the updated impact analysis and clarify that the City is concerned about potential project impacts to both municipal and industrial water users.

Page 11

657-MR-21-EV16

Comment: *As has been stated both verbally and in written form on multiple occasions there are numerous impacts that increased chloride concentrations will have on Savannah's water system. These impacts include both long term operation and maintenance costs, as well as the need to make immediate capital expenditures by Savannah and its industrial customers. A short discussion of these is provided as follows:*

Response: The City's estimated cost for the ferrous-based portion of its water distribution system is acknowledged. However, the District believes that replacing this portion of the distribution system is not warranted given construction of the raw water impoundment [which addresses the underlying problem].

Page 12

657-MR-21-EV16.5

Comment: *"Further, the USACE Office of Counsel reports that the City has no legal right to water with chloride levels below those established under the Safe Drinking Water Act, in this case 250 mg/L. Thus, even if a cause and effect relationship is found, there is no legal obligation for the GPA or the federal government to remedy the situation as long as concentrations remain below established Safe Drinking Water Standards. ...".*

Does the Corps intend to stand firm on its legal interpretation that the citizens and customers of Savannah have no legal right to water with lead and copper levels below those established under the Safe Drinking water act and even if a cause and effect relationship is found, there is no legal obligation for GPA or the federal government to remedy the situation?

Response: The City was quoting a passage from the Preliminary Draft General Reevaluation Report [April, 1998]. That wording was removed from the Draft GRR [July, 1998] and is not in the Final GRR.

657-MR-21-EV17

Comment: *Obviously, Savannah is also concerned with the long term viability of its large industrial customers. As has been stated on numerous occasions, the industries served by Savannah's surface water plant are vital to the economic well being of the entire southeast Georgia region. These industries not only provide over 1,000 direct well paying jobs, but also a wide range and number of jobs associated with the many small business that provide direct and indirect support and services. In addition, these industries use approximately 80 percent of the total water produced by Savannah's surface water system and therefore pay the lion's share of the cost to operate that system. A loss of these industries would require an immediate and substantial increase in water rates to the residential customer base throughout Chatham and Effingham Counties.*

Response: The proposed raw water impoundment [and associated mitigation plan] should provide relief to both industrial and municipal water users.

657-MR-21-EV18

Comment: *Increasing Freshwater Supply through Bear Creek. To the knowledge of Savannah, no modeling has been conducted to determine the volume of flow through Bear Creek and Abercorn Creek that would be necessary to offset the effects of increased chlorides from the Savannah River or even if the necessary volumes can be made available through these Creeks. Savannah would agree that this option would require a high level of maintenance to reliably mitigate the increased chlorides. It is also Savannah's opinion that the on-going cost and management of such maintenance would not be borne by Savannah.*

Response: Savannah District did not model increasing flow through Bear Creek [namely, determining the volume of freshwater necessary to eliminate the effects of expected chloride increases in Abercorn Creek] because of concerns about maintenance of a deepened creek. Use of the noted raw water impoundment will provide more efficient/effective mitigation [with greater certitude of success].

Page 15

657-MR-21-EV19

Comment: *It is correct that Savannah supports the concept of locating a supplemental water withdrawal intake upstream of the zone of project influence. However, Savannah does NOT support the concept of chloride mitigation based on the Adaptive Management strategy as proposed. Although, adaptive management may be a very useful tool under particular circumstances, it is Savannah's opinion that it will not be an acceptable alternative with regard to the mitigation of chlorides for the Savannah Harbor Expansion Project based on the following issues:*

Response: The updated chloride analysis included in the final GRR recommends construction [and operation] of the raw water impoundment feature prior to the completion of the deepening project rather than as a subsequent adaptive management measure.

Augusta
GEORGIA

North Augusta
South Carolina's Riverfront

January 25, 2011

William Bailey
ATTN: PD
US Army Corps of Engineers
Savannah District
100 W. Oglethorpe Ave.
Savannah, Georgia 31401-3640

Dear Mr. Bailey,

The deepening of the Savannah Harbor would have a tremendous positive economic impact on the states of Georgia and South Carolina, including communities outside of the immediate area. The Central Savannah River Area will enjoy these benefits, and thus the cities of North Augusta, South Carolina and Augusta-Richmond County, Georgia support the project. In addition to our general support we have interest in aspects of the project that will have a more direct impact on our community.

One item of direct impact on North Augusta and Augusta is the proposed use of a fish passage around the New Savannah Bluff Lock and Dam as one aspect of environmental remediation. This is a positive step forward on the long delayed plan to repair the NSBL&D and create a fish passage as joint projects, as mandated by public law. In addition, the positive impacts on the fish populations in the Savannah River will be a boost for the area environment and sportsmen.

A possibly overlooked benefit of the NSBL&D project to the harbor deepening is the super-saturation of oxygen it creates in the river's water as it passes the project. This oxygen loading helps provide a better quality of water headed down river towards the harbor, which suffers from low oxygen levels at certain depths and certain times. As noted by the study, this issue is a consideration for further deepening.

The deepening of the Savannah Harbor will increase the ability of the port to handle more cargo and materials, and this will be a boost for the economy of the CSRA as

well as the immediate port area. We support this project, and the inclusion of a fish passage around our own critical piece of infrastructure, the New Savannah Bluff Lock & Dam. The people of North Augusta, South Carolina and Augusta-Richmond County, Georgia will be enjoy the positive economic and environmental impact of this project.

Frederick Russell
Administrator
Augusta-Richmond County

Sam Bennett
Administrator
City of North Augusta

City of Augusta and North Augusta

Comment: Letter of Support.

Response: Comment noted.

US Army Corps of Engineers
Savannah District

Comment on the Savannah Harbor Expansion Project

The Savannah District, U.S. Army Corps of Engineers welcomes your comments on the Savannah Harbor Expansion Project. Once completed, place the card in the "comments" box or add postage and mail it back to us. Comments can also be provided online at **CESAS-PD@usace.army.mil**.

From: (optional) SARAH WARD, MPC

Comments:

- Unclear on APE for Environmental Review. Pennyworth Island is a significant cultural resource. Was it evaluated or is it outside the APE?

- Unclear on outcome for CSS Georgia. Will it be removed to a secure location for preservation or is it to be destroyed?

Sarah Ward MPC

500-MR-02-EV01

Comment: *Unclear on APE for Environmental Review, Pennyworth Island is a significant cultural resource- was it evaluated or is it outside the APE?*

Response: Pennyworth Island is within the APE and was considered during planning for the proposed project. The site would not be directly affected by the proposed project. The FEIS-Cultural Resources Section has been expanded to address concerns about the fate of cultural resources located on/around Pennyworth Island.

500-MR-02-EV02

Comment: *Unclear one outcome for CSS Georgia. Will it be removed to a secure location for preservation or is it to be destroyed?*

Response: The CSS Georgia will not be destroyed as a result of SHEP. Plans for the CSS Georgia are described in EIS-Appendix F, Cultural Resources and include artifact recovery, conservation, curation, and the development of an interpretive/display center.

US Army Corps of Engineers, Savannah District

Comment on the Savannah Harbor Expansion Project

The Savannah District, U.S. Army Corps of Engineers welcomes your comments on the Savannah Harbor Expansion Project. Once completed, place the card in the "comments" box or add postage and mail it back to us. Comments can also be provided online at **CESAS-PD@usace.army.mil**.

From: (optional) Ellen Harris MPE harrise@thempe.org

Comments: It would have been helpful to include more maps as a part of the public workshop - specifically maps showing the APE based locations of cultural resources.

What will be done w/ the CSS Georgia? Removal & data recovery is mentioned but what will happen to the artifacts once will they be stored?

Is Pennyworth Island within the APE? It was determined eligible for the National Register in 1993. A nomination is currently underway.

Ellen Harris MPC

501-MR-02-EV01

Comment: *What will be done w/ the CSS Georgia? Removal & data recovery is mentioned but what will happen to the artifacts? Where will they be stored?*

Response: The CSS Georgia will not be destroyed as a result of SHEP. Plans for the CSS Georgia are described in EIS-Appendix F, Cultural Resources and include artifact recovery, conservation, curation, and the development of an interpretive/display center.

501-MR-02-EV02

Comment: *Is Pennyworth Island within the APE? It was determined eligible for the national Register in 1993. A nomination is currently underway?*

Response: Pennyworth Island is within the APE and was considered during planning for the proposed project. The site would not be directly affected by the proposed project. The FEIS-Cultural Resources Section has been expanded to address concerns about the fate of cultural resources located on/around Pennyworth Island.

917 bay street, suite 207, beaufort, sc 29902
phone 843.379.3855 fax 843.379.9354
www.lowcountryeconomic.org

January 25, 2011

Mr. William Bailey
ATTN: PD, US Army Corps of Engineers, Savannah District,
100 West Oglethorpe Avenue
Savannah, Georgia 31401-3640

Dear Mr. Bailey,
On Jan. 7, the Lowcountry Economic Alliance offered its public comment relating to the Environmental Impact Statement (EIS) of the Savannah Harbor Expansion Project (SHEP). As the neighboring region, we felt it extremely important to weigh in on a topic so critical to our economy.

As part of that public comment we included an analysis of the Economic Impact Section of the SHEP EIS as completed by Dr. James Kleckley of East Carolina University. As you may recall we determined that the Economic Impact Section contained no fatal flaws but required additional analysis of the SHEP's economic impact on Beaufort and Jasper counties.

We since have contracted with Columbia, S.C.-based Miley & Associates which on Jan. 24 completed a report entitled "The Economic Impact of the Savannah Port Dredging on the Lowcountry of South Carolina." That report is included with this public comment.

Due to the short timeframe the Miley & Associates report was unable to address South Carolina as a whole but rather simply Beaufort and Jasper counties. Additionally, the report does not offer an outlook for potential economic impact, though it does outline the current importance of the Savannah River in terms of providing jobs for S.C. residents.

According to the report the Port of Savannah is responsible for employing almost 900 residents of Beaufort and Jasper counties and accounts for more than $32 million annually in labor income.

While it is our opinion that further economic analysis is necessary, we believe the Miley & Associates report paints a clearer picture of the Savannah River as an economic driver for not only Georgia but also the South Carolina Lowcountry.

We respectfully submit this letter and information in an effort to go on record in support of the SHEP and note its importance to the Lowcountry.

Sincerely,

Kim Statler
Lowcounty Economic Alliance

The Economic Impact Of The Savannah Port Dredging Project on the Lowcountry of South Carolina

Prepared for the

Prepared by

Miley & Associates, Inc.

Columbia, SC

January 2011

1. Introduction

The political boundaries between South Carolina and Georgia are delineated by distinct lines -- however the economies of the two states are not nearly so separate. In fact, they are very closely intertwined. This interdependent relationship is no more evident and no more important than that in the Lowcountry of South Carolina and the Savannah Georgia Port.

The on-going operations at the Savannah Port and the proposed dredging project by the Savannah Port are prime examples of this inter-relationship. There are substantial impacts in Beaufort and Jasper counties from the on-going operations at the Savannah Port. In addition, the proposed dredging of the Savannah River to enable larger container ships will have a substantial positive impact on the economy of the South Carolina Lowcountry.

This report summarizes the impacts from the on-going operations at the Savannah Port and the potential economic impacts for the proposed dredging project on Beaufort and Jasper Counties. While the impacts reach deep into the South Carolina economy, this report focuses on the impacts on Beaufort and Jasper Counties. These impacts are estimated to be generated from two major sources: 1) the direct employment by South Carolinians at the Savannah Port in on-going operations and 2) the economic activity generated from the $800 million in dredging construction. These impacts are outlined below.

2. Economic Impacts from On-Going Port Operations

The on-going operations of the Savannah Port have substantial economic impacts on South Carolina. A recent study by the University of Georgia estimated that the operations at the Savannah Port support over 19,700 full and part-time jobs in South Carolina.[1] Based on the estimates in the Georgia Report, it is estimated that there are 646 employees in Beaufort and Jasper counties that are directly employed by the Savannah Port.[2] These jobs are very important to the area's economic health.

As seen in Table 1, there were more than 6,500 workers in the two counties looking for jobs in November 2010. The area's unemployment rate was 8.7% at that time. The area's unemployment rate averaged 9.5% for 2010 peaked in early 2010 at 11%. These jobs at the Savannah Port take on more importance in high unemployment times such as the area and State have experienced over the last three years.

Table 1
Local Labor Force Indicators

November 2010

County	Labor Force	Employment	Unemployed	Unemployment Rate
Beaufort	65,197	59,644	5,553	8.5%
Jasper	10,341	9,335	1,006	9.7%
Region Totals	75,538	68,979	6,559	8.7%

Source: South Carolina Department of Employment and Workforce, January 2011.

The multipliers used in this analysis estimate three components of total change within the local area:

* *Direct effects* represent the initial change in the port related activities.

* *Indirect effects* are changes in inter-industry transactions as supplying industries respond to increased demands from the directly affected industries.

* *Induced effects* reflect changes in local spending that result from income changes in the directly and indirectly affected industry sectors.

This cycle of spending continues until leakages from the region (spending on goods and services outside the area) stop the cycle. Due to these multiplier effects, the initial, direct investment results in indirect and induced impacts of many more dollars.

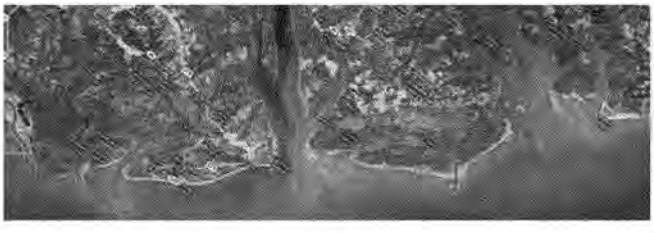
As seen in Table 2 below, the 646 jobs in Beaufort and Jasper Counties directly supported by the Savannah Port have a multiplied impact on the local economy of the Lowcountry. The direct employment of 646 support an additional 245 jobs in the two-county area through indirect and induced impacts for a total employment impact in the area of almost 900 jobs.

Table 2
Economic Impacts to
Beaufort and Jasper County
From On-going Savannah Port Operations

	Direct	Indirect	Induced	Total*
Output	$43,207,687	$10,124,006	$14,143,794	$67,475,488
Labor Income	$23,609,884	$4,212,728	$4,591,836	$32,414,447
Employment	646	100	145	890

* Totals may not equal sum of components due to rounding.

The direct employment of residents of Beaufort and Jasper counties generates substantial labor income and economic output in the two-county area. As seen in Table 2, there is more than $32 million in labor income generated in the area on an annual basis from the residents living in Beaufort and Jasper counties directly supported by the Savannah Port.



3. Economic Impacts from Savannah Port Dredging Operations

In addition to the positive economic impacts from the on-going operations of the Savannah Port, the proposed $800 million dredging project to deepen the river for larger ships will also have substantial economic impacts on South Carolina. The $800 million for the dredging project will be spent primarily in the immediate vicinity of the Port. It is likely that as much as 50% of the expenditures would be spent in South Carolina since half of the river bed is in South Carolina and half is in Georgia. Therefore, there could be $400 million of expenditures in South Carolina over the next few years as the dredging is completed.

However, to be conservative, it is assumed here that only 25% of the $800 million ($200 million) is spent in South Carolina. Table 3 summarizes the impacts on Beaufort and Jasper counties from the expenditures of the dredging operations.

As seen in Table 3, the dredging operations are estimated to generate an additional $269 million in economic activity in the two-county area. The dredging operations would generate more than $21 million in local labor income in Beaufort and Jasper counties. Perhaps as important to the local economy, the dredging operations are expected to generate over 550 jobs in the Lowcountry economy.

Table 3
Economic Impacts on
Beaufort and Jasper County
From Savannah Port Dredging Activities

	Direct	Indirect	Induced	Total*
Output	$227,609,459	$6,825,896	$35,069,773	$269,505,127
Labor Income	$7,976,971	$2,222,036	$11,385,313	$21,584,320
Employment	146	55	357	558

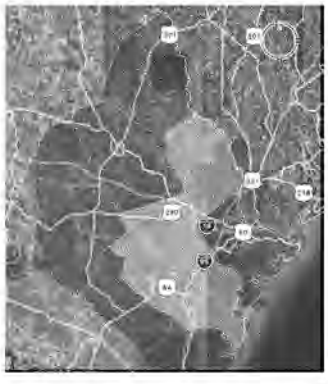
* Totals may not equal sum of components due to rounding.

4. Summary

As outlined in the accompanying analysis, it is clear that the on-going operations of the Savannah Port have substantial positive economic impacts on Beaufort and Jasper counties. In addition, the proposed dredging project will also generate substantial economic impacts to the Lowcountry.

Direct operations of the Savannah Port support almost 900 jobs in the two-county area. It is estimated that the dredging project will support and additional 550 jobs. Together, the on-going operations and the dredging project will support almost 1,450 jobs in the Lowcountry. Together they will generate over $337 million in total economic activity. And finally, the on-going operations and dredging project will generate $53.9 million in labor income in the area.

And finally, these estimates do not include future jobs and related economic activities that will result from any increased volume of traffic at the Savannah Port once the dredging project is completed. The increase in volume that has been projected would also have positive impacts on Beaufort and Jasper counties above those estimated here.



Endnotes:

[1] "The Economic Impact of Georgia's Deepwater Ports on South Carolina's Economy in FY 2009", Selig Center for Economic Growth, The University of Georgia, April 2010.

[2] Based on the relative share of value added in Beaufort and Jasper Counties and estimates for total employment impacts from "The Economic Impact of Georgia's Deepwater Ports on South Carolina's Economy in FY 2009", Selig Center for Economic Growth, The University of Georgia, April 2010.

METHODOLOGY

This study estimates the economic impacts on the state of South Carolina from the Savannah Port operations and the proposed dredging project by the Ports Authority. The methodology used in this study is the IMPLAN regional input-output modeling system developed by MIG, Inc. of Stillwater, Minnesota. This study uses 2009 data, the most recent data available for the IMPLAN models.

IMPLAN was developed by MIG, Inc. as a cost-effective means to develop regional input-output models. The IMPLAN accounts closely follow the accounting conventions used in the "Input-Output Study of the US Economy" by the Bureau of Economic Analysis (1980) and the rectangular format recommended by the United Nations.

The IMPLAN Input-Output Model mathematically describes commodity flows from producers to intermediate and final consumers. Purchases for final use (final demand) drive the model. Industries producing goods and services for final demand also purchase goods and services from other producers. These other producers, in turn, purchase goods and services. This buying of goods and services (indirect purchases) continues. Leakages from the region eventually stop the cycle.

The IMPLAN input-output model mathematically derives the indirect and induced effects. The resulting multipliers describe the change in output for every regional industry caused by a one-dollar change in final demand for any given industry. The notion of a multiplier rests upon the difference between the initial effect of a change in final demand and the total effects of that change. Total effects are the direct effects plus indirect effects, plus induced effects. Direct effects are the production changes associated with initial final demand changes. Indirect effects are production changes in backward-linked industries caused by the changing input needs of directly effected industries. Induced effects result from the household expenditures from the directly or indirectly generated labor income.

The multipliers used in this analysis estimate three components of total change within the local area:

* *Direct effects* represent the initial change in the industry in question.
* *Indirect effects* are changes in inter-industry transactions as supplying industries respond to increased demands from the directly affected industries.
* *Induced effects* reflect changes in local spending that result from income changes in the directly and indirectly affected industry sectors.

This cycle of spending continues until leakages from the region (spending on goods and services outside the area) stop the cycle. Due to these multiplier effects, the initial, direct investment results in indirect and induced impacts of many more dollars.

In essence, the multipliers estimated by this methodology represent the consecutive rounds of buying and selling that ripple through an economy. To produce one dollar of new product, employees must be hired and paid. The wages paid to these workers will then be spent on goods and services, such as food, gasoline, clothes, housing, etc. within the region and outside the region. As these cents are spent, they become income to the recipient, and the spending continues over and over again. The induced effect is the cumulative amount of spending.

The economic activity of the project also requires intermediate inputs to be purchased such as electricity, raw materials, transportation services, labor etc. These expenditures become income to the recipient and pay for the purchases of raw materials, labor, etc. They, in turn, are then spent over and over again in the economy. Purchases made from outside the region are considered "leakages" from the economy. The consecutive rounds of selling goods and services continue until these leakages from the region end the cycle. The indirect effect is the cumulative amount of such spending.

Data for this analysis is 2008 data unless otherwise noted.

Additional data such as employment and unemployment data are from the South Carolina Department of Employment and Workforce, the Lowcountry Economic Network, the Bureau of Labor Statistics, US Department of Labor; and the US Department of Commerce, Bureau of Economic Analysis.

The Study Area

The economic impacts of the Savannah Port operations will extend throughout the Lowcountry area, the surrounding counties and the entire state. However, the focus of this analysis is to estimate the impacts on the Beaufort and Jasper county area. For the purposes of this analysis, the study area is defined as the following two counties:

Beaufort
Jasper

Factors of production such as labor and materials freely flow between and across these county lines. Today's workforce is very mobile and many workers travel 40-50 miles to work everyday.

MILEY & ASSOCIATES, INC.

Miley & Associates is one of the Southeast's leading economic and financial consulting firms. The firm specializes in economic impact analyses, fiscal impact analyses, feasibility reports, impact fee studies and benefit/cost modeling. Our clients include national and prominent local real estate developers, school districts, local governments, regional development agencies, and other private sector development firms. Miley & Associates partners appear regularly before decision-makers at all levels of government and understand the values, needs and desires of the clients they represent.

Miley & Associates appreciates that every research project is unique and deserves a custom solution. Public policy decisions are not made overnight, and we excel at providing advice and counsel along the way. We represent our clients. Our business plan is simple: we focus on exceeding our client's expectations and building long-term relationships.

Miley & Associates, Inc. was founded in 1993 by Harry W. Miley, Jr. Ph. D. The Company is an economic and financial consulting firm providing a range of analytical services to public and private sector clients. Miley & Associates conducts fiscal and economic impact analyses of proposed new developments and has extensive experience in assisting clients with their economic development and community revitalization projects.

Dr. Miley served as Chairman of the South Carolina Board of Economic Advisors (BEA) under two Governors. The BEA is responsible for estimating the State's revenues for the Governor and the General Assembly to use in formulating the State's annual budget. Dr. Miley was originally appointed as Chairman by Governor Carroll Campbell and continued to serve as Chairman for Governor David Beasley.

Dr. Miley was the Senior Executive Assistant for Economic Development to Governor Campbell from 1987 to 1989. Dr. Miley served as principal advisor to Governor Carroll Campbell on the state's policies for economic development, employment and training, work force and adult illiteracy, technical education and transportation issues.

Prior to joining the Governor's Office, Dr. Miley was on the faculty of the Moore School of Business at the University of South Carolina and Associate Director of the Division of Research at the School.

General Limiting Conditions

This economic impact analysis is not a budget or forecasting document and is not intended to depict a definitive course of action. Moreover, economic impact analysis is not designed as a space or facility-planning document. Many assumptions underlying impact analyses are based on policy decisions which, if modified, would affect the overall results.

This study is based on estimates, assumptions and other information developed by Miley & Associates, Inc. from its independent research effort, consultations with the client and its representatives, and primary and secondary sources. We have utilized sources that are deemed to be reliable but cannot guarantee their accuracy. Moreover, estimates and analysis are based on trends and assumptions and, therefore, there will usually be differences between projected and actual results because events and circumstances frequently do not occur as expected, and those differences may be material. No responsibility is assumed for inaccuracies in reporting by the client, the client's agent and representatives or any other data source used in preparing this study.

This report is based on information that was current as of January, 2011 and Miley & Associates, Inc. has not undertaken any update of its research effort since that date. We have no obligation, unless subsequently engaged, to update this report or revise this analysis as presented due to events or conditions occurring after the date of this report.

Possession of this study does not carry with it the right of publication thereof in any manner without first obtaining the prior written consent of Miley & Associates, Inc. No abstracting, excerpting or summarization of this study may be made without first obtaining the prior written consent of Miley & Associates, Inc. This report is not to be used in conjunction with any public or private offering of securities or other similar purpose. This study may not be used for purposes other than that for which it is prepared or for which prior written consent has first been obtained from Miley & Associates, Inc.

Lowcountry Economic Alliance

756-JK-08-EC01

Comment: *According to the report the Port of Savannah is responsible for employing almost 900 residents of Beaufort and Jasper counties and accounts for more than $32 million annually in labor income.*

Response: It is recognized that the Port of Savannah positively impacts the regional economies of Georgia and South Carolina. The Economic Appendix in the final GRR includes a socioeconomic resources section that includes similar information to that provided by the commenter.

Page 1

756-JK-08-EC02

Comment: *This report summarizes the impacts from the on-going operations at the Savannah Port and the potential economic impacts for the proposed dredging project on Beaufort and Jasper Counties. While the impacts reach deep into the South Carolina economy, this report focuses on the impacts on Beaufort and Jasper Counties. These impacts are estimated to be generated from two major sources; 1) the direct employment by South Carolinians at the Savannah Port in on-going operations and 2) the economic activity generated from the $800 million in dredging construction. These impacts are outlined below.*

Response: It is recognized that Savannah Harbor impacts the regional economies of Georgia and South Carolina. The Economic Appendix in the final GRR includes a socioeconomic resources section that includes similar information to that provided by the commenter.

756-JK-08-EC03

Comment: *As seen in Table 1, there were more than 6,500 workers in the two counties looking for jobs in November 2010. The area's unemployment rate was 8.7% at that time. The area's unemployment rate averaged 9.5% for 2010 peaked in early 2010 at 11%. These jobs at the Savannah Port take on more importance in high unemployment times such as the area and State have experienced over the last three years.*

Response: The updated and expanded socioeconomic resources section in the Economics Appendix includes additional information regarding potential regional economic impacts associated with the proposed project.

Page 2

756-JK-08-EC04

Comment: *As seen in Table 2 below, the 646 jobs in Beaufort and Jasper Counties directly supported by the Savannah Port have a multiplied impact on the local economy of the Lowcountry. The direct employment of 646 support an additional 245 jobs in the two-county area through indirect and induced impacts for a total employment impact in the area of almost 900 jobs.*

Response: It is recognized that Savannah Harbor impacts the regional economies of Georgia and South Carolina. The Economic Appendix includes a socioeconomic resources section that includes similar information to that provided by the commenter.

Page 3

756-JK-08-EC05

Comment: *The direct employment of residents of Beaufort and Jasper counties generates substantial labor income and economic output in the two-county area. As seen in Table 2, there is more than $32 million in labor income generated in the area on an annual basis from the residents living in Beaufort and Jasper counties directly supported by the Savannah Port.*

Response: It is recognized that Savannah Harbor impacts the regional economies of Georgia and South Carolina. The Economic Appendix includes a socioeconomic resources section that includes similar information to that provided by the commenter.

Page 4

756-JK-08-EC06

Comment: *In addition to the positive economic impacts from the on-going operations of the Savannah Port, the proposed $800 million dredging project to deepen the river for larger ships will also have substantial economic impacts on South Carolina. The $800 million for the dredging project will be spent primarily in the immediate vicinity of the Port. It is likely that as much as 50% of the expenditures would be spent in South Carolina since half of the river bed is in South Carolina and half is in Georgia. Therefore, there could be $400 million of expenditures in South Carolina over the next few years as the dredging is completed.*

Response: It is recognized that Savannah Harbor impacts the regional economies of Georgia and South Carolina. The Economic Appendix includes a socioeconomic resources section that includes similar information to that provided by the commenter.

756-JK-08-EC07

Comment: *As seen in Table 3, the dredging operations are estimated to generate an additional $269 million in economic activity in the two-county area. The dredging operations would generate more than $21 million in local labor income in Beaufort and Jasper counties. Perhaps as important to the local economy, the dredging operations are expected to generate over 550 jobs in the Lowcountry economy.*

Response: It is recognized that Savannah Harbor impacts the regional economies of Georgia and South Carolina. The Economic Appendix includes a socioeconomic resources section that includes similar information to that provided by the commenter.

Page 5

756-JK-01-EC08

Comment: *Direct operations of the Savannah Port support almost 900 jobs in the two-county area. It is estimated that the dredging project will support and additional 550 jobs. Together, the on-going operations and the dredging project will support almost 1,450 jobs in the Lowcountry. Together they will*

generate over $337 million in total economic activity. And finally, the on-going operations and dredging project will generate $53.9 million in labor income in the area.

Response: It is recognized that Savannah Harbor impacts the regional economies of Georgia and South Carolina. The Economic Appendix includes a socioeconomic resources section that includes similar information to that provided by the commenter.

From: Kim Statler
To: CESAS-PD, SAS
Subject: Comments from the Lowcountry Economic Alliance
Date: Friday, January 07, 2011 5:00:26 PM
Attachments: Review of SavPort Studies 20110105final.pdf
Alliance SHEP response (3).doc

January 7, 2011

Mr. William Bailey
ATTN: PD, US Army Corps of Engineers, Savannah District,
100 West Oglethorpe Avenue
Savannah, Georgia 31401-3640

Dear Mr. Bailey,
Thank you for the opportunity to review and submit comments relating to the Environmental Impact Statement (EIS) of the Savannah Harbor Expansion Project (SHEP). As the neighboring region, we certainly appreciate the significance of this project and massive scope of the work presented.

The Lowcountry Economic Alliance (LEA) is a regional economic development group jointly formed by Beaufort and Jasper counties to promote the region and create a format for evaluating and supporting projects of significance to our area.

To that, we have reviewed the SHEP EIS and specifically the Economic Impact Section and have consulted with Dr. James Kleckley of East Carolina University for additional review.

In summary, we did not find any fatal flaws in the economic analysis contained in the EIS. We can conclude from the data that the project will create a more competitive shipping environment, but the report stops short of translating that eventual cost savings into relevant economic impact data for the purpose of community stakeholder review.

The analysis does not provide us with information whereby we can determine the value of the project to our region. Additional economic review must be done in order to properly understand the economic value of this project on counties in South Carolina and Georgia.

This project is critical to our economic development efforts. The market is clearly demonstrating that to us in our business recruitment efforts. The residents of both states need to be aware of the immediate and long-term benefits.

We respectfully request your consideration of more in-depth economic analysis as we move forward with our regional partners to do the same.

Sincerely,
Kim Statler
Lowcounty Economic Alliance

917 Bay Street, Suite 207
Beaufort, SC 29902
O: (843) 379-3955 F: (843) 379-3954
kstatler@lowcountrynet.org www.lowcountrynet.org

Lowcountry Economic Alliance

166-JK-04-EC01, 166-JK-04-EC02, 166-JK-04-EC03, 166-JK-04-EC04

Comment: *In summary, we did not find any fatal flaws in the economic analysis contained in the EIS. We can conclude from the data that the project will create a more competitive shipping environment, but the report stops short of translating that eventual cost savings into relevant economic impact data for the purpose of community stakeholder review.*

The analysis does not provide us with information whereby we can determine the value of the project to our region. Additional economic review must be done in order to properly understand the economic value of this project on counties in South Carolina and Georgia.

This project is critical to our economic development efforts. The market is clearly demonstrating that to us in our business recruitment efforts. The residents of both states need to be aware of the immediate and long-term benefits.

We respectfully request your consideration of more in-depth economic analysis as we move forward with our regional partners to do the same.

Response: The District evaluates its water resource projects from a National Economic Development (NED) perspective which, in essence, is the alternative [meeting project objectives] that produces the greatest net economic benefits. In this instance, the NED benefits are comprised primarily of the reduced transportation costs resulting from removing the current constraints of draft. It is important to note that these economic benefits accrue from the use of larger, more cost-effective container ships, not an incremental increase in the number of containers. The savings are presumably passed on to U.S. consumers and businesses in the form of lower prices. In performing the NED analysts, the Corps is mindful not to claim benefits if a project merely redistributes commerce between ports, rather than actually increase the size of the market.

In recent years, additional analyses have been undertaken which focus on Regional Economic Development [RED]. In doing so, analysts calculate the economic impacts to the region resulting from the influx of construction funds. The primary effects measured in such an RED analysis are jobs and worker income from the project construction expenditures. Chapter 8 of the Economic Appendix details regional economic impacts.

The study team reran the EIFS model to include the State of South Carolina and the GRR Economic Appendix includes a write up explaining the model and its results.

Savannah Maritime Association
33 Bull St, Suite 550, Savannah, Georgia 31401
Phone 912-233-0415 Fax 912-232-1733
Email: smasavga@bellsouth.net

December 29, 2010

Mr. William Bailey
ATTN: PD, US Army Corps of Engineers, Savannah District
100 West Oglethorpe Avenue
Savannah, GA 31401-3640

SUBJECT: Comments on the USACE Draft Tier II Environmental Impact Statement and Draft General Reevaluation Report for improvements and continued maintenance of the Savannah Harbor Federal Navigation Project, Chatham County, Georgia and Jasper County, South Carolina.

Dear Mr. Bailey,

The Savannah Maritime Association supports and encourages the expansion of the Savannah Harbor to 48 ft as described in the subject documents.

The Savannah District has been outstanding in including the maritime community and public in every phase and every decision for the Savannah Harbor Expansion Project. At the conclusion of project planning, the Stakeholders Evaluation Group is a team working on a project that benefits the entire community.

The engineering aspects of the project have been evaluated in detail and result in a positive approach to expansion. There are no unanswered questions or excessive risk in completing the project. An adaptive management approach provides resources to address any unknown or evolving risks.

The environmental issues and associated mitigation improve the overall environment of the Savannah River basin. When the project is approved, there will be more protected wetlands, more fish and wildlife support and no risk to the Floridian Aquifer.

The economic analysis of the project is conservative in calculating benefits and the cost/benefit ratio will greatly exceed 4 to 1. Increased efficiencies in transportation costs will benefit both imports and exports. The economic analysis does not predict what would actually happen if the project is not approved. The analysis indicates no change in volume if there is no change in the channel depth. It is clear that the more efficient Post-Panamax vessels will shift to other ports and trade in Savannah, both import and export will falter if the channel is not deepened.

USACE has done an outstanding job in managing the project but there have also been delays, most recently over two additional years for the economic analysis. USACE must complete the work and gain approval as quickly as possible. Anything else will be a disappointing failure to support all the people who work in our port and the southeast.

Sincerely,

Charles E. Sutlive
Executive Director

Savannah Maritime Association

521-DC-02-EC01, 521-DC-02-EC02

Comment: *The economic analysis of the project is conservative in calculating benefits and the Cost/benefit ratio will greatly exceed 4 to 1. Increased efficiencies in transportation costs will benefit both imports and exports. The economic analysis does not predict what would actually happen if the project is not approved. The analysis indicates no change in volume if there is no change in the channel depth. It is clear that the more efficient Post-Panamax vessels will shift to other ports and trade in Savannah, both import and export will falter if the channel is not deepened.*

Response: *Global Insight's* commodity forecast was one of the algorithms used to determine the benefit/cost ratios for SHEP alternatives. It includes a large number of economic factors and was vetted several times by economists for its applicability [reasonable assumptions] to the Savannah Harbor study. Moreover, Corps guidance on deep-draft navigation projects emphasizes using empirical data whenever possible and forecasting over a 50-year period of analysis. Data on the past and present navigation problems are used to help identify the future without-project condition scenario. This, in turn, serves as a baseline for project formulation and evaluation. As would be expected, a 50-year forecast contains uncertainty; therefore, several sensitivity analyses were performed to identify the sensitivity of the forecasts to different input parameters. These include using lower growth rates, no growth, and increased packaging densities. For the most part, the results show the feasibility of the proposed project improvements is not particularly sensitive to small variations in the input parameters.

The *HarborSym* analysis considers benefits to all vessels by estimating their efficiency gains from reduced congestion. The Transportation Cost Savings Model estimates the efficiency gains from vessels being able to load/unload without the current constraints of draft. Conversion of the operating fleet to larger vessels would substantially reduce transportation costs after implementation of SHEP. In fact, the largest vessels would benefit the most from the deepening proposal. However, there would be some incremental gains in efficiency to smaller vessels as a result of reduced harbor/channel congestion and reduced waiting for sufficient tidal windows.

The without-project condition describes the future conditions that are expected to prevail in the planning area [Harbor] if no federal action is taken to solve the current navigation problems. The economic analysis describes the without-project (-42 depth) condition and calculates the transportation costs required to move the forecasted cargo over the period of analysis.

It is possible that some of the cargo currently transiting Savannah could move to a nearby port if the proposed deepening does not occur. However, the Corps' analyses indicate that – based on economics alone – that is not likely. The multi-port analysis, which involves a systematic determination of alternate routing possibilities, indicate that it is costly to ship many goods to other ports only to have them transported back to the Savannah area's distribution centers. Landside trucking costs within the local area of Savannah are estimated to range from $100 to $150 each round trip whereas movements outside of the local area are estimated to average $1.50 to $2.00 per round trip mile. Since these costs exceed the savings a deepening project could provide, the likelihood of major cargo shifts is very unlikely from a cost standpoint.

The International

Propeller Club

of the United States

December 28, 2010

Mr. William Bailey
ATTN: PD, US Army Corps of Engineers, Savannah District, CESAS-PD@usace.army.mil
100 West Oglethorpe Avenue
Savannah, GA 31401-3640

SUBJECT: Comments on the USACE Draft Tier II Environmental Impact Statement and Draft General Reevaluation Report for improvements and continued maintenance of the Savannah Harbor Federal Navigation Project, Chatham County, Georgia and Jasper County, South Carolina.

Dear Mr. Bailey,

The Port of Savannah Propeller Club supports and approves development of a 48 ft channel with associated turn widening and meeting lanes in the Savannah River. Indeed, failure to expand the channel will have an adverse effect on port traffic and all the people who work on the river.

The Savannah Harbor Expansion provides overall benefits to the trade and distribution network on the United States East Coast and contributes to the continued viability of the United States market in the world economy.

The subject reports are effective in explaining and justifying needed development of the channel to 48 ft. The reports do not acknowledge that failure to provide the deepening needed for Post-Panamax vessels will result in a reduction in trade in the port. The effect will become more negative when shipping costs increase compared to other ports and start to affect export materials as well as imports.

USACE staff and associated organizations have provided a thorough and complete evaluation of the expansion of the Savannah River. There are no unanswered questions or issues. The project will enhance the environment and improve the quality of life for those people who work on and around the Savannah River and throughout our country. It is critically important that the project be approved as quickly as possible and without further delays. Savannah must be ready for the larger vessels who will start using the Panama Canal in 2014.

Sincerely,

Jim Myrick
President, Port of Savannah

Port of Savannah PO Box 9480 Savannah, GA 31412

The International Propeller Club of the United States

524-DC-01-ECD1

Comment: *The subject reports are effective in explaining and justifying needed development of the channel to 48 ft. The reports do not acknowledge that failure to provide the deepening needed for Post-Panamax vessels will result in a reduction in trade in the port. The effect will become more negative when shipping costs increase compared to other ports and start to affect export materials as well as imports.*

Response: Savannah Harbor has experienced remarkable growth over the last 15 years, even with its current channel depth constraints. However, each port is [relatively] unique and its success can be attributed to many factors. In the case of Savannah, recent construction of distribution centers, availability of affordable land, incentives by local governments, congestion at West Coast ports, type of ships calling and their rotations, and the commodities being processed – all played a role in its growth. Moreover, forecasts anticipate a continued upward trend line for Savannah over the 50-year period of analysis. Nonetheless, given the present depth restrictions, many vessels are constrained by draft. This creates economic inefficiencies and this problem will be exacerbated as the container fleet grows in average vessel size and more cargo is moved by the larger vessels.

7-811

THE MARITIME ASSOCIATION
SOUTH CAROLINA

January 25, 2011

Mr. William G. Bailey
ATTN: PD
Savannah District, U.S. Army Corps of Engineers
100 West Oglethorpe Ave
Savannah, GA 31401

RE: Comments on Draft EIS for the Savannah Harbor Expansion Project

Dear Mr. Bailey:

The Maritime Association of South Carolina has significant concerns about the proposed SHEP insofar as it may adversely affect the future construction of a bi-state container terminal located in Jasper County, South Carolina.

First, we do not understand why a proposed Jasper Ocean Terminal, though mentioned in the DEIS, is not considered as a viable, lower-cost alternative to the recommended plan. This is especially difficult to fathom when the DEIS projects that a no-build alternative would result in the same growth in container ship traffic to Savannah that would be experienced if the SHEP is completed as proposed.

Second, it does not appear possible that a Jasper Ocean Terminal could be available when South Carolina and Georgia would require it, based on cargo projections, if the Army Corps of Engineers intends to use the JOT site for SHEP dredge disposal until the year 2060.

Thank you for your consideration of these concerns.

Sincerely,

John F. Hassell III

John F. Hassell, III
President

JFH/hs

800 Morrison Dr. PO Box 494 Charleston, SC 29402 Tel: 843-577-PORT Fax: 843-722-3431

The Maritime Association South Carolina

814-MM-02-EV01

Comment: *First, we do not understand why a proposed Jasper Ocean Terminal, though mentioned in the DEIS, is not considered as a viable, lower-cost alternative to the recommended plan. This is especially difficult to fathom when the DEIS projects that a no-build alternative would result in the same growth in container ship traffic to Savannah that would be experienced if the SHEP is completed as proposed.*

Response: Congress asked that the Corps perform additional analyses when it authorized the Savannah Harbor Expansion Project in Section 203 of WRDA, 1999. The Corps identified the existing navigation problems and evaluated alternate ways to solve or reduce those problems. Those considerations included non-structural and structural solutions, and deepening to alternate terminal locations. Three of those alternate terminal locations were ones that were being considered for siting a new container terminal in Jasper County. The Corps released a report for public comment in 2005 that documented its findings. The report concluded that deepening to the existing Garden City Terminal would be less expensive than the combined cost of constructing a new terminal in Jasper County and deepening to that location. The report can be found in the EIS-Appendix O. See also numerous other responses to comments regarding Jasper terminal issues.

814-MM-02-EV02

Comment: *Second, it does not appear possible that a Jasper Ocean Terminal could be available when South Carolina and Georgia would require it, based on cargo projections, if the Army Corps of Engineers intends to use the JOT site for SHEP dredge disposal until the year 2060.*

Response: There are some obvious impediments to its implementation, but the present Jasper Terminal [JOT] site could be used to develop a viable port operation. There are numerous actions that would need to occur before a terminal could become operational. One of those is that the US Government must be "made whole" if it releases its dredged material disposal easement on those properties. The Government has requested the developers commit to a mechanism that would keep the Government's costs the same after releasing the easements. The Joint Project Office is presently working to identify a way to meet the Government's request. Should a reasonable way be identified and commitments made to implement that action, the Corps would release its dredged material disposal easement on the sites. Until that occurs, the Corps intends to use Disposal Areas 14A/14B [the presently proposed JOT site] to deposit excavated sediments since it is the least-cost, environmentally acceptable alternative. See also numerous other responses to comments regarding Jasper terminal issues.

#1120

SOUTH CAROLINA MANUFACTURERS

SOUTH CAROLINA CHAMBER OF COMMERCE

January 25, 2011

Mr. William Bailey
US Army Corps of Engineers
Savannah District
100 W. Oglethorpe Ave.
Savannah GA 31401-3640

Dear Mr. Bailey:

On behalf of the South Carolina Manufacturers Alliance and the South Carolina Chamber of Commerce, please accept these comments on the draft environmental impact statement (Draft EIS) for the Savannah Harbor Expansion Project (SHEP).

We have concerns about the analysis undertaken to evaluate the environmental impacts associated with the SHEP. Our primary concern is that the significant environmental impacts of the SHEP may preclude future industrial growth and economic development in South Carolina, and specifically in Jasper County, and that these impacts have not been thoroughly analyzed and accounted for in the analysis. Specifically, while part of the project occurs in South Carolina, the impacts, both environmental and economic, on South Carolina are given short shrift and do not appear to have been given due consideration. For example, the negative impacts on the SHEP on water supplies in Georgia have been reviewed, with no parallel consideration on the negative impacts on water supplies in South Carolina.

The underlying assumption of the analysis is that there will be no increase in ship traffic, but that additional containers will be carried on each ship so that the throughput for the Georgia Ports Authority and its Savannah terminals will increase while the ship traffic will remain static. This is a faulty premise that fails to reflect the realities of waterborne commerce and the shipping industry. The SHEP is meant to accommodate bigger ships traversing the Panama Canal. The industry projects this to lead to an increase in the number of routes and ships on the East Coast, meaning an increase in the ship calls on East Coast ports. There is no analytical support for the Corps' assumption of less ship traffic. Because the environmental analysis is predicated on this faulty assumption, the entire Draft EIS must be revisited.

This is especially critical since the development of a port jointly owned by the States of Georgia and South Carolina in Jasper County (Jasper Port) is not given any consideration in the Draft EIS. Instead, the Jasper Port is treated as "not reasonably foreseeable" and its development suffers from a "high degree of uncertainty." However, the Georgia Ports Authority has entered into an intergovernmental agreement with the South Carolina State Ports Authority for the development of the Jasper Port, and a Bi-State Commission exists to pursue the Jasper Port development. Millions of dollars have been spent towards the development of a Jasper Port. The Draft EIS fails to consider the impact on the Jasper Port, and given the environmental uncertainties and significant impact in the area this deepening could ultimately preclude a Jasper Port.

The water quality impacts, and especially the negative impact on dissolved oxygen (DO), deserves further consideration and should include a discussion about the impact on future development, especially given the prospect that the U.S. Environmental Protection Agency (EPA) has already designated the Savannah Harbor as a "no discharge" zone regarding DO. This points to the possibility that the SHEP would, for all practical purposes, prevent future discharges and thus future development. Saltwater intrusion and salinity are also significant issue for the South Carolina communities and industries. However, the Draft EIS does not appear to consider the impacts of DO, saltwater intrusion, and salinity on these adversely affected South Carolina communities and industries.

The analysis in the Draft EIS is internally inconsistent in any number of places, including in its analysis of the scope and need, the water quality impacts, the natural resource impacts, the impacts on wildlife and fisheries, and air quality impacts. All of these sections should be reexamined to ensure the integrity of the analysis and the inconsistencies reconciled or explained.

For example, the air quality discussion is not an analysis,[i] but is an inventory. No air dispersion modeling was done. In the inventory itself, it claims on the one hand that the number of ships calling on the Savannah terminals will not change regardless of the depth of the harbor, but in the inventory the number of ships calling is actually reduced as the harbor deepens.[ii] This gives the illusion that a deepened harbor would have no impact on air quality, and in fact the Draft EIS makes the bold (and unproven) claim that air quality will improve. This statement is contrary to other scientific studies and evidence and is unsupported by a mere air emissions inventory. No conclusion can be reached about the impact on air quality unless air dispersion modeling is undertaken.

Similar to the evaluation of environmental impacts, the mitigation efforts are focused on Georgia, and do not appear to account for the significant environmental impact this project will have on South Carolina. The mitigation plan should be revisited to include and incorporate specific mitigation efforts for the impacts on South Carolina communities and industries.

We also incorporate by reference the comments of all other South Carolina governmental agencies and their representatives. Thank you for your time and consideration.

Sincerely,

Lewis Gossett
President
South Carolina Manufacturers Alliance

Otis B. Rawl, Jr.
President and Chief Executive Officer
South Carolina Chamber of Commerce

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[i] Notably, the air emissions discussion concludes that vessel traffic will remain the same with a harbor deepening depth of 46 feet, which undercuts any deeper alternative. In fact, much of the analysis does not support a deepening to 48 feet.

[ii] Here again, the Jasper Port has been given no consideration. If this deepening project would aid the Jasper Port and be utilized by the Jasper Port, then vessel calls as a result of this deepening will increase and must be analyzed as a result of the Corps' action, including an air quality dispersion model.

South Carolina Chamber of Commerce

Page 1

1120-BB-09-EV01, 1120-BB-09-EV02

Comment: *We have concerns about the analysis undertaken to evaluate the environmental impacts associated with the SHEP. Our primary concern is that the significant environmental impacts of the SHEP may preclude future industrial growth and economic development in South Carolina, and specifically in Jasper County, and that these impacts have not been thoroughly analyzed and accounted for in the analysis. Specifically, while part of the project occurs in South Carolina, the impacts, both environmental and economic, on South Carolina are given short shrift and do not appear to have been given due consideration. For example, the negative impacts on the SHEP on water supplies in Georgia have been reviewed, with no parallel consideration on the negative impacts on water supplies in South Carolina.*

Response: The continued deposition of dredged sediments in existing Sites 14A and 14B is the least-cost, environmentally acceptable alternative for the proposed SHEP. However, deposition of sediment at these sites would not preclude their future development as a new container terminal. In fact, in 2011 the consultant working for the Joint Project Office publically stated that the proposed placement of new work sediments there [Areas 14A and 14B] would save the terminal development project over $300 million by raising its elevation to a workable height. Therefore, if SHEP is constructed, it would likely benefit the development of a terminal in Jasper County by significantly reducing initial construction costs.

The analysis of potential groundwater impacts discussed in the DEIS apply to the aquifer that supplies water to both Georgia and South Carolina. Extensive groundwater studies have been completed and are discussed in EIS-Sections 4.02.1 and 5.05. The proposed harbor deepening would have minimal adverse impacts on groundwater. The full results of the field work, groundwater modeling, and GIS analyses are described in Section 5 of the Engineering Appendix of the GRR. They are described in further detail in a document titled, *"Supplemental Studies to Determine Potential Groundwater Impacts to the Upper Floridan Aquifer, Savannah Harbor Expansion Project, Final Report, June 2007"*.

Water is withdrawn from the Savannah River by the Beaufort-Jasper Water Authority to serve customers in the SC Low country. That intake is located at roughly River Mile 39. The Corps evaluated potential increases in chloride levels in the upper portion of the estuary and found that no measureable effects should occur as far upstream as that water intake.

1120-BB-09-EC01

Comment: *The underlying assumption of the analysis is that there will be no increase in ship traffic, but that additional containers will be carried on each ship so that the throughput for the Georgia Ports Authority and its Savannah terminals will increase while the ship traffic will remain static. This is a faulty premise that fails to reflect the realities of waterborne commerce and the shipping industry. The SHEP is meant to accommodate bigger ships traversing the Panama Canal. The industry projects this to lead to an increase in the number of routes and ships on the East Coast, meaning an increase in the ship calls on East Coast ports. There is no analytical support for the Corps' assumption of less ship traffic. Because the environmental analysis is predicated on this faulty assumption, the entire Draft EIS must be revisited.*

Response: The Economic Analysis in the draft report shows a significant increase in ship traffic [calls], i.e., a rise from 2,172 in 2015 to 4,148 in 2032 (See Economic Appendix, Page 73, Table 42). This increase in vessel calls has a direct relationship with the port's future cargo growth. One of the main assumptions used in the transportation cost model is that no cargo would be *diverted* from a competing port. Instead, SHEP speaks to a project in which the majority of Savannah's cargo is expected to originate and remain in its hinterland market[1]. A multiport analysis [2006] was conducted for various hinterland origins and destinations [South Atlantic and Gulf ports including Savannah and nearby Charleston and Jacksonville]. It determined that there would be no substantial changes in origins and destinations of imports or exports to key US markets served by Savannah. Project deepening allows larger ships to call at the Port, as well as enabling them to load/unload without the current constraints of draft. All other things being equal, this reduces the total number of trips required to move the same volume of cargo.

Page 2

1120-BB-09-EV03

Comment: *This is especially critical since the development of a port jointly owned by the States of Georgia and South Carolina in Jasper County (Jasper Port) is not given any consideration in the Draft EIS. Instead, the Jasper Port is treated as "not reasonably foreseeable" and its development suffers from a "high degree of uncertainty." However, the Georgia Ports Authority has entered into an intergovernmental agreement with the South Carolina State Ports Authority for the development of the Jasper Port, and a Bi-State Commission exists to pursue the Jasper Port development. Millions of dollars have been spent towards the development of a Jasper Port. The Draft EIS fails to consider the impact on the Jasper Port, and given the environmental uncertainties and significant impact in the area this deepening could ultimately preclude a Jasper Port.*

Response: Incremental analyses were conducted [in accordance with NEPA and Section 203, WRDA 1999] to examine alternative actions to harbor deepening at the Garden City Terminal site. Jasper Ocean Terminal (sometimes referred to as Sites 14A/14B in the reports) was one of the alternative port sites considered for deepening [see GRR-Sections 6 and 12, GRR- Appendix D, EIS-Section 3, and EIS-Appendix O. However, the physical absence of a terminal, the uncertainty associated with its construction, the lack of supporting infrastructure, and important environment considerations militate against the Jasper site being considered in detail in this study. The initial evaluations that the Corps conducted found that construction of the required infrastructure and deepening to the site exceeded the costs of deepening to the existing Garden City Terminal (mitigation costs included in both scenarios). Recent events have not indicated that those findings would change if reassessed today. Lack of ratification of a bi-state compact by the two state legislatures since signing the Term Sheet in 2007 does not reduce uncertainties about development of the site into a container terminal. See also other responses to comments on Jasper terminal issues.

[1] This assumption might appear to contradict the port's claims of losing market share without a deepening; but as evidenced by the port's strong growth historically without a project, there are many reasons besides channel depth that foster growth.

1120-BB-09-EV04, 1120-BB-09-EV05

Comment: *The water quality impacts, and especially the negative impact on dissolved oxygen (DO), deserves further consideration and should include a discussion about the impact on future development, especially given the prospect that the U.S. Environmental Protection Agency (EPA) has already designated the Savannah Harbor as a "no discharge" zone regarding DO. This points to the possibility that the SHEP would, for all practical purposes, prevent future discharges and thus future development. Saltwater intrusion and salinity are also significant issue for the South Carolina communities and industries. However, the Draft EIS does not appear to consider the impacts of DO, saltwater intrusion, and salinity on these adversely affected South Carolina communities and industries."*

Response: The impacts of the SHEP on the dissolved oxygen regime in the Savannah Harbor estuary are discussed in the EIS and in even greater detail in the Engineering Appendix of the GRR. Based on the potential impacts to dissolved oxygen that would be caused by SHEP's implementation, an oxygen injection system is included in the project's mitigation plan. This system has been designed to remove the SHEP's incremental impacts on the estuary's dissolved oxygen regime as well as any adverse impact the project would have had on the harbor's aquatic resources. Implementation of the system would result in an incidental improvement in dissolved oxygen levels in over 90 percent of the estuary. The US EPA issued a draft revised TMDL for dissolved oxygen in the Savannah Harbor in April, 2010. The revised TMDL no longer designates the Savannah Harbor as a "no discharge" area; instead, it has been designated as a "naturally low water body". See also other responses to comments on these issues.

1120-BB-09-EV06

Comment: *The analysis in the Draft EIS is internally inconsistent in any number of places, including in its analysis of the scope and need, the water quality impacts, the natural resource impacts, the impacts on wildlife and fisheries, and air quality impacts. All of these sections should be reexamined to ensure the integrity of the analysis and the inconsistencies reconciled or explained.*

Response: Comments on the Draft EIS are being used to improve the document and help eliminate inconsistencies.

1120-BB-09-EV07

Comment: *For example, the air quality discussion is not an analysis, but is an inventory. No air dispersion modeling was done. In the inventory itself, it claims on the one hand that the number of ships calling on the Savannah terminals will not change regardless of the depth of the harbor, but in the inventory the number of ships calling is actually reduced as the harbor deepens. This gives the illusion that a deepened harbor would have no impact on air quality, and in fact the Draft EIS makes the bold (and unproven) claim that air quality will improve. This statement is contrary to other scientific studies and evidence and is unsupported by a mere air emissions inventory. No conclusion can be reached about the impact on air quality unless air dispersion modeling is undertaken.*

Response: There is no compelling evidence to support the allegation that harbor deepening will incrementally increase the number of containers transiting the port on any given year. The Corps' analysis predicts an increase in the number of containers [up to the maximum of 6.5 million TEUs] being processed through Savannah over time as a result of increasing demand, but that growth is predicted to occur with or without harbor deepening.

According to the commodity forecast found in Section 5, *Forecast of Without-Project Condition* in the GRR, the port will reach its landside cargo handling capacity in 2030. It is anticipated that without deepening (i.e., the -42 foot depth) more vessels would be required to transport that larger amount of cargo. With harbor deepening, the total number of vessels decreases [from what would be necessary with the existing -42 foot depth] as they will be able to load/unload without the current constraints of draft.

Since the number of containers per year is not predicted to increase as a result of deepening, per se, no landside changes in emissions would result. With fewer ships calling at the port, total air emissions would decrease [annualized] with harbor deepening (comparing without and with project conditions). Given this situation, there is no technical need for the project to conduct a detailed analysis of the how those emissions disperse.

In summary, any potential adverse effects from expected air emissions would be reduced if the harbor is deepened. See also other responses to comments regarding air quality.

1120-BB-09-EV08

Comment: *Similar to the evaluation of environmental impacts, the mitigation efforts are focused on Georgia, and do not appear to account for the significant environmental impact this project will have on South Carolina. The mitigation plan should be revisited to include and incorporate specific mitigation efforts for the impacts on South Carolina communities and industries.*

Response: Mitigation for the SHEP was designed in a sequential fashion to avoid, minimize, and compensate for adverse impacts, wherever they may occur.

From: Rick Shields
To: CESAS-PD, SAS
Subject: SHEP Comments
Date: Tuesday, January 25, 2011 5:17:54 AM

William Bailey
US Army Corps of Engineers
Savannah District

January 24, 2011

Dear Mr Bailey:

After reviewing the draft Environmental Impact Statement (EIS) for the Savannah Harbor Expansion Project and discussing the anticipated impact of the project with the staff of the US Fish & Wildlife Service Savannah Coastal Refuges Complex, I respectfully submit the following comments on behalf of the **Friends of the Savannah Coastal Wildlife Refuges, Inc:**

1. We are concerned about the accuracy of the models used to assess potential damage and to plan mitigation efforts. Loss of habitat, could be considerably more extensive than predicted if the models are wrong and the cost of mitigation could be considerably higher. The experience with the Back River tide gate points out the difficulty in attempting to model a complex system such as the Savannah River.

2. The Savannah River estuary, which once contained 12,000 acres of tidal freshwater wetlands, has already been reduced by 73% to just 3200 acres. The EIS predicts a loss of more than 10% of the surviving wetlands with a deepening to 48 feet, a loss than cannot be mitigated, and which could be greater if the models are wrong. Deepening to 45 feet reduces that wetlands loss to 34 acres – still more than desired but much less irreversibly impactful than losing 335 acres.

3. The adaptive management approach for mitigation efforts lacks sufficient specificity. The plan should stipulate a process and timeline for deciding on additional mitigation steps and for initiating action.

4. There is no provision for the Corps to provide advance funding for the escrow account that is to be used for future mitigation. Without guaranteed funding, implementation of adaptive management procedures becomes highly uncertain.

5. The post-construction monitoring period for mitigation projects is inadequate to allow the system to stabilize and to detect long-cycle problems; it should be increased from 5 to 10 years. Similarly, the monitoring period for future adaptive mitigation projects should be increased from 1 to 3 years.

6. We also have concerns about the ability of the proposed oxygen bubbler to infuse oxygen throughout the river basin. If it doesn't, the impact on the short-nosed sturgeon and other river-spawning fish could be catastrophic and there is no back-up plan available.

7 At a 48-foot depth, the EIS estimates that 28% of striped bass spawning habitat will be destroyed and will have to be mitigated by a stocking program. What if the estimate is wrong and it turns out that 50% of habitat is destroyed? Will the mitigation fund support an increased level of stocking year after year?

Given these concerns and the expense and irreversible environmental damage that river deepening will cause, **Friends of the Savannah Coastal Wildlife Refuges** feels that it is time to recognize that accommodating larger ships is not a suitable goal for a port that is 21 miles upstream on a major river. Such ships are more appropriately serviced at ports located in direct proximity to the ocean.

If deepening is nonetheless pursued, we recommend that the maximum depth be limited to 45 feet or less to provide a larger margin for error in the models used to complete the EIS and to minimize the adverse impact on the Savannah National Wildlife Refuge and its environs.

Sincerely,

Rick Shields
President
Friends of the Savannah Coastal Wildlife Refuges, Inc.
www.coastalrefuges.org
A Non-Profit 501(c)3 Corporation

Friends of the Savannah Coastal Wildlife Refuge

722-MR-06-EN01

Comment: *We are concerned about the accuracy of the models used to assess potential damage and to plan mitigation efforts. Loss of habitat, could be considerably more extensive than predicted if the models are wrong and the cost of mitigation could be considerably higher.*
The experience with the Back River tide gate points out the difficulty in attempting to model a complex system such as the Savannah River.

Response: The models used to identify project impacts and develop mitigation plans were calibrated and validated [multiple times] prior to their approval. The approved, calibrated, and validated models are appropriate to identify project impacts and develop mitigation plans. The hydrodynamic and water quality models simulate the complex estuarine dynamics, viz., hourly, daily, and monthly tidal variations, salinity and dissolved oxygen dynamics together with their spatial distribution within the system. The models are applicable over a wide range of conditions including low and high freshwater flow. The model grid incorporates surveyed bathymetry and includes point and non-point pollution sources in the watershed. The grid extends from Clyo, Georgia (river mile 61, USGS stream gage 02198500) downstream through the harbor to Fort Pulaski (river mile 0), and out to 17 miles offshore [Atlantic Ocean]. The model was calibrated and validated using observed data from 1997 to 2006 and has been designed to meet the expectations of the SHEP Water Quality Interagency Coordination Team, which followed in the steps of the modeling technical review group that was established in the late 1990s to oversee the development of a technically valid model for determining SHEP's environmental impacts and attendant mitigation features. The group included representatives from the District, US EPA Region 4, USGS, Georgia DNR-EPD, South Carolina DHEC, and private sector technical modeling experts [tasked with actual model development]. An independent technical review and uncertainty analysis have been conducted on the models and the resulting comments/concerns were incorporated into the final version. Details regarding the hydrodynamic and water quality model development process, extensive reviews, and uncertainty analysis can be found in the report "Development of the Hydrodynamic and Water Quality Models for the Savannah Harbor Expansion Project" dated January 2006 [included in the Supplemental Materials to the Engineering Appendix]. Acceptance letters from agencies involved in the modeling technical review group can be found in the document, "Correspondence Regarding Hydrodynamic & Water Quality Model Acceptability" [included the Supplemental Materials to the Engineering Appendix].

The models employed and the criteria established were developed through an iterative process with the model review team and the water quality interagency coordination team. The model selection, development, and refinement process literally took years [1999 to 2005] and the WASP and enhanced EFDC models were both certified for use in accordance with EC 1105-2-407. The considerable changes that were made over the course of this period and elaborate certification process are an indication of the thorough and deliberative process the District employed to ensure the models met all performance criteria prior to conducting runs to predict impacts associated with the proposed project.

The Monitoring and Adaptive Management Plan provides a discussion of post-construction monitoring and the decision-making process that would determine if additional monitoring and/or mitigation measures are warranted. Purposely, the plan does not identify specific acceptability criteria for water quality or biological parameters that would trigger the need for additional monitoring or modifications to mitigation measures. The District was willing to defer to the judgment of agency technical experts

rather than just use a specific parameter in determining when changes are necessary. Based on their experience, some resource experts may see a need to modify the monitoring and/or a mitigation measure, even though a specific [parameter] threshold has not been reached. Further, there is a concern about the potential cumulative/synergistic impacts of multiple parameters, even though the threshold limits had not been exceeded for any one parameter. If thresholds had been established for individual parameters, this flexibility would have been lessened.

Decisions about changes in the monitoring plan or mitigation features can be reached at any time during the post-construction monitoring effort. Monitoring data and reports would be made available to the resource agencies as soon as possible. Data from fixed water quality monitoring stations will be available on a real-time basis [on-line]. The plan provides for an annual meeting [end of monitoring year] between the District and the natural resource agencies to discuss the data and any necessary changes. However, the schedule is sufficiently flexible to convene a meeting any time that concerns dictate. If the monitoring identifies impacts that are outside those predicted, the Corps would consult with the resource agencies. Corrective actions could range from a change in the monitoring plan to a cessation of construction activities until a problem is rectified.

722-MR-06-EV01

Comment: *The adaptive management approach for mitigation efforts lacks sufficient specificity. The plan should stipulate a process and timeline for deciding on additional mitigation steps and for initiating action.*

Response: Appendix D has been revised to provide more specifics on the process and timelines associated with adaptive management decisions.

722-MR-06-EV02

Comment: *There is no provision for the Corps to provide advance funding for the escrow account that is to be used for future mitigation. Without guaranteed funding, implementation of adaptive management procedures becomes highly uncertain.*

Response: The District intends to obtain funds for adaptive management as the construction progresses, so that funds would be available should they be needed for some adjustment to the mitigation features. GPA also intends to provide its share of the adaptive management costs in an escrow account at the beginning of the construction period so they would be available if/when needed. Appendix D contains additional explanation regarding funding of adaptive management features.

722-MR-06-EV03

Comment: *The post-construction monitoring period for mitigation projects is inadequate to allow the system to stabilize and to detect long-cycle problems; it should be increased from 5 to 10 years. Similarly, the monitoring period for future adaptive mitigation projects should be increased from 1 to 3 years.*

Response: The FEIS includes a longer post-construction monitoring period. The monitoring period for a particular adaptive management measure has been extended to two years after its implementation and could be longer, if the agencies believe that to be prudent.

722-MR-06-EN02

Comment: *We also have concerns about the ability of the proposed oxygen bubbler to infuse oxygen throughout the river basin. If it doesn't, the impact on the short-nosed sturgeon and other river-spawning fish could be catastrophic and there is no back-up plan available.*

Response: Details of the oxygen injection technology proposed for SHEP mitigation are documented in the report, "Oxygen Injection Design Report" [2010]. It is included in the Supplemental Materials to the Engineering Appendix. The oxygen injection system uses a device [Speece Cone] to pull a small side stream of water from the river, super-oxygenates [pure oxygen] the sample, and returns it to the main river. The oxygenated stream would achieve concentrations of 40 to 140 mg/L which, when mixed with the main river, is sufficient to satisfy dissolved oxygen deficiencies [related to SHEP] and avoids the need to treat the entire river flow. Contrary to popular misconception, these high dissolved oxygen concentrations do not spontaneously effervesce, but can be kept in solution long enough to meet mitigation goals. The WASP model was used to determine the optimal number/locations of the oxygen injection facilities together with oxygen loadings necessary to achieve the project's mitigation goals. The extensive model grid allows examination of dissolved oxygen impacts and mitigation achievements throughout the estuary both spatially and by depth [including the navigation channel and the Middle and Back Rivers]. One additional cone [at each location] would be included as a back-up/maintenance spare for ready use when needed. As stated in the Monitoring and Adaptive Management Plan, the District has included sufficient funds to modify the DO systems if needed to meet the noted performance standards. The Monitoring and Adaptive Management Plan also describes the process by which the District and the Cooperating Agencies would jointly review the performance of the project (including its mitigation features) and work collaboratively to ensure the project functions as expected. See also numerous other responses to comments regarding dissolved oxygen.

722-MR-06-EV04

Comment: *At a 48-foot depth, the EIS estimates that 28% of striped bass spawning habitat will be destroyed and will have to be mitigated by a stocking program. What if the estimate is wrong and it turns out that 50% of habitat is destroyed? Will the mitigation fund support an increased level of stocking year after year?*

Response: An evaluation of SHEP's effects on Striped bass habitat using a combination of field data and results from the updated hydrodynamic- and water quality models has been added to the post-construction monitoring. The Mitigation Plan includes payment to the Georgia DNR for stocking Striped bass fingerlings. These funds could be increased [via the Adaptive Management Plan] if the noted analysis demonstrates the need for same.

The Nature Conservancy
Protecting nature. Preserving life.

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nature.org

January 25, 2011

Mr. William Bailey
ATTN: PD
US Army Corps of Engineers
Savannah District
100 West Oglethorpe Avenue
Savannah, Georgia 31401-33640
Email: CESAS-PD@usace.army.mil

Dear Mr. Bailey,

Thank you for the opportunity to review and comment upon the Draft Tier II Environmental Impact Statement (DEIS) for the Savannah Harbor Expansion Project (SHEP).

The mission of The Nature Conservancy is to preserve the plants, animals and natural communities that represent the diversity of life on Earth by protecting the lands and waters they need to survive. With the support of more than one million members, The Nature Conservancy (TNC) has protected more than 120 million acres and 5,000 river miles around the world. We currently have more than 150 marine conservation projects in 32 countries and every coastal state in the U.S.

The Nature Conservancy values the Savannah River for its biodiversity, which includes populations of diadromous fishes including the federally endangered shortnose sturgeon (*Acipenser brevirostrum*) and candidate species Atlantic Sturgeon (*Acipenser oxyrinchus oxyrinchus*). The latter is currently the subject of a Federal Register notice whereby the National Marine Fisheries Service recommends its elevation to endangered status. The Conservancy has worked in partnership with the Savannah District of the Corps of Engineers and a wide variety of scientific organizations, universities, and environmental agencies from Georgia and South Carolina to identify the needs and best management practices for the Savannah River.

The Nature Conservancy has carefully reviewed the DEIS. We appreciate your thorough analysis of the adverse environmental impacts associated with the proposed deepening of the Savannah Harbor and invite you to consider the following recommendations and comments:

1. Before implementing proposed mitigation strategies, the Corps should commit to a **robust exploration of the mitigation plan** with all state, federal and NGO partners. An interagency and NGO review process would allow further consideration of concerns such as the ones outlined below.

2. The Corps should identify a long-term, **dedicated funding mechanism** to support the approved mitigation plan, including ecological monitoring of the system throughout the life of the plan.

The comments below outline our concerns regarding potential impacts to the biological resources of the estuary, proposed mitigation measures, monitoring, and adaptive management.

Indirect Impacts to Wetlands

1. The Conservancy appreciates the conservative approach presented in the DEIS with respect to indirect impacts to wetlands, namely the conversion of fresh water marsh to brackish marsh as a consequence of harbor deepening. However, the projected final impact of -337 acres (48-foot deepening plus mitigation), once determined, is treated overconfidently in ensuing discussions. Impacts could be considerably different than this figure and the mitigation plan and associated funding should account for partial or total failure of the mitigation measures. The 5% over-original-cost figure for wetland mitigation projects overconfidence in the final impact acreage.
2. The mitigation plan for indirect wetland impacts contains some potentially valuable additions to the Savannah National Wildlife Refuge, and The Nature Conservancy fully supports the planned additions portrayed in the DEIS. However, given the potential variability of the final impacted acreage and uncertain willingness of sellers, additional preservation tracts should be identified, unconstrained by the Refuge boundary. Furthermore, while we agree the Refuge should be the priority for acquisition and fee ownership of mitigation tracts, the COE should also entertain potential fee ownerships by other entities outside of the Refuge boundary.

Shortnose Sturgeon

1. The modeled existing habitat for the sturgeon does not reconcile with known sturgeon habitat use as established by several years of telemetry data gathered by the SC and GA Departments of Natural Resources, NOAA, The Nature Conservancy, and Southeastern Natural Sciences Academy. This data is very recent and highly relevant to current sturgeon habitat use, and their fate under the proposed action. The modeled portrayal of sturgeon habitat must be reconciled with real data before areal impacts to sturgeon habitat can be calculated. This calculation is essential to devising appropriate mitigation plans for the sturgeon. As portrayed, current sturgeon habitat area is considerably underestimated by the model and therefore, the impacts to the habitat under the proposed action are significantly under-calculated.
2. The calculated areal effects of deepening with mitigation appear to assume that shortnose sturgeon will move from their current habitat to new habitat within the post-project system. The DEIS should document the reasoning as to why shortnose sturgeon will successfully relocate to new habitats, based on projected conditions therein.
3. Related to #2, shortnose sturgeon are continuous feeders, so food source and benthic substrate are important factors in their habitat selection. The DEIS contains no evaluation of how this factor will play into the self-directed relocation of the sturgeon. Either additional studies must be performed to more clearly understand the habitat selection of shortnose sturgeon in the Savannah estuary or, at a minimum, assertions of habitat relocation must be based in sound behavioral science from other population segments from the southern region. Lastly, this science needs to be clearly cited within the DEIS as the basis for these assertions.
4. The fish ladder being proposed is not a proven method for sturgeon passage. There are many uncertainties around potential success of the fish ladder, including contravention of shortnose sturgeon spawning movements by hypolimnetic releases from the Strom Thurmond Dam, the uncertainty of acquiring the necessary land or rights to build the facility, and the uncertainty of the Augusta Canal facility delivering sufficient water to the shoals. The uncertainties do not fully eliminate the promise a fish passage facility might provide, but these uncertainties need to be offset by a sufficient commitment to adaptive management and monitoring of the facility.

Furthermore, standard practice for fish passage facilities is to carry specific goals for numbers of fish passed, commitments to attractant flows, and monitoring of success. Typically, these are developed and applied to all species that will be passed. The DEIS currently does not contain these goals and commitments.

5. The mitigation plan for shortnose sturgeon should include a plan and cost projection for modification of release temperatures at Thurmond Dam via mixing towers or other technology. Mixing towers have proven successful in rectifying resource impacts from hypolimnetic release at other COE facilities; this is known and proven technology. Fish passage at New Savannah Bluff Lock and Dam is unlikely to be successful for any diadromous fish species if Thurmond releases continue to send cold-water pulses downriver during fish spawning season.

Atlantic Sturgeon

1. The Atlantic sturgeon is currently the subject of a Federal Register notice recommending elevation of the species to endangered status. The DEIS cannot assume equivalence of habitat requirements from shortnose to Atlantic sturgeon. Atlantic sturgeon adults and juveniles display different staging and spawning requirements than shortnose sturgeon. The DEIS should evaluate impacts to Atlantic sturgeon separately from shortnose sturgeon.

Monitoring and Adaptive Management

1. The Monitoring and Adaptive Management Plan contains a very thorough consideration of pre-project conditions, and during- and post-construction impacts, particularly with respect to the Monitoring targets and costs. However, the Adaptive Management budget appears to be based on arbitrary percentages of initial costs. Given the difficulties and logistical challenges of construction work in big river environments, benchmarks of 5-10% of original costs seem very low. This is especially true if several mitigation measures need modification at once. Given the COE's long experience in large-scale river engineering and construction, a more thorough and realistic cost projection of modifying mitigation measures should be feasible. If the 5-10% figures were based on real-world cost projections, that should be detailed in the EIS. If not, we suggest this be conducted and made part of the EIS.
2. The pre-construction monitoring should include a provision to characterize the benthic food sources at current shortnose sturgeon staging areas. This would be a relatively simple and low cost addition to benthic substrate sampling that is already planned. This knowledge would considerably enhance the confidence of predicted post-project habitat use by shortnose sturgeon.
3. The costs of required internal COE reviews of potential Adaptive Management actions should be detailed in the DEIS.
4. The Monitoring costs are based on the most optimistic 3-year projection of time of construction, while the DEIS recognizes a possible 6-year construction window. The Monitoring costs should be predicated on a worst-case scenario, as obtaining additional funding once work begins is likely to be difficult.
5. Unforeseen monitoring costs arising from Adaptive Management work or other unintended post-project impacts should not be funded at the expense of the Adaptive Management budget, as the DEIS currently proposes. A separate contingency fund should be established for this purpose.
6. As any unintended adverse impacts of the project and / or mitigation actions will occur in real time and are potentially lethal to some species and resources, Adaptive Management funding

must be stand-alone sufficient and free of any matching or cost-share requirements. Any such requirements could introduce fatal delays into Adaptive Management actions.

Thank you for your consideration of The Nature Conservancy's recommendations and comments regarding the Draft Tier II Environmental Impact Statement for the Savannah Harbor Expansion Project. The Nature Conservancy has enjoyed a long and productive relationship with the Corps of Engineers and welcomes many more opportunities to work with you on the Savannah River and beyond.

Sincerely,

Shelly Lakly, Ph.D.
Executive Director
Georgia Chapter

Shelly Lakly

Mark Robertson
Executive Director
South Carolina Chapter

Mark L. Robertson

CC: Eric Krueger, Christi Lambert, Alison McGee, Amanda Wrona

The Nature Conservancy

Page 1

730-MR-16-EV01

Comment: *Before implementing proposed mitigation strategies, the Corps should commit to a robust exploration of the mitigation plan with all state, federal and NGO partners. An interagency and NGO review process would allow further consideration of concerns such as the ones outlined below.*

Response: The mitigation plan was developed with extensive coordination with representatives of federal and state natural resource agencies, NGOs, and the public over several years. The Corps participated in the Stakeholders Evaluation Group that was organized by GPA and met since 1999. Agencies, NGOs and members of the public participated in discussions at those meetings. Public review of the DEIS and FEIS are part of the coordination process.

730-MR-16-EV02

Comment: *The Corps should identify a long-term, dedicated funding mechanism to support the approved mitigation plan, including ecological monitoring of the system throughout the life of the plan.*

Response: Funding for construction and its mitigation features [oxygen injection, adaptive management, Striped bass stocking, land acquisition, etc.] would be provided through the Corps of Engineers' construction program budget process. The District intends to request funding for Monitoring and Adaptive Management along with the other construction costs. Funds would then be available to implement an Adaptive Management action if it is determined by the Federal Cooperating Agencies to be needed. Costs which exceed the total estimated for Adaptive Management could be sought through the Corps' normal budget process. Monitoring and adaptive management are considered to be mitigation features, so they would be given the highest priority in the Corps budget process. The Corps considers the project in the "construction" phase until the end of the monitoring and adaptive management period. The SHEP would remain in a *construction* status until all of its constituent elements are completed, the post-construction monitoring is finished, and required mitigation actions are implemented. Following completion of these activities, the project would enter into the *Operation and Maintenance* phase, which would become responsible for costs associated with maintaining the mitigation features, i.e., oxygen injection, etc.

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730-MR-16-EV03

Comment: *The Conservancy appreciates the conservative approach presented in the DEIS with respect to indirect impacts to wetlands, namely the conversion of fresh water marsh to brackish marsh as a consequence of harbor deepening. However, the projected final impact of -337 acres (48-foot deepening plus mitigation), once determined, is treated overconfidently in ensuing discussions. Impacts could be considerably different than this figure and the mitigation plan and associated funding should account for partial or total failure of the mitigation measures. The 5% over-original-cost figure for wetland mitigation projects overconfidence in the final impact acreage.*

Response: Technical reviews by involved agencies [EPA, USFWS, NMFS, SCDHEC, and GA DNR-EPD] concluded that the EFDC models are acceptable impact prediction tools. The Interagency Coordination

Team validated the model's use through consideration of model grid representation, input parameters, and output presentations. The Corps used the models to evaluate impacts under several conditions (average and low river flows, summer and winter periods, with and without different amounts of sea level rise, etc). Wetland impact comparisons using the EFDC hydrodynamic model are closer [prediction versus actual empirical data] than those identified by other models [e.g., MSM models] at all proposed project depths. Hence, the District's use of the EFDC-derived impacts provides more conservative estimates than those produced by using the more technically-advanced Marsh Succession Model.

The District conducted a functional assessment of wetlands that would be impacted as a result of the SHEP. The results indicate that the differentiation between salt marsh and brackish marsh recommended by the Wetland Interagency Coordination Team and used in the DEIS was narrowly defined. Specifically, the salinity range used in the SHEP model to differentiate between brackish marsh [0.6-4 ppt] and salt marsh [> 4ppt] was restrictive given that brackish marsh salinities have been reported with a range from 0.5-10 ppt [NOAA, 2010] and in other estuarine systems from 0.5-17 ppt [Judd and Lonard, 2004]. An earlier assessment of wetland vegetation coinciding with the salinity range reported for brackish marsh systems [i.e., 5-10 ppt], both of which occur within the area of potential effect, also supports those findings. Thus, the salinity range used to quantify salt marsh in the area of potential effect [i.e., > 4 ppt] over estimates the amount of saltmarsh in the system and underestimates the amount of brackish marsh. As such, the described conversion of salt marsh to brackish marsh, which would occur as a result of harbor deepening, could be negligible. This would be especially true when taking into account the salinity tolerance range of individual species comprising the brackish marsh community [i.e., between 5 and 10 ppt].

Given the wide range of salinity reported in literature for brackish marsh systems, the inherent variability in salinity that exists for all estuarine systems, and the modeling results that report post-deepening salinity concentrations consistent with the aforementioned range, the District concluded the 740-acre calculated conversion of saltmarsh to brackish marsh if the harbor is deepened to 47 feet, may be an high value. In fact, in most instances actual vegetative shifts would not be identifiable *in situ* within the Savannah Harbor. That said, the District chose to be conservative in its assessment of the potential for project-related effects and elected to include the saltmarsh and brackish marsh conversions in its calculation of minor impacts.

The conversion of 223 acres of freshwater wetland to brackish marsh represents the only significant wetland conversion that is likely to be noticeable if the harbor is deepened to 47 feet. Again, it is important to reiterate that the ecological values of the impacted freshwater wetlands would not be completely lost. Instead, those acres would just be converted to brackish marsh. The District's calculation of the freshwater wetlands with the potential for conversion to brackish marsh is based on a shift in 0.5 ppt salinity, a traditional rule-of-thumb for differentiating between freshwater and brackish marsh. However, data reported in the literature for Savannah Harbor suggest that a shift in vegetation [from freshwater marsh to brackish marsh] in this estuary does not occur until salinity concentrations approach 2.5 ppt [Latham et al., 1994]. Even at oligohaline marsh sites [average salinity concentration of 2.1 ppt]], a discriminate function [DF] analysis revealed that only 47% of cases resulted in the correct pairing of environmental variables with vegetative species composition and dominance. At those same oligohaline sites, 37% of the vegetative species composition and dominance were more closely aligned with a freshwater classification [Latham et al., 1994].

The District's use of 0.5 ppt as the salinity value that denotes a defined shift from freshwater to brackish marsh is approximately five times lower than traditional observations of 100% vegetative shifts *in situ* within the Lower Savannah Watershed [Latham et al., 1994] and other coastal marsh systems in the southeastern United States [NOAA, 2010]. Thus, many of the existing freshwater emergent plant species, and associated ecological parameters, will likely be sustained in areas predicted to experience salinity concentrations in the range of 0 - <2.5 ppt. For those areas that do transition to more brackish characteristics, they would still continue to provide the traditional ecological functions associated with all emergent wetland systems. Thus, the preservation of 2,245 acres [consisting of bottom land hardwoods and upland buffer] is more than sufficient to offset any conversion in freshwater wetland vegetation that might occur. Using the higher salinity value observed in the Savannah basin for conversion to brackish marsh [2.5 ppt], less conversion would be expected, resulting in a mitigation-to-impacts ratio of roughly 10:1. Using the DF analysis reported by Latham et al [1994] which aligned 37% of freshwater species with oligohaline sites, the 223 acres of freshwater to brackish marsh conversion is reduced further such that the mitigation-to-impacts ratio is increased to 16:1.

When considering the acreage inclusiveness of the models and degree of vegetative shift that can be anticipated, USACE has concluded that the prediction of 223 acres of freshwater conversion is acceptable and the appropriate acreage of preservation mitigation has been defined. Moreover, the ability to acquire additional 5% preservation mitigation acreage is sufficient for the purpose of providing additional mitigation, if necessary.

730-MR-16-EV04

Comment: *The mitigation plan for indirect wetland impacts contains some potentially valuable additions to the Savannah National Wildlife Refuge, and The Nature Conservancy fully supports the planned additions portrayed in the DEIS. However, given the potential variability of the final impacted acreage and uncertain willingness of sellers, additional preservation tracts should be identified, unconstrained by the Refuge boundary. Furthermore, while we agree the Refuge should be the priority for acquisition and fee ownership of mitigation tracts, the COE should also entertain potential fee ownerships by other entities outside of the Refuge boundary.*

Response: Not all sites would provide the features needed to replace the wetland functions that would be lost through conversion of the marsh. Although the Corps has some flexibility in the tracts that would be acquired, the general area within the estuary is fairly-well decided to ensure the sites contain the needed characteristics.

730-MR-16-EV05

Comment: *The modeled existing habitat for the sturgeon does not reconcile with known sturgeon habitat use as established by several years of telemetry data gathered by the SC and GA Departments of Natural Resources, NOAA, The Nature Conservancy, and Southeastern Natural Sciences Academy. This data is very recent and highly relevant to current sturgeon habitat use, and their fate under the proposed action. The modeled portrayal of sturgeon habitat must be reconciled with real data before areal impacts to sturgeon habitat can be calculated. This calculation is essential to devising appropriate mitigation plans for the sturgeon. As portrayed, current sturgeon habitat area is considerably underestimated by the model and therefore, the impacts to the habitat under the proposed action are significantly under-calculated.*

Response: The habitat suitability criteria used in the model runs were defined and agreed upon by the Cooperating Agencies and the Fisheries Interagency Coordination Team. NOAA Fisheries, who is responsible for management of SNS under the Endangered Species Act, was a participant in those discussions. NOAA requested a revision to the habitat suitability criteria so they would better reflect the unpublished and newly-developing information to which you refer. The revised modeling results are incorporated into the Final EIS. The criteria, data, and outputs of the models presented in the Final EIS were coordinated with NMFS and are competent to evaluate impacts for each of the project alternatives.

730-MR-16-EV06

Comment: *The calculated areal effects of deepening with mitigation appear to assume that shortnose sturgeon will move from their current habitat to new habitat within the post-project system. The DEIS should document the reasoning as to why shortnose sturgeon will successfully relocate to new habitats, based on projected conditions therein.*

Response: Impacts to Shortnose sturgeon are difficult to mitigate completely. Section 5.3.1 addresses this and states: The adverse impacts that would remain to Shortnose sturgeon and Striped bass after the flow altering and dissolved oxygen components of the mitigation plan are included remain at levels which warrant further mitigation.

The Fisheries Interagency Coordination Team was queried about potential ways that habitats within the estuary could be restored or improved for SNS. The federal and state fishery experts could not identify measures that would improve its habitat over the wide range of river flow conditions. Similarly, no measures could be identified within the estuary that would compensate for Shortnose sturgeon habitat losses. The public was also consulted through the Stakeholders Evaluation Group, which also contains NGOs. No one could identify measures [structural/nonstructural] in the estuary that would adequately restore Shortnose sturgeon habitat. As a result, the Team agreed in 2007 that a fish bypass around the New Savannah Bluff Lock and Dam would compensate for losses by providing access to historic spawning areas at the Augusta Shoals. The Biological Opinion prepared by the NMFS provides information as to why Shortnose sturgeon are expected to be able to successfully use these historic spawning and foraging areas. See also following responses.

730-MR-16-EV07

Comment: *Related to #2, shortnose sturgeon are continuous feeders, so food source and benthic substrate are important factors in their habitat selection. The DEIS contains no evaluation of how this factor will play into the self-directed relocation of the sturgeon. Either additional studies must be performed to more clearly understand the habitat selection of shortnose sturgeon in the Savannah estuary or, at a minimum, assertions of habitat relocation must be based in sound behavioral science from other population segments from the southern region. Lastly, this science needs to be clearly cited within the DEIS as the basis for these assertions.*

Response: Appendix B of the EIS (Biological Assessment of Threatened and Endangered Species) includes a discussion of a study that the Corps had performed in 2010 (Dial Cordy) of the bottom substrate in the upper reaches of the harbor, which SNS use in the summer months and which they would likely use if their winter habitat is impacted, as predicted. The study found the bottom substrates between Interstate 95 and the Houlihan Bridge to be primarily sand, which is the substrate type known to support diverse and vibrant benthic populations, such as those used as forage by SNS.

The Corps also had a study performed around the New Savannah Bluff Lock and Dam of the habitat suitability/availability for Shortnose sturgeon spawning. The 2010 study by Dial Cordy used habitat suitability developed by NOAA to identify areas that would provide suitable spawning habitat. The study included the Augusta Shoals/Savannah Rapids area upstream of the New Savannah Bluff Lock and Dam. Substrate data were collected at 57 sites; 40% of the sites had a substrate type[s] considered suitable for sturgeon spawning. The combined frequency of marginally suitable sites was 37%. The remaining sites [33%] had unsuitable substrates.

Table: Benthic substrate frequency in Augusta Shoals study area

Class	Benthic substrate	SI[1]	Number of Sites	Frequency (%)
1	Mud, soft clay/fines	0.0	0	0
2	Silt, sand (diameter < 2.0 mm)	0.0	7	12
3	Sand, gravel (diameter > 2.0 mm to < 64 mm)	0.5	0	0
4	Cobble/gravel (diameter > 64 mm to < 250 mm)	1.0	3	5
5	Boulder (diameter 250 mm to 4,000 mm)	0.8	20	35
6	Bedrock w/ fissures w/ gravel/cobble mixtures	0.6	21	37
7	Bedrock smooth w/ few fissures or gravel	0.2	6	11

[1]1.0 indicates highest suitability; 0.0 the lowest.

The following link contains the full report of the investigation of Shortnose sturgeon spawning habitat in the Savannah River [Georgia and South Carolina]: http://www.sas.usace.army.mil/plnew.html

In addition to existing information, an extensive monitoring study in the southeastern U.S. is being funded by NOAA on the Atlantic and Shortnose sturgeon. This effort will begin in the spring of 2011 and will last for 5 years. The work in the Savannah River will be performed by SCDNR. http://www.nmfs.noaa.gov/pr/conservation/states/funded.htm.
As information becomes available, it will be considered using the processes set forth in the SHEP's Adaptive Management Plan.

730-MR-16-EV08

Comment: *The fish ladder being proposed is not a proven method for sturgeon passage. There are many uncertainties around potential success of the fish ladder, including contravention of shortnose sturgeon spawning movements by hypolimnetic releases from the Strom Thurmond Dam, the uncertainty of acquiring the necessary land or rights to build the facility, and the uncertainty of the Augusta Canal facility delivering sufficient water to the shoals. The uncertainties do not fully eliminate the promise a fish passage facility might provide, but these uncertainties need to be offset by a sufficient commitment to adaptive management and monitoring of the facility. Furthermore, standard practice for fish passage facilities is to carry specific goals for numbers of fish passed, commitments to attractant flows, and*

monitoring of success. Typically, these are developed and applied to all species that will be passed. The DEIS currently does not contain these goals and commitments.

Response: The decline of Shortnose sturgeon is attributable to many factors, but none is more important than the loss of its upstream spawning habitat. Appendix L provides an historic account of this and other endangered species in Savannah Harbor and details the reason[s] for their decline. Harbor deepening would not affect the Shortnose sturgeon's spawning habitat since it is located over 100 miles upstream from the SHEP effects' area. Rather, the harbor deepening would have a long-term impact on the juvenile sturgeon's winter habitat in the lower Savannah River. The adverse project-induced impacts are caused by an increase in upstream salinity levels. While no critical habitat for Shortnose sturgeon has been designated in the Savannah River, the importance of protecting [and even improving] the habitat for all resident species in the lower Savannah River is obvious.

The results of the extensive analyses and mitigation planning, including flow re-routing and addition of dissolved oxygen, have minimized impacts to Shortnose sturgeon habitat. The latest modeling indicates that harbor deepening would reduce winter habitat for Shortnose sturgeon adults and juveniles, and increase the summer habitat for Shortnose sturgeon adults. Since reduced spawning habitat has become a critical factor in maintaining [and increasing] long-term population levels for Shortnose sturgeon in this river basin, restoring access to upstream historic spawning areas would adequately compensate for the unavoidable impacts to its winter habitat.

There are of course uncertainties with any project, but the Cooperating Agencies and the Fisheries Interagency Coordination Team all support fish passage at the lock and dam since passage will provide anadromous fish access to 20 additional miles of historic habitat for spawning. The Corps estimated roughly 450 acres of SNS spawning habitat exist at the Augusta Shoals. The intent is to increase the population levels of this endangered species, but other anadromous species would also surely benefit. There are no planned changes in releases from the upstream dams due to the proposed fish passage at New Savannah Bluff Lock and Dam. Dissolved oxygen levels in the hypolimnetic discharges from the Strom Thurmond Dam will not be an issue in the late winter and early spring when the sturgeon spawn, since the reservoir waters are well mixed. Hypolimnetic discharges during the late winter and early spring can decrease water temperatures and affect spawning during drought conditions, but there is no feasible method to avoid this without major impacts to hydropower (e.g. spilling surface water).

Adaptive management, attraction flow commitments, and monitoring are described in detail in Appendix D of the EIS. A detailed monitoring plan to determine SNS passage success will be developed in conjunction with the Cooperating Agencies and the Fisheries Interagency Coordination Team if the project is approved and moves to construction. The passage of Shortnose sturgeon through the structure will be monitored to ensure it performs as intended (Appendix D).

Page 3

730-MR-16-EV09

Comment: *The mitigation plan for shortnose sturgeon should include a plan and cost projection for modification of release temperatures at Thurmond Dam via mixing towers or other technology. Mixing towers have proven successful in rectifying resource impacts from hypolimnetic release at other COE facilities; this is known and proven technology. Fish passage at New Savannah Bluff Lock and Dam is unlikely to be successful for any diadromous fish species if Thurmond releases continue to send cold-water pulses downriver during fish spawning season.*

Response: See Section 5.03.2 of the EIS. Dissolved oxygen levels in the hypolimnetic discharges from the Strom Thurmond Dam will not be an issue in the late winter and early spring when the sturgeon spawn, since the reservoir waters are well mixed. Hypolimnetic discharges during the late winter and early spring can decrease water temperatures and effect spawning during drought conditions, but there is no feasible method to avoid this without major impacts to hydropower (e.g. spilling surface water).

730-MR-16-EV10

Comment: *The Atlantic sturgeon is currently the subject of a Federal Register notice recommending elevation of the species to endangered status. The DEIS cannot assume equivalence of habitat requirements from shortnose to Atlantic sturgeon. Atlantic sturgeon adults and juveniles display different staging and spawning requirements than shortnose sturgeon. The DEIS should evaluate impacts to Atlantic sturgeon separately from shortnose sturgeon.*

Response: Disagree. The Shortnose and Atlantic sturgeon can be grouped together based on habitat use, distribution throughout the proposed action area, foraging behavior/prey base, and subsequent risk of take relative to dredging/trawling operations. Information on these species can be obtained from the following link and other sources. http://sero.nmfs.noaa.gov/pr/sturgeon.htm

The impacts of the SHEP on the Atlantic sturgeon were evaluated in the BATES (Appendix B). The NMFS reviewed the BATES, and they have submitted their Biological Opinion (Appendix Z) which thoroughly addresses project impacts to both the Shortnose and Atlantic sturgeon. The Corps will adhere to all of the reasonable and prudent measures outlined in the BO to protect Atlantic sturgeon.

730-MR-16-EV11

Comment: *The Monitoring and Adaptive Management Plan contains a very thorough consideration of pre-project conditions, and during- and post-construction impacts, particularly with respect to the Monitoring targets and costs. However, the Adaptive Management budget appears to be based on arbitrary percentages of initial costs. Given the difficulties and logistical challenges of construction work in big river environments, benchmarks of 5-10% of original costs seem very low. This is especially true if several mitigation measures need modification at once. Given the COE's long experience in large-scale river engineering and construction, a more thorough and realistic cost projection of modifying mitigation measures should be feasible. If the 5-10% figures were based on real-world cost projections, that should be detailed in the EIS. If not, we suggest this be conducted and made part of the EIS.*

Response: As noted, costs for an Adaptive Management program were developed by summing a portion of the initial construction costs for a number of mitigation features. There are no specified

criteria in Corps of Engineers' regulations to determine funding levels for an Adaptive Management plan [to included mitigation features or adaptive changes]. However, given the extensive, long-term planning by the involved parties on this project, the District is confident that when taken as a whole, the estimated amount is reasonable based on current information. Actual funding requirements for individual adaptive management measures will not be known until the project is constructed and monitoring data can be reviewed to determine how the project and mitigation measures are performing. The funds for the SHEP mitigation and adaptive management features greatly exceed usual allocations for similar Corps of Engineers water resource projects.

730-MR-16-EV12

Comment: *The pre-construction monitoring should include a provision to characterize the benthic food sources at current shortnose sturgeon staging areas. This would be a relatively simple and low cost addition to benthic substrate sampling that is already planned. This knowledge would considerably enhance the confidence of predicted post-project habitat use by shortnose sturgeon.*

Response: The Corps characterized the benthic substrate in the upper harbor area through work performed by Dial Cordy in 2010. The study found the bottom substrates between Interstate 95 and the Houlihan Bridge to be primarily sand, which is the substrate type known to support diverse and vibrant benthic populations, such as those used as forage by SNS.

730-MR-16-EV13

Comment: *The costs of required internal COE reviews of potential Adaptive Management actions should be detailed in the DEIS.*

Response: The adaptive management costs in Appendix D of the EIS are estimates. Detailed cost estimates would not be developed until monitoring results were available and the performance of the project could be evaluated.

730-MR-16-EV14

Comment: *The Monitoring costs are based on the most optimistic 3-year projection of time of construction, while the DEIS recognizes a possible 6-year construction window. The Monitoring costs should be predicated on a worst-case scenario, as obtaining additional funding once work begins is likely to be difficult.*

Response: The Monitoring During Construction costs have been increased to accommodate a 4-year construction schedule. Monitoring and channel deepening costs would be funded via the annual construction program budget process.

730-MR-16-EV15

Comment: *Unforeseen monitoring costs arising from Adaptive Management work or other unintended post-project impacts should not be funded at the expense of the Adaptive Management budget, as the DEIS currently proposes. A separate contingency fund should be established for this purpose.*

Response: If monitoring and adaptive management costs exceed what is expected, the District could seek additional funds. It would follow the same procedure if the dredging costs are substantially higher than anticipated and exceed the contingencies.

730-MR-16-EV16

Comment: *As any unintended adverse impacts of the project and / or mitigation actions will occur in real time and are potentially lethal to some species and resources, Adaptive Management funding must be stand-alone sufficient and free of any matching or cost-share requirements. Any such requirements could introduce fatal delays into Adaptive Management actions.*

Response: Congress and the Corps consider Adaptive Management to be part of the initial construction. WRDA 1986 determined that the costs of those activities would be shared between the Federal Government and the project's non-Federal sponsor. The non-Federal sponsor, acting through the Georgia Ports Authority, has agreed to set aside, in advance, their cost-shared portion of the adaptive management funds in an escrow account upon approval of the project.

CITIZENS FOR SOUND CONSERVATION

January 25, 2011

Mr. William G. Bailey
ATTN: PD
Savannah District, US Army Corps of Engineers
100 West Oglethorpe Ave.
Savannah, GA 31404

RE: Savannah Harbor Expansion Project

Please accept these comments on behalf of Citizens for Sound Conservation (CSC) regarding the proposed Savannah Harbor Expansion Project (SHEP). Citizens for Sound Conservation is a 501(c)3 non-partisan not-for-profit organization dedicated to improving South Carolina's environmental and economic quality of life. Our support base is comprised of various entities that collectively represent well over 100,000 South Carolinians working in the manufacturing, utility, real estate, home building, contracting and maritime sectors, among others.

With that as background - and upon reviews of the draft EIS and draft GRR - we would like to go on record as voicing serious concerns regarding the proposed Savannah Harbor Expansion Project and respectfully request that the application be withdrawn, amended and resubmitted before moving forward.

Chief among CSC's concerns are the project's environmental and economic impacts, as well as safety and navigability questions.

On the environmental front, the EIS shows a significant adverse impact on the amount of dissolved oxygen in the affected area. And while a "solution" is proposed to this dilemma that involves pumping oxygen back into the river, it is our contention that such a technique has not been thoroughly vetted nor approved for such a massive project. Additionally, the study points to a number of habitats and species that will be adversely affected - including shortnose sturgeon, striped bass and numerous species living in the tidal freshwaters and brackish marsh. Also of particular note is the fact that of twenty-three federal and state environmental laws that apply, this project currently complies with only eight.

Economically, this expansion could very well disturb the river to such a degree that future projects - such as the proposed Jasper Ocean Terminal and/or other industrial prospects - would never be able to receive permitting. Coupled with the finding that the Corps believes the Georgia Ports Authority would enjoy the same growth in container traffic regardless of whether or not the SHEP is done, the question must be asked whether or not this specific project is warranted – particularly when both states have agreed to work jointly on the Jasper Ocean Terminal. The fact that this proposal calls for disposing of the dredge spoil onto cells in Jasper County that are currently "reserved" as part of the future Jasper Ocean Terminal is another red flag for the future of this terminal and associated economic growth.

On the issue of navigability and safety, we concur with the SC Port Oversight Committee's contention that the Corps "fails to reconcile the severe and dangerous limitations imposed by its imprudent recommendations for draft, channel width, vessel speed and single-lane layout." If the channel were in fact built to study specifications, there are serious doubts as to whether or not it would be able to accommodate the number of ships upon which many of the project's benefits are based. This once again calls into question the need and viability of this project.

If we are truly serious about protecting the environment while providing economic growth for both South Carolina and Georgia, more study and review of the alternatives is necessary. For these reasons Citizens for Sound Conservation opposes the Savannah Harbor Expansion Project as currently proposed and calls for an immediate withdrawal and review of the project.

Thank you for the opportunity to comment on this important issue.

Contact:
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Citizens for Sound Conservation

741-MR-04-EV01

Comment: *On the environmental front, the EIS shows a significant adverse impact on the amount of dissolved oxygen in the affected area. And while a "solution" is proposed to this dilemma that involves pumping oxygen back into the river, it is our contention that such a technique has not been thoroughly vetted nor approved for such a massive project. Additionally, the study points to a number of habitats and species that will be adversely affected - including shortnose sturgeon, striped bass and numerous species living in the tidal freshwaters and brackish marsh. Also of particular note is the fact that of twenty-three federal and state environmental laws that apply, this project currently complies with only eight.*

Response: The SHEP's impacts on the dissolved oxygen regime in the Savannah Harbor estuary are discussed in the EIS and in greater detail in the Engineering Appendix of the GRR. Based on the potential impacts to dissolved oxygen that would be caused by its implementation, the project's mitigation plan includes an oxygen injection system. While the injection of oxygen into an estuary [to improve dissolved oxygen levels] is a relatively new concept, the technology is not. There is little objective doubt that oxygen injection can eliminate the incremental effects of deepening [all options] on the harbor's dissolved oxygen regime. This position is verified by the results from a field demonstration of the subject oxygen injection equipment and subsequent water quality modeling of the effects of injection on dissolved oxygen levels [throughout the water column]. Due to the spacing of the injectors, the dissolved oxygen regime would be improved in over 90 percent of the project effect's area compared to existing conditions.

The risks and uncertainties of the proposed dissolved oxygen system for Savannah Harbor are fully discussed in the Risk and Uncertainty Analysis. Specifically, a risk analysis of the water quality model was prepared to predict post-project dissolved oxygen levels. An oxygen demonstration trial verified the efficacy of the Speece Cones to compensate for incremental reductions in dissolved oxygen resulting from harbor deepening. The results are summarized in the Oxygen Injection Design Report Savannah Harbor Expansion Project, dated October 2010. The report, prepared for GPA by Tetra Tech, is included as part of the Engineering Appendix supplemental materials in the GRR. Extensive post-construction monitoring will determine whether initial predictions regarding oxygen levels are correct. Given the depth of these analyses, there is little risk to decision-makers regarding the dissolved oxygen issue. Post-project, the adaptive management plan provides a means to make any required changes to the oxygen injection system. This could range from increasing the amount of injected oxygen, modifying the oxygen injection equipment, or adding injection sites.

Environmental evaluations were conducted in accordance with Council on Environmental Quality (CEQ) Regulations for Implementing NEPA (40 CFR 1500-1508). This document provides the framework for compliance with applicable environmental laws and regulations. Additional compliance steps were also taken as a result of the conditional authorization of this project (WRDA 1999), i.e., it requires the Secretary of the Interior, Secretary of Commerce, and Administrator of the Environmental Protection Agency along with the Secretary of the Army to approve a selected plan only after determining that the associated mitigation plan adequately addresses the project's environmental impacts. The environmental impact/mitigation planning process included assessment, avoidance, minimization, and mitigation as well as years of close coordination with federal and state agencies. As a result, full compliance with applicable environmental laws will be achieved before the project can be constructed.

741-MR-04-EC01, 741-MR-04-EV02

Comment: *Economically, this expansion could very well disturb the river to such a degree that future projects - such as the proposed Jasper Ocean Terminal and/or other industrial prospects - would never be able to receive permitting. Coupled with the finding that the Corps believes the Georgia Ports Authority would enjoy the same growth in container traffic regardless of whether or not the SHEP is done, the question must be asked whether or not this specific project is warranted – particularly when both states have agreed to work jointly on the Jasper Ocean Terminal. The fact that this proposal calls for disposing of the dredge spoil onto cells in Jasper County that are currently "reserved" as part of the future Jasper Ocean Terminal is another red flag for the future of this terminal and associated economic growth.*

Response: The District evaluates its water resource projects from a National Economic Development (NED) perspective, which in essence is the alternative [meeting project objectives] having the greatest net economic benefits [benefits - costs]. In this instance, the NED benefits are comprised primarily of a savings in transportation costs from removing the current constraints of draft. It is important to note that these economic benefits accrue from the use of larger, more cost-effective container ships, not an increase in the number of containers. The savings are presumably passed onto US consumers and businesses in the form of lower prices. In performing the NED, analysts are mindful not to claim benefits if a project merely redistributes commerce from one port to another rather, than an actual market increase, per se.

In recent years, additional analyses have been undertaken which focus on Regional Economic Development [RED]. In doing so, analysts often calculate the economic impacts to the region resulting from the influx of construction funds. The primary effects measured in an RED analysis include jobs and worker income from the proposed construction expenditures. Chapter 8 of the Economic Appendix details regional economic impacts.

The Georgia Department of Transportation has requested that the District relinquish its sediment disposal rights for Areas 14A and 14B [the presently proposed location for a Jasper County terminal]. Continued deposition of dredged material in existing Sites 14A and 14B is the least-cost, environmentally acceptable alternative for the proposed SHEP; however, deposition of this new work sediment onto these sites does not preclude future construction of a Jasper terminal. The JPO's consultant observed that placing new work sediments on Areas 14A and 14B would save the terminal development project over $300 million by raising its elevation to a workable height. Therefore, if SHEP is constructed, it would benefit the development of a terminal at the Jasper site by significantly reducing its initial construction costs. Further, local newspapers report the Joint Project Office agreeing that a terminal at Jasper would also require a navigation channel deeper that the present 42-foot depth. The District is providing technical information to the Joint Project Office to identify a disposal site which would replace this lost capacity for Savannah Harbor as well as existing mitigation features [from previous projects] located there. The District has advised GA DOT and the Joint Project Office that it would not consider releasing the disposal easements until development of a Jasper terminal is imminent, i.e. the developer obtains a Section 404 permit.

As part of the incremental analyses conducted in accordance with NEPA and the language of Section 203, WRDA 1999, deepening other sites in lieu of Garden City Terminal was considered. A Jasper terminal (sometimes referred to as Site 14A/14B) was examined as an alternative port site, as described in Section 6 and Section 12 of the GRR, Appendix D of the GRR, Section 3 of the EIS, and Appendix O of

the EIS. However, the absence of terminal facilities, an uncertain future, and lack of associated transit infrastructure render it impractical as a current option to deepening the Garden City Terminal.

Construction of SHEP will not "exacerbate the impacts of Jasper." The secondary impacts referenced in your comment as regards DEIS-Appendix O are associated solely with construction of the Jasper terminal and have no linkage to construction of SHEP. As noted, the presently proposed site for a Jasper terminal (Sites 14A and 14B), does not have adequate road and rail infrastructure to support a terminal. This access would have to be constructed to operate a port operation; deepening of the existing channel is generally unrelated to these potential impacts. It is true that the use of Sites 14A and 14B for dredge material placement is the current Federal standard [least-cost-most environmentally acceptable] alternative for the Savannah Harbor Federal Navigation Project. Further, the proposed SHEP has no plans to alter the use of these sites or construct new ones. At some future time, plans to construct a port at the present Jasper terminal site may eventuate. However, it would be the responsibility of its local sponsor through the analysis of a Section 404(b) permit application to identify an alternate disposal plan. Any proposal in this regard would have to replace lost disposal capacity as well as the mitigation features currently maintained at Sites 14 A/B [at no additional cost to the federal government]. The potential environmental impacts associated with a potential Jasper terminal can only be described in general outline. The District considered all readily available data, but a comprehensive assessment of the impacts of the notional Jasper terminal is just not practical at this time. Moreover, it is not within the District's existing authorities. The Joint Project Office [JPO] is planning to conduct the necessary analyses and file a Section 404(b) permit application so the Corps may properly assess the potential impacts associated with a Jasper development. The District is working with the JPO to provide technical information as noted previously.

The comment statement that the District "discussed the two projects in a coordinated fashion" is incorrect. As noted above and documented in formal correspondence with GDOT and JPO, the District is working with the JPO (at the request of the GDOT) to provide data and technical assistance within the Corps' statutory authorities. GPA is a participating member of the JPO, but does not control that organization.

741-MR-04-EN01

Comment: *On the issue of navigability and safety, we concur with the SC Port Oversight Committee's contention that the Corps "fails to reconcile the severe and dangerous limitations imposed by its imprudent recommendations for draft, channel width, vessel speed and single-lane layout." If the channel were in fact built to study specifications, there are serious doubts as to whether or not it would be able to accommodate the number of ships upon which many of the project's benefits are based. This once again calls into question the need and viability of this project.*

Response: The channel was designed in accordance with Corps of Engineers' Design Standards and Procedures outlined in EM-1110-2-1613. Final channel dimensions and navigation requirements were developed using the Corps' state-of-the-art Ship Simulator with input from the Savannah Harbor Pilots Association (SHPA). Since those pilots guide vessels through the harbor on a daily basis, they are thoroughly familiar with environmental conditions that affect the way vessels handle in this particular harbor. The use of ship simulators to establish final design parameters for deep draft navigation channels is the standard practice worldwide and ensures that channels are safe and economical and result in minimal environmental impact and long term maintenance requirements. The use of ship

simulators also provides the harbor pilots who will actually use the channel with the opportunity to provide input into the design and ensure the navigability and safety of the channel.

The existing channel dimensions can accommodate meeting the deepening design vessel (Post-Panamax Generation 2; 140' beam) and a smaller vessel. Two meeting areas are also included to provide for meeting of two design vessels.

The CADET program used for the vertical ship motion predictions is a probabilistic or risk-based model which includes probabilities of waves over a 20-year wave hindcast. SHPA brings in vessels provided 4-feet of underkeel clearance (UKC) is available. Depending on the draft of the vessel, use of tide may be required to maintain that UKC throughout transit. The vertical ship motion study used a ratio of channel depth h to ship draft T of h/T =1.09, which for a light-loaded vessel drafting 46-feet corresponds to a channel depth of 50-feet. This condition matches the SHPA policy of 4-foot UKC. The vertical motion study confirmed that a light-loaded vessel would not touch bottom with a 4-foot UKC and the vessel speed does not exceed 12 knots. The study also showed that given additional water depth, and therefore higher h/T values, ships could reach higher speeds without causing enough squat to cause grounding.

For the fully loaded 47.5-foot draft, using a channel depth h to ship draft T of h/T =1.09, would correspond to a water depth of 52-feet requiring at least a 3-foot tidal increase for the 49-foot project (2-foot tidal increase for the 50-foot project). The vertical motion study showed that ship speed of 14 knots or less would not cause grounding due to squat for this condition. Greater speed would require additional depth to prevent grounding due to squat.

January 24, 2011

Colonel Jeffrey M. Hall
District Commander
US Army Engineer District, Savannah
ATTN: PD
Post Office Box 889
Savannah, Georgia 31402-0889

Dear Colonel Hall:

The Georgia Wildlife Federation is pleased to present comments on the Draft Tier II Environmental Impact Statement for the proposed Savannah Harbor Expansion Project. The Federation has been an active stakeholder in the SEG process since its formation in 1999. We look forward to responding to any change in the proposed project as the review and permitting process goes forward. Please consider our comments contained below on pages 1 through 6 as an inseparable part of this letter.

Sincerely,

Jerry L. McCollum
Certified Wildlife Biologist
President & CEO

Comments of the Georgia Wildlife Federation to the Draft Tier II Environmental Impact Statement for the proposed Savannah Harbor Expansion:

The project is requested by the Georgia Ports Authority in order to be able to more efficiently accommodate post-Panamax generation container ships following widening of the Panama Canal in 2014 and to maintain its competitiveness with other Atlantic ports. The Federation has been an active stakeholder in the SEG process since its formation in 1999 by recommending and reviewing scientific studies to the Georgia Ports Authority for more accurately identifying and evaluating natural resource impacts of alternative channel depths and development of suitable mitigation plans for protection of critical freshwater marsh habitat and trust fishery resources from detrimental salinity incursions and lowered dissolved oxygen in the harbor. Accomplishing these difficult tasks included extensive evaluation and refinement of complex hydrodynamic and water quality models and building consensus as to the selected models' ability to reasonably predict adverse impacts of incrementally deepening channel depths from the existing

42-foot channel to a maximum of 48 feet. Much of the required modeling focused on isolating portions of the estuary, specifically Middle and Back River, to reduce salinity impacts from deepening on Front River and rerouting flow paths by closing or opening various cuts and channels. An enormous amount of effort was directed towards defining and testing viable mitigation measures to hopefully restore the historic hydrology in the Back River and Little Back River (once the primary striped bass spawning habitat in the estuary) and diverting (enhancing) upstream freshwater flow into these systems which supply the Savannah National Wildlife Refuge managed waterfowl impoundments and a major portion of the remaining freshwater marsh areas in the Savannah River estuary.

The Federation's specific comments to the Draft Tier II EIS are primarily limited to (1) salinity mitigation alternatives for freshwater marsh and species protection, (2) the preferred depth plan, and (3) the proposed monitoring and adaptive management program. Other water quality issues and species impacts from reduced dissolved oxygen levels in the dredged harbor channel, liquid oxygen injection mitigation, and development of revised TMDL's and a new dissolved oxygen standard for Savannah Harbor will be deferred to the respective state and federal agencies responsible for issuing the 401 water quality certifications for the harbor deepening project.

Mitigation Plan

As a condition of approval for the deepening projects, the Federation strongly supports implementation of all the final proposed natural resource mitigation plans listed in the draft EIS, regardless of the depth plan selected, including those which would likely be conducted under the Adaptive Management Program following harbor deepening. These include:

1. Constructing and operating flow re-routing features in and near the Savannah National Wildlife Refuge to reduce salinity impacts to tidal freshwater and brackish wetlands and protect and possibly enhance historic striped bass spawning habitats. Recommended **Plan 6a**, the proposed mitigation measure for 45, 46, 47 and 48 foot channel depths, would fill entire Sediment Basin at the mouth of Back River; remove Tide Gate structure and abutments; close Rifle Cut; close western arm of McCoy's Cut; construct a water diversion structure in the main Savannah River at the entrance to New McCoy's Cut; and deepen channel of McCoy's Cut and upper portions of Middle and Little Back River with maintenance under the Adaptive Management Program as required.
2. Acquiring up to approximately 2, 683 acres of riverine bottomland hardwood tracts/fresh water wetlands listed on the Savannah National Wildlife Refuge's approved acquisition list to compensate for salinity increases to tidal freshwater wetlands located in the western most areas of the Refuge near the Front River. These acquired lands would become part of the Savannah National Wildlife Refuge Complex and be managed by USFWS.
3. Constructing and operating a dissolved oxygen system in the Front River Channel for the life of the project to remove the incremental effects of the harbor deepening project.

4. Constructing a sill at the mouth of Middle River to reduce salinity impacts to adult and juvenile shortnose sturgeon refugia holes. Constructing and operating a fish bypass channel at the New Savannah Bluff Lock and Dam near Augusta for accessing over 20 miles of upstream spawning habitats for shortnose sturgeon, American shad and striped bass to compensate for impacts to downstream habitats.
5. Funding to Georgia Wildlife Resources Division to continue an advanced size striped bass stocking program over the life of the project to compensate for impacts to striped bass spawning and nursery habitats within the estuary.
6. Implementing all appropriate adaptive management features for corrective action if post-construction monitoring shows them to be needed. These include but are not limited to removing a Tide Gate sill above the filled Sediment Basin in Back River, enlarging the proposed diversion structure at McCoy's Cut, constructing a diversion structure at the junction of Middle and Little Back Rivers, and acquisition of up to another 10 percent of freshwater wetlands depending on salinity model predictability variation and mitigation success.

Depth Plan Selection

The Corps of Engineers (Corps) developed and evaluated five incremental depth (44 to 48 foot) channel deepening alternatives, in addition to the No Action Alternative. The Corps analysis indicates that incremental net economic benefits (local benefits) of the alternatives are maximized at a depth of 45 feet (3' deepening), decrease from 45 to 47 feet, and are negative at 48 feet. The 47-foot depth provides the greatest total net economic benefits and is identified as the National Economic Development (NED) Plan, the plan that maximizes net economic benefits to the Nation. The maximum authorized depth of 48 feet is the locally preferred plan (LPP) of the non-Federal cost share sponsor, the Georgia Ports Authority. The additional national economic benefits of the LPP relative to the NED plan (approximately 1 percent more), but higher project costs (approximately 6 percent more), reflect negative incremental net benefits. The draft EIS states the present recommended plan is either the 47-foot alternative (NED plan) or the 48-foot alternative (LPP), although three federal agencies must still approve the final plan selection.

The Georgia Wildlife Federation's logical preference for deepening Savannah Harbor is selection of the 45-foot depth alternative, because it minimizes the loss of freshwater wetlands, impacts to Savannah National Wildlife Refuge (NWR), and risk and uncertainty of impacts to trust fish and wildlife resources, due not only to hydrodynamic model error and variability but a myriad of other unforeseen factors. Previous channel deepening and flow modification projects have reduced tidal freshwater marsh which is critical to successful reproduction, survival, and abundance of important fish and wildlife populations in the Savannah River Estuary from around 12,000 acres to only around 3,300 acres. The majority of the remaining freshwater tidal wetlands are located on Savannah NWR. Further deepening the harbor channel from its present depth of 42 feet would further limit this critical and increasingly rare natural resource. The 45-foot depth plan with approved mitigation included would result in a loss of 32 acres of freshwater

marsh and a 3 percent reduction in striped bass reproductive habitat in the estuary, whereas the NED depth plan (47-feet) predicted loss is 223 acres of freshwater marsh and a 27 percent reduction in striped bass reproductive habitat with mitigation. At the LPP depth (48 feet), a net loss of 337 acres of tidal freshwater is predicted after flow-diversion mitigation is implemented. The loss of an additional 114 acres of freshwater tidal wetlands associated with LPP represents a 50 percent increase in impacts to Savannah NWR over the NED plan and a cumulative loss of approximately 10 percent of the basin's remaining freshwater tidal wetlands. For this reason, Georgia Wildlife Federation does not support the LPP.

Monitoring/Adaptive Management

Assuring the effectiveness of the mitigation features proposed in the Draft EIS is essential to approval of the selected project plan. These features were developed using pre-construction data and models to predict potential effects to the estuary. The Draft EIS states that natural variation alone will nearly guarantee conditions in the first few years after construction different from those under which the models were first calibrated. Currently, the Monitoring and Adaptive Management Plan proposes 5 years post-construction monitoring of key mitigation features, which we believe is not long enough. It is the Georgia Wildlife Federation's position that 10 years post-construction monitoring is necessary for the adaptive management process to work, ie., to ensure that impacts to natural resources in this complex system resulting from project construction are limited to those predicted. Further, the Federation recommends a more precise definition of observed conditions that would prompt changes to the mitigation features, and a time-line for making decisions and taking corrective actions thereafter. Most importantly, funding for the plan needs to be clearly defined. The Federation is concerned that funding for adaptive management will be dependent upon the Corps' annual appropriations process. It is relatively certain that impacts to trust resources of the Nation will occur following construction, but the effectiveness of the mitigation features is much less certain. Therefore, the Federation cannot acknowledge that the proposed mitigation adequately addresses project impacts unless contingency funding for monitoring and adaptive management is assured.

Appendix D, Monitoring and Adaptive Management Program

5.C. Pre-construction Monitoring – Details of the Monitoring, page 8 and Figure 3. There are two existing water quality stations on Back River (021989784 and 021989791), and one on Front River (02198920), that have long-term salinity data. The Federation recommends using this long-term salinity data set, from the end of the last harbor deepening construction to the start of any new deepening construction, as baseline salinity conditions for these sites and to supplement the 1 year of pre-construction water quality monitoring.

5.C. Pre-construction Monitoring – Details of the Monitoring, page 8. Pre-construction monitoring for 1 year is intended to create or supplement a pre-project baseline. However, information based on only 1 year of data may not provide an adequate baseline. Using existing longer-term data from water quality stations on Back River and Front River should help address this problem (see previous comment on Appendix D, section 5.C, page 8 and Figure 3). Similarly, wetland and fishery studies performed during project planning represent useful baseline information. This section and others in the final EIS should describe in greater detail developing baseline conditions for the various monitoring parameters. In addition, this section states: "*Monitoring would be conducted between the time a decision is made on implementing a harbor expansion and the time the construction begins which would affect aquatic resources in the inner harbor.*" If construction is delayed for more than 1 year after a decision for harbor expansion, the Federation recommends continuing pre-construction monitoring until construction begins.

7.B. Post-construction Monitoring – Major Components, page 22. No monitoring is proposed for striped bass, but should be. We recommend a post-project assessment of striped bass habitat using the water quality monitoring data and updated water quality simulations. Model updates are already planned that would facilitate a low-cost assessment using the established striped bass habitat criteria. The Federation recommends comparing conditions during the fourth year of post-project monitoring with pre-construction predicted habitat impacts, and formulating corrective actions as necessary based on the results.

7.C. Post-construction Monitoring – Details of the Monitoring, page 24. The Draft EIS shows various post construction monitoring from 2 to 5 years. It is not unlikely that a drought or high-flow period lasting several years would occur during the post-construction monitoring period, which would complicate comparisons with pre-construction monitoring data. In addition, tidal freshwater wetlands respond slowly to salinity change. Therefore, the Federation recommends increasing wetland and continuous water quality monitoring from 5 years post-construction to 10 years.

8.B. Performances Measures – Post-construction Monitoring, page 28. We recommend developing a detailed data analysis plan for the post-construction water quality monitoring. The mitigation features will significantly alter the system, which will complicate the comparisons of pre- and post-construction conditions to determine the efficacy of the mitigation measures. A recent example of the need for such a plan was the re-oxygenation demonstration performed for the Savannah Harbor Expansion project. Monitoring data was collected, but the analysis of that data failed to conclusively quantify the effect of the demonstration project in the highly variable DO dynamics of the system.

9.B. Adaptive Management-Decision Making Process, page 30. This section proposes to provide a post-construction monitoring report within 1 year after the monitoring period, followed by 30 days of agency review, an unspecified time period for further report revision, public review, and a potential elevation process. This time-line

would likely require a minimum of 1.5 years after monitoring to make a decision on adaptive management actions, and could take much longer. The Federation recommends compressing this process so that a final decision on a corrective action is reached within 1 year after the monitoring period.

9.B. Adaptive Management – Decision Criteria, page 31-32. The Federal modeling performance goals in the plan are those provided by review agencies in 2001 during hydrodynamic model development. Because the agencies were aware of the complexity of the system and model limitations, considerable latitude in the performance of the models was allowed. We are concerned that adopting the same tolerances for the performance of the constructed project is inappropriate, because actual impacts could differ substantially from the predicted impacts without triggering remedial action. The Corps modified the goal for <1 ppt salinity based on earlier coordination to +/- 0.1 ppt, and we support this modification. The goal for 1-5 ppt salinity has not been modified, and would allow considerable impact without triggering action. As proposed, the salinity goal for 1 ppt would allow from 0.5 ppt to 1.5 ppt to be acceptable (+/- 50%), while salinity of 0.99 ppt would allow 0.89 to 1.09 to be acceptable. We recommend modifying the goal for salinity in the range 1-5 ppt +/- 10% (not +/- 0.5 ppt) as proposed) to make it more consistent with other goals and triggers for adaptive management.

10. Adaptive Management – Implementing Warranted Modifications, pages 32-33. This section states that the "Corps would seek and obtain its funds for this phase each year through the normal budget process", which creates concern. It is relatively certain that impacts to trust resources of the Nation will occur following construction but the effectiveness of the mitigation features is much less certain. Therefore, now can the stakeholders (SEG) and the regulatory agencies have confidence that the proposed mitigation plan adequately addresses project impacts unless contingency funding for monitoring/adaptive management activities is assured.

This section should also discuss an implementation schedule for needed corrective actions. The Federation recommends initiating construction, or other appropriate remedial actions, within 1 year of a decision to modify a mitigation feature.

10.C. Adaptive Management – Monitoring after Implementing an Adaptive Management Feature, page 35. The Corps proposes to monitor the performance of corrective actions under the adaptive management program. It is unlikely that 1 year of post-construction monitoring is sufficient to determine the outcome of the action in a system as dynamic as the Savannah estuary. The Federation feels that 3 years of post-construction monitoring of adaptive management actions is reasonable.

11.B. Long Term Monitoring – Major Components, page 36. The Corps proposes to fund four water monitoring stations to determine whether the mitigation features are functioning as intended. The Federation recommends adding one additional station. Station 021989784 is located at the intake of the freshwater supply system for the 3,000 acres of managed wetlands on Savannah NWR. Therefore, this station is especially important for monitoring project impacts.

The Georgia Wildlife Federation

Page 4

748-OC-01-OC01

Comment: *The Georgia Wildlife Federation's logical preference for deepening Savannah Harbor is selection of the 45-foot depth alternative, because it minimizes the loss of freshwater wetlands, impacts to Savannah National Wildlife Refuge (NWR), and risk and uncertainty of impacts to trust fish and wildlife resources, due not only to hydrodynamic model error and variability but a myriad of other unforeseen factors. Previous channel deepening and flow modification projects have reduced tidal freshwater marsh which is critical to successful reproduction, survival, and abundance of important fish and wildlife populations in the Savannah River Estuary from around 12,000 acres to only around 3,300 acres. The majority of the remaining freshwater tidal wetlands are located on Savannah NWR. Further deepening the harbor channel from its present depth of 42 feet would further limit this critical and increasingly rare natural resource. The 45-foot depth plan with approved mitigation included would result in a loss of 32 acres of freshwater marsh and a 3 percent reduction in striped bass reproductive habitat in the estuary, whereas the NED depth plan (47-feet) predicted loss is 223 acres of freshwater marsh and a 27 percent reduction in striped bass reproductive habitat with mitigation. At the LPP depth (48 feet), a net loss of 337 acres of tidal freshwater is predicted after flow-diversion mitigation is implemented. The loss of an additional 114 acres of freshwater tidal wetlands associated with LPP represents a 50 percent increase in impacts to Savannah NWR over the NED plan and a cumulative loss of approximately 10 percent of the basin's remaining freshwater tidal wetlands. For this reason, Georgia Wildlife Federation does not support the LPP.*

Response: The Corps notes the commenter's support of implementation of the mitigation features of the project, preference for the 45-foot depth, and opposition to the LPP (48-foot project). The selected plan is the 47-foot alternative, as discussed in other responses.

748-MR-10-EV01

Comment: *There are two existing water quality stations on Back River (021989784 and 021989791), and one on Front River (02198920), that have long-term salinity data. The Federation recommends using this long-term salinity data set, from the end of the last harbor deepening construction to the start of any new deepening construction, as baseline salinity conditions for these sites and to supplement the 1 year of pre-construction water quality monitoring.*

Response: All available data sources will be considered in establishing the water quality baseline [in addition to the one year of pre-construction monitoring specifically associated with SHEP].

Page 5

748-MR-10-EV02

Comment: *Pre-construction monitoring for 1 year is intended to create or supplement a pre-project baseline. However, information based on only 1 year of data may not provide an adequate baseline. Using existing longer-term data from water quality stations on Back River and Front River should help address this problem (see previous comment on Appendix D, section 5.C, page 8 and Figure 3). Similarly,*

wetland and fishery studies performed during project planning represent useful baseline information. This section and others in the final EIS should describe in greater detail developing baseline conditions for the various monitoring parameters. In addition, this section states: "Monitoring would be conducted between the time a decision is made on implementing a harbor expansion and the time the construction begins which would affect aquatic resources in the inner harbor." If construction is delayed for more than 1 year after a decision for harbor expansion, the Federation recommends continuing pre-construction monitoring until construction begins.

Response: All available data useful in establishing baseline conditions in Savannah Harbor will be considered for use. FEIS-Appendix D has been revised to that effect. The pre-construction monitoring would be conducted for a period of one year.

748-MR-10-EV03

Comment: *No monitoring is proposed for striped bass, but should be. We recommend a post-project assessment of striped bass habitat using the water quality monitoring data and updated water quality simulations. Model updates are already planned that would facilitate a low-cost assessment using the established striped bass habitat criteria. The Federation recommends comparing conditions during the fourth year of post-project monitoring with pre-construction predicted habitat impacts, and formulating corrective actions as necessary based on the results.*

Response: Appendix D has been revised to include an evaluation of the impacts of the SHEP on Striped bass as part of the post-construction monitoring. The updated hydrodynamic and water models would be used in conjunction with the field data collected to conduct this analysis. If the results of this study show impacts beyond those predicted in the EIS, then annual payments to the GADNR-WRD could be adjusted accordingly.

748-MR-10-EV04

Comment: *The Draft EIS shows various post construction monitoring from 2 to 5 years. It is not unlikely that a drought or high-flow period lasting several years would occur during the post-construction monitoring period, which would complicate comparisons with pre-construction monitoring data. In addition, tidal freshwater wetlands respond slowly to salinity change. Therefore, the Federation recommends increasing wetland and continuous water quality monitoring from 5 years post-construction to 10 years.*

Response: Appendix D has been revised to describe a longer post-construction monitoring program for wetlands and water quality.

748-MR-10-EV05

Comment: *We recommend developing a detailed data analysis plan for the post-construction water quality monitoring. The mitigation features will significantly alter the system, which will complicate the comparisons of pre- and post-construction conditions to determine the efficacy of the mitigation measures. A recent example of the need for such a plan was the re-oxygenation demonstration performed for the Savannah Harbor Expansion project. Monitoring data was collected, but the analysis of that data failed to conclusively quantify the effect of the demonstration project in the highly variable DO dynamics of the system.*

Response: The Monitoring Plan and Adaptive Management Plan includes sufficient opportunities to analyze water quality data. The Cooperating Agencies and the state natural resource agencies would be provided all monitoring data [annually]. The District will prepare a report at the end of each year summarizing the findings of the data collected that year. At the end of the post-construction monitoring period, the District will prepare a comprehensive report that summarizes the entire data collection period and its determinations relative to SHEP impacts on the water quality regime in Savannah Harbor and any water quality adaptive management measures that should be implemented. The Cooperating Agencies and state natural resource partners will have an opportunity to respond to the District's findings and present their views.

The monitoring plan contains specific measures to evaluate the impacts of the SHEP on the dissolved oxygen regime in Savannah Harbor and the effectiveness of the oxygen injection system including eight continuous recording water quality monitors and a Transfer Efficiency Study to determine the operational requirements for the system. The Corps has conducted further coordination with the USFWS and the NMFS regarding water quality monitoring, and the results of that coordination were used to revise Appendix D accordingly.

748-MR-10-EV06

Comment: *This section proposes to provide a post-construction monitoring report within 1 year after the monitoring period, followed by 30 days of agency review, an unspecified time period for further report revision, public review, and a potential elevation process. This time-line would likely require a minimum of 1.5 years after monitoring to make a decision on adaptive management actions, and could take much longer. The Federation recommends compressing this process so that a final decision on a corrective action is reached within 1 year after the monitoring period.*

Response: The decision to implement an adaptive management measure could be made during the construction process as well as during the post-construction monitoring period. Paragraph 9 of

Appendix D has been revised to provide a more thorough discussion of the adaptive management decision making process.

Page 6

748-MR-10-EV07

Comment: *The Federal modeling performance goals in the plan are those provided by review agencies in 2001 during hydrodynamic model development. Because the agencies were aware of the complexity of the system and model limitations, considerable latitude in the performance of the models was allowed. We are concerned that adopting the same tolerances for the performance of the constructed project is inappropriate, because actual impacts could differ substantially from the predicted impacts without triggering remedial action. The Corps modified the goal for <1 ppt salinity based on earlier coordination to +/- 0.1 ppt, and we support this modification. The goal for 1-5 ppt salinity has not been modified, and would allow considerable impact without triggering action. As proposed, the salinity goal for 1 ppt would allow from 0.5 ppt to 1.5 ppt to be acceptable (+/- 50%), while salinity of 0.99 ppt would allow 0.89 to 1.09 to be acceptable. We recommend modifying the goal for salinity in the range 1-5 ppt +/- 10% (not +/- 0.5 ppt) as proposed) to make it more consistent with other goals and triggers for adaptive management.*

Response: For salinity, the goal for model accuracy should be +/- 10 % instead of +/- 0.5 ppt [in the range of 1-5 ppt]. While this is the objective, models do have limitations; hence, this target may not be achieved.

748-MR-10-EV08

Comment: *This section states that the "Corps would seek and obtain its funds for this phase each year through the normal budget process", which creates concern. It is relatively certain that impacts to trust resources of the Nation will occur following construction but the effectiveness of the mitigation features is much less certain. Therefore, now can the stakeholders (SEG) and the regulatory agencies have confidence that the proposed mitigation plan adequately addresses project impacts unless contingency funding for monitoring/adaptive management activities is assured.*

Response: The Corps would obtain funding sufficient to implement adaptive management measures during the project construction period. The project would remain in a construction status until all of the construction is complete, the Post-Construction Monitoring is complete, and any adaptive management measures implemented that were determined to be required. The Georgia Department of Transportation, the expected non-Federal sponsor of the construction project, would also provide (during the construction period) its share of the funds required to implement these actions. The sponsor has indicated they intend to establish an escrow account at the beginning of the project to have their share of these funds available for expenditure, should they be needed. The District also intends to obtain funds for adaptive management each year it obtains funds to perform regular construction activities. Those adaptive management funds would be expended if the modifications are deemed necessary by the Federal Cooperating Agencies.

If modifications are found to be warranted and they are contained in the group of adaptive management measures described in the EIS, they could be implemented without further public

coordination or environmental approvals. If modifications are identified that are not described in the EIS, the Corps would prepare the documents needed to coordinate the proposed action with the public and the agencies to obtain the required environmental approvals.

If modifications are deemed warranted that are larger in scope than the adaptive management measures described in the EIS, and require additional funding, the Corps would submit the appropriate documents to its Headquarters for approval. If additional Federal funding is required, Congressional action would likely be needed to obtain those funds. Please see Chapter 10 of Appendix D.

748-MR-10-EV09

Comment: *The Corps proposes to monitor the performance of corrective actions under the adaptive management program. It is unlikely that 1 year of post-construction monitoring is sufficient to determine the outcome of the action in a system as dynamic as the Savannah estuary. The Federation feels that 3 years of post-construction monitoring of adaptive management actions is reasonable.*

Response: The Adaptive Management Plan has been revised to include two years of site-specific monitoring after any modification to a mitigation feature is complete. Monitoring of an adaptive management change to a mitigation feature could continue longer than two years if the resource agencies believe that to be prudent.

748-MR-10-EV10

Comment: *The Corps proposes to fund four water monitoring stations to determine whether the mitigation features are functioning as intended. The Federation recommends adding one additional station. Station 021989784 is located at the intake of the freshwater supply system for the 3,000 acres of managed wetlands on Savannah NWR. Therefore, this station is especially important for monitoring project impacts.*

Response: The continuous water quality monitoring station at the intake to the Savannah National Wildlife Refuge is already funded by the Georgia Ports Authority.

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January 25, 2011

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Mr. William Bailey
ATTN: PD, US Army Corps of Engineers, Savannah District
100 West Oglethorpe Avenue
Savannah, Georgia 31401-3640

SUBMITTED TO: CESAS-PD@usace.army.mil.

Dear Mr. Bailey:

The Georgia Conservancy submits the following comments to the draft General Reevaluation Report (GRR) and the draft Environmental Impact Statement (EIS) for the Savannah Harbor Expansion Project (SHEP).

Defining the Project

These comments are directed to the recommended SHEP navigation project depth of 47 feet, MLW. The Georgia Conservancy is aware that the Georgia Department of Transportation and their partner, the Georgia Ports Authority, have indicated their Locally Preferred Plan (LPP) is 48 feet MLW; however, there has been no indication by the U.S. Army Corps of Engineers (the Corps) as to how, whether or when the LPP might be accepted.

We also note that the U.S. Fish & Wildlife Service (USF&WS) has indicated that it does not support deepening beyond 45 feet MLW because of the impacts to the Savannah National Wildlife Refuge, particularly the forecast loss of tidal freshwater wetlands. Although we believe our comments would strengthen a SHEP project of any increment, the Georgia Conservancy places great weight on the ultimate positions of USF&WS and other state and federal natural resource agencies on the SHEP EIS and GRR. No comment on the project as currently proposed should be misconstrued as opposing a project of lesser depth.

Comment Focus

Savannah District Commander Hall's predecessor, Colonel Edward Kertis used to say, "All models are wrong; some models are useful." With this in mind, these comments will not address many of the technical analyses and modeling except to note that --however advanced-- it is only realistic to expect that neither the environmental impacts nor the mitigation measures will perform as predicted.

True to our organizational vision, "A Georgia where people and the environment thrive," the Georgia Conservancy wants to see as much dedication to making the project work *after* construction as has been devoted to studying its justification.

In addition to detailing the flaws in the proposed mitigation plan and adaptive management plan, these comments will discuss crucial elements to an effective adaptive management plan.

Ultimately, our support or opposition to the SHEP will rest upon whether the project's mitigation and adaptive management measures create a reliable post-construction process that ensures both the deepening and the mitigation perform as promised, now and in the future.

Flawed Mitigation

The Georgia Conservancy believes the SHEP mitigation plan is unacceptably flawed in three fundamental respects. First, in too many critical areas the plan fails to achieve "like-for-like" remediation, meaning the proposed mitigation measure does not address the impact. For example, to offset loss of striped bass and shortnosed sturgeon habitat, the SHEP proposes a fish ladder around New Savannah Bluff Lock & Dam (to help sturgeon regain access to supposedly favored spawning grounds), and a striped bass stocking program. Neither remedy serves to ameliorate the SHEP's actual impact to habitat.

The hope seems to be that the benefit from mitigation may outweigh the harm from the project impact; however, hope is not a sufficient strategy in the case of the endangered shortnosed sturgeon, and a challenged striped bass fishery.

Similarly, the Corps proposes to offset the predicted loss of critical tidal freshwater wetlands with wetlands of different functions and values, depending largely upon what is for sale at a given point in the SHEP process. Especially in the case of tidal freshwater wetlands loss, acquiring dissimilar wetlands types as mitigation (even those within the designated Savannah National Wildlife Refuge Acquisition Area) is the biological equivalent of replacing oases with desert. True acre-for-acre wetland mitigation may require a longer term commitment to land acquisition; however, "doing the best we could at the time" is plainly inadequate.

Second, what happens if key mitigation elements, such as the oxygenation system, do not work as expected? What if shortnosed sturgeon don't use the fish ladder? Both represent ground-breaking applications even as valid questions have been raised about the likelihood of success. It does not take a pessimist to ask about contingencies—and there appear to be none for either of these elements.

Third, any change to the SHEP mitigation plan will need to be approved by at least four federal natural resource agencies (the Corps, U.S. Environmental Protection Agency (EPA), USF&WS, and the National Oceanographic and Atmospheric Administration (NOAA)). Not only are we concerned that this shared oversight will bog down, but also we think state and local resource agencies need to be integral partners. For mitigation, a time-sensitive, enumerated consultative process is vital; for adaptive management, it is essential.

Mitigation & Adaptive Management

There is an important distinction between a realistic adaptive management proposal and a comprehensive mitigation plan. To be sure, the more complicated a mitigation plan, the more critical the need for adaptive management due to the greater potential points for deviation. But support for adaptive management does not relieve the requirement to incorporate realistic, effective remedial actions. Simply put, adaptive management should not be the catch-all remedy that legitimizes incorporating dubious mitigation elements.

Inadequate SHEP Adaptive Management

The SHEP Adaptive Management (AM) proposal is inadequate in several fundamental respects First, the proposed five-year monitoring period is an arbitrary deadline, reflecting neither the timeframe for biological processes nor the permanent alteration to the estuary posed by the SHEP and its mitigation measures. Moreover, a central purpose of AM is to watch for, and react to, unintended or secondary impacts. Especially as the Corps proposes an even more highly-engineered system for the Savannah estuary, it needs to create a system that perpetually monitors project impacts.

Second, adaptive management needs to be funded during the construction phase, not relegated to a wish-list congressional earmark request, as at present. At one point in the project development, AM was slated to be funded at 10 percent of project construction cost; now, it appears to be only 10 percent of mitigation costs. Such drastic changes in (theoretical) funding levels do not inspire confidence in the Corps commitment to AM.

Third, as part of the SHEP AM, the Corps should fund a long-term land acquisition effort that would replace – acre-for-acre – any tidal freshwater wetlands lost to the deepening as suitable property becomes available in the future.

Fourth, the Corps needs to demonstrate its dedication to the SHEP project by differentiating AM from the rest of Corps water resources project management structure. The Corps already studies, designs and builds projects. In the case of the Savannah deepening, the Corps would also be responsible for post-construction monitoring and deciding whether any corrective action is warranted.

This is simply too much power to give any single agency. The Corps actions in the SHEP directly affect two states, at least four federal agencies and various local governments, all of which should be genuine partners. Specifically, the Corps should create a "Savannah Harbor Resources Adaptive Management Council" to oversee the AM program. Under the circumstances, we think the USF&WS ought to chair this new Council.

Over the course of the SHEP process, various evaluative criteria, tools and approaches have changed. These include programmatic changes such as incorporating independent technical review. It is the Georgia Conservancy's hope that the current lack of Corps Headquarter guidance on AM will allow the Savannah District to incorporate these principles into its AM proposal. We would welcome the opportunity to work with the Corps on such a ground-breaking AM program.

Extended Comments

As the State of South Carolina has told the Corps, completing a review of the body of work that comprises the SHEP proposal is nearly impossible in 45-60 days. Certainly, this task is even more daunting to a conservation organization than a state natural resource agency. All the more so in the case of organizations with freedom of information requests that could not be filled by the January 25, 2011 public comment deadline.

It is our understanding that the Corps may allow comments to be submitted beyond the deadline. We not only encourage this course, but we also urge the Corps to publicly announce their intentions as soon as possible.

Thank you for your attention to these comments.

Sincerely,

Pierre Howard

Pierre Howard
President

The Georgia Conservancy

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770-JK-15-EC01

Comment: *These comments are directed to the recommended SHEP navigation project depth of 47 feet, MLW. The Georgia Conservancy is aware that the Georgia Department of Transportation and their partner, the Georgia Ports Authority, have indicated their Locally Preferred Plan (LPP) is 48 feet MLW; however, there has been no indication by the U.S. Army Corps of Engineers (the Corps) as to how, whether or when the LPP might be accepted.*

Response: In light of subsequent discussions with the non-Federal sponsor, the Corps decided not to identify the LPP as the Selected Plan.

770-JK-15-EV01

Comment: *Savannah District Commander Hall's predecessor, Colonel Edward Kertis used to say, "All models are wrong; some models are useful." With this in mind, these comments will not address many of the technical analyses and modeling except to note that --however advanced-- it is only realistic to expect that neither the environmental impacts nor the mitigation measures will perform as predicted.* *Savannah District Commander Hall's predecessor, Colonel Edward Kertis used to say, "All models are wrong; some models are useful." With this in mind, these comments will not address many of the technical analyses and modeling except to note that --however advanced-- it is only realistic to expect that neither the environmental impacts nor the mitigation measures will perform as predicted.*

Response: Much effort was spent developing hydrodynamic and water quality models that could reliably replicate existing conditions. Being able to use such models reduces the uncertainty surrounding predictions of how the system would behave if physical modifications, such as deepening or closing a channel were implemented. Without such tools, decision-makers would be forced to rely entirely on professional judgment. In brief, the model developer (Tetra Tech) had an uncertainty analysis performed by a separate independent modeler to assess the models' performance. The Corps conducted an independent technical review of the models to determine if they were adequate. The Corps also obtained concurrence from the natural resource agencies that these models were acceptable to evaluate environmental impacts from this project. An interagency team oversaw development of the hydrodynamic and water quality models intended to be used on this project. Those independent reviews and agency concurrences reduce the risk that the models were inappropriate and/or inaccurate.

The reliability of the hydrodynamic and water quality models is also dependent on how well they are applied. The Corps used Interagency Coordination Teams to define how the models should be used to predict physical changes from changes proposed in the harbor. The use of experts from several organizations reduced the risk of error from the limited perspective of just one or a few individuals. The Interagency Coordination Teams recommended that the models be applied over a range of conditions. Using the aforementioned approach reduced the risk of evaluating impacts based on just one set of conditions that may not be a good representation of conditions which are encountered in the future

In addition, the project includes an extensive Monitoring and Adaptive Management Plan (Appendix D) to evaluate the performance of the project and implement adaptive management measures should the monitoring indicate that impacts exceed what was predicted.

Page 2

770-JK-1S-EV02

Comment: *The Georgia Conservancy believes the SHEP mitigation plan is unacceptably flawed in three fundamental respects. First, in too many critical areas the plan fails to achieve "like-for-like" remediation, meaning the proposed mitigation measure does not address the impact. For example, to offset loss of striped bass and shortnosed sturgeon habitat, the SHEP proposes a fish ladder around New Savannah Bluff Lock & Dam (to help sturgeon regain access to supposedly favored spawning grounds), and a striped bass stocking program. Neither remedy serves to ameliorate the SHEP's actual impact to habitat.*

Response: The District agrees that in-kind or "like-for-like" mitigation should be and was the goal of its mitigation efforts. However, despite years of deliberation [DEIS-Section 5.03.2], the Cooperating Agencies and the Fisheries Interagency Coordination Team could not identify measures [structural/nonstructural] within the estuary that would adequately restore Shortnose sturgeon winter habitat or Striped bass spawning and larval habitat that would be lost to the SHEP's construction/operation. As a result, the Team agreed [2007] that a fish bypass around the New Savannah Bluff Lock and Dam would compensate for losses within the estuary by providing 20 additional miles of upstream spawning/foraging habitat. Similarly, the Team agreed that paying the State of Georgia to stock fingerling Striped bass would be suitable compensation for impacts to spawning and larval habitats.

770-JK-1S-EV03

Comment: *Similarly, the Corps proposes to offset the predicted loss of critical tidal freshwater wetlands with wetlands of different functions and values, depending largely upon what is for sale at a given point in the SHEP process. Especially in the case of tidal freshwater wetlands loss, acquiring dissimilar wetlands types as mitigation (even those within the designated Savannah National Wildlife Refuge Acquisition Area) is the biological equivalent of replacing oases with desert. True acre-for-acre wetland mitigation may require a longer term commitment to land acquisition; however, "doing the best we could at the time" is plainly inadequate.*

Response: The conversion of 223 acres of freshwater wetland to brackish marsh represents the only significant wetland conversion that is likely to be noticeable if the harbor is deepened to 47 feet. It is important to reiterate that the ecological values of the impacted freshwater wetlands would not be completely lost. Instead, those acres would convert to brackish marsh. The District's calculation of the freshwater wetlands with the potential for conversion to brackish marsh is based on a shift in 0.5 ppt salinity, a traditional rule-of-thumb for differentiating between freshwater and brackish marsh. However, data reported in the literature for Savannah Harbor suggest that a shift in vegetation [from freshwater marsh to brackish marsh] in this estuary does not occur until salinity concentrations approach 2.5 ppt [Latham et al., 1994]. Even at oligohaline marsh sites [average salinity concentration of 2.1 ppt]], a discriminate function [DF] analysis revealed that only 47% of cases resulted in the correct pairing of environmental variables with vegetative species composition and dominance. At those same

oligohaline sites, 37% of the vegetative species composition and dominance were more closely aligned with a freshwater classification [Latham et al., 1994].

The District's salinity value that denotes a defined shift from freshwater to brackish marsh [i.e., 0.5 ppt] is approximately five times lower than traditional observations of 100% vegetative shifts *in situ* within the Lower Savannah Watershed [Latham et al., 1994] and other coastal marsh systems in the southeastern United States [NOAA, 2010]. Thus, many of the existing freshwater emergent plant species, and associated ecological parameters, will likely continue to occur in areas predicted to experience salinity concentrations in the range of 0 - <2.5 ppt. Those areas that do transition to more brackish characteristics would still continue to provide the traditional ecological functions associated with all emergent wetland systems. Thus, the preservation of 2,245 acres [consisting of bottomland hardwoods and upland buffer] is more than sufficient to offset the conversion in freshwater wetland vegetation that may occur. Using the higher salinity value observed in the Savannah basin for conversion to brackish marsh [2.5 ppt], less conversion would be expected, resulting in a mitigation-to-impacts ratio of roughly 8:1. Using the DF analysis reported by Latham et al [1994] which aligned 37% of freshwater species with oligohaline sites, the 223 acres of freshwater to brackish marsh conversion is reduced further such that the mitigation-to-impacts ratio is increased to 12:1.

A comparison of potential changes in elements of wetland function for both conversion scenarios is provided in Table 1.

Table 1. Changes in Wetland Function as a Result of Wetland Conversion

Elements of Wetland Function	Freshwater to Brackish Marsh (Approximately 223 acres)	Saltmarsh to Brackish Marsh (Approximately 740 acres)
Water Purification	Negligible	Negligible
Flood Protection	Negligible	Negligible
Shoreline Stabilization	Negligible	Negligible
Groundwater Recharge	Negligible	Negligible
Streamflow Maintenance	Negligible	Negligible
Retention of Particles	Negligible	Negligible
Surface Water Storage	Negligible	Negligible
Subsurface Storage	Negligible	Negligible
Nutrient Cycling	Negligible	Negligible
Values to Society	Negligible	Negligible
Fish and Wildlife Habitat	Minor	Negligible

As illustrated above, the only indirect effect the 47-foot project would have on the function of these wetlands systems would be associated with fish and wildlife habitat values. All other elements of wetland function associated with predicted shifts in wetlands categorization would be negligible as a result of the anticipated increase in salinity. Previous studies have noted that areas of the Savannah Harbor identified as saltmarsh or brackish marsh often support similar fish and wildlife assemblages. Any anticipated conversion of saltmarsh to a brackish marsh system is expected to have a negligible impact on the overall wetland functioning from a long-term perspective. The District recognizes that a

comparison of fish and wildlife habitat between freshwater and brackish marsh systems yields fewer similarities, but this difference would still be quantitatively minor [and ecologically unimportant].

A Wetland Interagency Coordination Team (ICT) [technical expert representatives from USACE and federal/state natural resource agencies] was assembled to identify acceptable mitigation for SHEP. At that time, USFWS stated that mitigation actions must be performed within the basin for impacts to wetlands located within the SNWR. The Service suggested preservation of lands as a possible solution and recommended sites that are part of its long-term lands acquisition strategy to compliment the SNWR. The District then consulted with the Stakeholder Evaluation Group, including its Non-governmental Organizations (NGOs) members such as the Georgia Conservancy, to see if they could identify any suitable mitigation options. Over the 10-year study period, no agency/organization could identify another feasible alternative as mitigation for impacts that would occur as a result of the wetland species shifts. Therefore, the District proceeded with the identification of preservation sites.

The proposed preservation lands consist of various community types, viz., bottomland hardwoods, maritime forest, and uplands dominated by deciduous forest and re-growth. The bottomland hardwoods are categorized as palustrine, forested, broad-leaved deciduous systems that are both temporarily and/or seasonally flooded. Preserving these areas would ensure this wildlife habitat is preserved in perpetuity. Moreover, the additional lands would buffer the Savannah National Wildlife Refuge from future threats of development. Hence, changes in land use would not occur immediately adjacent to existing areas of the Refuge that contain emergent wetlands. The acquisition/preservation of wetland and upland buffer would provide a functional replacement for the minor conversion of the only wetland function [fish and wildlife habitat] that would be expected when freshwater marsh is converted to a brackish counterpart. Based on these determinations, the District's functional assessment concluded that the noted preservation satisfies the intent of the no-net-loss of function criterion.

The Wetland Interagency Coordination Team assigned a hierarchical value to wetlands as follows: freshwater, brackish, and saltmarsh. The District used this general ranking throughout its wetland impact and mitigation evaluations. However, in response to US EPA's comments on the DEIS, the District developed a functional approach that details the anticipated direct and indirect wetland impacts to each of these categories resulting from SHEP. The District agrees that each wetland type is important to the Lower Savannah Watershed. The conclusion from our functional assessment confirms that a minor shift [freshwater to brackish marsh] in the percent composition of vegetation could impact fish and wildlife habitat [one of multiple facets of wetland function]. However, this change in fish and wildlife use should not be construed as constituting a loss in this wetland functional category. To verify that position, the magnitude of impact was considered when evaluating mitigation options to ensure compliance with the 2008 Mitigation Rule. Ultimately, the District concluded that preservation of 2,245 acres of bottomland hardwood wetlands and upland buffer around the SNWR would sufficiently compensate for the noted changes to fish and wildlife habitat - the single element of wetland function that would be affected as a result of the vegetation shift. USFWS and the Savannah National Wildlife Refuge (SNWR) have identified properties within the estuary with a high priority for acquisition because the Service believes they are ecologically valuable and provide positive contributions to the goals of the Refuge and enhance the area's fish and wildlife resources.

Through the functional assessment, the District determined that the mitigation for the freshwater wetland impacts satisfies the no-net-loss of function criterion. For additional information, please see Appendix C – Mitigation Planning, Section VII Consideration of 2008 Mitigation Rule.

770-JK-15-EV04, 770-JK-15-EV05

Comment: *Second, what happens if key mitigation elements, such as the oxygenation system, do not work as expected? What if shortnosed sturgeon don't use the fish ladder? Both represent ground-breaking applications even as valid questions have been raised about the likelihood of success. It does not take a pessimist to ask about contingencies—and there appear to be none for either of these elements.*

Response: The risks and uncertainties of the proposed dissolved oxygen system for Savannah Harbor are carefully examined in the Risk and Uncertainty Analysis. Specifically, a risk analysis of the water quality model was prepared to predict post-project dissolved oxygen levels. An oxygen demonstration trial verified the efficacy of the Speece Cones to add oxygen to the river and its distribution in the tidally-dominated river system. Extensive post-construction monitoring will allow the Corps and others to assess whether initial predictions regarding oxygen levels are correct. Given the depth of analysis of this matter, there is minimal risk to decision-making regarding the dissolved oxygen issue. Post-construction monitoring will allow similar determinations to be made about the success of Shortnose sturgeon passage around the New Savannah Bluff Lock and Dam. The adaptive management plan provides a means to make any required changes to the mitigation features, including the two identified in this comment. For the D.O. systems, this could range from increasing the amount of injected oxygen, modifying the oxygen injection equipment, or adding injection sites.

In the adaptive management plan (Appendix D), contingencies are discussed for the oxygenation and fish passage systems. For example, "The Corps would prepare a report describing the findings of the monitoring of fish passage at New Savannah Bluff Lock and Dam. That report would identify whether any modifications to the fish bypass structure are recommended for the mitigation feature to function as intended. ... Adjustments could be required to the entrance or exits of the structure to establish flow conditions that encourage fish passage."

770-JK-15-EV06

Comment: *Third, any change to the SHEP mitigation plan will need to be approved by at least four federal natural resource agencies (the Corps, U.S. Environmental Protection Agency (EPA), USF&WS, and the National Oceanographic and Atmospheric Administration (NOAA)). Not only are we concerned that this shared oversight will bog down, but also we think state and local resource agencies need to be integral partners. For mitigation, a time-sensitive, enumerated consultative process is vital; for adaptive management, it is essential.*

Response: The decision process in regards to the adaptive management plan is provided in Appendix D. State resource agency participation is an integral part of the Monitoring and the Adaptive Management Plans.

Page 3

770-JK-15-EV07

Comment: *There is an important distinction between a realistic adaptive management proposal and a comprehensive mitigation plan. To be sure, the more complicated a mitigation plan, the more critical the need for adaptive management due to the greater potential points for deviation. But support for adaptive management does not relieve the requirement to incorporate realistic, effective remedial actions. Simply put, adaptive management should not be the catch-all remedy that legitimizes incorporating dubious mitigation elements.*

Response: All aspects of the mitigation plan are designed and included to provide mitigation for expected project impacts. No feature was included unless a need for it exists and the design would meet the need. The effectiveness of the SHEP mitigation features (flow diversion, oxygen injection, etc.) was evaluated using the experience of technical experts from state/federal resource agencies along with the best models available.

770-JK-15-EV08

Comment: *The SHEP Adaptive Management (AM) proposal is inadequate in several fundamental respects. First, the proposed five-year monitoring period is an arbitrary deadline, reflecting neither the timeframe for biological processes nor the permanent alteration to the estuary posed by the SHEP and its mitigation measures. Moreover, a central purpose of AM is to watch for, and react to, unintended or secondary impacts. Especially as the Corps proposes an even more highly-engineered system for the Savannah estuary, it needs to create a system that perpetually monitors project impacts.*

Response: The FEIS describes post-construction monitoring over a 10-year period and focuses on critical natural resources. It was developed using the experience of technical experts from state/federal resource agencies, with input from the public. The water quality monitoring would produce sufficient data to define the impacts of SHEP on the environmental regime in Savannah Harbor and allow determinations of whether any additional adaptive management measures [flow diversion, oxygen injection, etc.] are required. The monitoring will includes updates to the hydrodynamic and water quality models to increase their accuracy. This would permit better assessments of project performance under the actual post-construction conditions.

The project also includes long-term monitoring, i.e., operation and maintenance of four continuous water monitors, annual bathymetric surveys in the areas of the flow diversion structures, and data collection from groundwater wells.

770-JK-15-EV09

Comment: *Second, adaptive management needs to be funded during the construction phase, not relegated to a wish-list congressional earmark request, as at present. At one point in the project development, AM was slated to be funded at 10 percent of project construction cost; now, it appears to be only 10 percent of mitigation costs. Such drastic changes in (theoretical) funding levels do not inspire confidence in the Corps commitment to AM.*

Response: The District intends to obtain adaptive management funds when dredging starts in the inner harbor so that they would be available, if needed, as the construction progresses. Additional adaptive management funds would be obtained each year the new work dredging occurs. The project cannot be considered complete and moved from the construction to the operation and maintenance phase until

the construction is complete and all mitigation measures are in place and operating properly. The Corps does not have any hard criteria (i.e. percentage of construction costs or mitigation costs) for determining sufficient adaptive management funding levels.

770-IK-1S-EV10

Comment: *Third, as part of the SHEP AM, the Corps should fund a long-term land acquisition effort that would replace – acre-for-acre – any tidal freshwater wetlands lost to the deepening as suitable property becomes available in the future.*

Response: A Wetland Interagency Coordination Team (ICT) [technical expert representatives from USACE and federal/state natural resource agencies] was assembled to identify acceptable mitigation for SHEP. At that time, USFWS stated that mitigation actions must be performed within the basin for impacts to wetlands located within the SNWR. The Service suggested preservation of lands as a possible solution and recommended sites that are part of its long-term lands acquisition strategy to compliment the SNWR. The District then consulted with the Stakeholder Evaluation Group, including its non-governmental members (such as the Georgia Conservancy), to see if they could identify any suitable mitigation options. Over the 10-year study period, no agency/organization could identify another feasible alternative as mitigation for impacts that would occur as a result of the wetland species shifts. Therefore, the District proceeded with the identification of preservation sites.

The proposed preservation lands consist of various community types, viz., bottomland hardwoods, maritime forest, and uplands dominated by deciduous forest and re-growth. The bottomland hardwoods are categorized as palustrine, forested, broad-leaved deciduous systems that are both temporarily and/or seasonally flooded. The sites contain some high ground so they are at risk of development. Preserving these areas would ensure this wildlife habitat is preserved in perpetuity. Moreover, the additional lands would buffer the Savannah National Wildlife Refuge from future threats of development. Hence, changes in land use would not occur immediately adjacent to existing areas of the Refuge that do contain emergent wetlands. The acquisition/preservation of wetland and upland buffer would provide a functional replacement for the conversion of the only wetland function [fish and wildlife habitat] that would be expected when freshwater marsh is converted to a brackish counterpart. Based on these determinations, the District's functional assessment concluded that the noted preservation satisfies the intent of the no-net-loss of function criterion.

The most appropriate and practicable means of mitigating the minor shift in vegetation that would occur is the preservation of approximately 2,245 acres of bottomland hardwoods and upland buffer. The USFWS and the Savannah National Wildlife Refuge (SNWR) identified properties within the estuary having a high priority for acquisition. The Service believes this acreage is ecologically valuable and would provide positive contributions to the goals of the Refuge via enhancement of the region's fish and wildlife resources (Please see Watershed Assessment and Functional Assessment provided in Appendix C-Mitigation Planning).

Adaptive management cost estimates [in the EIS] include funding of additional preservation lands, if determined to be necessary. Additional lands could be acquired and preserved as part of the adaptive management, if such actions are warranted.

770-JK-15-EV11

Comment: *Fourth, the Corps needs to demonstrate its dedication to the SHEP project by differentiating AM from the rest of Corps water resources project management structure. The Corps already studies, designs and builds projects. In the case of the Savannah deepening, the Corps would also be responsible for post-construction monitoring and deciding whether any corrective action is warranted.*

Response: The Monitoring and Adaptive Management Plan (Appendix D) is an important part of the Savannah Harbor deepening project. The District is on record as being fully committed to its implementation [notwithstanding cost or difficulty]. Importantly, modifications would not be implemented without coordination/concurrence of the federal cooperating agencies. However, the District does not have the procedural option to differentiate adaptive management from the rest of the Corps' water resources management structure. If project modifications become necessary, but are larger in scope and/or require greater funding than specified in EIS-Appendix D, the District would submit the appropriate documents to its Headquarters for approval. If additional Federal funding is required, Congressional action would be needed to obtain the money. The Record of Decision (ROD) for the project will constitute a binding legal commitment for implementation of the Adaptive Management Plan. See also other responses to comments on this issue.

The District would not be the only entity involved reviewing the monitoring data and making decisions regarding implementing adaptive management measures. State/federal resource agency agencies would also be involved in the post-construction monitoring, data review, and in the decision-making process. [see the Monitoring Plan and Adaptive Management Plan for details]

770-JK-15-EV12

Comment: *This is simply too much power to give any single agency. The Corps actions in the SHEP directly affect two states, at least four federal agencies and various local governments, all of which should be genuine partners. Specifically, the Corps should create a "Savannah Harbor Resources Adaptive Management Council" to oversee the AM program. Under the circumstances, we think the USF&WS ought to chair this new Council.*

Response: Appendix D describes the decision-making process relative to adaptive management measures. As described in the DEIS and the FEIS, the Cooperating Agencies and the state natural resource agencies are part of the decision-making process. However, since the Corps of Engineers would be responsible to Congress, the public, and the State of Georgia (as the cost-sharing non-Federal sponsor) for SHEP's implementation/completion, it cannot delegate the responsibility for the decision-making to another entity.

770-JK-15-EV13

Comment: *Over the course of the SHEP process, various evaluative criteria, tools and approaches have changed. These include programmatic changes such as incorporating independent technical review. It is the Georgia Conservancy's hope that the current lack of Corps Headquarter guidance on AM will allow the Savannah District to incorporate these principles into its AM proposal. We would welcome the opportunity to work with the Corps on such a ground-breaking AM program.*

Response: The Adaptive Management Plan was developed in coordination with the Cooperating Agencies and the state natural resource agencies, and it provides for their full participation throughout the process [including technical review of data].

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770-JK-15-EV14

Comment: *It is our understanding that the Corps may allow comments to be submitted beyond the deadline. We not only encourage this course, but we also urge the Corps to publicly announce their intentions as soon as possible.*

Response: While the official public comment period closed on January 25, 2011, the District accepted comments that were received after that date until the final reports were being drafted.

Georgia Chapter Sierra Club

January 25, 2011

Colonel Jeffrey Hall, District Commander

U. S. Army Engineer District, Savannah, GA

Please consider these comments and concerns on natural resource issues contained in the November, 2010, Draft Environmental Impact Statement and General Reevaluation and Review on the Savannah Harbor Expansion Project as you develop the Final document, and any supplemental materials you might publish subsequent to the draft documents.

Sincerely,

Judy Jennings

Savannah River Harbor Issue Leader, Georgia Sierra Club

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cc: Mr. Bill Bailey

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Comments on Environmental Fluid Dynamics Code (EFDC) and Water Quality Analysis Simulation Program (WASP)

In order to understand our position and concerns about the hydrodynamic and water quality modeling, a reference to the past is required.

In a May 18, 2004, Information Paper from CESAS-PD-E, the U.S. Environmental Protection Agency {EPA}, U.S. Fish and Wildlife Service {USFWS}, National Marine Fisheries Service {NMFS}), Georgia Department of Natural Resources Environmental Protection Division (GADNR-EPD), South Carolina Department of Health and Environmental Control (SCDHEC), and City of Savannah, Georgia, expressed technical concerns about the ability of the hydrodynamic models (based on the Boundary Fitted Hydrodynamic code – BFHYDRO) developed by Applied Technology & Management (ATM) to be sufficiently defensible and accurate to be used to identify potential impacts from proposed harbor deepening alternatives.

The ATM BFHYDRO model was already underway when the Stakeholders Evaluation Group (SEG) started meeting in January, 1999. Four and one half years of effort, including data collection, many meetings of agency personnel and contractors, reports, correspondence, and analyses had occurred before the BFHYDRO model was rejected. Data collection was done during historically low-flow periods (summers of 1997-1999) and there were concerns about

difficulties with the vertical mixing scheme. While the BFHYDRO rejection decision is history to the current SHEP DEIS and GRR, we think it is relevant since many objections to the model's development had been expressed during the 4 ½ years, yet its development continued with pressure to stay on schedule and make the BFHYDRO work. The effort clearly shows that time-spent and even good intentions do not yield a defensible work product.

The decision was then made to perform the hydrodynamic simulations using an enhanced Environmental Fluid Dynamics Code (EFDC) model from EPA's TMDL (Total Maximum Daily Load) Toolbox. It is hard to overestimate the importance of the enhanced EFDC model to SHEP since other project models and predictions are based on it, including the very important Water Quality Analysis Simulation Program (WASP), also from the EPA TMDL Toolbox.

Seven years of USGS long-term data, from January 1, 1997 through December 31, 2003, were available to the EFDC modeling effort. Also available were data collected by ATM from the summer months of 1997-1999.

The EFDC and WASP together were used to evaluate the impacts to SHEP's primary environmental and infrastructure components, including fishery habitat, water quality and dissolved oxygen, wetlands and chlorides. So, the importance of having a defensible model proven to be capable to the tasks required of it cannot be overstated.

Misjudgments in the development of the highly complex mathematical models are not merely academic arguments, if misjudgments exist and are allowed to stand as SHEP moves forward, they will become magnified linchpins in gross environmental damage and the misuse and/or loss of hundreds of millions of tax dollars in potentially misguided mitigation attempts.

On a macro-level, because of the timing of the decisions to use the enhanced EFDC, there is reason to believe that political considerations could have been playing greater roles in decisions about modeling choices than they should have. At the time, EPA was facing a court-ordered deadline to set TMDLs in the Savannah River Harbor and they needed a predictive tool. Time was important to EPA and the agencies which had concurrence responsibilities on TMDLs. Also, participation in SEG and SEG-related meetings leads us to believe that USACOE leadership during the time of the models' development might have been more focused on complying with scheduling than scientific accuracy. While it is fiscally responsible to use similar tools for somewhat similar uses when they have been adequately evaluated for all tasks, it can be disastrous when time and politics become greater drivers than science and appropriately applied accurate observation.

On a micro-level, we don't have use of all the knowledge we'd like to have to assess the models. The model calibration report prepared by Tetra Tech, "Development of the Hydrodynamic and Water Quality Models for the Savannah Harbor Expansion Project." is included in the GRR's Engineering Investigations Supplemental Materials via an

enclosed CD. The Engineering Investigations Section of the GRR lists four pages of document titles contained within the Supplement, many of which seem much more suited for Ph.D.s in mathematics and physics, and well beyond the general public's ability to discern with only the 60 days allotted to them to comment on the entire and extremely lengthy DEIS and GRR.

However, some presentations were made by the Corps and contractors to the SEG during 2005 and some digestible material is included in Section 7 of the Engineering Investigations.

A primary concern is whether or not the models are able to deal with the twice daily tidal cycles in our valuable wetlands and whether or not the model was ever adequately evaluated to be predictive. An error in either or both could render the work in the SHEP DEIS and GRR virtually worthless. There is expert opinion from hired consultants that gives us concern and we'll try and lay that out for you here. We have made every effort to quote from the actual transcripts and not take comments out of context. We do apologize for the lengthy nature of the quotations, but it has been our experience that scientists can have genuine disagreements, and that they are best represented by their own words.

At the July 12, 2005, SEG meeting Mr. Steve Davie of Tetra Tech gave some explanations that address the issues of tidal cycles, spatial differences and risk analysis. His remarks also introduce for further

discussion, Mr. Chuck Watson of Kinetic Analysis Corp, who subcontracted to do the Risk Analysis.

From transcript of SEG meeting on July 12, 2005:

Steve Davie: **QUOTE** "Most estuaries are real wide and flat. If you look at Charleston and some of the other ports on the eastern coast, they're usually a wider system with a navigation channel that cuts through it. Savannah is the navigation system. It's very narrow and very long, and the tides complicate it even more. Our spring tides are 10 to 12 feet in range which is pretty significant."

"Pretty straightforward, EPA took the lead on the TMDL. The Corps has taken the lead on the harbor expansion, but with the Corps also the Port Authority through their funding. And the ultimate goal for both of these, the TMDL and the harbor expansion is to have one model used for the harbor. This kind of gives you an idea that there are multiple efforts going on in the harbor, as you know.

There's, of course, all kinds of other studies outside of this, but with regard to water quality, and specifically dissolved oxygen, all of these efforts are going to impact each other.

We don't know what those impacts are yet. That's the purpose of having the models.

We hired, as a subcontractor to us, we hired Chuck Watson, who I think comes to the SEG meetings. Chuck did the uncertainty analysis of the model. We learned a lot with Chuck, a lot of back and forth a lot of e-

mails, a lot of phone calls, and Chuck did great work in improving the model in the enhanced grid. I'll give you a summary of what Chuck told us and the recommendations he gave us.

One of Chuck Watson's recommendations to us, in the uncertain analysis, is don't over-calibrate your model. Don't over-calibrate to this period of low flow critical conditions. You do really well in that period, but you don't do well overall.

Chuck Watson did the uncertainty analysis. He did the uncertainty analysis with the TMDL grid, which was a coarser grid used last year. He did it with this new enhanced grid. He made several recommendations to us. Don't over calibrate for the summer. Do not smooth for the bathymetry. Us modellers like to make things smooth so they're stable. We went back and just used the actual numbers and other things here. Chuck had a lot of comments. And I think we addressed all of Chuck's comments. Chuck basically said, in the end, that the enhanced grid was a significant improvement. That's what we were looking for. We were wanting that uncertainty, in the model, to decrease. That was a very positive note from Chuck's work. Chuck also wanted to do a lot of other things. He wanted to run the model for multiple periods. He didn't have time to do it, and it wasn't part of his scope. And so Chuck has a full report that's included in our report that you guys are welcome to read." **UNQUOTE**

After the July, 2005, SEG meeting, questions arose about Tetra Tech's handling of a data-set related event in December, 2000, that caused the EFDC model run to crash. The SEG members were concerned about statements the model could not correctly handle the dry cycles in the

wetlands. SEG members had also asked to hear directly from Mr. Watson about his concerns of instability in the EFDC model and that it could not run the entire 7-year period of data without artificial manipulation of the data. Mr. Joe Hoke, USACOE; Mr. Steve Davie, Tetra Tech; and Mr. Chuck Watson, Kinetic Analysis Corporation (KAC), are quoted below.

From transcript of SEG meeting on October 4, 2005:

Joe Hoke: **QUOTE** "So I'm back now to present what's been going on in the last month. So just to review the basic problem, this is from the Kinetic Analysis Corporation, which is Chuck Watson, the executive summary from his report that's in the -- it's the appendix for the May 2005 Tetra Tech modeling report. It says, even with stability problems, the enhanced grid model appears to present a significant improvement over the TMDL model, has the potential to become an extremely useful tool in studying the Lower Savannah River. However, the inability to conduct seven year test runs is a source of serious concern, with respect to the suitability of the models for predictive purposes. Therefore, Kinetic Analysis Corporation does not recommend the operational use of the enhanced grid model for predictive modeling of bathymetric changes, means deepening, until the stability issues can be resolved." **UNQUOTE**

Steve Davie: **QUOTE** "It appears to not to be a stability issue with the model. It's actual reality. There are, somewhere in the back or little

back river, one of the cells in the model goes dry during the run. The model is not designed to run without the water everywhere, so it does what you then expect it to, it ceases to run at that point. That's what occurred in December of 2000. There are some models that do wetting and drying, where they would actually let the cells go dry, and EFDC has the ability to do it, but we don't have it configured. It takes a -- it would be an exponential amount of time to run that. It takes the model a lot longer to run that, the calculations through it, so we've elected not to do that." **UNQUOTE**

Joe Hoke: **QUOTE** "One of the other things is because it's paired with the WASP model, the WASP is not able to dry either, so that is over the riding. So to come back through the EFDC model here, the model failed to run through the full seven years because there's not enough water in the little back river." **UNQUOTE**

Steve Davie: **QUOTE** "If there's no water there, we don't have salinity and we don't have DO. So we're not modeling dry marsh. We're not modeling dry riverbeds. We're modeling water."

UNQUOTE

The fact that they were modeling water is apparent in the GRR's Engineering Investigations Section 7. Figure 7.1-1 shows the 1997-1999 data collection station locations. The stations are all along the Savannah River's water channels. Also instructive is Figure 7.3-1

showing the enhanced model grip with 931 cells that extend upstream to Clyo, Georgia, (~61 miles from Fort Pulaski) and downstream to the Atlantic Ocean (~17 miles offshore from Fort Pulaski). Including the marsh cells adjacent to the Savannah River system, there are 947 total cells. Simple arithmetic shows how overwhelmingly the model grid cells were concentrated in the river.

Chuck Watson: **QUOTE** "The problem was when we tried some of the other runs, one of the things we do is called a perturbation analysis, where we take the grid and randomly make very small changes to the bathymetry to see how that changes the model. We were unable to successfully complete a lot of those runs. Those crashed or aborted at times other than December 2000." **UNQUOTE**

As the October 4, 2005, SEG meeting continued, the dialog among the scientists become more and more complex as to specific instances and even computer languages. So, citing quotes would be cumbersome. However, we are confident that it is fair to say that, while Mr. Watson maintained that the enhanced EFDC model was an improvement over the BFHYDRO, that the SHEP EFDC still needed more data, and that there were serious unresolved issues as to its stability and ability to be predictive of changes in a dynamic tidal system. We emphasize that Mr. Watson was not a regular SEG attendee, but a subcontractor to evaluate a product for use by the USACOE.

We realize that the modeling work is, in a sense, old news. But that is one of the reasons we single this out for particular concern. Its completion was necessary for other aspects of SHEP to begin and proceed and, as we've previously mentioned, any wrong judgments are amplified in subsequent work and decision making.

Appendix Q of the DEIS, "Risk and Uncertainty Analysis in Environmental Evaluation Approach," informs that, " All the agencies agree that these models are more accurate when used to identify the differences between two scenarios than when used to identify values at a given location at a point in time in a given scenario." Doesn't that defy the objective of the models? The environment is not a laboratory in which two scenarios are compared. It is a natural world, in which a measurement is distinct and precise.

In several Sections, it is noted that, "the hydrodynamic model has roughly 80 percent chance of over-predicting salinity levels at low salinity levels, thus leading to an over-prediction of salinity induced impacts to wetlands."

Simplify that sentence, and it says the model has an 80% chance of error. That is huge. No one would accept that. It is also very risky to assume that the impacts of the error can be explained by the most obvious conclusion. A case in point exists in the previous harbor deepening, when assumptions about salinity were made using apparently sound and consensus-oriented logic. But, when subsequent

experiences with spring and neap tides and the concurrent mixing were evaluated, the exact opposite of the "obvious" proved to be fact.

Section Q contains quotes from agencies that reiterate concerns about uncertainty.

Mr. Watson of KAC discussed model errors at four locations. We believe the Corps' conclusions about the errors were capricious, bowing to a schedule-driven impetus to implement the model at any cost.

Questions:

Is the data collection adequate?

If not, what other data would help make the models more predictive?

Was the December 2000 data-set event and the model's reaction to it an anomaly, or was it indicative of more pervasive concerns of the model's development?

Was the model calibrated using the most scientifically defensible data sets?

Is there instability in the model?

Why do the model runs crash during perturbation analysis?

Are the models defensibly able to predict water flows and dissolved oxygen contents in all the marsh areas of concern to SHEP?

Conclusions:

So, before the project moves any further, we ask that the EFDC and WASP models be revisited, divested of political and timing considerations.

Most importantly, we need to be sure the predictive ability of the model has been adequately evaluated. This cannot be over-

emphasized since almost every other decision in the DEIS and GRR flows from it.

Judy Jennings, Savannah Harbor Issue Leader, January 25, 2011

Comments on Impacts to Tidal Freshwater Wetlands at the Savannah National Wildlife Refuge (SNWR)

Modeling Concerns:

DEIS Section 5.1.2 addresses indirect impacts to wetlands which includes impacts to tidal freshwater wetlands, considered by USFWS to be the most critical natural resource in the harbor. These tidal freshwater wetlands were the original impetus for this organization's interest in harbor deepening. They are more ecologically diverse than saltwater wetlands and their acreage along the east coast and SNWR in particular has been in steady decline over recent decades. It is imperative that we preserve what we have and take measures to restore what has been lost in the SNWR.

The enhanced EFCD and WASP models, addressed in Section 1 of these comments, were used to evaluate the impacts to wetlands from proposed depths of harbor deepening. A reference back to our Section 1 indicates our grave concerns about the lack of adequate evaluation of the models for predictive purposes in the tidal wetlands. Even though the Corps had an Independent Technical Review (ITR) performed of the model by ERDC, the ITR did not include analysis of the model programming.

Our concerns about the EFCD model are heightened by results from the attempts to develop and use Marsh Succession Models (MSM) which were intended to use salinity information from the EFDC to predict wetland species at a given location. ATM and the USGA Fish and Wildlife Cooperative Research Unit in Gainesville, Florida (USGS Coop Unit) attempted to develop MSMs. External Peer Reviewers generally found both models to be acceptable. However, problems appeared when the Corps applied the MSMs to some of the mitigation plans. From DEIS 5.1.2.2 states, "The models produced unreliable results when they were used to evaluate mitigation plans that substantially altered flows in the tidal creeks." And further, "Salinity changes predicted to occur in the river produced no corresponding changes in salinity levels in adjacent marshes." Ultimately, "the Federal Cooperating Agencies decided to abandon the planned use of the Marsh Succession Models to evaluate the mitigation proposals." Yet, the Agencies decided "MSMs could still be used to check the prediction of wetland vegetation distribution resulting from the use of the hydrodynamic model."

We fail to follow the logic of the last conclusion since previous reviewers had been wrong about approving applications stemming from the use of the EFDC.

Implication of Sea Level Rise:

We also object to the conclusion of a sensitivity analysis that that indicated sea level rise would help ameliorate the impacts to tidal freshwater marshes from a harbor deepening project. While we fully agree that sea level rise is a real phenomenon that is currently producing environmental impacts and will produce significant environmental impacts within the 50-year planning range of the project, we reject the claim that it should be a significant factor in very near-term harbor deepening decisions. 50-years has consistently been proven to be a woefully unrealistic planning period for harbor deepening planning. Impacts to the tidal freshwater system from harbor deepening must be attributed to

deepening. Indeed, the Economics Analysis of the GRR supports this conclusion with contentions that changes within the shipping industry are moving so fast that the Tier I EIS was obsolete within only a few years of its publication.

In addition to these complications, predictions of changes to tidal freshwater wetlands are compounded by the use of marsh salinity contour lines extrapolated from river data from the EFDC; effects of prolonged drought, and increased surface water withdrawals as a result of growing populations and caps on withdrawals from the Floridan Aquifer.

Mitigation:

Regardless of these concerns, we will proceed with comments about the proposed mitigation for the loss of tidal freshwater wetlands since, regardless of the inadequacy of predictive tools, it is intellectually and intuitively obvious that harbor deepening will result in the loss of tidal freshwater wetlands.

We will defer comments on flow rerouting plans suggested for altering adverse impacts to the wetlands until USFWS has made official comments on such.

As for compensatory mitigation, Section 5.1.2.5 informs that the Corps can use the Standard Operating Procedures (SOP) which has been adopted by the natural resource agencies in Georgia to evaluate impacts and calculate compensatory mitigation on projects requiring Section 404 permits. The Corps used impact data from the EFDC as the starting point for SOP, and then calculated the minimum number of acres that need to be acquired and preserved to acceptably mitigate for wetland impacts.

In identifying lands that need to be acquired, the Corps has turned to the USFWS's July, 2007, "Final Environmental Assessment Plan: Proposed Expansion of the Savannah National Wildlife Refuge."

Questions:

Are any of the properties tidal freshwater wetlands?

If so, are there enough of such wetlands to be sufficient to meet mitigation needs?

Are the properties only available from a willing seller? Is condemnation an option?

Since authorization for SHEP requires that mitigation occur before or concurrent with the project construction, what will happen if sufficient properties cannot be acquired during such time?

If properties acquired are not contiguous with the current SNWR boundaries, what funding mechanisms are available if their management is disproportion in the Department of Interior's normal budgeting process?

Is there any commitment to replace "like" with "like"?

Conclusions:

We strongly believe that impacts to the SNWR should be avoided or mitigated with like-to-like and that restoration of tidal freshwater wetlands lost from previous deepening activities are a responsibility of moving forward with SHEP. Until this happens, SHEP in any form should not move forward. We recognize that there are ways to quantitatively evaluate impacts to natural resources from infrastructure projects and include them in the costs of the project. We do not believe that these quantitative techniques could adequately evaluate the environmental and economic losses that are predicted to the SNWR. If the SNWR cannot be protected and previously lost wetlands restored, then SHEP should be held without funding until such measures for the SNRW are identified and funding to implement are secured.

Judy Jennings, Georgia Chapter Sierra Club, Savannah River Harbor Issue Leader, January 25, 2011

Comments on Endangered Species Shortnose sturgeon:

Appendix B, "Biological Assessment of Threatened and Endangered Species for the Proposed Savannah Harbor Expansion Project: Under the Endangered Species Act of 1973, As Amended," does a good job of reviewing species listed in Jasper County, SC; Chatham County , GA; and Federally Listed Threatened and Endangered Species. While we value all of these diverse species, time limits our comments now to the federally endangered Shortnose sturgeon.

Dangers to the Shortnose sturgeon:

There is good scientific consensus that the construction of dams throughout the Shortnose stugeon's range probably reduces their reproductive success by reducing the volume of suitable spawning habitat. Dredging activities have been been known to take individual sturgeon and can reduce the quality of their feeding, rearing, and wintering habitat. Juveniles and larvae are vulnerable to intake structures.

The summary of hydrodynamic-related impacts to the Shortnose sturgeon habitat are enumerated in DEIS Appendix B, Table 8-12 (without mitigation) and Table 8-13 (depth alternatives with mitigation). These numbers are based on outputs from the EFDC model, and we continue to express our lack of confidence in its predictive ability.

Page 179 of Appendix B states, "Since no means of increasing the volume of acceptable habitat within the estuary could be identified," the Corps suggested a fishway that would allow shortnose sturgeon to move by the lowest dam on the river, the New Savannah Bluff Lock and Dam (NSBL&D) at Augusta. Such a structure is speculated to also benefit other anadromous fish species.

Appendix C, Mitigation Planning, reads that after addressing dissolved oxygen mitigation measures based on data from the EFDC, "Neither the Corps nor the agencies could identify any measure that could be implemented in the estuary that would restore sturgeon habitat or enhance existing habitats." Again, the Corps identifies a fishway by the NSBL&D.

Additionally, the Corps proposes to construct a sill in the Middle River to protect nursery habitat for the juvenile Shortnose sturgeon. The sill would require construction, maintenance, monitoring, and possible occasional reconstruction.

Questions:

We understand that several years of telemetry day gathered by the South Carolina and Georgia Departments of Natural Resources, NOAA, and The Nature Conservancy does not match modeled existing habitat for the Shortnose sturgeon. Is any effort being made to reconcile this newly acquired real data with modeled data?

Does newly collected data suggest that modeled data for Shortnose sturgeon habitat is underestimated?

What science is being used to indicate that Shortnose sturgeon would successfully relocate among available habitats?

Is the fishway a proven method for sturgeon passage?

Is the temperature of water from the Strom Thurmond Dam appropriate for attracting Shortnose sturgeon?

Has the land or rights to the land to build the fishway been acquired?

What is the mechanism for ensuring that proper water flow is available for the fishway?

Is the proposed sill a proven mitigation technology?

How will maintenance of the sill be funded?

Conclusions:

Examples of proven success should be a requirement in the EIS for the fishway ladder and sill to be considered viable mitigation options. All of the above questions should have demonstrated answers with available funding before they are considered mitigation for SHEP.

Additionally, we request that the Atlantic sturgeon, currently being recommended for listing as endangered species, be considered when assessing environmental impacts from SHEP.

Judy Jennings, Georgia Chapter Sierra Club, Savannah River Harbor Issue Leader, January 25, 2011

Comments on Striped Bass

Striped bass fishing in the Savannah River is a popular recreational sport, but the Striped bass has a checkered past with Port and Corps activities. It is possible that a viable population no longer exists in the lower Savannah River. However, the hydrodynamic and salinity models we repeatedly question still predict adverse impacts to spawning, eggs, and larvae.

Appendix C, Mitigation Planning, page 102, states, "The natural resource agencies could not identify any physical measures that could be implemented in the estuary to restore or enhance Striped bass habitat." Agencies concluded that a stocking program would be the only means to provide additional fish to the population to compensate for reduced spawning and early development habitats. It was considered that stocking young-of-the-year fish would be sufficient to get the population past the higher salinity caused by harbor deepening.

The Corps considers that deepening would not impact 100% of the existing spawning or early life stage habitat in the estuary. It uses percentage estimates from habitat loss and calculates annual program funding for stocking.

Conclusions:

We don't see any end to this artificial life support system. It seems more appropriate to study changes to river flow conditions that would positively impact habitat for spawning, eggs, and larvae. Stocking could be used until such time changes in river flows allowed for healthy spawning that produced healthy adult Striped bass. A study of river flow changes for the benefit of the Striped bass should be part of the mitigation, along with a funding mechanism to restore the fishery.

Judy Jennings, Georgia Chapter Sierra Club, Savannah River Harbor Issue Leader, January 25, 2011

Georgia Chapter Sierra Club

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766-JK-53-EN01

Comment: *Misjudgments in the development of the highly complex mathematical models are not merely academic arguments, if misjudgments exist and are allowed to stand as SHEP moves forward, they will become magnified linchpins in gross environmental damage and the misuse and/or loss of hundreds of millions of tax dollars in potentially misguided mitigation attempts.*

Response: The models used to identify project impacts and develop mitigation plans were calibrated and validated [multiple times] prior to their approval. Together the hydrodynamic and water quality models simulate the complex estuarine dynamics including hourly, daily, and monthly tidal variations, salinity and dissolved oxygen dynamics together with their spatial distribution within the system. The models are applicable over a wide range of conditions including low and high freshwater flow. The model grid incorporates surveyed bathymetry and includes point and non-point pollution sources in the watershed. The grid extends from Clyo, Georgia (river mile 61, USGS stream gage 02198500) downstream through the harbor to Fort Pulaski (river mile 0), and out to 17 miles offshore [Atlantic Ocean]. The model was calibrated and validated using observed data from 1997 to 2006 and has been designed to meet the expectations of the SHEP Water Quality Interagency Coordination Team, which followed in the footsteps of the Modeling Technical Review Group that was established in the late 1990s to oversee the development of a technically valid model for determining SHEP's environmental impacts and attendant mitigation features. The group included representatives from the District, US EPA Region 4, USGS, Georgia DNR-EPD, South Carolina DHEC, and private sector technical modeling experts [tasked with actual model development]. An independent technical review and uncertainty analysis have been conducted on the models and the resulting comments/concerns were incorporated into the final version. Details regarding the hydrodynamic and water quality model development process, extensive reviews, and uncertainty analysis can be found in the report, "Development of the Hydrodynamic and Water Quality Models for the Savannah Harbor Expansion Project" dated January 2006 [included in the Supplemental Materials to the Engineering Appendix]. Acceptance letters from agencies involved in the modeling technical review group can be found in the document, "Correspondence Regarding Hydrodynamic & Water Quality Model Acceptability" [included the Supplemental Materials to the Engineering Appendix].

The District does not concur that insufficient information was presented to allow for meaningful evaluation of the modeling efforts. The tools employed in the various studies were developed by subject matter experts from federal/state agencies and private industry over a number of years as summarized in Section 7.4 of the GRR-Engineering Appendix. The models were used to predict future impacts resulting from the various depth alternatives. Their use employed state-of-the-art techniques that were independently reviewed and verified. These tools were just part of a comprehensive study approach which was refined over a 13-year study period to ensure all impacts were adequately assessed. The analyses performed and data presented in various reports were coordinated with the principals [interagency teams, non-federal sponsor, and stakeholders] and adequately evaluate the impacts of the noted project alternatives. The detailed information summarized in the subject reports, combined with the technical reports included as appendices and supplemental data, provide the reader with sufficient information to make meaningful comment. The sheer volume of data [appendices and supplemental materials, independent verification, organizational certification, and the extensive record

of public and interagency coordination] are evidence to that fact that the modeling tools employed and results presented are more than adequate for reasonable decision-making.

766-JK-53-EN02

Comment: *On a macro-level, because of the timing of the decisions to use the enhanced EFDC, there is reason to believe that political considerations could have been playing greater roles in decisions about modeling choices than they should have. At the time, EPA was facing a court-ordered deadline to set TMDLs in the Savannah River Harbor and they needed a predictive tool. Time was important to EPA and the agencies which had concurrence responsibilities on TMDLs. Also, participation in SEG and SEG-related meetings leads us to believe that USACOE leadership during the time of the models' development might have been more focused on complying with scheduling than scientific accuracy. While it is fiscally responsible to use similar tools for somewhat similar uses when they have been adequately evaluated for all tasks, it can be disastrous when time and politics become greater drivers than science and appropriately applied accurate observation.*

Response: Political consideration played no role in the District's decisions regarding modeling choices nor was technical accuracy sacrificed to meet tight scheduling requirements. Details regarding the hydrodynamic and water quality model development process, extensive reviews, and uncertainty analysis can be found in the report , "Development of the Hydrodynamic and Water Quality Models for the Savannah Harbor Expansion Project" [January 2006]; it is included in the Supplemental Materials to the Engineering Appendix. This report includes a discussion detailing the model's accuracy for various parameters [including salinity and dissolved oxygen] throughout the Savannah River estuary [including Middle and Back Rivers]. The hydrodynamic and water quality models employed for SHEP were developed through an iterative process closely coordinated with the SHEP Water Quality Interagency Coordination Team, which followed in the footsteps of the Modeling Technical Review Group that was established in the late 1990s to review the model which would be developed for the deepening project and determine its viability for use with SHEP impact evaluations and mitigation development. The group consisted of technical modelers from the Corps, US EPA Region 4, USGS, Georgia DNR-EPD, South Carolina DHEC, and technical modeling experts [under contract to develop and refine the SHEP model]. The group ultimately decided to adopt a model [originally developed for the TMDL] for evaluating the effects of harbor deepening because it allowed simulation of the harbor's salinity stratification and was state-of-the-art with its 3-dimensional capabilities. After three years of intense work, the original TMDL model was sufficiently enhanced/modified [specifically as regards the calibration of the existing harbor conditions] to receive final acceptance letters from federal, state, and industry reviewers. These letters of acceptance can be found in the Supplemental Materials to the Engineering Appendix (Correspondence Regarding Hydrodynamic & Water Quality Model Acceptability).

766-JK-53-EN03

Comment: *On a micro-level, we don't have use of all the knowledge we'd like to have to assess the models. The model calibration report prepared by Tetra Tech, "Development of the Hydrodynamic and Water Quality Models for the Savannah Harbor Expansion Project." is included in the GRR's Engineering Investigations Supplemental Materials via an enclosed CD. The Engineering Investigations Section of the GRR lists four pages of document titles contained within the Supplement, many of which seem much more suited for Ph.D.s in mathematics and physics, and well beyond the general public's ability to discern with only the 60 days allotted to them to comment on the entire and extremely lengthy DEIS and GRR.*

Response: Summaries of the technical reports and documents can be found in the main body of the Engineering Appendix. These summaries were carefully written [manner and language] to convey an understanding of the detailed, highly technical documents found in the supplemental materials. Elaborate efforts were made by the District to make the complex technical information available to the general public in a fashion that it could be easily understood and digested. Many of the technical professionals [including members of Tetra Tech's modeling staff that developed and calibrated the SHEP model grid] have made themselves available to answer questions and discuss their findings with members of the general public through the SEG. In addition to the SEG presentations, District staff with direct knowledge of the model's use and application as well as those who were instrumental in the impact assessment and mitigation development attended the public workshop [December, 2010]. These SHEP team members circulated throughout the course of the meeting to discuss the model's intricacies with the general public in attendance.

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766-JK-53-EN04

Comment: *A primary concern is whether or not the models are able to deal with the twice daily tidal cycles in our valuable wetlands and whether or not the model was ever adequately evaluated to be predictive. An error in either or both could render the work in the SHEP DEIS and GRR virtually worthless. There is expert opinion from hired consultants that gives us concern and we'll try and lay that out for you here. We have made every effort to quote from the actual transcripts and not take comments out of context. We do apologize for the lengthy nature of the quotations, but it has been our experience that scientists can have genuine disagreements, and that they are best represented by their own words.*

Response: The models used to identify project impacts and develop mitigation plans were calibrated and validated [multiple times] prior to their approval. The approved, calibrated, and validated models are appropriate to identify project impacts and develop mitigation plans. The hydrodynamic and water quality models simulate the complex estuarine dynamics, viz., hourly, daily, and monthly tidal variations, salinity and dissolved oxygen dynamics together with their spatial distribution within the system. The models are applicable over a wide range of conditions including low and high freshwater flow. The model grid incorporates surveyed bathymetry and includes point and non-point pollution sources in the watershed. The grid extends from Clyo, Georgia (river mile 61, USGS stream gage 02198500) downstream through the harbor to Fort Pulaski (river mile 0), and out to 17 miles offshore [Atlantic Ocean]. The model was calibrated and validated using observed data from 1997 to 2006 and has been designed to meet the expectations of the SH Water Quality Interagency Coordination Team, which followed in the footsteps of the modeling technical review group that was established in the late 1990s to oversee development of a technically valid model for determining SHEP's environmental impacts and attendant mitigation features. The group included representatives from the District, US EPA Region 4, USGS, Georgia DNR-EPD, South Carolina DHEC, and private sector technical modeling experts [tasked with actual model development]. An independent technical review and uncertainty analysis have been conducted on the models and the resulting comments/concerns were incorporated into the final version. Details regarding the hydrodynamic and water quality model development process, extensive reviews, and uncertainty analysis can be found in the report, "Development of the Hydrodynamic and Water Quality Models for the Savannah Harbor Expansion Project" dated January 2006 [included in the Supplemental Materials to the Engineering Appendix]. Acceptance letters from agencies involved in the modeling technical review group can be found in the document, "Correspondence Regarding

Hydrodynamic & Water Quality Model Acceptability" [included the Supplemental Materials to the Engineering Appendix].

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766-JK-53-EN05

Comment: *Pretty straightforward, EPA took the lead on the TMDL. The Corps has taken the lead on the harbor expansion, but with the Corps also the Port Authority through their funding. And the ultimate goal for both of these, the TMDL and the harbor expansion is to have one model used for the harbor. This kind of gives you an idea that there are multiple efforts going on in the harbor, as you know.*

Response: Since this comment was made at a SEG meeting [over 5 years ago] the hydrodynamic and water quality models have been developed, calibrated, validated, and approved for use by the principals [federal/state] through their representatives on the modeling review team. The expected impacts due to harbor deepening and the proposed mitigation are well researched and documented in the GRR and EIS. Details regarding the hydrodynamic and water quality model development process, extensive reviews, and uncertainty analysis can be found in the report , "Development of the Hydrodynamic and Water Quality Models for the Savannah Harbor Expansion Project" [January 2006]; it is included in the Supplemental Materials to the Engineering Appendix. This report includes a discussion detailing the model's accuracy for various parameters [including salinity and dissolved oxygen] throughout the Savannah River estuary [including Middle and Back Rivers]. The hydrodynamic and water quality models employed for SHEP were developed through an iterative process closely coordinated with the SHEP Water Quality Interagency Coordination Team, which followed in the footsteps of the Modeling Technical Review Group that was established in the late 1990s to review the model which would be developed for the deepening project and determine its viability for use with SHEP impact evaluations and mitigation development. The group consisted of technical modelers from the Corps, US EPA Region 4, USGS, Georgia DNR-EPD, South Carolina DHEC, and technical modeling experts [under contract to develop and refine the SHEP model]. The group ultimately decided to adopt a model [originally developed for the TMDL] for evaluating the effects of harbor deepening because it allowed simulation of the harbor's salinity stratification and was state-of-the-art with its 3-dimensional capabilities. After three years of intense work, the original TMDL model was sufficiently enhanced/modified [specifically as regards the calibration of the existing harbor conditions] to receive final acceptance letters from federal, state, and industry reviewers. These letters of acceptance can be found in the Supplemental Materials to the Engineering Appendix (Correspondence Regarding Hydrodynamic & Water Quality Model Acceptability).

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766-JK-53-EN06

Comment: *One of Chuck Watson's recommendations to us, in the uncertain analysis, is don't over-calibrate your model. Don't over-calibrate to this period of low flow critical conditions. You do really well in that period, but you don't do well overall.*

Response: As reported in Section 7.3 of the Engineering Appendix, the hydrodynamic and water quality model improvements included grid resolution, tidal-marsh interaction, and boundary delineation. All were necessary elements to secure the model review team's approval. Enhancement and calibration of the models was essential to have a means to (1) predict and quantify impacts to the estuary and (2) to

develop mitigation features and plans that are scientifically sound and acceptable to all of the federal agencies involved in SHEP. The model development and calibration report includes both the hydrodynamic and water quality modeling results along with calibration and confirmation periods. The calibration of the models was performed to the summer of 1999 data [period with the most comprehensive dataset]. The confirmation of the model was performed to the summer of 1997 data and the USGS long-term data from January 1, 1997 through December 31, 2003. The model calibration report prepared by Tetra Tech is titled "Development of the Hydrodynamic and Water Quality Models for the Savannah Harbor Expansion Project". It is included in the Supplemental Materials to the Engineering Appendix. The model applications have been designed to meet the demands of the model review team. The model code, modeling results [in both time series and statistical formats], and a database containing model comparison data were made available for peer review. Ultimately, the goals of the hydrodynamic and water quality models were to produce defensible, accurate, and transferable tools that the federal and state agencies could use to make management decisions for the Savannah Harbor and Savannah River Estuary. Letters of acceptance from agencies involved in the model review group can be found in the document titled "Correspondence Regarding Hydrodynamic & Water Quality Model Acceptability". It is included in the Supplemental Materials to the Engineering Appendix.

766-JK-53-EN07

Comment: *Chuck Watson did the uncertainty analysis. He did the uncertainty analysis with the TMDL grid, which was a coarser grid used last year. He did it with this new enhanced grid. He made several recommendations to us. Don't over calibrate for the summer. Do not smooth for the bathymetry. Us modellers like to make things smooth so they're stable. We went back and just used the actual numbers and other things here. Chuck had a lot of comments. And I think we addressed all of Chuck's comments. Chuck basically said, in the end, that the enhanced grid was a significant improvement. That's what we were looking for. We were wanting that uncertainty, in the model, to decrease. That was a very positive note from Chuck's work. Chuck also wanted to do a lot of other things. He wanted to run the model for multiple periods. He didn't have time to do it, and it wasn't part of his scope. And so Chuck has a full report that's included in our report that you guys are welcome to read." UNQUOTE*

Response: The report, "Development of the Hydrodynamic and Water Quality Models for the Savannah Harbor Expansion Project" [included in the Supplemental Materials to the Engineering Appendix] addresses model interactions. Specifically, the report states: Tetra Tech included KAC's (Kinetic Analysis Corporation) recommendations by paying close attention to the bathymetry incorporation and interpolation into the model grid and the bottom roughness (friction) coefficients in the EFDC model. [See Section 4.2 on the model grid bathymetry and Section 4.3.1 on the bottom roughness coefficient]. A constant (global) bottom roughness was used in the enhanced grid to calibrate the hydrodynamics. Also, the bathymetry was not averaged or smoothed in the navigational channel. This approach took into account the perturbations in its longitudinal axis rather than through compensation in the bottom roughness term.

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766-JK-53-EN08

Comment: *Joe Hoke: QUOTE "So I'm back now to present what's been going on in the last month. So just to review the basic problem, this is from the Kinetic Analysis Corporation, which is Chuck Watson, the executive summary from his report that's in the -- it's the appendix for the May 2005 Tetra Tech modeling report. It says, even with stability problems, the enhanced grid model appears to present a significant improvement over the TMDL model, has the potential to become an extremely useful tool in studying the Lower Savannah River. However, the inability to conduct seven year test runs is a source of serious concern, with respect to the suitability of the models for predictive purposes. Therefore, Kinetic Analysis Corporation does not recommend the operational use of the enhanced grid model for predictive modeling of bathymetric changes, means deepening, until the stability issues can be resolved."* UNQUOTE

Response: The report, "Development of the Hydrodynamic and Water Quality Models for the Savannah Harbor Expansion Project" [included in the Supplemental Materials to the Engineering Appendix] addresses model uncertainty/stability. Specifically, the report states: "Tetra Tech agrees with the conclusions of the uncertainty analysis report that the enhanced grid is a significant improvement over the TMDL grid. However, even though the KAC report met expectations and was helpful in the calibration process, Tetra Tech does not agree with the conclusion that the model could be unstable.

Tetra Tech was not able to the run the model for the full 7-year confirmation period due to one set of conditions measured by the Fort Pulaski tide station. On December 31, 2000, the Fort Pulaski tide data was at variance to the remaining seven year period. Namely, the high tide and low tide appeared to be affected by frontal passage [wind shifts] which resulted in a much lower high tide than normal and, more importantly, a much lower low tide. However, the model was run through this one-day period by "smoothing" its tide data and the EFDC model at a 5-second time step. Overall, it appeared that the summer low-flow conditions were stable at a 10-second time step, but the longer, more dynamic flow, runs needed a 5-second time step. The calibration and confirmation periods of the summer of 1999 and 1997 used a 10-second time step. Typically, complex estuarine models are not calibrated, validated, or confirmed to longer datasets than 1-3 years. Most of the time, it is less than 1 year and focused on a summer critical conditions. Therefore, for ease of confirmation runs, the EFDC model was run in two parts: 1997-1999 and 2001-2003, both are three-year periods. Seven years of validation in Savannah is unusual for complex models such as this one, so we believe the emphasis on both summer periods and validation to 3 and 4-yr periods is appropriate. Appendices L and M were shown for the full seven-year period. The resultant figures were created with two model runs. One ended at the end of December 2000 and the other started in early December 2000. Tetra Tech does not agree that 7 years is a requirement for confirmation and that by not having 7 years prevents the model from being used to evaluate scenarios for the harbor."

766-JK-53-EN09

Comment: *Steve Davie: QUOTE "It appears to not to be a stability issue with the model. It's actual reality. There are, somewhere in the back or little back river, one of the cells in the model goes dry during the run. The model is not designed to run without the water everywhere, so it does what you then expect it to, it ceases to run at that point. That's what occurred in December of 2000. There are some models that do wetting and drying, where they would actually let the cells go dry, and EFDC has the ability to do it, but we don't have it configured. It takes a -- it would be an exponential amount of time to run that. It*

takes the model a lot longer to run that, the calculations through it, so we've elected not to do that." UNQUOTE"

Response: The hydrodynamic and water quality models employed for SHEP were developed through an iterative process closely coordinated with the SHEP Water Quality Interagency Coordination Team, which followed in the footsteps of the Modeling Technical Review Group that was established in the late 1990s to review the models which would be developed for the deepening project and determine its viability for use with SHEP impact evaluations and mitigation development. The group consisted of technical modelers from the Corps, US EPA Region 4, USGS, Georgia DNR-EPD, South Carolina DHEC, and technical modeling experts under contract to develop and refine the SHEP models. The group ultimately decided to adopt a model [originally developed for the TMDL] for evaluating the effects of harbor deepening because it allowed simulation of the harbor's salinity stratification and was state-of-the-art with its 3-dimensional capabilities. After three years of intense work, the original TMDL model was sufficiently enhanced/modified [specifically as regards the calibration of the existing harbor conditions] to receive final acceptance letters from federal, state, and industry reviewers. These letters of acceptance can be found in the Supplemental Materials to the Engineering Appendix (Correspondence Regarding Hydrodynamic & Water Quality Model Acceptability).

Subsequent investigations found the problem to stem from synthetic data that the modelers had developed to bridge a datagap between two important days in December. When that synthetic data was adjusted, the model was able to run for the desired duration.

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766-JK-53-EN10

Comment: *Joe Hoke: QUOTE "One of the other things is because it's paired with the WASP model, the WASP is not able to dry either, so that is over the riding. So to come back through the EFDC model here, the model failed to run through the full seven years because there's not enough water in the little back river." UNQUOTE*

Response: The hydrodynamic and water quality models employed for SHEP were developed through an iterative process closely coordinated with the SHEP Water Quality Interagency Coordination Team, which followed in the footsteps of the Modeling Technical Review Group that was established in the late 1990s to review the model which would be developed for the deepening project and determine its viability for use with SHEP impact evaluations and mitigation development. The group consisted of technical modelers from the Corps, US EPA Region 4, USGS, Georgia DNR-EPD, South Carolina DHEC, and technical modeling experts under contract to develop and refine the SHEP model. The group ultimately decided to adopt a model [originally developed for the TMDL] for evaluating the effects of harbor deepening because it allowed simulation of the harbor's salinity stratification and was state-of-the-art with its 3-dimensional capabilities. After three years of intense work the original TMDL model was sufficiently enhanced/modified [specifically as regards the calibration of the existing harbor conditions] to receive final acceptance letters from federal, state, and industry reviewers. These letters of acceptance can be found in the Supplemental Materials to the Engineering Appendix (Correspondence Regarding Hydrodynamic & Water Quality Model Acceptability).

Subsequent investigations found the problem to stem from synthetic data that the modelers had developed to bridge a datagap between two important days in December. When that synthetic data was adjusted, the model was able to run for the desired duration.

766-JK-53-EN11

Comment: *Steve Davie: QUOTE "If there's no water there, we don't have salinity and we don't have DO. So we're not modeling dry marsh. We're not modeling dry riverbeds. We're modeling water."*

Response: Subsequent investigations found the problem to stem from synthetic data that the modelers had developed to bridge a datagap between two important days in December. When that synthetic data was adjusted, the model was able to run for the desired duration.

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766-JK-53-EN12

Comment: *Chuck Watson: QUOTE "The problem was when we tried some of the other runs, one of the things we do is called a perturbation analysis, where we take the grid and randomly make very small changes to the bathymetry to see how that changes the model. We were unable to successfully complete a lot of those runs. Those crashed or aborted at times other than December 2000." UNQUOTE*

Response: The report, "Development of the Hydrodynamic and Water Quality Models for the Savannah Harbor Expansion Project" [included in the Supplemental Materials to the Engineering Appendix] addresses model stability. Specifically, Section 12.0 discusses a sensitivity analysis, i.e., the process of varying model input parameters over a reasonable [but small] range and observing how the model responses. The purpose of the sensitivity analysis is to demonstrate how responsive a particular model simulation is to uncertainties in its input data or calibration parameters. The sensitivity of one model parameter relative to other parameters can also be demonstrated. A sensitivity analysis was performed on the following model parameters and boundary inputs: turbulence scheme coefficients, offshore salinity concentration, freshwater inflow rate and timing, bottom friction, horizontal eddy viscosity, selected water-quality rate kinetics, dissolved oxygen boundary conditions, and BOD loads from point sources and marshes. Results from the sensitivity analysis can be found [over several pages] within Section 12.0. As shown by the output from this analysis the model did not crash while varying these parameters. This technique is similar to the perturbation analysis conducted by Chuck Watson [Kinetic Analysis Corporation].

766-JK-53-EN13

Comment: *As the October 4, 2005, SEG meeting continued, the dialog among the scientists become more and more complex as to specific instances and even computer languages. So, citing quotes would be cumbersome. However, we are confident that it is fair to say that, while Mr. Watson maintained that the enhanced EFDC model was an improvement over the BFHYDRO, that the SHEP EFDC still needed more data, and that there were serious unresolved issues as to its stability and ability to be predictive of changes in a dynamic tidal system. We emphasize that Mr. Watson was not a regular SEG attendee, but a subcontractor to evaluate a product for use by the USACOE.*

Response: The approved, calibrated, and validated models are appropriate to identify project impacts and develop mitigation plans. The hydrodynamic and water quality models simulate the complex estuarine dynamics, viz., hourly, daily, and monthly tidal variations, salinity and dissolved oxygen

dynamics together with their spatial distribution within the system. The models are applicable over a wide range of conditions including low and high freshwater flow. The model grid incorporates surveyed bathymetry and includes point and non-point pollution sources in the watershed. The grid extends from Clyo, Georgia (river mile 61, USGS stream gage 02198500) downstream through the harbor to Fort Pulaski (river mile 0), and out to 17 miles offshore [Atlantic Ocean]. The model was calibrated and validated using observed data from 1997 to 2006 and has been designed to meet the expectations of the SHEP Water Quality Interagency Coordination Team, which followed in the footsteps of the Modeling Technical Review Group that was established in the late 1990s to oversee the development of a technically valid model for determining SHEP's environmental impacts and attendant mitigation features. The group included representatives from the District, US EPA Region 4, USGS, Georgia DNR-EPD, South Carolina DHEC, and private sector technical modeling experts [tasked with actual model development]. An independent technical review and uncertainty analysis have been conducted on the models and the resulting comments/concerns were incorporated into the final version. Details regarding the hydrodynamic and water quality model development process, extensive reviews, and uncertainty analysis can be found in the report, "Development of the Hydrodynamic and Water Quality Models for the Savannah Harbor Expansion Project" dated January 2006 [included in the Supplemental Materials to the Engineering Appendix]. Acceptance letters from agencies involved in the modeling technical review group can be found in the document, "Correspondence Regarding Hydrodynamic & Water Quality Model Acceptability" [included the Supplemental Materials to the Engineering Appendix].

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766-JK-53-EN14

Comment: *Appendix Q of the DEIS, "Risk and Uncertainty Analysis in Environmental Evaluation Approach," informs that, " All the agencies agree that these models are more accurate when used to identify the differences between two scenarios than when used to identify values at a given location at a point in time in a given scenario." Doesn't that defy the objective of the models? The environment is not a laboratory in which two scenarios are compared. It is a natural world, in which a measurement is distinct and precise.*

Response: Section 7.2-Engineering Appendix describes the process and reasoning behind the model selection and outlines the guidelines which were used to evaluate the performance of the hydrodynamic and water quality models. Post-processing routines used to predict impacts associated with the SHEP are also discussed. The EPA, USFWS, USGS, NMFS (National Marine Fisheries) and the Corps of Engineers prepared an expectations document [Savannah Harbor Data Analysis & Modeling Expectations of Federal Agencies, 2003] that described: (1) the resources of primary concern in the estuary, (2) the locations and conditions under which project impacts should be evaluated for those resources, (3) the modeling approach to be taken, (4) the statistical analyses to be performed to document the model's performance, and (5) the evaluation criteria. The expectations were to be viewed as performance goals to which model predictions would be compared and evaluated for strengths and weaknesses and by which an understanding of their uncertainties would be developed. However, the stated expectations would not be used individually (by station and parameter) for a "pass/fail" evaluation of the model calibration and/or any post-processing routine. The noted report is included in the Engineering Investigations Supplemental Materials.

766-JK-53-EN15

Comment: *In several Sections, it is noted that, "the hydrodynamic model has roughly 80 percent chance of over-predicting salinity levels at low salinity levels, thus leading to an over-prediction of salinity induced impacts to wetlands."*

Response: EIS-Appendix Q discusses the risks and uncertainties associated with modeling the project's environmental impacts. This section describes the difficulties associated with developing hydrodynamic and water quality models that can reliably replicate existing conditions. Assessments from SC DHEC state: "The EFDC model continues to under-predict salinity on Middle River; however, we agree with Tetra Tech that the model achieves a reasonable balance between Middle River, Front River (where the model does well), and Little Back River (where the model tends to over-predict salinity)." The USFWS provided the following in their final assessment of the model development: "...we believe that salinity prediction performance is adequate to use in project planning." The District recognizes that there are legitimate reservations about some of the hydrodynamic model's salinity predictions, but believes that those uncertainties are within reasonable limits and do not pose any unacceptable risks to prudent decision-making.

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766-JK-53-EN16

Comment: *Mr. Watson of KAC discussed model errors at four locations. We believe the Corps' conclusions about the errors were capricious, bowing to a schedule-driven impetus to implement the model at any cost.*

Response: Political consideration played no role in the District's decisions regarding modeling choices nor was technical accuracy sacrificed to meet tight scheduling requirements. Details regarding the hydrodynamic and water quality model development process, extensive reviews, and uncertainty analysis can be found in the report , "Development of the Hydrodynamic and Water Quality Models for the Savannah Harbor Expansion Project" [January 2006]; it is included in the Supplemental Materials to the Engineering Appendix. This report includes a discussion detailing the model's accuracy for various parameters [including salinity and dissolved oxygen] throughout the Savannah River estuary [including Middle and Back Rivers]. The hydrodynamic and water quality models employed for SHEP were developed through an iterative process closely coordinated with the SHEP Water Quality Interagency Coordination Team, which followed in the footsteps of the Modeling Technical Review Group that was established in the late 1990s to review the model which would be developed for the deepening project and determine its viability for use with SHEP impact evaluations and mitigation development. The group consisted of technical modelers from the Corps, US EPA Region 4, USGS, Georgia DNR-EPD, South Carolina DHEC, and technical modeling experts under contract to develop and refine the SHEP model The group ultimately decided to adopt a model [originally developed for the TMDL] for evaluating the effects of harbor deepening because it allowed simulation of the harbor's salinity stratification and was state-of-the-art with its 3-dimensional capabilities. After three years of intense work the original TMDL model was sufficiently enhanced/modified [specifically as regards the calibration of the existing harbor conditions] to receive final acceptance letters from federal, state, and industry reviewers. These letters of acceptance can be found in the Supplemental Materials to the Engineering Appendix (Correspondence Regarding Hydrodynamic & Water Quality Model Acceptability).

The models employed and the criteria established were developed through an iterative process with the model review and the water quality interagency coordination teams. The model selection, development, and refinement process literally took years [1999 to 2005] and the WASP and enhanced EFDC models were both certified for use in accordance with EC 1105-2-407. The considerable changes that were made over the course of this period and elaborate certification process are an indication of the thorough and deliberative process the District employed to ensure the models met the performance goals prior to conducting runs to predict impacts associated with the proposed project.

766-JK-53-EN17
Comment: *Is the data collection adequate?*

Response: The data collection effort for SHEP model development is more than adequate. Section 2.0 of the report, "Development of the Hydrodynamic and Water Quality Models for the Savannah Harbor Expansion Project" [Supplemental Materials to the Engineering Appendix] outlines the extensive data collection effort used to develop, calibrate, and confirm the hydrodynamic and water quality models. According to the report, the majority of the data used in the calibration and confirmation process were taken from studies conducted in 1997 and 1999. Information was collected on salinity, temperature, water level, dissolved oxygen, currents, and flow data at 19 stations around the harbor. Specifically, the data collection stations were located on Front, Middle, Back, Little Back Rivers and the South Channel and acquired the noted information from surface, bottom and mid-depth in the water column. In addition to these sites, there were eight stations operated and maintained by the USGS which collected water level, salinity, and flow at mid-depth at various locations in the estuary [Front and Little Back River] for use in model development.

766-JK-53-EN18
Comment: *If not, what other data would help make the models more predictive?*

Response: The natural resource agencies reviewed and approved the data collection effort for the SHEP model development before the work was started and agreed that the SOW would be sufficient for model development purposes. Later, those agencies agreed that the hydrodynamic and water quality models were sufficient for impact evaluation purposes for SHEP. Any further widespread collection efforts would not likely add material value to the overall assessments of the project.

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766-JK-53-EN19
Comment: *Was the December 2000 data-set event and the model's reaction to it an anomaly, or was it indicative of more pervasive concerns of the model's development?*

Response: The report, "Development of the Hydrodynamic and Water Quality Models for the Savannah Harbor Expansion Project" [included in the Supplemental Materials to the Engineering Appendix] discusses model interactions. Specifically, Appendix V, comment 12 from the Agency Technical Review Group and response by Tetra Tech states: The group concluded that the inability to run the models over a 7-year duration was the result of synthetic data that was developed to fill in a data gap around December 2000. The group concluded that the inability of the model to run over the entire 7-year period of data does not reflect on the structure of the model or its performance, and should not be a consideration of the model's usefulness for its intended purposes of predicting impacts of the Savannah

Harbor Expansion Project, developing a dissolved oxygen TMDL, or permitting point source discharges. Tetra Tech agrees the 7-year run is important but in no way reflects on the stability of the model. In Section 11 of the report, Tetra Tech comments on the results of the Uncertainty Analysis. Tetra Tech performed stability and mass balance tests with the model. The model was crashing during mid-December because there was not enough water in the Little Back River during this event. The high tide on Dec 17, 2000 was only 4 feet (compared to usual 6 to 8 feet) and the low tide on Dec 19, 2000 was –2 feet (compared to usual 0 to –1 feet). The event was a real phenomenon and later USGS reported that the Fort Pulaski data during this time period have been checked and are real data, not synthetic data as previously discussed. The TMDL grid ran through this period because the Back and Little Back Rivers were deeper (Tetra Tech updated the bathymetry based on the 2004 USGS survey data). Therefore, Tetra Tech believes it is not a stability issue, but rather a reality issue. The model will not run when the river bed is dry, and it is believed that parts of the upper system were very shallow (or dry) during this time period.

Some reaches of the Back and Little Back Rivers appeared to go dry during extremely low flows and low tide range (documented in December, 2000). Subsequent investigations found the problem to stem from synthetic data that the modelers had developed to bridge a datagap between two important days in December. When that synthetic data was adjusted, the model was able to run for the desired duration. Tetra Tech modified the PSER.inp (time series water level boundary file) by adjusting 10 data points out of 245,280 (0.004%). Duration-wise this only accounted for five hours out of a seven-year record, but it allowed the model to run for the entire period without going dry. Since December 2000 is not a critical period for the modeling scenarios, altering the water level boundary for these limited data points was deemed acceptable.

In summary, the data during the noted December 2000 time frame proved to be indicative of a real phenomenon, i.e., a strong offshore wind or pressure system which severely depressed water levels. Since the seven-year model run became a critical issue among the Stakeholder Evaluation Group, Tetra Tech modified the water level boundary file to receive a continuous model run [over this period].

766-JK-53-EN20
Comment: *Was the model calibrated using the most scientifically defensible data sets?*

Response: The SHEP model calibration was completed using scientifically defensible datasets. Section 2.0 of the report, "Development of the Hydrodynamic and Water Quality Models for the Savannah Harbor Expansion Project" outlines the extensive data collection effort used to develop, calibrate, and confirm the hydrodynamic and water quality models. It is included in the Supplemental Materials to the Engineering Appendix. Continuous datasets collected by ATM, Inc. for GPA [1999] were used extensively in the calibration. They were further analyzed by USGS for additional quality assurance/quality control at the request of EPA Region 4. USGS worked with the raw data files collected in the summer of 1999 for water levels, specific conductance, temperature, and dissolved oxygen.

Details of the calibration of the EFDC and WASP models can be found in Sections 5.0 and 9.0. For EFDC calibration the methodology was parameter specific starting with the following order: water surface elevation, currents, flow, temperature, and salinity. Each one of these parameters has its importance in the success determination for the model calibration and confirmation. The order in which the hydrodynamic model is calibrated is also important to address issues such as bathymetry, friction, tidal volume, cross-sectional area, and heat budget which must be accomplished before salinity is calibrated.

Salinity is the model's principal signal which ensures that mass is being moved horizontally and vertically with the appropriate timing and direction.

766-JK-53-EN21
Comment: *Is there instability in the model?*

Response: No. The report, "Development of the Hydrodynamic and Water Quality Models for the Savannah Harbor Expansion Project" addresses model stability. It is included in the Supplemental Materials to the Engineering Appendix. Specifically, the report states: "Tetra Tech agrees with the conclusions of the uncertainty analysis report that the enhanced grid is a significant improvement over the TMDL grid. However, even though the KAC report met expectations and was helpful in the calibration process, Tetra Tech does not agree with the conclusion that the model could be unstable. Tetra Tech was not able to the run the model for the full 7-year confirmation period due to one set of conditions measured by the Fort Pulaski tide station. On December 31, 2000, the Fort Pulaski tide data was lower than any other period in the 7 years and the high tide and low tide appeared to be shifted down causing a much lower high tide than normal and, more importantly, a much lower low tide. However, we were able to run the model through this period by smoothing the tide data for that one day and the EFDC model at a 5-second time step. Overall, it appeared that the summer low-flow conditions were stable at a 10-second time step, but the longer, more dynamic flow, runs needed a 5-second time step. The calibration and confirmation periods of the summer of 1999 and 1997 used a 10-second time step. Typically, complex estuarine models are not calibrated, validated, or confirmed to longer datasets than 1-3 years. Most of the time, it is less than 1 year and focused on a summer critical conditions. Therefore, for ease of confirmation runs, the EFDC model was run in two parts: 1997-1999 and 2001-2003, both are three-year periods. Seven years of validation in Savannah is unusual for complex models such as this one so we believe the emphasis on both summer periods and validation to 3 and 4-yr periods is appropriate. Appendices L and M were shown for the full seven year period. The resultant figures were created with two model runs. One ended at the end of December 2000 and the other started in early December 2000. Tetra Tech does not agree that 7 years is a requirement for confirmation and that by not having 7 years prevents the model from being used to evaluate scenarios for the harbor."

766-JK-53-EN22
Comment: *Why do the model runs crash during perturbation analysis?*

Response: The specifics of the perturbation analysis on the model mentioned by Mr. Chuck Watson of KAC are not referenced in his account. It is included as an Appendix to the report, "Development of the Hydrodynamic and Water Quality Models for the Savannah Harbor Expansion Project"; therefore, it is difficult to discern why the model runs he performed crashed during the noted perturbation analysis [discussion in SEG meeting-2005]. However, Section 11.0 of the report states: "Tetra Tech incorporated KAC's recommendations by paying close attention to the bathymetry incorporation and interpolation into the model grid and the bottom roughness (friction) coefficients in the EFDC model. Also, the bathymetry was not averaged or smoothed in the navigational channel to allow for the perturbations in the longitudinal direction to be accounted for and not compensated through the bottom roughness term."

The report, "Development of the Hydrodynamic and Water Quality Models for the Savannah Harbor Expansion Project" [included in the Supplemental Materials to the Engineering Appendix] addresses

model stability. Specifically, Section 12.0 discusses a sensitivity analysis, i.e., the process of varying model input parameters over a reasonable [but small] range and observing how the model responses. The purpose of the sensitivity analysis is to demonstrate how responsive a particular model simulation is to uncertainties in its input data or calibration parameters. The sensitivity of one model parameter relative to other parameters can also be demonstrated. A sensitivity analysis was performed on the following model parameters and boundary inputs: turbulence scheme coefficients, offshore salinity concentration, freshwater inflow rate and timing, bottom friction, horizontal eddy viscosity, selected water-quality rate kinetics, dissolved oxygen boundary conditions, and BOD loads from point sources and marshes. Results from the sensitivity analysis can be found [over several pages] within Section 12.0. As shown by the output from this analysis the model did not crash while varying these parameters. This technique is similar to the perturbation analysis conducted by Chuck Watson [Kinetic Analysis Corporation].

766-JK-53-EN23

Comment: *Are the models defensibly able to predict water flows and dissolved oxygen contents in all the marsh areas of concern to SHEP?*

Response: The hydrodynamic and water quality models [impact determination and mitigation development] do not predict water flows and dissolved oxygen content within the estuary's marshes. The unique nature of tidally-influenced marshes requires a modeling framework that allows areas of the model's numerical architecture to become wet during incoming tides and to dry out as the tide recedes. Similarly, the EFDC and WASP models [developed for SHEP] do not have the capacity for alternating wet and dry cells within the models' domain. For calibration purposes the storage capacity of the marshes are represented volumetrically within the model grid, but also have to be prevented from drying. This method improved the calibration for Little Back and Middle Rivers, but output from these cells was deemed unreliable for wetland impact determination.

766-JK-53-EN24

Comment: *So, before the project moves any further, we ask that the EFDC and WASP models be revisited, divested of political and timing considerations.*

Response: Political consideration played no role in the District's decisions regarding modeling choices nor was technical accuracy sacrificed to meet tight scheduling requirements. Details regarding the hydrodynamic and water quality model development process, extensive reviews, and uncertainty analysis can be found in the report , "Development of the Hydrodynamic and Water Quality Models for the Savannah Harbor Expansion Project" [January 2006]; it is included in the Supplemental Materials to the Engineering Appendix. This report includes a discussion detailing the model's accuracy for various parameters [including salinity and dissolved oxygen] throughout the Savannah River estuary [including Middle and Back Rivers]. The hydrodynamic and water quality models employed for SHEP were developed through an iterative process closely coordinated with the SHEP Water Quality Interagency Coordination Team, which followed in the footsteps of the Modeling Technical Review Group that was established in the late 1990s to review the model which would be developed for the deepening project and determine its viability for use with SHEP impact evaluations and mitigation development. The group consisted of technical modelers from the Corps, US EPA Region 4, USGS, Georgia DNR-EPD, South Carolina DHEC, and technical modeling experts [under contract to develop and refine the SHEP model]. The group ultimately decided to adopt a model [originally developed for the TMDL] for evaluating the effects of harbor deepening because it allowed simulation of the harbor's salinity stratification and was

state-of-the-art with its 3-dimensional capabilities. After three years of intense work the original TMDL model was sufficiently enhanced/modified [specifically as regards the calibration of the existing harbor conditions] to receive final acceptance letters from federal, state, and industry reviewers. These letters of acceptance can be found in the Supplemental Materials to the Engineering Appendix (Correspondence Regarding Hydrodynamic & Water Quality Model Acceptability).

Both the EFDC and WASP models have been certified "Approved for Use" under the Corps' Technical Excellence Network which provides uniform science and engineering tools/practices. Care must be taken not to confuse review of a model's programming with review of its application. The model programming review (certification) is to assure that accepted scientific principles have been used and that the computer programming is accurate. Review of model applications determines if the data for the specific application was properly input and the calibration and verification process was accomplished. EFDC and WASP have been reviewed and approved, both for the model program development and for the Savannah Harbor application.

766-JK-S3-EN25

Comment: *Most importantly, we need to be sure the predictive ability of the model has been adequately evaluated. This cannot be over-emphasized since almost every other decision in the DEIS and GRR flows from it.*

Response: The predictive ability of the model has been adequately evaluated. The Risk and Uncertainty Section of the EIS (Appendix Q) discusses development and use of the various predictive tools. It specifically states: "The Corps used Interagency Coordination Teams to define how the models should be used to predict physical changes from changes proposed in the harbor. The use of experts from several organizations reduces the risk of error from the limited perspective of just one or a few individuals. The Interagency Coordination Teams recommended that the models be applied over a range of conditions." This approach is specifically verified in the letters of acceptance from the agencies represented in the modeling technical review group. Their approval for the models used for SHEP can be found the document, "Correspondence Regarding Hydrodynamic & Water Quality Model Acceptability" [included the Supplemental Materials to the Engineering Appendix].

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766-JK-S3-EV01

Comment: *DEIS Section 5.1.2 addresses indirect impacts to wetlands which includes impacts to tidal freshwater wetlands, considered by USFWS to be the most critical natural resource in the harbor. These tidal freshwater wetlands were the original impetus for this organization's interest in harbor deepening. They are more ecologically diverse than saltwater wetlands and their acreage along the east coast and SNWR in particular has been in steady decline over recent decades. It is imperative that we preserve what we have and take measures to restore what has been lost in the SNWR.*

Response: The SHEP was designed in a manner to avoid and minimize impacts to the maximum extent practicable while still achieving its basic purpose and need. For unavoidable impacts, sufficient compensatory mitigation was provided as a means to preserve and sustain aquatic resources within the Lower Savannah River Watershed.

Congress has established procedures that allow the Corps to modify existing federal water resource projects to provide additional mitigation, when warranted. However, these procedures are separate from those Congress set up to mitigate for environmental impacts from proposed new projects. In this instance, Congress's 1999 authorization of the Savannah Harbor Expansion Project did not include wording that would allow the District to include mitigation for impacts from the existing Savannah Harbor Navigation Project.

766-JK-53-EN26

Comment: *The enhanced EFCD and WASP models, addressed in Section 1 of these comments, were used to evaluate the impacts to wetlands from proposed depths of harbor deepening. A reference back to our Section 1 indicates our grave concerns about the lack of adequate evaluation of the models for predictive purposes in the tidal wetlands. Even though the Corps had an Independent Technical Review (ITR) performed of the model by ERDC, the ITR did not include analysis of the model programming.*

Response: As stated in the GRR-Engineering Appendix*, "All components of the EFDC model have been extensively validated over the course of the model's 15-year existence with more than 80 applications. The model has been extensively peer reviewed, as evidenced by 12 peer reviewed journal articles and 17 peer reviewed conference proceedings articles. There were no code modifications required for the Savannah Harbor application." Additionally, the EFDC model is a part of the US EPA *TMDL Modeling Toolbox*. Notably, its code has been peer reviewed, tested, and distributed for public use. EFDC has demonstrated its capability to capture the complex hydrodynamics in systems similar to Savannah Harbor, e.g., Mobile Bay, AL, Neuse River and Estuary, NC, Brunswick Harbor, GA, Cape Fear River, NC, St. Johns River, FL, and Charleston Harbor, SC. [*"Development of the Hydrodynamic and Water Quality Models for the Savannah Harbor Expansion Project" [Supplemental Materials to the Engineering Appendix].

The water quality model used for the project [WASP] is also part of US EPA's *TMDL Modeling Toolbox*. This program is proprietary to EPA and has been in circulation since 2005. WASP has been used extensively to examine eutrophication of Tampa Bay, FL; phosphorus loading to Lake Okeechobee, FL; eutrophication of the Neuse River Estuary, NC; eutrophication Coosa River and Reservoirs, AL; PCB pollution of the Great Lakes, eutrophication of the Potomac Estuary, kepone pollution of the James River Estuary, volatile organic pollution of the Delaware Estuary, and heavy metal pollution of the Deep River, North Carolina, and mercury in the Savannah River, GA.

Both the EFDC and WASP models have been certified "Approved for Use" under the Corps' Technical Excellence Network which provides uniform science and engineering tools/practices. Care must be taken not to confuse review of a model's programming with review of its application. The model programming review (certification) is to assure that accepted scientific principles have been used and that the computer programming is accurate. Review of model applications determines if the data for the specific application was properly input and the calibration and verification process was accomplished. EFDC and WASP have been reviewed and approved, both for the model program development and for the Savannah Harbor application.

766-JK-53-EN27

Comment: *Our concerns about the EFCD model are heightened by results from the attempts to develop and use Marsh Succession Models (MSM) which were intended to use salinity information from the EFDC to predict wetland species at a given location. ATM and the USGA Fish and Wildlife Cooperative Research*

Unit in Gainesville, Florida (USGS Coop Unit) attempted to develop MSMs. External Peer Reviewers generally found both models to be acceptable. However, problems appeared when the Corps applied the MSMs to some of the mitigation plans. From DEIS 5.1.2.2 states, "The models produced unreliable results when they were used to evaluate mitigation plans that substantially altered flows in the tidal creeks." And further, "Salinity changes predicted to occur in the river produced no corresponding changes in salinity levels in adjacent marshes." Ultimately, "the Federal Cooperating Agencies decided to abandon the planned use of the Marsh Succession Models to evaluate the mitigation proposals." Yet, the Agencies decided "MSMs could still be used to check the prediction of wetland vegetation distribution resulting from the use of the hydrodynamic model."

Response: EIS-Section 5.01.2 speaks to the usefulness of MSM and the problems which were encountered during development of certain aspects of the mitigation plan. Specifically, "In March 2007, the Federal Cooperating Agencies discussed a USGS proposal to revise the linkage to increase its usefulness for evaluating potential mitigation measures. The agencies did not believe the effort to satisfactorily revise the linkage would necessarily be successful or that the predicted improvements would be sufficient for the needs of the project. Therefore, the Federal Cooperating Agencies decided to abandon the planned use of the Marsh Succession Models to evaluate the mitigation proposals. The Marsh Succession Models (MSM) could still to be used to check the predictions of wetland vegetation distribution resulting from use of the hydrodynamic model."

MSM was reviewed and found to have been accurately programmed. Its application to existing conditions in Savannah Harbor was also reviewed and determined to be appropriate for use [subsequently approved]. However, the model's application to deepened conditions was found to be unacceptable [too inaccurate]. This demonstrates the technical review process worked, i. e., as soon as it was determined the model application was not accurately portraying marsh conditions [when mitigation features were included] it was not used in further analysis. While MSM did not prove to be a useful tool for mitigation plan development, it was used to compare wetland impacts under scenarios of deepening only. Significantly, it showed that wetland impacts identified by using the EFDC hydrodynamic model are of greater magnitude than those shown by the Marsh Succession Model [at all proposed project depths]. Hence, the District's use of the EFDC-derived impacts provides a more conservative estimate than would have been the case using the more technically-advanced Marsh Succession Model.

766-JK-S2-EN28, 766-JK-S3-EV02, 766-JK-S3-EC01

Comment: *We also object to the conclusion of a sensitivity analysis that that indicated sea level rise would help ameliorate the impacts to tidal freshwater marshes from a harbor deepening project. While we fully agree that sea level rise is a real phenomenon that is currently producing environmental impacts and will produce significant environmental impacts within the 50-year planning range of the project, we reject the claim that it should be a significant factor in very near-term harbor deepening decisions. 50-years has consistently been proven to be a woefully unrealistic planning period for harbor deepening planning. Impacts to the tidal freshwater system from harbor deepening must be attributed to deepening. Indeed, the Economics Analysis of the GRR supports this conclusion with contentions that changes within the shipping industry are moving so fast that the Tier I EIS was obsolete within only a few years of its publication.*

Response: The District requested and received a waiver from Section 5, paragraph E-36.c. (1) of ER 1105-2-100 regarding use of the average annual basis to compute the degree/kind of environmental impacts. This waiver request was based on the rationale that (1) a project should mitigate for the environmental impacts it would produce at implementation, and (2) the fact these impacts are more certain than those that may occur toward the end of the 50-year project life.

Mitigation is included in the project for impacts that would occur at project implementation. The original 50-year period of analysis that considered sea level rise (that complies with Corps policy) has been rescinded.

The Corps disagrees with the commenter's opinion that changes in the shipping industry moved so fast that the Tier I EIS was quickly rendered obsolete. The Corps' economic analysis acknowledges that the container shipping industry continues its rapid evolution, which makes projections of future conditions difficult. However, a 50-year period of analysis is required by Congress and Corps policy.

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766-JK-53-EN29

Comment: *In addition to these complications, predictions of changes to tidal freshwater wetlands are compounded by the use of marsh salinity contour lines extrapolated from river data from the EFDC; effects of prolonged drought, and increased surface water withdrawals as a result of growing populations and caps on withdrawals from the Floridan Aquifer.*

Response: Georgia DNR's current efforts to reduce groundwater pumping from the Floridan aquifer will undoubtedly result in increased utilization of surface water supplies. Water withdrawals at the Abercorn Creek facility average about 30 mgd. However, its permit would allow for treatment of an additional 20 mgd [total of 50 mgd]. Even at the maximum permitted withdrawal rate, only about 1-1/2% of the Savannah's low flow rate [measured by the USGS near the Clyo gage] would be affected [removed]. It was, therefore, concluded that even at the maximum withdrawal rate there would only be a negligible effect on the river's overall flow.

The modeling periods used in the analysis covered multiple periods of severe drought, most notably the drought-of-record for the Savannah River basin in 2007-2008. During the modeling process, the District had similar concerns to those referenced in this comment, but is confident that they [risk/uncertainty issues] have been addressed.

766-JK-53-EV03

Comment: *Regardless of these concerns, we will proceed with comments about the proposed mitigation for the loss of tidal freshwater wetlands since, regardless of the inadequacy of predictive tools, it is intellectually and intuitively obvious that harbor deepening will result in the loss of tidal freshwater wetlands.*

Response: The conversion of up to 223 acres of freshwater wetland to brackish marsh represents the only significant wetland conversion that is likely to be noticeable if the harbor is deepened to 47-feet [LPP]. Again, it is important to reiterate that the ecological values of the impacted freshwater wetlands would not be completely lost. Instead, those acres would just be converted to brackish marsh. The District's calculation of the freshwater wetlands with the potential for conversion to brackish marsh is based on a shift in 0.5 ppt salinity, a traditional rule-of-thumb for differentiating between freshwater

and brackish marsh. Data reported in the literature for Savannah Harbor suggest that a shift in vegetation [from freshwater marsh to brackish marsh] in this estuary does not occur until salinity concentrations approach 2.5 ppt [Latham et al., 1994]. Even at oligohaline marsh sites [average salinity concentration of 2.1 ppt]], a discriminate function [DF] analysis revealed that only 47% of cases resulted in the correct pairing of environmental variables with vegetative species composition and dominance. At those same oligohaline sites, 37% of the vegetative species composition and dominance were more closely aligned with a freshwater classification [Latham et al., 1994].

The District's salinity value that denotes a defined shift from freshwater to brackish marsh [i.e., 0.5 ppt] is approximately five times lower than traditional observations of 100% vegetative shifts *in situ* within the Lower Savannah Watershed [Latham et al., 1994] and other coastal marsh systems in the southeastern United States [NOAA, 2010]. Thus, many of the existing freshwater emergent plant species, and associated ecological parameters, may be sustained in areas predicted to experience salinity concentrations in the range of 0 - <2.5 ppt. For those areas that do transition to more brackish characteristics, they would still continue to provide the traditional ecological functions associated with all emergent wetland systems [see functional assessment response]. Thus, the preservation of up to 2,245 acres [consisting of bottom land hardwoods and upland buffer] is more than sufficient to offset any conversion in freshwater wetland vegetation that might occur. Using the higher salinity value observed in the Savannah basin for conversion to brackish marsh [2.5 ppt], less conversion would be expected, resulting in a mitigation-to-impacts ratio of roughly 8:1. Using the DF analysis reported by Latham et al [1994] which aligned 37% of freshwater species with oligohaline sites, the 223 acres of freshwater to brackish marsh conversion is reduced further such that the mitigation-to-impacts ratio is increased to 12:1.

A Wetland Interagency Coordination Team [technical expert representatives from USACE and federal/state natural resource agencies] was assembled to identify acceptable mitigation for SHEP. At that time, USFWS stated that mitigation actions must be performed within the basin for impacts to wetlands located within the SNWR. The Service suggested preservation of lands as a possible solution and recommended sites that are part of its long-term lands acquisition strategy to compliment the SNWR. The District then consulted with the Stakeholder Evaluation Group, including its non-governmental organizations members, to see if they had identified any suitable mitigation options. Over the 10-year study period, no agency/organization could identify another feasible alternative as mitigation for impacts that would occur as a result of the wetland species shifts. Therefore, the District proceeded with the identification of preservation sites.

The Corps' Agency Technical Review (ATR) assessed the use of Savannah District's SOP to develop a mitigation plan for SHEP. The ATR was lead by the National Deep-Draft Navigation Planning Center of Expertise; technical work was performed by Corps experts at the Engineering Research and Development Center in Vicksburg, MS. The ATR evaluated the SOP to determine if it was an appropriate method of ascertaining the preservation acreage needed to compensate for SHEP impacts. The ATR also commented on the underlying assumptions used in the application of the SOP for the SHEP. It should be emphasized that the SOP was only used to determine the amount of preservation acreage necessary to offset the remaining impacts after development of avoidance, minimization, and restoration features. The ATR concurred with use of the SOP to determine the amount of preservation acreage needed and considered Savannah District's application of the SOP to be reasonable in quantifying impacts and required mitigation.

The properties of interest to the USFWS are described in the latest version of the Refuge's Acquisition Plan and are included in the document titled "Final Environmental Assessment and Land Protection Plan; Proposed Expansion of Savannah National Wildlife Refuge". Land Acquisition would be concentrated in areas identified as "Mill Creek Acquisition Lands" and "Abercorn Island Acquisition Lands". The project would acquire properties from the Refuge's Acquisition Plan that best meet the needs of the Refuge, viz., fresh water wetlands. The District has consulted with the Refuge and intends to focus on freshwater wetland parcels that the Refuge identifies as priorities. The District always attempts to acquire property from willing sellers.

The most appropriate and practicable means of mitigating the minor shift in vegetation that would occur is the preservation of approximately 2,245 acres of bottomland hardwoods and upland buffer. The proposed preservation lands consist of various community types, viz., bottom land hardwoods, maritime forest, and uplands dominated by deciduous forest and re-growth. The bottomland hardwoods are categorized as palustrine, forested, broad-leaved deciduous systems that are both temporarily and/or seasonally flooded. Preserving these areas would ensure this wildlife habitat is preserved in perpetuity. Moreover, the additional lands would buffer the Savannah National Wildlife Refuge from future threats of development. Hence, changes in land use would not occur immediately adjacent to existing areas of the Refuge that do contain emergent wetlands. The acquisition/preservation of wetland and upland buffer would provide a functional replacement for the minor conversion of the only wetland function [fish and wildlife habitat] that would be expected when freshwater marsh is converted to a brackish counterpart. Based on these determinations, the District's functional assessment concluded that the noted preservation satisfies the intent of the no-net-loss of function criterion. For additional information, please see other responses that include a functional assessment, watershed assessment and information on compliance with the 2008 Mitigation Rule. Appendix C – Mitigation Planning, Section VII Consideration of 2008 Mitigation Rule also includes relevant information.

766-JK-53-EV04, 766-JK-53-EV05
Comment: *Are any of the properties tidal freshwater wetlands?*
If so, are there enough of such wetlands to be sufficient to meet mitigation needs?

Response: The properties of interest to the USFWS are described in the latest version of the Refuge's Acquisition Plan [July 2007] as well as the document, "Final Environmental Assessment and Land Protection Plan; Proposed Expansion of Savannah National Wildlife Refuge". Land acquisition would be concentrated in areas identified as "Mill Creek Acquisition Lands" and "Abercorn Island Acquisition Lands". The project would focus on acquiring properties that meet both the SHEP and the Refuge's needs, viz., fresh water wetlands. The District is in consultation the Refuge management and intends to focus on parcels identified as Refuge priorities. The District always attempts to acquire property from willing sellers.

766-JK-53-EV06
Comment: *Are the properties only available from a willing seller? Is condemnation an option?*

Response: As discussed in GRR-Appendix B, direct contact with all land owners [of proposed mitigation properties] has not taken place. Based on previous experience with Savannah Harbor projects, it is likely that the sponsor will encounter varying degrees of resistance from some landowners regarding acquisition. As a matter of policy, the project sponsor has the responsibility to acquire all required real

estate interests. Although the project sponsor has condemnation and quick take authority, these avenues of acquisition would not be exercised unless absolutely necessary. The project sponsor shall comply with applicable provisions [of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, Public Law 91-646, and amended by Title IV of the Surface Transportation Uniform Relocation Assistance Act of 1987, Public Law 100-17] in acquiring these real estate interests, and inform all affected persons of applicable benefits, policies, and procedures in connection with said Act(s).

766-JK-53-EV07

Comment: *Since authorization for SHEP requires that mitigation occur before or concurrent with the project construction, what will happen if sufficient properties cannot be acquired during such time?*

Response: The District has allocated almost a year to purchase the properties [noted in the Refuge's Acquisition Plan-2007] to satisfy the required preservation mitigation. This action would occur at the beginning of the project and should be completed before dredging occurs in the Inner Harbor (see Figure, "Timing of Construction" in Appendix C). Thus, sufficient properties will be acquired before or concurrent with project construction.

766-JK-53-EV08

Comment: *If properties acquired are not contiguous with the current SNWR boundaries, what funding mechanisms are available if their management is disproportion in the Department of Interior's normal budgeting process?*

Response: The properties proposed for acquisition are already approved for inclusion in the Refuge's Acquisition Plan [2007]. This indicates USFWS is committed to managing those lands appropriately and would pursue the necessary funds required to meet that goal.

766-JK-53-EV09, 766-JK-53-EV10, 766-JK-53-EV11

Comment: *Is there any commitment to replace "like" with "like"?*
We strongly believe that impacts to the SNWR should be avoided or mitigated with like-to-like and that restoration of tidal freshwater wetlands lost from previous deepening activities are a responsibility of moving forward with SHEP. Until this happens, SHEP in any form should not move forward. We recognize that there are ways to quantitatively evaluate impacts to natural resources from infrastructure projects and include them in the costs of the project. We do not believe that these quantitative techniques could adequately evaluate the environmental and economic losses that are predicted to the SNWR. If the SNWR cannot be protected and previously lost wetlands restored, then SHEP should be held without funding until such measures for the SNRW are identified and funding to implement are secured.

Response: All impacts to wetlands have been avoided and minimized to the maximum extent practicable while still achieving the overall purpose and need of the project. The USACE conducted a watershed assessment and reviewed the 2008 Mitigation Rule to ensure that the proposed preservation was appropriate to mitigate for the vegetative conversion of up to 223 acres of freshwater wetland (see previous responses for additional detail). The District conducted this watershed assessment in conjunction with the results of the functional assessment that concluded the only element of wetland function that would be impacted as a result of the conversion was fish and wildlife habitat (see previous responses for additional detail).

In brief, District reviewed the listing of approved mitigation banks in the Lower Savannah River Watershed. As of this response date, there are no established mitigation banks having tidal, freshwater wetland credits. Additionally, the In-Lieu Fee program has not been updated or approved by the District and Interagency Review Team (IRT) to provide this type of wetland compensation. The District also considered the creation of freshwater, tidal wetlands; however, experience has shown that when wetlands are derived from upland habitat, there is a very high risk of failure [long-term]. Ultimately, the District and its study partners decided that this tact was not a viable option, and for the duration of the project, another approach would be pursued.

The Corps assembled a Wetland Interagency Coordination Team (ICT) [technical expert representatives from USACE and federal/state natural resource agencies] to identify acceptable mitigation for SHEP. At that time, USFWS stated that mitigation actions must be performed within the basin for impacts to wetlands located within the SNWR. The Service suggested preservation of lands as a possible solution and recommended sites that are part of its long-term lands acquisition strategy to compliment the SNWR. The District then consulted with the Stakeholder Evaluation Group, including its non-governmental Organizations members, to see if they had identified any suitable mitigation options. Over the 10-year study period, no agency/organization could identify another feasible alternative as mitigation for impacts that would occur as a result of the wetland species shifts. Therefore, the District proceeded with the identification of preservation sites.

The most appropriate and practicable means of mitigating the shift in vegetation that would occur is the preservation of approximately 2,245 acres of bottomland hardwoods and upland buffer. The properties of interest to the USFWS are described in the latest version of the Refuge's Acquisition Plan [July 2007] and are included in the document, "Final Environmental Assessment and Land Protection Plan; Proposed Expansion of Savannah National Wildlife Refuge". Land Acquisition would be concentrated in areas identified as "Mill Creek Acquisition Lands" and "Abercorn Island Acquisition Lands". The project would focus on acquiring properties that meet both the SHEP and the Refuge's needs, viz., fresh water wetlands. The District is in consultation the Refuge management and intends to focus on parcels identified as Refuge priorities. The District always attempts to acquire property from willing sellers.

Congress has established procedures that allow the Corps to modify existing federal water resource projects, including providing additional mitigation, when warranted. These procedures are separate from those that Congress established to mitigate environmental impacts from proposed new federal projects. Notably, Congress's 1999 authorization of the Savannah Harbor Expansion Project did not include wording that would allow the District to include mitigation for impacts from the existing Savannah Harbor Navigation Project.

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766-JK-53-EN30

Comment: *The summary of hydrodynamic-related impacts to the Shortnose sturgeon habitat are enumerated in DEIS Appendix B, Table 8-12 (without mitigation) and Table 8-13 (depth alternatives with mitigation). These numbers are based on outputs from the EFDC model, and we continue to express our lack of confidence in its predictive ability.*

Response: The habitat suitability criteria used in the model runs were defined and agreed upon by the Cooperating Agencies and the Fisheries Interagency Coordination Team [of which NMFS was a participating member]. The criteria used in the model runs include data for the Shortnose sturgeon's summer and winter foraging habitat. The modeling outputs [to include the formulation criteria and raw data] were extensively coordinated with NMFS and the results and conclusion there from should be sufficient to evaluate the impacts of the deepening alternatives. For example, NOAA requested additional analyses of bottom substrates in the upper harbor and Main River up to I-95 [Dial Cordy, 2010]. This investigation found the bottom consisted predominantly of sands fractions which readily support benthic communities used as forage by sturgeon. As noted in EIS-Section 5.03.2, the Cooperating Agencies and the Fisheries Interagency Coordination Team could not identify measures within the estuary that could completely restore Shortnose sturgeon habitat. As a result, the FICT agreed [2007] that a fish bypass around the New Savannah Bluff Lock and Dam would compensate for losses within the estuary by providing 20 additional miles of upstream spawning/foraging habitat.

The models used to identify project impacts and develop mitigation plans were calibrated and validated [multiple times] prior to their approval. The approved, calibrated, and validated models are appropriate to identify project impacts and develop mitigation plans. The hydrodynamic and water quality models simulate the complex estuarine dynamics, viz., hourly, daily, and monthly tidal variations, salinity and dissolved oxygen dynamics together with their spatial distribution within the system. The models are applicable over a wide range of conditions including low and high freshwater flow were calibrated and validated using observed data from 1997 to 2006. Notably, they have been designed to meet the expectations of the SHEP Water Quality Interagency Coordination Team, which followed in the footsteps of the Modeling Technical Review Group that was established in the late 1990s to oversee the development of a technically valid model for determining SHEP's environmental impacts and attendant mitigation features. The group included representatives from the District, US EPA Region 4, USGS, Georgia DNR-EPD, South Carolina DHEC, and private sector technical modeling experts [tasked with actual model development]. An independent technical review and uncertainty analysis have been conducted on the models and the resulting comments/concerns were incorporated into the final version. Details regarding the hydrodynamic and water quality model development process, extensive reviews, and uncertainty analysis can be found in the report, "Development of the Hydrodynamic and Water Quality Models for the Savannah Harbor Expansion Project" dated January 2006 [included in the Supplemental Materials to the Engineering Appendix]. Acceptance letters from agencies involved in the modeling technical review group can be found in the document, "Correspondence Regarding Hydrodynamic & Water Quality Model Acceptability" [included the Supplemental Materials to the Engineering Appendix].

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766-JK-53-EN31

Comment: *Does newly collected data suggest that modeled data for Shortnose sturgeon habitat is underestimated?*

Response: The District is confident about the results of modeling which quantify project impacts to Shortnose sturgeon habitat. This notwithstanding, the District remains committed to working with technical staff of NOAA's National Marine Fisheries Service to ensure this conclusion remains valid over the long-term. In this regard, Shortnose surgeon habitat impacts continue to be evaluated for both winter and summer periods and for juvenile and adult life-stages. Additionally, the coordination efforts

between the District and the SHEP Fisheries Interagency Coordination Team will be maintained [at least] until the end of the post-project monitoring period.

766-JK-53-EV12

Comment: *What science is being used to indicate that Shortnose sturgeon would successfully relocate among available habitats?*

Response: The habitat suitability/availability criteria for the Shortnose sturgeon were developed by the Interagency Fisheries group. The ranking criteria were based on professional expertise/experience, a review of pertinent literature, and site specific data for the Savannah River. In the 20-mile study area [Augusta Shoals/Savannah Rapids upstream of the New Savannah Bluff Lock and Dam] substrate data were collected at 57 sites. Forty percent of the sites had a substrate type[s] considered suitable for sturgeon spawning (NMFS 2007) whereas the combined frequency of marginally suitable sites was 37%. The remaining sites [33%] had unsuitable substrates.

Benthic substrate frequency in Augusta Shoals study area

Class	Benthic substrate	SI[1]	Number of Sites	Frequency (%)
1	Mud, soft clay/fines	0.0	0	0
2	Silt, sand (diameter < 2.0 mm)	0.0	7	12
3	Sand, gravel (diameter > 2.0 mm to < 64 mm)	0.5	0	0
4	Cobble/gravel (diameter > 64 mm to < 250 mm)	1.0	3	5
5	Boulder (diameter 250 mm to 4,000 mm)	0.8	20	35
6	Bedrock w/ fissures w/ gravel/cobble mixtures	0.6	21	37
7	Bedrock smooth w/ few fissures or gravel	0.2	6	11

[1]1.0 indicates highest suitability; 0.0 the lowest.

The following link contains the full report of the investigation of Shortnose sturgeon spawning habitat in the Savannah River [Georgia and South Carolina]: http://www.sas.usace.army.mil/plnew.html

766-JK-53-EV13

Comment: *Is the fishway a proven method for sturgeon passage?*

Response: Fish ways have a long/successful history. For example, Lake sturgeon have been observed negotiating both constructed/natural rapids [entire river width] in the upper mid-west [US]. Some of these observations were made at more shallow water depths than will be the case [3.5 to 5.5 feet] for the fish passage at the New Savannah Bluff Lock and Dam (Aadland 2010). Since the Lake sturgeon is a larger species than the Shortnose, the latter should have little difficulty passing the constructed fish way.

An interagency workshop was held [April 2011] which was attended by the National Marine Fisheries Service [the agency with statutory responsibility for the Shortnose sturgeon], the US Fish and Wildlife Service, and the state natural resource agencies. The main focus of the workshop was to address agency concerns over the effectiveness of the proposed fish bypass [horse shoe]. Based on input from the workshop attendees, the District prepared preliminary designs for three structural alternatives: (1) Full River Rock Ramp, (2) Off-Channel Rock Ramp, and (3) Hybrid Rock Ramp. All three structures would utilize approximately the same volume of water to allow the sturgeon to transit up/down the river. Their designs differ by how they are positioned within the channel's cross-section. The alternatives were ranked by the technical staff in attendance based their anticipated success in allowing easy passage of the sturgeon up- and downstream. Because of the criteria the District established, all three designs would accommodate the larger Atlantic sturgeon. The structures should also readily pass other anadromous species such as American shad and Striped bass.

Based on an evaluation of various factors (cost, effectiveness in both upstream and downstream fish passage, etc.) the District recommended construction of the off-channel rock ramp option to provide access to traditional spawning areas at the Augusta Shoals. Initial estimates suggest a 75% success rate in upstream passage coupled with an 85% effectiveness for downstream passage.

766-JK-53-EV14

Comment: *Is the temperature of water from the Strom Thurmond Dam appropriate for attracting Shortnose sturgeon?*

Response: There is no intent for releases from Thurmond Dam to attract Shortnose sturgeon. Hypolimnetic discharges from the Strom Thurmond Dam will not be an issue related to dissolved oxygen in the late winter and early spring when the sturgeon spawn since the reservoir waters are well mixed. Hypolimnetic discharges from the Strom Thurmond Dam during the late winter and early spring can depress water temperatures and affect spawning during drought conditions, but there is no realistic method to avoid this situation without major adverse impacts to hydropower (e.g. spilling surface water).

766-JK-53-EV-15

Comment: *Has the land or rights to the land to build the fishway been acquired?*

Response: The fish passage would be constructed on property that is primarily already owned by the federal government. The remaining land necessary to access the fish passage structure would be acquired after the project is approved.

766-JK-53-EV16

Comment: *What is the mechanism for ensuring that proper water flow is available for the fishway?*

Response: As indicated in Appendix C, the fish bypass would be designed to operate continuously and pass about 8,000 CFS. The 8,000 CFS flow would be the entire river flow for 64% of the time between February and June. The fish bypass would pass a slightly greater volume when river flows are of greater magnitude. Flows in the fish way are designed to be self-regulating over a two-foot headwater variation. The Off-Channel Rock Ramp would employ boulder weirs at 25' intervals. There would be roughly a 9-inch drop per weir along the length of the bypass. The water depth would range between 3.5 and 5.5 feet in the fish way.

766-JK-53-EV17
Comment: *Is the proposed sill a proven mitigation technology?*

Response: No. The sill in Middle River has been dropped from the project. An assessment of the cost-effectiveness of the sill revealed that it would provide substantially less habitat benefit for Shortnose sturgeon than would the upriver bypass. The reduction in salinity at the deep hole in Middle River would have been minimal, while the cost would have been substantial.

766-JK-53-EV18
Comment: *How will maintenance of the sill be funded?*

Response: The sill in Middle River has been dropped from the project. An assessment of the cost-effectiveness of the sill revealed that it would provide substantially less habitat benefit for Shortnose sturgeon than would the upriver bypass. The reduction in salinity at the deep hole in Middle River would have been minimal, while the cost would have been substantial.

766-JK-53-EV19
Comment: *Examples of proven success should be a requirement in the EIS for the fishway ladder and sill to be considered viable mitigation options. All of the above questions should have demonstrated answers with available funding before they are considered mitigation for SHEP.*

Response: Fish ways have a long/successful history. For example, Lake sturgeon have been observed negotiating both constructed/natural rapids [entire river width] in the upper mid-west [US]. Some of these observations were made at more shallow water depths than will be the case [3.5 to 5.5 feet] for the fish passage at the New Savannah Bluff Lock and Dam (Aadland 2010). Since the Lake sturgeon is a larger species than the Shortnose, the latter should have little difficulty passing the constructed fish way.

The effectiveness of the subject sill has been predicted via hydrodynamic modeling, but there are empirical examples where similar structures have blocked salt water intrusion. For example, a sill was constructed in the Mississippi River [based on a modeling design] to protect the New Orleans' water supply from salt water contamination. (http://chl.erdc.usace.army.mil/Media/8/1/0/HL-MP-94-1.pdf). The effort was successful and the predictions from a similar model proved accurate. Even though this system is much bigger than the Savannah River, the modeling results and principles remain applicable.

766-JK-53-EV20
Comment: *Additionally, we request that the Atlantic sturgeon, currently being recommended for listing as endangered species, be considered when assessing environmental impacts from SHEP.*

Response: The Atlantic Sturgeon is discussed in Appendix B, Biological Assessment of Threatened and Endangered Species for the Proposed Savannah Harbor Extension Project. The Corps has received the BO from the NMFS which includes reasonable and prudent measures to protect the Atlantic sturgeon. The BO is included in Appendix Z.

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766-IX-53-EV21

Comment: *We don't see any end to this artificial life support system. It seems more appropriate to study changes to river flow conditions that would positively impact habitat for spawning, eggs, and larvae. Stocking could be used until such time changes in river flows allowed for healthy spawning that produced healthy adult Striped bass. A study of river flow changes for the benefit of the Striped bass should be part of the mitigation, along with a funding mechanism to restore the fishery.*

Response: Additional studies of river flow changes to benefit the Striped bass fishery would not add any material value to the original investigation. Recently, the District contacted the GA DNR-WRD and reconfirmed that the proposed expansion of their stocking program would adequately compensate for the impacts to Striped bass identified in the EIS. Please see Appendix C – Mitigation Planning for additional details concerning the stocking program.

Some Thoughts on Economics Analysis of SHEP

Judy Jennings

January 25, 2011

This writer has previously been identified as the Savannah Harbor Issue Leader for the Georgia Chapter Sierra Club. However, time deadlines loom and the ability to understand and cogently respond to complex cost and benefit analyses is therefore limited. So, these are the comments of the writer and not necessarily those of an organization.

This writer considers that, even if time had allowed for detailed analyses of the Economics report, it is highly unlikely comments would sway the Corps in their 2 ½ year-long Economics Analysis, However, past experience with Congressional authorization for SHEP, the creation of the Stakeholders Evaluation Group (SEG) and full participation in it, and advocacy for and chairmanship of the SEG's Economics Working Group (EWG) does inform and provide some insights. The Economics Analysis will continue to be a valued source of the Corps' guiding principles and of Savannah, regional, and national data on ships, commodities, and shipping trends. There is a tremendous amount of valuable information in the systems of accounts analysis that the GRR used to identify and compare the impacts of no action and of each alternative plan.

This opportunity, though, is probably best spent on observation and a few questions.

Depth and public policy:

One is the oft-repeated phrase in the GRR that Savannah is currently the second largest port on the U.S. east coast (by TEU volume). It also frequently repeats that Savannah has the shallowest controlling depth of a major port. Logic doesn't seem to tie those two sentences together, but history does. Since GPA started deepening studies in 1996 under Section 203 of WRDA 1986 until now, GPA has had an impressive list of press releases about recording breaking growth rates. This could be explained by many ways, all of which would be flattering to GPA's management, but they would not be attributable to a deeper channel. Ports in Baltimore and Norfolk currently exist at 50', and Savannah has still excelled.

One factor in Savannah was a carefully cultivated increase in liners using an all-water route, ostensibly to avoid the delays and congestion of using the land-bridge from west coast ports.

But, in 2006, Panama, a country with about the same population as the City of Houston, Texas, held a referendum to enlarge the Panama Canal to accommodate the world's bigger ships. Voter turnout was low, just over 40%. Yet about three quarters of those voting said yes to a self-financed, larger Panama Canal that could float 50 ft sailing drafts. This blip of fate from a comparatively small handful of people changed the world.

Savannah changed too, of course. The mantra for SHEP was no longer merely about keeping the port up-to- date. It was about being ready for the new Panama. Port executives who had been shrill telling groups of businessmen that the Savannah port had to be deepened just " because," now had a new mantra – being ready for the new Panama. And, that is fine for port executives. It is their job.

It put the Corps, though, in the position of not just providing channels for the world's fleet of bigger ships, but of being an arbiter of international commerce and a gatekeeper for competition among U. S. ports, especially those along the east and gulf coasts, but also along the west coast.

For instance, Section 4.1 in the beginning of the GRR recounts an instance of a Mediterranean Shipping Company service that called on Savannah, left for Charleston and came back to Savannah. The identified culprit was tidal delays. But, isn't the Corps getting just a little too close to port business in thinking that one such story is relevant?

Trying to stay on a larger scale can fail too. One erroneous interpretation of the NED is that it directs federal dollars to where they'll do the most good and avoid duplication of services using national resources, both monetary and natural. But, it doesn't really do that. Most times an NED number will not fail to justify a project unless the project can be proven (before construction) to have horrendously negative consequences.

So, if Savannah is deepened to 48', it will be practically impossible for the Corps to deny other port deepenings to prepare for big ships through the Panama. We are constantly told that the Corps is directed by Congress and does not, in and of itself, set public policy. But, the approval of consecutive deepenings all with the same set of data and analyses clearly shows that the Corps is setting public policy on. The same thing can be said if, in some way, the Corps does not approve SHEP. It would still, in effect, be setting public policy.

There likely will be some small, citizen-lead effort of advocacy to Congress for their members to take control of the matter, and be responsible for accommodating the biggest change in the shipping industry in 100 years. But, it is likely Congress will let the Corps remain in the hot-seat since it is easier to watch a large federal agency sweat than take the heat for pushing earmarks in times of fiscal austerity.

Beneficial Tides:

The concept of unit efficiency from the reduction and elimination of tidal delays is more easily appreciated than even a very sincere effort to predict the efficiencies by quantifying future fleet movement.

A basic assumption is that the efficiency would, in fact, be a net change from current assumptions. And, a non-project condition assumes that all ships that draft over 38 ft are tidally constrained. Even though your summary of assumptions says that pilots are assumed to use tide to their advantage, you don't seem to use that assumption in your calculations. At an average of 7 feet twice/day, it is quite a nice benefit. So, when the calculations give credit for the elimination of tidal delays, it double-dips for the

larger ships that would use tide to their advantage. We'd ridicule taking away a benefit from a ship arrival if it encountered bad weather, mechanical failure, or pirate attacks. We do not use such unpredictable occurrences in calculations. But, tides are highly predictable and it seems we all agree they are useful.

World fleets, their deployments and appropriate load factor analyses:

No one can deny that the world fleet is growing in larger ships. But, the distribution of the world fleet to regions and ports seems to be based more on linear extrapolation and unswerving application of the cascading effect. The same is true of LFA. The potential for error is even greater with LFAs because of rapidly changing world manufacturing and consumption patterns and, again, over-reliance on past trends well into new decades. If there is opportunity for further comment on this DEIS, there are many questions (many of which might be covered in the DEIS, but time does prohibit further discussion here).

Sensitivity Analyses:

This writer and other SEG members have long called for a substantial analysis of the proposed port in Jasper County, SC.

Section 12.1.1 of the GRR states, "the proposed future Jasper County Terminal is not included as a without or with-project conditions due to the high level of uncertainty concerned the proposed terminal." While there is a level of uncertainty that can't be denied, there is a question about where uncertainty becomes overriding to analysis.

Case-in-point that was hard to miss was the inclusion of the 800,000 TEU-capacity Dames Point Hangin Terminal in Jacksonville, Florida, in Table 5-2: New, Planned, or Proposed Container Terminals in the U.S. East and Gulf. The referenced table lists the channel depth in the St. John's River as 45' though a footnote explains the study to go from 40' to 45' is still in the feasibility stage with the Corps. On January 25, 2011 (just yesterday), Hanjin announced a 2 to 2 ½ year delay in design because they want river deepening and construction to happen simultaneously. This writer had recently researched the Hanjin Terminal and could find no records of permits.

Both ports exist only in computer renderings. Why does one seem so credible, and the other so "uncertain?" After all, SHEP has existed in one form or another for over 14 years, and it is still a draft document. Risk can be a political perception.

LNG, for example:

Section 4.4 in the front of the GRR describes the Liquified Natural Gas (LNG) facility on Elba Island in the Savannah River. LNG vessels are unrestricted at the current depth, but the Coast Guard enforces a one mile "regulated navigation area" around inbound LNG tankers

Despite good efforts to coordinate, the LNG traffic does cause delays, yet the traffic is counted as a benefit because of the need for LNG vessels to arrive at high slack tide meaning that a deeper channel

would allow waiting containerships to enter the channel more quickly. It seems that such a small benefit to the project would be insignificant compared to the time spent waiting on them regardless of the tide.

The irony is that the whole issue could be academic since LNG has experienced a decline in popularity since the 2003 permit to expand LNG on Elba Island and the traffic might be less, not more.

Irony not-withstanding, the example of risks in predictions, probably outweighed by the discount factor for long planning periods, and misplaced benefits remains appropriate.

From: judyjennings
To: judyjennings; Bailey, William G SAS; Bailey, William G SAS; CESAS-PD, SAS
Subject: Re: Comments on SHEP Economics Analysis
Date: Wednesday, January 26, 2011 12:18:48 AM

Bill, I can't believe this - I quickly added another short paragraph to my little econ paper and now the darn thing won't send the attachment....anyway, my question was - has anybody evaluated the Distribution Industry as to what stage of business it is in. For years, it clearly was a growth industry for Savannah. Is it in a growth phase still? Or, are there signs of maturation of the DC industry here?

I mentioned this in an NGO meeting last week....you may have already seen the comment other places. Or not. I can't believe I was in such a hurry I didn't put it in my own paper.

Thanks lots, Judy

Georgia Chapter Sierra Club

Page 1

780-JK-09-EC01

Comment: *One is the oft-repeated phrase in the GRR that Savannah is currently the second largest port on the U.S. east coast (by TEU volume). It also frequently repeats that Savannah has the shallowest controlling depth of a major port. Logic doesn't seem to tie those two sentences together, but history does. Since GPA started deepening studies in 1996 under Section 203 of WRDA 1986 until now, GPA has had an impressive list of press releases about recording breaking growth rates. This could be explained by many ways, all of which would be flattering to GPA's management, but they would not be attributable to a deeper channel. Ports in Baltimore and Norfolk currently exist at 50', and Savannah has still excelled.*

Response: Savannah Harbor has experienced significant growth in spite of the noted depth restrictions. There are a number of factors which played significant roles in that growth, viz., building additional distribution centers for imported goods, availability of affordable land in the vicinity of the terminal area, economic incentives offered by local governments, congestion [shipping and otherwise] at West Coast ports, expansion of the hinterland market, population growth in the Southeast, and the types of commodities being serviced. Recent forecasts predict this growth will continue over the period of analysis. Given the present depth restrictions in the channel, many vessels will have to light load, making them operate less efficiently than otherwise would be the case. With time, the problem will be exacerbated as cargo volumes increase and larger Post-Panamax vessels become more commonplace.

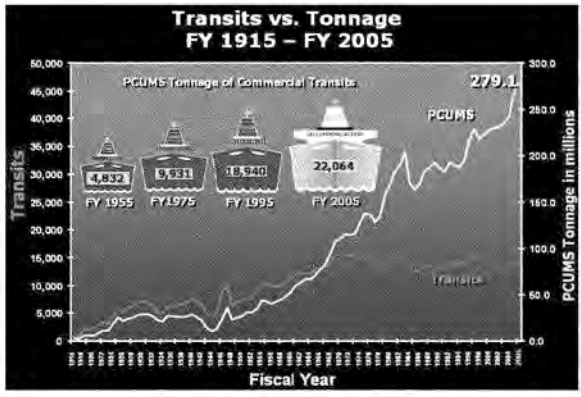
As noted in the EISI, each port is relatively unique with its growth attributable to factors besides water depth, e.g., types of calling vessels, cargo types in delivery, and port rotations. For example, the Port of Baltimore has a controlling depth of 50-feet, but its landside infrastructure is primarily designed to serve large bulk carriers [which have declined in importance in recent years as the container trade has flourished].

780-JK-09-EC02

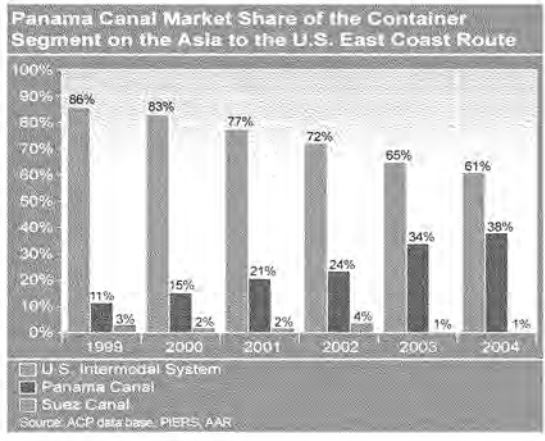
Comment: *But, in 2006, Panama, a country with about the same population as the City of Houston, Texas, held a referendum to enlarge the Panama Canal to accommodate the world's bigger ships. Voter turnout was low, just over 40%. Yet about three quarters of those voting said yes to a self-financed, larger Panama Canal that could float 50 ft sailing drafts. This blip of fate from a comparatively small handful of people changed the world.*

Response: GPA is working to prepare its facilities and operations to the changes that they expect to occur in the shipping business as a result of the expansion of the Panama Canal. There are also other operative factors in play, e.g., the rapid rise in globalization, years of congestion in the main Panama Canal channel, and the increased use of Post-Panamax vessels. The following graphics [prepared by the Corps' Institute for Water Resources] illustrates the trends leading up to the GPT decision. Over the past six years, Post-Panamax containership calls on U.S. ports have increased by over 270 percent. By 2012, the world's Post-Panamax containership fleet capacity is expected to increase by nearly 80 percent, as more than 400 new Post-Panamax vessels enter service.

Historic Growth in Vessel Sizes[2] (Prior to Expansion Plans)



Source: ACP Expansion Report



A sizable portion of today's containerships are too large for the Canal. The following table shows the existing fleet and new orders of Post-Panamax vessels.

[2] PCMUS is an acronym for Panama Canal Universal Measurement System. A PCMUS is used by the Canal to establish tolls and measures volumetric capacity. A PCUMS is equivalent to approx. 100 ft^3 of cargo space; a 20 ft long container is equivalent to 13 PCUMS tons.

Post-Panamax Container Vessel Fleet

Shipping Company	Existing Post-Panamax Vessel Fleet (Feb. 2006)			New Orders for Post-Panamax Container Vessels			Total Fleet in 2011	
	Total Capacity of existing Post-Panamax Vessels	TEU Range	Total Existing Post-Panamax Vessels	Total Capacity of New Orders	TEU Range	Total Post-Panamax Vessels on order	Number of Post-Panamax Vessels	TEU Capacity
Maersk Line*	409,066	3,700 - 9,200	62	388,108	12,000 - 8,500	42	104	797,174
Mediterranean Shipping (MSC)	146,525	9,200 - 5,500	20	95,000	9,200 - 5,500	13	33	241,525
CMA-CMG	107,074	9,160 - 5,700	16	42,920	9,160 - 8,200	5	21	149,994
Evergreen Mar. Co.	151,310	5,364 - 7,024	27	57,241	7,024	8	35	208,551
Hapag Lloyd Cont.	45,916	8,600 - 7,180	6	50,600	8,600 - 8,100	6	12	96,516
China Shipping	81,712	8,468 - 5,618	14	52,230	9,580 - 8,530	6	20	133,942
Hanjin Shipping Co.	37,126	5,308	7	52,000	8,500	8	15	89,126
APL	92,030	5,500 - 4,300	20				20	92,030
Cosco	84,978	5,270 - 5,576	16	80,000	10,000	8	24	164,978
Nippon Yusen Kaisai (NYK)	79,179	8,492 - 4,743	13	123,600	8,200 - 6,500	16	29	202,779
Mitsui O.S.K.	71,537	4,706 - 8,350	13	80,350	8,100 - 6350	11	24	151,887
OOCL	115,632	8,063 - 4,960	20	32,252	8,063	4	24	147,884
K"Line"	78,220	5,500 - 5,624	14	87,546	8,120 - 5,624	12	26	165,766
Yang Ming	55,132	5,512	10	73,000	8,000	9	19	128,132
Hamburg Sud	33,312	5,552	6	55,560	5,500	10	16	88,872
Hyundai	32,315	4,411 - 5,700	6	116,400	8,600 - 6,800	15	21	148,715
Others	895,884	4,330 - 9,449	135	680,083	9,580 - 5,527	89	224	1,575,967
Total	**2,516,948**		**405**	**2,066,890**		**262**	**667**	**4,583,838**

*Includes vessels from P&O Nedlloyd, now Maersk Line
Source: Shipping Intelligence Network, 1 February 2006; Clarkson Research Services

This table shows that the changing composition of vessels calling at US ports and Savannah is no exception.

Containership Composition at U.S. Ports

Vessel Size (TEUs)	2001	2002	2003	2004	2005	2006
<1,000	675	566	626	443	394	330
1,000-1,999 (Panamax)	4,975	4,097	3,492	3,463	3,600	3,800
2,000-2,999 (Panamax)	4,434	4,032	4,032	4,470	4,330	3,881
3,000-3,999 (Panamax)	3,464	4,129	4,050	3,959	3,704	3,404
4,000-4,999 (Panamax)	2,574	3,186	3,945	4,210	4,226	4,782
>5,000 (Post-Panamax)	972	1,128	1,142	1,734	2,288	3,312
Total	17,076	17,138	17,287	18,279	18,542	19,509
TEUs per call	2,801	3,020	3,144	3,241	3,321	3,505

Source: American Association of Port Authorities and Terminal Operators

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780-JK-09-EC03

Comment: *For instance, Section 4.1 in the beginning of the GRR recounts an instance of a Mediterranean Shipping Company service that called on Savannah, left for Charleston and came back to Savannah. The identified culprit was tidal delays. But, isn't the Corps getting just a little too close to port business in thinking that one such story is relevant?*

Response: The GRR provides a discussion of how shippers respond to tidal delays, e.g., some opt to wait for adequate tide whereas, in extreme cases, some choose to call at a nearby port [which can result in transportation inefficiencies]. The landside costs, time-sensitivity, and/or value of cargo can also play a role in their decision whether to wait.

780-JK-09-EC04

Comment: *Trying to stay on a larger scale can fail too. One erroneous interpretation of the NED is that it directs federal dollars to where they'll do the most good and avoid duplication of services using national resources, both monetary and natural. But, it doesn't really do that. Most times an NED number will not fail to justify a project unless the project can be proven (before construction) to have horrendously negative consequences.*

Response: The Corps' Principles & Guidelines defines the Federal objective as "contributing to National Economic Development (NED) consistent with protecting the environment". The NED plan is the alternative that reasonably maximizes a project's NED benefits to the nation over its associated economic costs. The NEPA process is a separate, concurrent process intended to consider/resolve the environmental [and certain socio-economic] concerns associated with implementing a major federal action. All costs, including mitigation, are taken into account in the economic analysis.

In the case of Savannah Harbor, the 47-foot deepening alternative resulted in the highest difference in benefits over costs; thus, it is the NED plan. The transportation savings to the nation are approximately $180 million on an average annual equivalent basis. Non-federal sponsors have the option of recommending another alternative, which is designated the Locally-Preferred Plan. Departures from the NED have cost-sharing implications and need to be approved by the Assistant Secretary of the Army for Civil Works.

780-JK-09-EC05

Comment: *So, if Savannah is deepened to 48', it will be practically impossible for the Corps to deny other port deepenings to prepare for big ships through the Panama. We are constantly told that the Corps is directed by Congress and does not, in and of itself, set public policy. But, the approval of consecutive deepenings all with the same set of data and analyses clearly shows that the Corps is setting public policy on. The same thing can be said if, in some way, the Corps does not approve SHEP. It would still, in effect, be setting public policy.*

Response: Every port is examined individually and the deepening of one port in no way signals that all competing ports will be deepened. All studies must follow the same rigorous process detailed in Engineering Regulation (ER) 1105-2-100 [as well as other guidance and regulations]. All analyses and documents are subject to iterative review, including an evaluation by an independent party.

As explained in the Economic Appendix, there are many variables that influence a channel's optimal depth. Examples include vessel composition, cargo weight, container slot utilization, port rotations along with the channel bathymetry. Experience demonstrates that each of these factors can vary from one port to another. Furthermore, a multiport analysis, a systematic analysis of alternate routing possibilities [including depths at other ports as well as implications for the study port], was performed in 2006. The analysis concluded that no traffic (containers) would be diverted from other ports under the With project conditions based on a least total delivered transportation cost analysis.

780-JK-09-EC06

Comment: *A basic assumption is that the efficiency would, in fact, be a net change from current assumptions. And, a non-project condition assumes that all ships that draft over 38 ft are tidally constrained. Even though your summary of assumptions says that pilots are assumed to use tide to their advantage, you don't seem to use that assumption in your calculations. At an average of 7 feet twice/day, it is quite a nice benefit. So, when the calculations give credit for the elimination of tidal delays, it double-dips for the larger ships that would use tide to their advantage. We'd ridicule taking away a benefit from a ship arrival if it encountered bad weather, mechanical failure, or pirate attacks. We do not use such unpredictable occurrences in calculations. But, tides are highly predictable and it seems we all agree they are useful.*

Response: The District considered the use of tides in both the "without" and "with project" conditions; therefore, there was no double counting of benefits as suggested. In the HarborSym analysis of tidal delays, vessels are assumed to arrive on a random basis. Their time (if any) is calculated from that arrival to when the tide would provide them sufficient depth to transit the navigation channel (at their arrival draft). Tidal delay benefits would occur if a deeper channel allowed that vessel to spend less time waiting for sufficient depth to transit the harbor.

Shippers adhere to "just in time delivery" practices; this makes it more difficult for a vessel to arrive precisely at the 7-foot maximum high tide. The actual tidal assistance at port call is likely to be less than optimal. Recall, there are two types of transportation savings: (1) those derived from larger vessels or from more fully loaded vessels (which include tide and underkeel clearance); and (2) the reduction in tidal delays brought about by reduced waiting and congestion. The former savings are derived by a reduced cost per ton (made possible via larger vessels or fuller loads); the latter savings are defined as the reduced congestion (calculated as the reduction in idling costs). These savings were computed through two separate models, the Transportation Cost Savings and the HarborSym. The tidal delay savings represent a much lower percentage of the overall project's benefits. For the SHEP project, the savings in transportation costs are over 90 percent of the benefits of deepening the harbor. The tidal delay benefits are much smaller.

Page 3

780-JK-09-EC07

Comment: *No one can deny that the world fleet is growing in larger ships. But, the distribution of the world fleet to regions and ports seems to be based more on linear extrapolation and unswerving application of the cascading effect. The same is true of LFA. The potential for error is even greater with LFAs because of rapidly changing world manufacturing and consumption patterns and, again, over-reliance on past trends well into new decades. If there is opportunity for further comment on this DEIS, there are many questions (many of which might be covered in the DEIS, but time does prohibit further discussion here).*

Response: The Corps' guidance on deep-draft navigation projects emphasizes using empirical field data whenever possible together with making forecasts over a 50-year period of analysis. Data on the past and present problems help to shape the future without-project condition scenario, which serves as a baseline for project formulation and evaluation. As would be expected, a 50-year forecast contains uncertainty; therefore, several sensitivity analyses are performed using lower growth rates, no growth, and increased packaging densities. The vast majority of the sensitivity analyses show the deepening improvements are economically justified.

780-JK-09-EC08

Comment: *Section 12.1.1 of the GRR states, "the proposed future Jasper County Terminal is not included as a without or with-project conditions due to the high level of uncertainty concerned the proposed terminal." While there is a level of uncertainty that can't be denied, there is a question about where uncertainty becomes overriding to analysis.*

Response: As part of the incremental analyses conducted in accordance with NEPA and the language of Section 203, WRDA [1999], deepening to other sites in lieu of Garden City Terminal was considered. The site presently identified for a Jasper terminal (sometimes referred to as Sites 14A/14B) was examined as an alternative port site, as described in GRR-Sections 6 and 12, GRR-Appendix D, EIS-Section 3, and EIS-Appendix O. The analyses showed that the combined costs of developing the infrastructure to and for the terminal plus deepening to the site would exceed the costs of deepening to the existing Garden City Terminal (mitigation costs included in both scenarios). As a result, that site was dropped from further consideration as an alternative in this study. Recent events have not changed the major factors in that decision.

Although studies are underway, the developers of the site have not yet applied for a Section 404 permit. That application would provide the proposed development plan (proposed function, size, timing, equipment, etc) and allow the regulatory agencies and the public an opportunity to evaluate the environmental sustainability of whatever design is being proposed. Continued uncertainty in construction of a terminal is evidenced by the lack of ratification of a bi-state compact by the two state legislatures since signing the term sheet in 2007.

The Corps also performed a sensitivity analysis of the effects on the economic justification of deepening to the Garden City Terminal if a container terminal in Jasper County were subsequently constructed and became operational. The analysis found that deepening to the Garden City Terminal would still have been justified under most every scenario examined if, at a later time, a Jasper County terminal is

developed. In addition, the analysis found that if a Jasper terminal was already operational, deepening the channel segment to Garden City Terminal would be economically justified.

780-IK-09-EC09

Comment: *Despite good efforts to coordinate, the LNG traffic does cause delays, yet the traffic is counted as a benefit because of the need for LNG vessels to arrive at high slack tide meaning that a deeper channel would allow waiting containerships to enter the channel more quickly. It seems that such a small benefit to the project would be insignificant compared to the time spent waiting on them regardless of the tide.*

Response: LNG traffic was included in the *HarborSym* analysis to model [more accurately] future vessel calls at Savannah throughout the period of analysis. These vessels were similarly considered for the "without project" and "with project" conditions. By necessity, deep-draft vessels calling on Savannah must interact with LNG vessel traffic. Restrictions placed on the LNG class in the form of safety zones and tide restrictions have an associated effect on the transit times/costs of all other deep-draft vessels. All deep-draft vessels (e.g., container, LNG, general cargo) contribute to [and by extension are subject to] harbor congestion. Therefore, the District evaluated (and included in the project) meeting areas to help alleviate the situation. Savings in LNG vessel operating costs (tidal delays) were included in the benefit/cost analysis [even though they are relatively small].

1110-MR-01-EC01

Comment: *Bill, I can't believe this - I quickly added another short paragraph to my little econ paper and now the darn thing won't send the attachment....anyway, my question was - has anybody evaluated the Distribution Industry as to what stage of business it is in. For years, it clearly was a growth industry for Savannah. Is it in a growth phase still? Or, are there signs of maturation of the DC industry here?*

Response: While a complete analysis of distribution centers was not performed, anecdotal evidence and cargo patterns suggest the industry is still in a growth phase. It appears the availability of affordable land and other economic incentives will continue to drive GPA's rate of container expansion [as well as the associated need for the DC industry].

From: Sierra Club Membership Services on behalf of Sylvia Pannell
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Monday, January 24, 2011 10:00:37 PM

Jan 24, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

The current terminals along the Savannah River support hundreds of thousands of jobs throughout Georgia and South Carolina and there is no reason to believe they won't in the future. Even without deepening the Savannah River, Savannah Port will continue to grow and provide even more jobs as current container ships visiting Jacksonville, if deepened, will now use Savannah Port.

The Federal Government can not afford to assist deepening every port along the Atlantic Coast -- nor are state budgets deep enough to allow every state along the Atlantic Coast to spend tax payers money to deepen every state port.

The Corps of Engineers needs to recommend to the Federal Government which port to help fund. This would save funds currently planned for deepening the Savannah River and yearly dredging funds needed to keep it deep.

Thank you for your attention to this matter.

Sincerely,

Ms. Sylvia Pannell
520 W Cloverhurst Ave
Athens, GA 30606-4216
(706) 202-4750

From: Sierra Club Membership Services on behalf of Chris Carroll
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Monday, January 24, 2011 11:19:02 PM

Jan 24, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

The current terminals along the Savannah River support hundreds of thousands of jobs throughout Georgia and South Carolina and there is no reason to believe they won't in the future. Deepening the river may have unforeseeable enivronmental consequences and is not likely to improve the quality of the air that Georgians in the region breathe.

The Federal Government can not afford to assist deepening every port along the Atlantic Coast -- nor are state budgets deep enough to allow every state along the Atlantic Coast to spend tax payers money to deepen every state port.

The Corps of Engineers needs to recommend to the Federal Government that only a few ports be funded, and the enivronmental study needs to be detailed and scientifically valid. Please take the time to do an extensive study of the impacts.

Sincerely,

Ms. Chris Carroll
815 Pinetree Dr
Decatur, GA 30030-2332

From: Sierra Club Membership Services on behalf of Sheena Myers
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Thursday, January 27, 2011 10:10:09 AM

Jan 27, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

The current terminals along the Savannah River support hundreds of thousands of jobs throughout Georgia and South Carolina and there is no reason to believe they won't in the future. Even without deepening the Savannah River, Savannah Port will continue to grow and provide even more jobs as current container ships visiting Jacksonville, if deepened, will now use Savannah Port.

The Federal Government can not afford to assist deepening every port along the Atlantic Coast -- nor are state budgets deep enough to allow every state along the Atlantic Coast to spend tax payers money to deepen every state port.

The Corps of Engineers needs to recommend to the Federal Government which port to help fund. This would save funds currently planned for deepening the Savannah River and yearly dredging funds needed to keep it deep.

Sincerely,

Mrs. Sheena Myers
323 River Point Dr
McDonough, GA 30252-4150

From: Sierra Club Membership Services on behalf of Theresa Cromeans
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Thursday, January 27, 2011 10:09:10 AM

Jan 27, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

The current terminals along the Savannah River support hundreds of thousands of jobs throughout Georgia and South Carolina and there is no reason to believe they won't in the future. Even without deepening the Savannah River, Savannah Port will continue to grow and provide even more jobs as current container ships visiting Jacksonville, if deepened, will now use Savannah Port.

The Federal Government can not afford to assist deepening every port along the Atlantic Coast -- nor are state budgets deep enough to allow every state along the Atlantic Coast to spend tax payers money to deepen every state port.

The Corps of Engineers needs to recommend to the Federal Government which port to help fund. This would save funds currently planned for deepening the Savannah River and yearly dredging funds needed to keep it deep.

Sincerely,

Ms. Theresa Cromeans
1328 Middlesex Ave NE
Atlanta, GA 30306-3229

From: Sierra Club Membership Services on behalf of Terri Haney
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Wednesday, January 26, 2011 10:33:04 PM

Jan 26, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

The current terminals along the Savannah River support hundreds of thousands of jobs throughout Georgia and South Carolina and there is no reason to believe they won't in the future. Even without deepening the Savannah River, Savannah Port will continue to grow and provide even more jobs as current container ships visiting Jacksonville, if deepened, will now use Savannah Port.

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The Corps of Engineers needs to recommend to the Federal Government which port to help fund. This would save funds currently planned for deepening the Savannah River and yearly dredging funds needed to keep it deep.

Sincerely,

Ms. Terri Haney
4126 New Liberty Rd
Clarkesville, GA 30523-2200
(706) 499-8703

From: Sierra Club Membership Services on behalf of Regina Mowrer
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Wednesday, January 26, 2011 9:01:55 PM

Jan 26, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

The current terminals along the Savannah River support hundreds of thousands of jobs throughout Georgia and South Carolina and there is no reason to believe they won't in the future. Even without deepening the Savannah River, Savannah Port will continue to grow and provide even more jobs as current container ships visiting Jacksonville, if deepened, will now use Savannah Port.

The Federal Government can not afford to assist deepening every port along the Atlantic Coast -- nor are state budgets deep enough to allow every state along the Atlantic Coast to spend tax payers money to deepen every state port.

The Corps of Engineers needs to recommend to the Federal Government which port to help fund. This would save funds currently planned for deepening the Savannah River and yearly dredging funds needed to keep it deep.

Sincerely,

Regina Mowrer
1240 Platinum Dr
Hoschton, GA 30548-1760

From: Sierra Club Membership Services on behalf of Jamesa Rhodes
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Wednesday, January 26, 2011 7:31:37 PM

Jan 26, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

The current terminals along the Savannah River support hundreds of thousands of jobs throughout Georgia and South Carolina and there is no reason to believe they won't in the future. Even without deepening the Savannah River, Savannah Port will continue to grow and provide even more jobs as current container ships visiting Jacksonville, if deepened, will now use Savannah Port.

The Federal Government can not afford to assist deepening every port along the Atlantic Coast -- nor are state budgets deep enough to allow every state along the Atlantic Coast to spend tax payers money to deepen every state port.

The Corps of Engineers needs to recommend to the Federal Government which port to help fund. This would save funds currently planned for deepening the Savannah River and yearly dredging funds needed to keep it deep.

Sincerely,

Miss Jamesa Rhodes
1342 Revelstoke Cv
Riverdale, GA 30296-7179

From: Sierra Club Membership Services on behalf of Mary Francell-Sharfstein
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Wednesday, January 26, 2011 5:32:23 PM

Jan 26, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

The current terminals along the Savannah River support hundreds of thousands of jobs throughout Georgia and South Carolina and there is no reason to believe they won't in the future. Even without deepening the Savannah River, Savannah Port will continue to grow and provide even more jobs as current container ships visiting Jacksonville, if deepened, will now use Savannah Port.

The Federal Government can not afford to assist deepening every port along the Atlantic Coast -- nor are state budgets deep enough to allow every state along the Atlantic Coast to spend tax payers money to deepen every state port.

The Corps of Engineers needs to recommend to the Federal Government which port to help fund. This would save funds currently planned for deepening the Savannah River and yearly dredging funds needed to keep it deep.

Sincerely,

Mrs. Mary Francell-Sharfstein
3425 Marquess Moor
Alpharetta, GA 30022-7631

From: Sierra Club Membership Services on behalf of Harrison Layer
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Wednesday, January 26, 2011 3:55:27 PM

Jan 26, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

The current terminals along the Savannah River support hundreds of thousands of jobs throughout Georgia and South Carolina and there is no reason to believe they won't in the future. Even without deepening the Savannah River, Savannah Port will continue to grow and provide even more jobs as current container ships visiting Jacksonville, if deepened, will now use Savannah Port.

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The Corps of Engineers needs to recommend to the Federal Government which port to help fund. This would save funds currently planned for deepening the Savannah River and yearly dredging funds needed to keep it deep.

Sincerely,

Mr. Harrison Layer
75 John Wesley Dobbs Ave NE Unit 207
Atlanta, GA 30303-2439

From: Sierra Club Membership Services on behalf of Gladness Adkins
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Wednesday, January 26, 2011 2:56:26 PM

Jan 26, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

The current terminals along the Savannah River support hundreds of thousands of jobs throughout Georgia and South Carolina and there is no reason to believe they won't in the future. Even without deepening the Savannah River, Savannah Port will continue to grow and provide even more jobs as current container ships visiting Jacksonville, if deepened, will now use Savannah Port.

The Federal Government can not afford to assist deepening every port along the Atlantic Coast -- nor are state budgets deep enough to allow every state along the Atlantic Coast to spend tax payers money to deepen every state port.

The Corps of Engineers needs to recommend to the Federal Government which port to help fund. This would save funds currently planned for deepening the Savannah River and yearly dredging funds needed to keep it deep.

Sincerely,

Miss Gladness Adkins
505 Calibre Springs Way NE
Atlanta, GA 30342-1888
(615) 573-4969

From: Sierra Club Membership Services on behalf of Cassie Fitzgibbon
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Wednesday, January 26, 2011 1:54:35 PM

Jan 26, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

The current terminals along the Savannah River support hundreds of thousands of jobs throughout Georgia and South Carolina and there is no reason to believe they won't in the future. Even without deepening the Savannah River, Savannah Port will continue to grow and provide even more jobs as current container ships visiting Jacksonville, if deepened, will now use Savannah Port.

The Federal Government can not afford to assist deepening every port along the Atlantic Coast -- nor are state budgets deep enough to allow every state along the Atlantic Coast to spend tax payers money to deepen every state port.

The Corps of Engineers needs to recommend to the Federal Government which port to help fund. This would save funds currently planned for deepening the Savannah River and yearly dredging funds needed to keep it deep.

Sincerely,

Ms. Cassie Fitzgibbon
106 Ridgewood Cir
Rincon, GA 31326-9334

From: Sierra Club Membership Services on behalf of Sharon Bubel
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Wednesday, January 26, 2011 1:25:10 PM

Jan 26, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

The current terminals along the Savannah River support hundreds of thousands of jobs throughout Georgia and South Carolina and there is no reason to believe they won't in the future. Even without deepening the Savannah River, Savannah Port will continue to grow and provide even more jobs as current container ships visiting Jacksonville, if deepened, will now use Savannah Port.

The Federal Government can not afford to assist deepening every port along the Atlantic Coast -- nor are state budgets deep enough to allow every state along the Atlantic Coast to spend tax payers money to deepen every state port.

The Corps of Engineers needs to recommend to the Federal Government which port to help fund. This would save funds currently planned for deepening the Savannah River and yearly dredging funds needed to keep it deep.

Sincerely,

Ms. Sharon Bubel
3078 Clairmont Rd NE
Apt 622
Atlanta, GA 30329-1668

From: Sierra Club Membership Services on behalf of Cynthia Mead
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Wednesday, January 26, 2011 1:24:45 PM

Jan 26, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

Before the Corps even considers deepening the Savannah River, it should conduct an Environmental Impact Study analyzing how the deepening of the Savannah River and the expansion of the port would impact the environment and health of the surrounding areas. Serious questions exist as to the impact of this proposal on the air quality, water supply, and quality of life in the surrounding regions. These questions are not adequately addressed by the existing Environmental Impact Study.

Sincerely,

Ms. Cynthia Mead
1277 Oakdale Rd NE
Atlanta, GA 30307-1052

From: Sierra Club Membership Services on behalf of Z Highsmith
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Wednesday, January 26, 2011 12:24:11 PM

Jan 26, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

The current terminals along the Savannah River support hundreds of thousands of jobs throughout Georgia and South Carolina and there is no reason to believe they won't in the future. Even without deepening the Savannah River, Savannah Port will continue to grow and provide even more jobs as current container ships visiting Jacksonville, if deepened, will now use Savannah Port.

The Federal Government can not afford to assist deepening every port along the Atlantic Coast -- nor are state budgets deep enough to allow every state along the Atlantic Coast to spend tax payers money to deepen every state port.

The Corps of Engineers needs to recommend to the Federal Government which port to help fund. This would save funds currently planned for deepening the Savannah River and yearly dredging funds needed to keep it deep.

Sincerely,

Z Highsmith
137 Summer Brooke
Peachtree City, GA 30269-2472
(678) 927-0655

From: Sierra Club Membership Services on behalf of William Brillhart
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Wednesday, January 26, 2011 11:24:47 AM

Jan 26, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

The current terminals along the Savannah River support hundreds of thousands of jobs throughout Georgia and South Carolina and there is no reason to believe they won't in the future. Even without deepening the Savannah River, Savannah Port will continue to grow and provide even more jobs as current container ships visiting Jacksonville, if deepened, will now use Savannah Port.

The Federal Government can not afford to assist deepening every port along the Atlantic Coast -- nor are state budgets deep enough to allow every state along the Atlantic Coast to spend tax payers money to deepen every state port.

The Corps of Engineers needs to recommend to the Federal Government which port to help fund. This would save funds currently planned for deepening the Savannah River and yearly dredging funds needed to keep it deep.

Sincerely,

Mr. William Brillhart
2919 Lavista Way
Decatur, GA 30033-1108

From: Sierra Club Membership Services on behalf of Linda Eller
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Wednesday, January 26, 2011 10:53:19 AM

Jan 26, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

The current terminals along the Savannah River support hundreds of thousands of jobs throughout Georgia and South Carolina and there is no reason to believe they won't in the future. Even without deepening the Savannah River, Savannah Port will continue to grow and provide even more jobs as current container ships visiting Jacksonville, if deepened, will now use Savannah Port.

The Federal Government can not afford to assist deepening every port along the Atlantic Coast -- nor are state budgets deep enough to allow every state along the Atlantic Coast to spend tax payers money to deepen every state port.

The Corps of Engineers needs to recommend to the Federal Government which port to help fund. This would save funds currently planned for deepening the Savannah River and yearly dredging funds needed to keep it deep.

Sincerely,

Mrs. Linda Eller
3874 Western Way
Macon, GA 31216-5646
(478) 788-6184

From: Sierra Club Membership Services on behalf of Eldon Kennedy
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Wednesday, January 26, 2011 10:23:58 AM

Jan 26, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

The current terminals along the Savannah River support hundreds of thousands of jobs throughout Georgia and South Carolina and there is no reason to believe they won't in the future. Even without deepening the Savannah River, Savannah Port will continue to grow and provide even more jobs as current container ships visiting Jacksonville, if deepened, will now use Savannah Port.

The Federal Government can not afford to assist deepening every port along the Atlantic Coast -- nor are state budgets deep enough to allow every state along the Atlantic Coast to spend tax payers money to deepen every state port.

The Corps of Engineers needs to recommend to the Federal Government which port to help fund. This would save funds currently planned for deepening the Savannah River and yearly dredging funds needed to keep it deep.

Sincerely,

Mr. Eldon Kennedy
225 E Gordon St
Savannah, GA 31401-5003

From: Sierra Club Membership Services on behalf of Phyllis Miller
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Wednesday, January 26, 2011 8:22:56 AM

Jan 26, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

The current terminals along the Savannah River support hundreds of thousands of jobs throughout Georgia and South Carolina and there is no reason to believe they won't in the future. Even without deepening the Savannah River, Savannah Port will continue to grow and provide even more jobs as current container ships visiting Jacksonville, if deepened, will now use Savannah Port.

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The Corps of Engineers needs to recommend to the Federal Government which port to help fund. This would save funds currently planned for deepening the Savannah River and yearly dredging funds needed to keep it deep.

Sincerely,

Mrs. Phyllis Miller
2394 Leafgate Rd
Decatur, GA 30033-2021

From: Sierra Club Membership Services on behalf of Patricia Osborne
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Wednesday, January 26, 2011 7:53:03 AM

Jan 26, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

The current terminals along the Savannah River support hundreds of thousands of jobs throughout Georgia and South Carolina and there is no reason to believe they won't in the future. Even without deepening the Savannah River, Savannah Port will continue to grow and provide even more jobs as current container ships visiting Jacksonville, if deepened, will now use Savannah Port.

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The Corps of Engineers needs to recommend to the Federal Government which port to help fund. This would save funds currently planned for deepening the Savannah River and yearly dredging funds needed to keep it deep.

Sincerely,

Ms. Patricia Osborne
404 Dogwood Path
Hiram, GA 30141-4484

From: Sierra Club Membership Services on behalf of Tanya Rowden
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Wednesday, January 26, 2011 6:22:34 AM

Jan 26, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

The current terminals along the Savannah River support hundreds of thousands of jobs throughout Georgia and South Carolina and there is no reason to believe they won't in the future. Even without deepening the Savannah River, Savannah Port will continue to grow and provide even more jobs as current container ships visiting Jacksonville, if deepened, will now use Savannah Port.

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The Corps of Engineers needs to recommend to the Federal Government which port to help fund. This would save funds currently planned for deepening the Savannah River and yearly dredging funds needed to keep it deep.

Sincerely,

Ms. Tanya Rowden
842 Boss Hardy Rd
Winder, GA 30680-2743

From: Sierra Club Membership Services on behalf of Scott Rechtman
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Wednesday, January 26, 2011 12:35:31 AM

Jan 25, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

The current terminals along the Savannah River support hundreds of thousands of jobs throughout Georgia and South Carolina and there is no reason to believe they won't in the future. Even without deepening the Savannah River, Savannah Port will continue to grow and provide even more jobs as current container ships visiting Jacksonville, if deepened, will now use Savannah Port.

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The Corps of Engineers needs to recommend to the Federal Government which port to help fund. This would save funds currently planned for deepening the Savannah River and yearly dredging funds needed to keep it deep.

Sincerely,

Scott Rechtman
4692 Pamler June Ct
Tucker, GA 30084-2937

From: Sierra Club Membership Services on behalf of Stephen Langston
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Tuesday, January 25, 2011 11:34:53 PM

Jan 25, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

The current terminals along the Savannah River support hundreds of thousands of jobs throughout Georgia and South Carolina and there is no reason to believe they won't in the future. Even without deepening the Savannah River, Savannah Port will continue to grow and provide even more jobs as current container ships visiting Jacksonville, if deepened, will now use Savannah Port.

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The Corps of Engineers needs to recommend to the Federal Government which port to help fund. This would save funds currently planned for deepening the Savannah River and yearly dredging funds needed to keep it deep.

Sincerely,

Mr. Stephen Langston
6 Lachlan Ln
Savannah, GA 31411-1708
(912) 598-0596

From: Sierra Club Membership Services on behalf of Doug Oetter
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Tuesday, January 25, 2011 11:34:48 PM

Jan 25, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

The current terminals along the Savannah River support hundreds of thousands of jobs throughout Georgia and South Carolina and there is no reason to believe they won't in the future. Even without deepening the Savannah River, Savannah Port will continue to grow and provide even more jobs as current container ships visiting Jacksonville, if deepened, will now use Savannah Port.

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The Corps of Engineers needs to recommend to the Federal Government which port to help fund. This would save funds currently planned for deepening the Savannah River and yearly dredging funds needed to keep it deep.

Sincerely,

Dr. Doug Oetter
701 W Thomas St
Milledgeville, GA 31061-2673

From: Sierra Club Membership Services on behalf of Kyle Embler
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Tuesday, January 25, 2011 11:05:05 PM

Jan 25, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

The current terminals along the Savannah River support hundreds of thousands of jobs throughout Georgia and South Carolina and there is no reason to believe they won't in the future. Even without deepening the Savannah River, Savannah Port will continue to grow and provide even more jobs as current container ships visiting Jacksonville, if deepened, will now use Savannah Port.

The Federal Government can not afford to assist deepening every port along the Atlantic Coast -- nor are state budgets deep enough to allow every state along the Atlantic Coast to spend tax payers money to deepen every state port.

The Corps of Engineers needs to recommend to the Federal Government which port to help fund. This would save funds currently planned for deepening the Savannah River and yearly dredging funds needed to keep it deep.

Thank you for your serious consideration.

Kyle Embler
662 Mercer Street SE
Atlanta, GA 30312

Sincerely,

Mr. Kyle Embler
662 Mercer St SE
Atlanta, GA 30312-3520

From: Sierra Club Membership Services on behalf of Amelia Fusaro
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Tuesday, January 25, 2011 10:34:49 PM

Jan 25, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

The current terminals along the Savannah River support hundreds of thousands of jobs throughout Georgia and South Carolina and there is no reason to believe they won't in the future. Even without deepening the Savannah River, Savannah Port will continue to grow and provide even more jobs as current container ships visiting Jacksonville, if deepened, will now use Savannah Port.

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The Corps of Engineers needs to recommend to the Federal Government which port to help fund. This would save funds currently planned for deepening the Savannah River and yearly dredging funds needed to keep it deep.

Sincerely,

Ms. Amelia Fusaro
684 Darlington Rd NE
Atlanta, GA 30305-2709

From: Sierra Club Membership Services on behalf of steve willis
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Tuesday, January 25, 2011 10:34:19 PM

Jan 25, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

The current terminals along the Savannah River support hundreds of thousands of jobs throughout Georgia and South Carolina and there is no reason to believe they won't in the future. Even without deepening the Savannah River, Savannah Port will continue to grow and provide even more jobs as current container ships visiting Jacksonville, if deepened, will now use Savannah Port.

The Federal Government can not afford to assist deepening every port along the Atlantic Coast -- nor are state budgets deep enough to allow every state along the Atlantic Coast to spend tax payers money to deepen every state port.

The Corps of Engineers needs to recommend to the Federal Government which port to help fund. This would save funds currently planned for deepening the Savannah River and yearly dredging funds needed to keep it deep.

Sincerely,

Mr. steve willis
801 E Victory Dr
Savannah, GA 31405-2421
(912) 341-0718

From: Sierra Club Membership Services on behalf of Lynda Sanford
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Tuesday, January 25, 2011 10:05:05 PM

Jan 25, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

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The Corps of Engineers needs to recommend to the Federal Government which port to help fund. This would save funds currently planned for deepening the Savannah River and yearly dredging funds needed to keep it deep.

Sincerely,

Ms. Lynda Sanford
4443 Wieuca Rd NE
Atlanta, GA 30342-3437
(404) 264-1613

From: Sierra Club Membership Services on behalf of William Harper
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Tuesday, January 25, 2011 10:04:34 PM

Jan 25, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

The current terminals along the Savannah River support hundreds of thousands of jobs throughout Georgia and South Carolina and there is no reason to believe they won't in the future. Even without deepening the Savannah River, Savannah Port will continue to grow and provide even more jobs as current container ships visiting Jacksonville, if deepened, will now use Savannah Port.

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The Corps of Engineers needs to recommend to the Federal Government which port to help fund. This would save funds currently planned for deepening the Savannah River and yearly dredging funds needed to keep it deep.

Sincerely,

Mr. William Harper
1495 Highway 29 N
Athens, GA 30601-1120

From: Sierra Club Membership Services on behalf of Amanda Larkin
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Tuesday, January 25, 2011 9:35:53 PM

Jan 25, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

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Sincerely,

Ms. Amanda Larkin
1823 Winchester Trl
Atlanta, GA 30341-1447
(404) 313-9454

From: Sierra Club Membership Services on behalf of Andrew Kraft
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Tuesday, January 25, 2011 9:34:55 PM

Jan 25, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

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Sincerely,

Andrew Kraft
1470 Crescent Walk
Decatur, GA 30033-2401

From: Sierra Club Membership Services on behalf of David Wappler
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Tuesday, January 25, 2011 8:36:15 PM

Jan 25, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

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Sincerely,

David Wappler
1809 Azalea Dr
West Point, GA 31833-1337

From: Sierra Club Membership Services on behalf of jane curry
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Tuesday, January 25, 2011 6:04:11 PM

Jan 25, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

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The Corps of Engineers needs to recommend to the Federal Government which port to help fund. This would save funds currently planned for deepening the Savannah River and yearly dredging funds needed to keep it deep.

Sincerely,

Ms. jane curry
3441 Hickory View Dr NW
Marietta, GA 30064-1150

From: Sierra Club Membership Services on behalf of Marilyn Haight
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Tuesday, January 25, 2011 6:03:56 PM

Jan 25, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

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The Corps of Engineers needs to recommend to the Federal Government which port to help fund. This would save funds currently planned for deepening the Savannah River and yearly dredging funds needed to keep it deep.

Sincerely,

Mrs. Marilyn Haight
4016 Donna Dr
Gainesville, GA 30506-4402
(770) 503-9647

From: Sierra Club Membership Services on behalf of Lynn Walston
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Tuesday, January 25, 2011 5:04:46 PM

Jan 25, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

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The Corps of Engineers needs to recommend to the Federal Government which port to help fund. This would save funds currently planned for deepening the Savannah River and yearly dredging funds needed to keep it deep.

Sincerely,

Ms. Lynn Walston
1383 Varner Rd
Marietta, GA 30062-4066

From: Sierra Club Membership Services on behalf of Patricia Brown
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Tuesday, January 25, 2011 5:04:34 PM

Jan 25, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

The current terminals along the Savannah River support hundreds of thousands of jobs throughout Georgia and South Carolina and there is no reason to believe they won't in the future. Even without deepening the Savannah River, Savannah Port will continue to grow and provide even more jobs as current container ships visiting Jacksonville, if deepened, will now use Savannah Port.
The Federal Government can not afford to assist deepening every port along the Atlantic Coast -- nor are state budgets deep enough to allow every state along the Atlantic Coast to spend tax payers money to deepen every state port.
The Corps of Engineers needs to recommend to the Federal Government which port to help fund. This would save funds currently planned for deepening the Savannah River and yearly dredging funds needed to keep it deep. Jobs are crucial but please consider the impact on the environment which we can't replace! Thank you.

Sincerely,

Patricia Brown
2471 Lansdowne Ct
Lawrenceville, GA 30044-3709
(770) 876-5132

From: Sierra Club Membership Services on behalf of Jeralyn Musser
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Tuesday, January 25, 2011 4:20:42 PM

Jan 25, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

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The Corps of Engineers needs to recommend to the Federal Government which port to help fund. This would save funds currently planned for deepening the Savannah River and yearly dredging funds needed to keep it deep.

Sincerely,

Ms. Jeralyn Musser
301 N Gross Rd Apt 126
Kingsland, GA 31548-7021

From: Sierra Club Membership Services on behalf of Douglas Shumate
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Tuesday, January 25, 2011 4:20:41 PM

Jan 25, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

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The Corps of Engineers needs to recommend to the Federal Government which port to help fund. This would save funds currently planned for deepening the Savannah River and yearly dredging funds needed to keep it deep.

Sincerely,

Mr. Douglas Shumate
213 Wesleyan Ct
Warner Robins, GA 31093-1326

From: Sierra Club Membership Services on behalf of Jeralyn Musser
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Tuesday, January 25, 2011 4:20:36 PM

Jan 25, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

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Sincerely,

Ms. Jeralyn Musser
301 N Gross Rd Apt 126
Kingsland, GA 31548-7021

From: Sierra Club Membership Services on behalf of Heather Holloway
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Tuesday, January 25, 2011 4:20:26 PM

Jan 25, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

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The Corps of Engineers needs to recommend to the Federal Government which port to help fund. This would save funds currently planned for deepening the Savannah River and yearly dredging funds needed to keep it deep.

Sincerely,

Ms. Heather Holloway
829 Debbie Ln
Ringgold, GA 30736-5564

From: Sierra Club Membership Services on behalf of Samantha Claar
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Tuesday, January 25, 2011 3:52:11 PM

Jan 25, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

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The Corps of Engineers needs to recommend to the Federal Government which port to help fund. This would save funds currently planned for deepening the Savannah River and yearly dredging funds needed to keep it deep.

Sincerely,

Ms. Samantha Claar
PO Box 2011
112 Andrea Dr
Tybee Island, GA 31328-9100
(912) 786-4351

From: Sierra Club Membership Services on behalf of hugh dargan
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Tuesday, January 25, 2011 3:52:09 PM

Jan 25, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

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Sincerely,

Mr. hugh dargan
3121 Maple Dr NE Ste 103
Atlanta, GA 30305-2519

From: Sierra Club Membership Services on behalf of janet collins
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Tuesday, January 25, 2011 3:50:59 PM

Jan 25, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

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Sincerely,

Ms. janet collins
12 Mountain Chase Rd SW
Rome, GA 30165-8574

From: Sierra Club Membership Services on behalf of kristen mielhe
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Tuesday, January 25, 2011 3:21:27 PM

Jan 25, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

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Sincerely,

Ms. kristen mielhe
14 Logan Ave
Tybee Island, GA 31328-9409

From: Sierra Club Membership Services on behalf of Carol Brizzi
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Tuesday, January 25, 2011 3:20:32 PM

Jan 25, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

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Sincerely,

Ms. Carol Brizzi
95 Paces Landing Pl
Newnan, GA 30263-6904

From: Sierra Club Membership Services on behalf of Linda Duncan
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Tuesday, January 25, 2011 2:51:53 PM

Jan 25, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

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Sincerely,

Mrs. Linda Duncan
255 Cedar Creek Dr
Athens, GA 30605-3309

From: Sierra Club Membership Services on behalf of Donna Harris
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Tuesday, January 25, 2011 2:51:52 PM

Jan 25, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

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Sincerely,

Ms. Donna Harris
260 Austin Dr
Douglasville, GA 30134-5192

From: Sierra Club Membership Services on behalf of Michelle Sayne
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Tuesday, January 25, 2011 2:50:44 PM

Jan 25, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

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Sincerely,

Ms. Michelle Sayne
115 Auburn Park
Dallas, GA 30132-3449

From: Sierra Club Membership Services on behalf of Mary Anne Fichter
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Tuesday, January 25, 2011 2:50:44 PM

Jan 25, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

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Sincerely,

Mrs. Mary Anne Fichter
345 Sundew Ln
Mount Airy, GA 30563-4143
(706) 894-2825

From: Sierra Club Membership Services on behalf of Theresa Perenich
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Tuesday, January 25, 2011 2:20:33 PM

Jan 25, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

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Sincerely,

Ms. Theresa Perenich
215 Riverhill Dr
Athens, GA 30606-4039

From: Sierra Club Membership Services on behalf of Jennifer Collazo
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Tuesday, January 25, 2011 2:20:29 PM

Jan 25, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

The current terminals along the Savannah River support hundreds of thousands of jobs throughout Georgia and South Carolina and there is no reason to believe they won't in the future. Even without deepening the Savannah River, Savannah Port will continue to grow and provide even more jobs as current container ships visiting Jacksonville, if deepened, will now use Savannah Port.

The Federal Government can not afford to assist deepening every port along the Atlantic Coast -- nor are state budgets deep enough to allow every state along the Atlantic Coast to spend tax payers money to deepen every state port.

The Corps of Engineers needs to recommend to the Federal Government which port to help fund. This would save funds currently planned for deepening the Savannah River and yearly dredging funds needed to keep it deep.

Sincerely,

Mrs. Jennifer Collazo
9155 Nesbit Ferry Rd
Unit 98
Alpharetta, GA 30022-5540

From: Sierra Club Membership Services on behalf of Diana Getz
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Tuesday, January 25, 2011 2:20:29 PM

Jan 25, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

Please spend the time to research deeply the environmental effects of this action. The health of the eco system is at least as important as job creation. Don't rush such an incredibly big project.

Sincerely,

Diana Getz
779 Clifton Rd NE
Atlanta, GA 30307-1221
(404) 343-3476

From: Sierra Club Membership Services on behalf of Floyd Massey
To: CESAS-PD, SAS
Subject: Protest the Savannah National Wildlife Refuge
Date: Tuesday, January 25, 2011 2:20:28 PM

Jan 25, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

The current terminals along the Savannah River support hundreds of thousands of jobs throughout Georgia and South Carolina and there is no reason to believe they won't in the future. Even without deepening the Savannah River, Savannah Port will continue to grow and provide even more jobs as current container ships visiting Jacksonville, if deepened, will now use Savannah Port.

The Federal Government can not afford to assist deepening every port along the Atlantic Coast -- nor are state budgets deep enough to allow every state along the Atlantic Coast to spend tax payers money to deepen every state port.

The Corps of Engineers needs to recommend to the Federal Government which port to help fund. This would save funds currently planned for deepening the Savannah River and yearly dredging funds needed to keep it deep.

Sincerely,

Mr. Floyd Massey
806 Monroe St
Lagrange, GA 30240-4234

From: Sierra Club Membership Services on behalf of Grant Kruhly
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Tuesday, January 25, 2011 1:50:21 PM

Jan 25, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

The current terminals along the Savannah River support hundreds of thousands of jobs throughout Georgia and South Carolina and there is no reason to believe they won't in the future. Even without deepening the Savannah River, Savannah Port will continue to grow and provide even more jobs as current container ships visiting Jacksonville, if deepened, will now use Savannah Port.

The Federal Government can not afford to assist deepening every port along the Atlantic Coast -- nor are state budgets deep enough to allow every state along the Atlantic Coast to spend tax payers money to deepen every state port.

The Corps of Engineers needs to recommend to the Federal Government which port to help fund. This would save funds currently planned for deepening the Savannah River and yearly dredging funds needed to keep it deep.

Sincerely,

Dr. Grant Kruhly
6410 Suwanee Dam Rd
Buford, GA 30518-5521

From: Sierra Club Membership Services on behalf of Kathy Britt
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Tuesday, January 25, 2011 1:20:56 PM

Jan 25, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

The current terminals along the Savannah River support hundreds of thousands of jobs throughout Georgia and South Carolina and there is no reason to believe they won't in the future. Even without deepening the Savannah River, Savannah Port will continue to grow and provide even more jobs as current container ships visiting Jacksonville, if deepened, will now use Savannah Port.

The Federal Government can not afford to assist deepening every port along the Atlantic Coast -- nor are state budgets deep enough to allow every state along the Atlantic Coast to spend tax payers money to deepen every state port.

The Corps of Engineers needs to recommend to the Federal Government which port to help fund. This would save funds currently planned for deepening the Savannah River and yearly dredging funds needed to keep it deep.

Sincerely,

Mrs. Kathy Britt
1160 Glen Wilkie Trl
Ball Ground, GA 30107-5291
(714) 926-5611

From: Sierra Club Membership Services on behalf of Arlette Potyondy
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Tuesday, January 25, 2011 1:20:20 PM

Jan 25, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

The current terminals along the Savannah River support hundreds of thousands of jobs throughout Georgia and South Carolina and there is no reason to believe they won't in the future. Even without deepening the Savannah River, Savannah Port will continue to grow and provide even more jobs as current container ships visiting Jacksonville, if deepened, will now use Savannah Port.

The Federal Government can not afford to assist deepening every port along the Atlantic Coast -- nor are state budgets deep enough to allow every state along the Atlantic Coast to spend tax payers money to deepen every state port.

The Corps of Engineers needs to recommend to the Federal Government which port to help fund. This would save funds currently planned for deepening the Savannah River and yearly dredging funds needed to keep it deep.

Sincerely,

Ms. Arlette Potyondy
4509 Greenway Dr
Valdosta, GA 31602-0816
(229) 977-1577

From: Sierra Club Membership Services on behalf of Bonnie Buxton
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Tuesday, January 25, 2011 1:20:19 PM

Jan 25, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

The current terminals along the Savannah River support hundreds of thousands of jobs throughout Georgia and South Carolina and there is no reason to believe they won't in the future. Even without deepening the Savannah River, Savannah Port will continue to grow and provide even more jobs as current container ships visiting Jacksonville, if deepened, will now use Savannah Port.

The Federal Government can not afford to assist deepening every port along the Atlantic Coast -- nor are state budgets deep enough to allow every state along the Atlantic Coast to spend tax payers money to deepen every state port.

The Corps of Engineers needs to recommend to the Federal Government which port to help fund. This would save funds currently planned for deepening the Savannah River and yearly dredging funds needed to keep it deep.

Sincerely,

Dr. Bonnie Buxton
7271 Grand Reunion Dr
Hoschton, GA 30548-4068

From: Sierra Club Membership Services on behalf of Andia Azimi
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Tuesday, January 25, 2011 12:51:13 PM

Jan 25, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

The current terminals along the Savannah River support hundreds of thousands of jobs throughout Georgia and South Carolina and there is no reason to believe they won't in the future. Even without deepening the Savannah River, Savannah Port will continue to grow and provide even more jobs as current container ships visiting Jacksonville, if deepened, will now use Savannah Port.

The Federal Government can not afford to assist deepening every port along the Atlantic Coast -- nor are state budgets deep enough to allow every state along the Atlantic Coast to spend tax payers money to deepen every state port.

The Corps of Engineers needs to recommend to the Federal Government which port to help fund. This would save funds currently planned for deepening the Savannah River and yearly dredging funds needed to keep it deep. Without knowing the potential dangers to the environment, it is not wise to go forth with this action. It is time to put nature and the health of the community before the pockets of corporations.

Sincerely,

Ms. Andia Azimi
3675 Aubusson Trce
Alpharetta, GA 30022-5227

From: Sierra Club Membership Services on behalf of jerry smith
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Tuesday, January 25, 2011 12:51:03 PM

Jan 25, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

The current terminals along the Savannah River support hundreds of thousands of jobs throughout Georgia and South Carolina and there is no reason to believe they won't in the future. Even without deepening the Savannah River, Savannah Port will continue to grow and provide even more jobs as current container ships visiting Jacksonville, if deepened, will now use Savannah Port.

The Federal Government can not afford to assist deepening every port along the Atlantic Coast -- nor are state budgets deep enough to allow every state along the Atlantic Coast to spend tax payers money to deepen every state port.

The Corps of Engineers needs to recommend to the Federal Government which port to help fund. This would save funds currently planned for deepening the Savannah River and yearly dredging funds needed to keep it deep.

Sincerely,

Mr. jerry smith
117 Meadow Ln
Calhoun, GA 30701-2041
(770) 547-3108

From: Sierra Club Membership Services on behalf of Belinda Brantley
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Tuesday, January 25, 2011 12:51:02 PM

Jan 25, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

The current terminals along the Savannah River support hundreds of thousands of jobs throughout Georgia and South Carolina and there is no reason to believe they won't in the future. Even without deepening the Savannah River, Savannah Port will continue to grow and provide even more jobs as current container ships visiting Jacksonville, if deepened, will now use Savannah Port.

The Federal Government can not afford to assist deepening every port along the Atlantic Coast -- nor are state budgets deep enough to allow every state along the Atlantic Coast to spend tax payers money to deepen every state port.

The Corps of Engineers needs to recommend to the Federal Government which port to help fund. This would save funds currently planned for deepening the Savannah River and yearly dredging funds needed to keep it deep.

Sincerely,

Mrs. Belinda Brantley
8193 Chapel Lake Dr
Midland, GA 31820-3532

From: Sierra Club Membership Services on behalf of Mark Alexander
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Tuesday, January 25, 2011 12:51:01 PM

Jan 25, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

The current terminals along the Savannah River support hundreds of thousands of jobs throughout Georgia and South Carolina and there is no reason to believe they won't in the future. Even without deepening the Savannah River, Savannah Port will continue to grow and provide even more jobs as current container ships visiting Jacksonville, if deepened, will now use Savannah Port.

The Federal Government can not afford to assist deepening every port along the Atlantic Coast – nor are state budgets deep enough to allow every state along the Atlantic Coast to spend tax payers money to deepen every state port.

The Corps of Engineers needs to recommend to the Federal Government which port to help fund. This would save funds currently planned for deepening the Savannah River and yearly dredging funds needed to keep it deep.

As a concerned Georgia citizen who loves Savannah, I thank you for considering my opinion on this.

Sincerely,

Mr. Mark Alexander
511 Tuxworth Cir
Decatur, GA 30033-5618

From: Sierra Club Membership Services on behalf of Lawrell Studstill
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Tuesday, January 25, 2011 12:51:00 PM

Jan 25, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

The current terminals along the Savannah River support hundreds of thousands of jobs throughout Georgia and South Carolina and there is no reason to believe they won't in the future. Even without deepening the Savannah River, Savannah Port will continue to grow and provide even more jobs as current container ships visiting Jacksonville, if deepened, will now use Savannah Port.

The Federal Government can not afford to assist deepening every port along the Atlantic Coast -- nor are state budgets deep enough to allow every state along the Atlantic Coast to spend tax payers money to deepen every state port.

The Corps of Engineers needs to recommend to the Federal Government which port to help fund. This would save funds currently planned for deepening the Savannah River and yearly dredging funds needed to keep it deep.

Sincerely,

Lawrell Studstill
2678 Cove Cir NE
Atlanta, GA 30319-3708

From: Sierra Club Membership Services on behalf of Karen Neel
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Tuesday, January 25, 2011 12:50:12 PM

Jan 25, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

The current terminals along the Savannah River support hundreds of thousands of jobs throughout Georgia and South Carolina and there is no reason to believe they won't in the future. Even without deepening the Savannah River, Savannah Port will continue to grow and provide even more jobs as current container ships visiting Jacksonville, if deepened, will now use Savannah Port.

The Federal Government can not afford to assist deepening every port along the Atlantic Coast -- nor are state budgets deep enough to allow every state along the Atlantic Coast to spend tax payers money to deepen every state port.

The Corps of Engineers needs to recommend to the Federal Government which port to help fund. This would save funds currently planned for deepening the Savannah River and yearly dredging funds needed to keep it deep.

Sincerely,

Ms. Karen Neel
1656 Delia Dr
Decatur, GA 30033-3318

From: Sierra Club Membership Services on behalf of Sara Blocker
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Tuesday, January 25, 2011 12:50:11 PM

Jan 25, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

The current terminals along the Savannah River support hundreds of thousands of jobs throughout Georgia and South Carolina and there is no reason to believe they won't in the future. Even without deepening the Savannah River, Savannah Port will continue to grow and provide even more jobs as current container ships visiting Jacksonville, if deepened, will now use Savannah Port.

The Federal Government can not afford to assist deepening every port along the Atlantic Coast -- nor are state budgets deep enough to allow every state along the Atlantic Coast to spend tax payers money to deepen every state port.

The Corps of Engineers needs to recommend to the Federal Government which port to help fund. This would save funds currently planned for deepening the Savannah River and yearly dredging funds needed to keep it deep.

Sincerely,

Ms. Sara Blocker
1471 W Black Island Rd SE
Darien, GA 31305-4429

From: Sierra Club Membership Services on behalf of Kea Fifer
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Tuesday, January 25, 2011 12:50:10 PM

Jan 25, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

The current terminals along the Savannah River support hundreds of thousands of jobs throughout Georgia and South Carolina and there is no reason to believe they won't in the future. Even without deepening the Savannah River, Savannah Port will continue to grow and provide even more jobs as current container ships visiting Jacksonville, if deepened, will now use Savannah Port.

The Federal Government can not afford to assist deepening every port along the Atlantic Coast -- nor are state budgets deep enough to allow every state along the Atlantic Coast to spend tax payers money to deepen every state port.

The Corps of Engineers needs to recommend to the Federal Government which port to help fund. This would save funds currently planned for deepening the Savannah River and yearly dredging funds needed to keep it deep.

Sincerely,

Mrs. Kea Fifer
625 Freeman Brock Rd
Auburn, GA 30011-2634
(770) 363-4043

From: Sierra Club Membership Services on behalf of Ruth Carter
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Tuesday, January 25, 2011 12:20:03 PM

Jan 25, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

The current terminals along the Savannah River support hundreds of thousands of jobs throughout Georgia and South Carolina and there is no reason to believe they won't in the future. Even without deepening the Savannah River, Savannah Port will continue to grow and provide even more jobs as current container ships visiting Jacksonville, if deepened, will now use Savannah Port.

The Federal Government can not afford to assist deepening every port along the Atlantic Coast -- nor are state budgets deep enough to allow every state along the Atlantic Coast to spend tax payers money to deepen every state port.

The Corps of Engineers needs to recommend to the Federal Government which port to help fund. This would save funds currently planned for deepening the Savannah River and yearly dredging funds needed to keep it deep.

Sincerely,

Mrs. Ruth Carter
3336 Foxford Ct
Atlanta, GA 30340-4442

From: Sierra Club Membership Services on behalf of Brent Tozzer
To: CESAS-PD, SAS
Subject: Protest the Savannah National Wildlife Refuge
Date: Tuesday, January 25, 2011 12:20:03 PM

Jan 25, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

The current terminals along the Savannah River support hundreds of thousands of jobs throughout Georgia and South Carolina. We must balance dredging with its effects on coastal ecosystems.

The Federal Government can not afford to assist deepening every port along the Atlantic Coast -- nor are state budgets deep enough to allow every state along the Atlantic Coast to spend tax payers money to deepen every state port.

The Corps of Engineers needs to recommend to the Federal Government which port to help fund. This would save funds currently planned for deepening the Savannah River and yearly dredging funds needed to keep it deep.

Sincerely,

Mr. Brent Tozzer
641 Longwood Dr NW
Dept S
Atlanta, GA 30305-3903
(404) 697-2312

From: Sierra Club Membership Services on behalf of Allisom Katanich
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Tuesday, January 25, 2011 11:51:22 AM

Jan 25, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

The current terminals along the Savannah River support hundreds of thousands of jobs throughout Georgia and South Carolina and there is no reason to believe they won't in the future. Even without deepening the Savannah River, Savannah Port will continue to grow and provide even more jobs as current container ships visiting Jacksonville, if deepened, will now use Savannah Port.

The Federal Government can not afford to assist deepening every port along the Atlantic Coast -- nor are state budgets deep enough to allow every state along the Atlantic Coast to spend tax payers money to deepen every state port.

The Corps of Engineers needs to recommend to the Federal Government which port to help fund. This would save funds currently planned for deepening the Savannah River and yearly dredging funds needed to keep it deep.

Please consider the implications on the wildlife habitats and ecosystem as you contemplate this action.

Sincerely,

Ms. Allisom Katanich
1050 Techwood Dr NW
Atlanta, GA 30318-5604
(404) 575-5949

From: Sierra Club Membership Services on behalf of Vish Narendra
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Tuesday, January 25, 2011 11:50:43 AM

Jan 25, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

The current terminals along the Savannah River support hundreds of thousands of jobs throughout Georgia and South Carolina and there is no reason to believe they won't in the future. Even without deepening the Savannah River, Savannah Port will continue to grow and provide even more jobs as current container ships visiting Jacksonville, if deepened, will now use Savannah Port.

The Federal Government can not afford to assist deepening every port along the Atlantic Coast -- nor are state budgets deep enough to allow every state along the Atlantic Coast to spend tax payers money to deepen every state port.

The Corps of Engineers needs to recommend to the Federal Government which port to help fund. This would save funds currently planned for deepening the Savannah River and yearly dredging funds needed to keep it deep.

Sincerely,

Mr. Vish Narendra
1005 Oakpointe Pl
Dunwoody, GA 30338-2621

From: Sierra Club Membership Services on behalf of Karen Wheeler
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Tuesday, January 25, 2011 11:50:41 AM

Jan 25, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

The current terminals along the Savannah River support hundreds of thousands of jobs throughout Georgia and South Carolina and there is no reason to believe they won't in the future. Even without deepening the Savannah River, Savannah Port will continue to grow and provide even more jobs as current container ships visiting Jacksonville, if deepened, will now use Savannah Port.

The Federal Government can not afford to assist deepening every port along the Atlantic Coast -- nor are state budgets deep enough to allow every state along the Atlantic Coast to spend tax payers money to deepen every state port.

The Corps of Engineers needs to recommend to the Federal Government which port to help fund. This would save funds currently planned for deepening the Savannah River and yearly dredging funds needed to keep it deep.

Sincerely,

Mrs. Karen Wheeler
211East Robert Toombs Ave.
Washington, GA 30673

From: Sierra Club Membership Services on behalf of Mac Schmitz
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Tuesday, January 25, 2011 11:50:39 AM

Jan 25, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

The current terminals along the Savannah River support hundreds of thousands of jobs throughout Georgia and South Carolina and there is no reason to believe they won't in the future. Even without deepening the Savannah River, Savannah Port will continue to grow and provide even more jobs as current container ships visiting Jacksonville, if deepened, will now use Savannah Port.

The Federal Government can not afford to assist deepening every port along the Atlantic Coast -- nor are state budgets deep enough to allow every state along the Atlantic Coast to spend tax payers money to deepen every state port.

The Corps of Engineers needs to recommend to the Federal Government which port to help fund. This would save funds currently planned for deepening the Savannah River and yearly dredging funds needed to keep it deep.

Sincerely,

Mr. Mac Schmitz
15295 Highgrove Rd
Milton, GA 30004-3192

From: Sierra Club Membership Services on behalf of Carla Manning
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Tuesday, January 25, 2011 11:50:39 AM

Jan 25, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

The current terminals along the Savannah River support hundreds of thousands of jobs throughout Georgia and South Carolina and there is no reason to believe they won't in the future. Even without deepening the Savannah River, Savannah Port will continue to grow and provide even more jobs as current container ships visiting Jacksonville, if deepened, will now use Savannah Port.

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The Corps of Engineers needs to recommend to the Federal Government which port to help fund. This would save funds currently planned for deepening the Savannah River and yearly dredging funds needed to keep it deep.

Sincerely,

Ms. Carla Manning
1070 Baggett Mill Rd
Cairo, GA 39827-5649

From: Sierra Club Membership Services on behalf of Joan Lardin
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Tuesday, January 25, 2011 11:50:39 AM

Jan 25, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

The current terminals along the Savannah River support hundreds of thousands of jobs throughout Georgia and South Carolina and there is no reason to believe they won't in the future. Even without deepening the Savannah River, Savannah Port will continue to grow and provide even more jobs as current container ships visiting Jacksonville, if deepened, will now use Savannah Port.

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The Corps of Engineers needs to recommend to the Federal Government which port to help fund. This would save funds currently planned for deepening the Savannah River and yearly dredging funds needed to keep it deep.

Sincerely,

Ms. Joan Lardin
984 Ormewood Ter SE
Atlanta, GA 30316-2585
(404) 627-6253

From: Sierra Club Membership Services on behalf of Anna-Marie Soper-O'Rourke
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Tuesday, January 25, 2011 11:20:21 AM

Jan 25, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

The current terminals along the Savannah River support hundreds of thousands of jobs throughout Georgia and South Carolina and there is no reason to believe they won't in the future. Even without deepening the Savannah River, Savannah Port will continue to grow and provide even more jobs as current container ships visiting Jacksonville, if deepened, will now use Savannah Port.

The Federal Government can not afford to assist deepening every port along the Atlantic Coast -- nor are state budgets deep enough to allow every state along the Atlantic Coast to spend tax payers money to deepen every state port.

The Corps of Engineers needs to recommend to the Federal Government which port to help fund. This would save funds currently planned for deepening the Savannah River and yearly dredging funds needed to keep it deep.

Sincerely,

Mrs. Anna-Marie Soper-O'Rourke
1331 N Crossing Dr NE
Atlanta, GA 30329-3570

From: Sierra Club Membership Services on behalf of Phyllis Colmar
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Tuesday, January 25, 2011 11:20:20 AM

Jan 25, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

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The Federal Government can not afford to assist deepening every port along the Atlantic Coast -- nor are state budgets deep enough to allow every state along the Atlantic Coast to spend tax payers money to deepen every state port.

The Corps of Engineers needs to recommend to the Federal Government which port to help fund. This would save funds currently planned for deepening the Savannah River and yearly dredging funds needed to keep it deep.

Sincerely,

Phyllis Colmar
34 Rockyford Rd NE
Atlanta, GA 30317-1321

From: Sierra Club Membership Services on behalf of Eric Ware
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Tuesday, January 25, 2011 11:20:13 AM

Jan 25, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

I am a citizen that expects all organizations involved with a project such as this, to investigate and show why it is appropriate project at this time.
While I don't want tons of money spent on another useless study of what anyone could guess, It is not good enough just to wave your hand in the name of progress and say that if we don't start now we'll are be doomed. To use this thought, there would no end to the funds that could be spent, but is a limit to the funds. There been too many needs around the state that are ignored when BIG projects are set into motion. The public deserves better accounting from unbiased experts can state clearly the pros and cons of projects like this. A report should also investigate alternatives, so that a compromise might be found to preserve our environment as it is now. If it is indeed a viable project, it should be made clear, so the public doesn't feel railroad again and again.

The current terminals along the Savannah River support hundreds of thousands of jobs throughout Georgia and South Carolina and there is no reason to believe they won't in the future. Even without deepening the Savannah River, Savannah Port will continue to grow and provide even more jobs as current container ships visiting Jacksonville, if deepened, will now use Savannah Port.

The Federal Government can not afford to assist deepening every port along the Atlantic Coast -- nor are state budgets deep enough to allow every state along the Atlantic Coast to spend tax payers money to deepen every state port.

The Corps of Engineers needs to recommend to the Federal Government which port to help fund. This would save funds currently planned for deepening the Savannah River and yearly dredging funds needed to keep it deep.

Sincerely,

Mr. Eric Ware
2915 Thornbriar Rd
Atlanta, GA 30340-5103

From: Sierra Club Membership Services on behalf of Gail Kilpatrick
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Tuesday, January 25, 2011 11:20:12 AM

Jan 25, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

Big business - the coal industry, oil, pig farming, etc - degrade our environment on a daily basis in their efforts to increase profit without taking measure to control pollution and destruction. The government's job should be to protect the environment, historic landmarks and lifestyles and not further degrade. Please read the follwoing message and believe.
The current terminals along the Savannah River support hundreds of thousands of jobs throughout Georgia and South Carolina and there is no reason to believe they won't in the future. Even without deepening the Savannah River, Savannah Port will continue to grow and provide even more jobs as current container ships visiting Jacksonville, if deepened, will now use Savannah Port.

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The Corps of Engineers needs to recommend to the Federal Government which port to help fund. This would save funds currently planned for deepening the Savannah River and yearly dredging funds needed to keep it deep.

Sincerely,

Ms. Gail Kilpatrick
238 Elvan Ave NE
Atlanta, GA 30317-1353
(404) 371-4120

From: Sierra Club Membership Services on behalf of Genie Strickland
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Tuesday, January 25, 2011 11:20:10 AM

Jan 25, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

The current terminals along the Savannah River support hundreds of thousands of jobs throughout Georgia and South Carolina and there is no reason to believe they won't in the future. Even without deepening the Savannah River, Savannah Port will continue to grow and provide even more jobs as current container ships visiting Jacksonville, if deepened, will now use Savannah Port.

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The Corps of Engineers needs to recommend to the Federal Government which port to help fund. This would save funds currently planned for deepening the Savannah River and yearly dredging funds needed to keep it deep.

Sincerely,

Ms. Genie Strickland
743 E College Ave Ste B
Decatur, GA 30030-4199
404-6-7-1262

From: Sierra Club Membership Services on behalf of Joanne Stone
To: CESAS-PD_SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Tuesday, January 25, 2011 11:20:10 AM

Jan 25, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

Where am I going to take my grandchildren and great grandchildren to see the lovely Savannah in a few years? Everything will look, smell and be so crowded like LosAngeles. Please, please re think your unwise decision to modernize Savannah. Leave it like it is and preserve it for many generations. Remember this is our legacy from our ancestors and they trusted us to keep it intact. I want to see it this way on my subsequent visits. There is nothing wrong in keeping the good in our lives. Something is telling me very many are going to profit comfortably on this ill advised decision and I can tell you right now it isn't the everyday folks that have kept Savannah alive and well for a long, long time. The current terminals along the Savannah River support hundreds of
thousands of jobs throughout Georgia and South Carolina and there is no reason to believe they won't in the future. Even without deepening the Savannah River, Savannah Port will continue to grow and provide even more jobs as current container ships visiting Jacksonville, if deepened, will now use Savannah Port.

The Federal Government can not afford to assist deepening every port along the Atlantic Coast -- nor are state budgets deep enough to allow every state along the Atlantic Coast to spend tax payers money to deepen every state port.

The Corps of Engineers needs to recommend to the Federal Government which port to help fund. This would save funds currently planned for deepening the Savannah River and yearly dredging funds needed to keep it deep.

Sincerely,

Mrs. Joanne Stone
2351 Henderson Mill Rd NE Apt 2
Atlanta, GA 30345-2719

From: Sierra Club Membership Services on behalf of Patty Cook
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Tuesday, January 25, 2011 11:20:10 AM

Jan 25, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

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The Corps of Engineers needs to recommend to the Federal Government which port to help fund. This would save funds currently planned for deepening the Savannah River and yearly dredging funds needed to keep it deep.

Sincerely,

Mrs. Patty Cook
2427 Hurndon Rd
Snellville, GA 30078-5001
Do not send anything by mail

From: Sierra Club Membership Services on behalf of Lori Ugolik
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Tuesday, January 25, 2011 10:50:24 AM

Jan 25, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

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The Corps of Engineers needs to recommend to the Federal Government which port to help fund. This would save funds currently planned for deepening the Savannah River and yearly dredging funds needed to keep it deep.

Sincerely,

Dr. Lori Ugolik
618 Shurling Dr
Macon, GA 31211-1950
(478) 757-9615

From: Sierra Club Membership Services on behalf of Christopher Straub
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Tuesday, January 25, 2011 10:49:51 AM

Jan 25, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

The current terminals along the Savannah River support hundreds of thousands of jobs throughout Georgia and South Carolina and there is no reason to believe they won't in the future. Even without deepening the Savannah River, Savannah Port will continue to grow and provide even more jobs as current container ships visiting Jacksonville, if deepened, will now use Savannah Port.

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The Corps of Engineers needs to recommend to the Federal Government which port to help fund. This would save funds currently planned for deepening the Savannah River and yearly dredging funds needed to keep it deep.

Sincerely,

Mr. Christopher Straub
706 Emerald Rdg
Woodstock, GA 30189-5180

From: Sierra Club Membership Services on behalf of Cornelia Brillhart
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Tuesday, January 25, 2011 10:20:23 AM

Jan 25, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

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Sincerely,

Ms. Cornelia Brillhart
2919 Lavista Way
Decatur, GA 30033-1108
(404) 633-0660

From: Sierra Club Membership Services on behalf of Jessica Warren
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Tuesday, January 25, 2011 10:20:22 AM

Jan 25, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

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The Corps of Engineers needs to recommend to the Federal Government which port to help fund. This would save funds currently planned for deepening the Savannah River and yearly dredging funds needed to keep it deep.

Sincerely,

Mrs. Jessica Warren
633 Culpepper Rd
Carnesville, GA 30521-3062
(706) 677-4609

From: Sierra Club Membership Services on behalf of Billy Gosa
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Tuesday, January 25, 2011 10:20:22 AM

Jan 25, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

The current terminals along the Savannah River support hundreds of thousands of jobs throughout Georgia and South Carolina and there is no reason to believe they won't in the future. Even without deepening the Savannah River, Savannah Port will continue to grow and provide even more jobs as current container ships visiting Jacksonville, if deepened, will now use Savannah Port.

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The Corps of Engineers needs to recommend to the Federal Government which port to help fund. This would save funds currently planned for deepening the Savannah River and yearly dredging funds needed to keep it deep.

Sincerely,

Mr. Billy Gosa
2858 Ash St SW
Marietta, GA 30008-6004
(678) 360-4658

From: Sierra Club Membership Services on behalf of Kim Ricciardi
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Tuesday, January 25, 2011 10:20:21 AM

Jan 25, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

The current terminals along the Savannah River support hundreds of thousands of jobs throughout Georgia and South Carolina and there is no reason to believe they won't in the future. Even without deepening the Savannah River, Savannah Port will continue to grow and provide even more jobs as current container ships visiting Jacksonville, if deepened, will now use Savannah Port.

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The Corps of Engineers needs to recommend to the Federal Government which port to help fund. This would save funds currently planned for deepening the Savannah River and yearly dredging funds needed to keep it deep.

Sincerely,

Mrs. Kim Ricciardi
899 Powers Ferry Rd SE
Marietta, GA 30067-5727

From: Sierra Club Membership Services on behalf of mark carson
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Tuesday, January 25, 2011 10:20:06 AM

Jan 25, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

The current terminals along the Savannah River support hundreds of thousands of jobs throughout Georgia and South Carolina and there is no reason to believe they won't in the future. Even without deepening the Savannah River, Savannah Port will continue to grow and provide even more jobs as current container ships visiting Jacksonville, if deepened, will now use Savannah Port.

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The Corps of Engineers needs to recommend to the Federal Government which port to help fund. This would save funds currently planned for deepening the Savannah River and yearly dredging funds needed to keep it deep.

Sincerely,

Mr. mark carson
1358 Iverson St NE
Atlanta, GA 30307-2075

From: Sierra Club Membership Services on behalf of Oliver Smith
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Tuesday, January 25, 2011 10:20:05 AM

Jan 25, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

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The Corps of Engineers needs to recommend to the Federal Government which port to help fund. This would save funds currently planned for deepening the Savannah River and yearly dredging funds needed to keep it deep.

Sincerely,

Mr. Oliver Smith
1432 Cobb Branch Dr
Decatur, GA 30032-3003

From: Sierra Club Membership Services on behalf of Tami Freedman
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Tuesday, January 25, 2011 10:20:00 AM

Jan 25, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

The current terminals along the Savannah River support hundreds of thousands of jobs throughout Georgia and South Carolina and there is no reason to believe they won't in the future. Even without deepening the Savannah River, Savannah Port will continue to grow and provide even more jobs as current container ships visiting Jacksonville, if deepened, will now use Savannah Port.

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The Corps of Engineers needs to recommend to the Federal Government which port to help fund. This would save funds currently planned for deepening the Savannah River and yearly dredging funds needed to keep it deep.

Sincerely,

Ms. Tami Freedman
160 Edsel Dr
Rossville, GA 30741-7609
(423) 236-4262

From: Sierra Club Membership Services on behalf of Anne Harper
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Tuesday, January 25, 2011 10:19:59 AM

Jan 25, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

The current terminals along the Savannah River support hundreds of thousands of jobs throughout Georgia and South Carolina and there is no reason to believe they won't in the future. Even without deepening the Savannah River, Savannah Port will continue to grow and provide even more jobs as current container ships visiting Jacksonville, if deepened, will now use Savannah Port.

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Sincerely,

Ms. Anne Harper
104 Marietta St NW
Ste 430
Atlanta, GA 30303-2743
(404) 659-3122

From: Sierra Club Membership Services on behalf of Stephanie Coffin
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Tuesday, January 25, 2011 10:19:59 AM

Jan 25, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

The current terminals along the Savannah River support hundreds of thousands of jobs throughout Georgia and South Carolina and there is no reason to believe they won't in the future. Even without deepening the Savannah River, Savannah Port will continue to grow and provide even more jobs as current container ships visiting Jacksonville, if deepened, will now use Savannah Port.

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The Corps of Engineers needs to recommend to the Federal Government which port to help fund. This would save funds currently planned for deepening the Savannah River and yearly dredging funds needed to keep it deep.

I have read articles in the paper about the Mayor Kasim Reed urging the deepening because of the transportation link from Savannah to Atlanta. However, even this might benefit to Atlanta, we still need to go slow and do the proper environmental analysis as well as look at alternatives that do not damage the environment.

Sincerely,

Ms. Stephanie Coffin
1021 Highland Vw NE
Atlanta, GA 30306-3816
(404) 874-0523

From: Sierra Club Membership Services on behalf of sally sinden
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Tuesday, January 25, 2011 10:19:48 AM

Jan 25, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

The current terminals along the Savannah River support hundreds of thousands of jobs throughout Georgia and South Carolina and there is no reason to believe they won't in the future. Even without deepening the Savannah River, Savannah Port will continue to grow and provide even more jobs as current container ships visiting Jacksonville, if deepened, will now use Savannah Port.

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Sincerely,

Ms. sally sinden
315 Brassy Ct
Johns Creek, GA 30022-6885
(678) 404-8439

From: Sierra Club Membership Services on behalf of Timothy Taylor
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Tuesday, January 25, 2011 10:19:48 AM

Jan 25, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

The current terminals along the Savannah River support hundreds of thousands of jobs throughout Georgia and South Carolina and there is no reason to believe they won't in the future. Even without deepening the Savannah River, Savannah Port will continue to grow and provide even more jobs as current container ships visiting Jacksonville, if deepened, will now use Savannah Port.

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Sincerely,

Dr. Timothy Taylor
1178 Old Kincaid Rd
Colbert, GA 30628-2536

From: Sierra Club Membership Services on behalf of Sarah Sjoberg
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Tuesday, January 25, 2011 9:50:09 AM

Jan 25, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

The current terminals along the Savannah River support hundreds of thousands of jobs throughout Georgia and South Carolina and there is no reason to believe they won't in the future. Even without deepening the Savannah River, Savannah Port will continue to grow and provide even more jobs as current container ships visiting Jacksonville, if deepened, will now use Savannah Port.

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Sincerely,

Ms. Sarah Sjoberg
741 Frederica St NE
Apt 16
Atlanta, GA 30306-4224

From: Sierra Club Membership Services on behalf of Doug Wright
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Tuesday, January 25, 2011 9:50:08 AM

Jan 25, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

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Sincerely,

Mr. Doug Wright
19 East Dr NW
Rome, GA 30165-1818

From: Sierra Club Membership Services on behalf of Diane Miller
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Tuesday, January 25, 2011 9:50:08 AM

Jan 25, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

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Sincerely,

Dr. Diane Miller
380 Deertriger Lndg
Athens, GA 30605-5701

From: Sierra Club Membership Services on behalf of Laura Scigliano
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Tuesday, January 25, 2011 9:50:08 AM

Jan 25, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

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Sincerely,

Ms. Laura Scigliano
916 Regency Path Dr
Decatur, GA 30030-4168

From: Sierra Club Membership Services on behalf of Katherine Williamson
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Tuesday, January 25, 2011 9:50:08 AM

Jan 25, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

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Sincerely,

Ms. Katherine Williamson
264 Early Parkway Dr SE
Smyrna, GA 30082-3123

From: Sierra Club Membership Services on behalf of Martin Kraft
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Tuesday, January 25, 2011 9:49:56 AM

Jan 25, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

The current terminals along the Savannah River support hundreds of thousands of jobs throughout Georgia and South Carolina and there is no reason to believe they won't in the future. Even without deepening the Savannah River, Savannah Port will continue to grow and provide even more jobs as current container ships visiting Jacksonville, if deepened, will now use Savannah Port.

The Federal Government cannot afford to assist deepening every port along the Atlantic Coast -- nor are state budgets deep enough to allow every state along the Atlantic Coast to spend taxpayers' money to deepen every state port.

The Corps of Engineers needs to recommend to the Federal Government which port to help fund. This would save funds currently planned for deepening the Savannah River and yearly dredging funds needed to keep it deep.

Sincerely,

Mr. Martin Kraft
PO Box 72784
Marietta, GA 30007-2784

From: Sierra Club Membership Services on behalf of Leslie Inman
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Tuesday, January 25, 2011 9:49:56 AM

Jan 25, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

The current terminals along the Savannah River support hundreds of thousands of jobs throughout Georgia and South Carolina and there is no reason to believe they won't in the future. Even without deepening the Savannah River, Savannah Port will continue to grow and provide even more jobs as current container ships visiting Jacksonville, if deepened, will now use Savannah Port.

The Federal Government can not afford to assist deepening every port along the Atlantic Coast -- nor are state budgets deep enough to allow every state along the Atlantic Coast to spend tax payers money to deepen every state port.

The Corps of Engineers needs to recommend to the Federal Government which port to help fund. This would save funds currently planned for deepening the Savannah River and yearly dredging funds needed to keep it deep.

Sincerely,

Mrs. Leslie Inman
1709 N Pelham Rd NE
Atlanta, GA 30324-5260
(404) 876-1467

From: Sierra Club Membership Services on behalf of jeannine collins
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Tuesday, January 25, 2011 9:49:55 AM

Jan 25, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

The current terminals along the Savannah River support hundreds of thousands of jobs throughout Georgia and South Carolina and there is no reason to believe they won't in the future. Even without deepening the Savannah River, Savannah Port will continue to grow and provide even more jobs as current container ships visiting Jacksonville, if deepened, will now use Savannah Port.

The Federal Government can not afford to assist deepening every port along the Atlantic Coast -- nor are state budgets deep enough to allow every state along the Atlantic Coast to spend tax payers money to deepen every state port.

The Corps of Engineers needs to recommend to the Federal Government which port to help fund. This would save funds currently planned for deepening the Savannah River and yearly dredging funds needed to keep it deep.

Sincerely,

jeannine collins
491 Staghorn Trl
Nicholson, GA 30565-1665

From: Sierra Club Membership Services on behalf of Bernard Cleveland
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Tuesday, January 25, 2011 9:49:55 AM

Jan 25, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

The current terminals along the Savannah River support hundreds of thousands of jobs throughout Georgia and South Carolina and there is no reason to believe they won't in the future. Even without deepening the Savannah River, Savannah Port will continue to grow and provide even more jobs as current container ships visiting Jacksonville, if deepened, will now use Savannah Port.

The Federal Government can not afford to assist deepening every port along the Atlantic Coast -- nor are state budgets deep enough to allow every state along the Atlantic Coast to spend tax payers money to deepen every state port.

The Corps of Engineers needs to recommend to the Federal Government which port to help fund. This would save funds currently planned for deepening the Savannah River and yearly dredging funds needed to keep it deep.

Sincerely,

Bernard Cleveland
11199 Big Canoe
Big Canoe, GA 30143-5102

From: Sierra Club Membership Services on behalf of Kate King
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Tuesday, January 25, 2011 9:49:54 AM

Jan 25, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

The current terminals along the Savannah River support hundreds of thousands of jobs throughout Georgia and South Carolina and there is no reason to believe they won't in the future. Even without deepening the Savannah River, Savannah Port will continue to grow and provide even more jobs as current container ships visiting Jacksonville, if deepened, will now use Savannah Port.

The Federal Government can not afford to assist deepening every port along the Atlantic Coast -- nor are state budgets deep enough to allow every state along the Atlantic Coast to spend tax payers money to deepen every state port.

The Corps of Engineers needs to recommend to the Federal Government which port to help fund. This would save funds currently planned for deepening the Savannah River and yearly dredging funds needed to keep it deep.

Sincerely,

Ms. Kate King
Woodlands Drive
Smyrna, GA 30080

From: Sierra Club Membership Services on behalf of Matthew Wagner
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Tuesday, January 25, 2011 9:19:52 AM

Jan 25, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

The current terminals along the Savannah River support hundreds of thousands of jobs throughout Georgia and South Carolina and there is no reason to believe they won't in the future. Even without deepening the Savannah River, Savannah Port will continue to grow and provide even more jobs as current container ships visiting Jacksonville, if deepened, will now use Savannah Port.

The Federal Government can not afford to assist deepening every port along the Atlantic Coast -- nor are state budgets deep enough to allow every state along the Atlantic Coast to spend tax payers money to deepen every state port.

The Corps of Engineers needs to recommend to the Federal Government which port to help fund. This would save funds currently planned for deepening the Savannah River and yearly dredging funds needed to keep it deep.

Sincerely,

Mr. Matthew Wagner
871 Wylie St SE
Atlanta, GA 30316-1243
(404) 584-8554

From: Sierra Club Membership Services on behalf of David Burgess
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Tuesday, January 25, 2011 9:19:51 AM

Jan 25, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

It never ceases to amaze me how stubborn the Corps of Engineers can be when it come to making decisions. However, there seems to be an inconsistency on the decisions. Savannah Port expansion is an example of not looking elsewhere for a port expansion that would make sense, i.e. the Port of Brunswick, and yet in my own backyard the State can not get a permit to widen a dangerous two lane bridge over Allatoona Lake (which is grossly mismanaged by the Corps) which would have minuscule impact of the health of the lake.

So one the one hand the Corps wants to plow ahead and wreck havoc on the environment in Savannah by continual dredging and expansion while on the other hand blocks a bridge improvement that has very little or no impact on a lake that the Corps does annual damage to by its lake draining practice.

The Corps of Engineers needs to recommend to the Federal Government which port to help fund, such as the Port of Brunswick (which as actually closer to the Atlantic Ocean than Savannah's Port. This would save funds currently planned for deepening the Savannah River and yearly dredging funds needed to keep it deep.

Sincerely,

Mr. David Burgess
208 Emerald Cove Ln
Woodstock, GA 30189-5156

From: Sierra Club Membership Services on behalf of Elizabeth Pape
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Tuesday, January 25, 2011 9:19:50 AM

Jan 25, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

Savannah should be preserved, not pillaged. I've loved Savannah since I first went there as a child and eventually married my husband who's from Savannah. We visit as often as we can. Don't destroy more of what charm and history of such a jewel that still exists!

The current terminals along the Savannah River support hundreds of thousands of jobs throughout Georgia and South Carolina and there is no reason to believe they won't in the future. Even without deepening the Savannah River, Savannah Port will continue to grow and provide even more jobs as current container ships visiting Jacksonville, if deepened, will now use Savannah Port.

The Federal Government can not afford to assist deepening every port along the Atlantic Coast -- nor are state budgets deep enough to allow every state along the Atlantic Coast to spend tax payers money to deepen every state port.

The Corps of Engineers needs to recommend to the Federal Government which port to help fund. This would save funds currently planned for deepening the Savannah River and yearly dredging funds needed to keep it deep.

Sincerely,

Ms. Elizabeth Pape
290 Crestwood Dr
Athens, GA 30605-3912
(706) 543-4550

From: Sierra Club Membership Services on behalf of Carla Baird
To: CESAS-PD, SAS
Subject: Protest the Savannah National Wildlife Refuge
Date: Tuesday, January 25, 2011 9:19:49 AM

Jan 25, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

The current terminals along the Savannah River support hundreds of thousands of jobs throughout Georgia and South Carolina and there is no reason to believe they won't in the future. Even without deepening the Savannah River, Savannah Port will continue to grow and provide even more jobs as current container ships visiting Jacksonville, if deepened, will now use Savannah Port.

The Federal Government can not afford to assist deepening every port along the Atlantic Coast -- nor are state budgets deep enough to allow every state along the Atlantic Coast to spend tax payers money to deepen every state port.

The Corps of Engineers needs to recommend to the Federal Government which port to help fund. This would save funds currently planned for deepening the Savannah River and yearly dredging funds needed to keep it deep.

Sincerely,

Mrs. Carla Baird
14525 Morning Mountain Way
Milton, GA 30004-4522

From: Sierra Club Membership Services on behalf of Stanley Stockman
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Tuesday, January 25, 2011 9:19:49 AM

Jan 25, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

The current terminals along the Savannah River support hundreds of thousands of jobs throughout Georgia and South Carolina and there is no reason to believe they won't in the future. Even without deepening the Savannah River, Savannah Port will continue to grow and provide even more jobs as current container ships visiting Jacksonville, if deepened, will now use Savannah Port.

The Federal Government can not afford to assist deepening every port along the Atlantic Coast -- nor are state budgets deep enough to allow every state along the Atlantic Coast to spend tax payers money to deepen every state port.

The Corps of Engineers needs to recommend to the Federal Government which port to help fund. This would save funds currently planned for deepening the Savannah River and yearly dredging funds needed to keep it deep.

Sincerely,

Mr. Stanley Stockman
6160 Hedgestone Way
Douglasville, GA 30135-6007

From: Sierra Club Membership Services on behalf of Cathryn Lee
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Tuesday, January 25, 2011 9:19:48 AM

Jan 25, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

The current terminals along the Savannah River support hundreds of thousands of jobs throughout Georgia and South Carolina and there is no reason to believe they won't in the future. Even without deepening the Savannah River, Savannah Port will continue to grow and provide even more jobs as current container ships visiting Jacksonville, if deepened, will now use Savannah Port.

The Federal Government can not afford to assist deepening every port along the Atlantic Coast -- nor are state budgets deep enough to allow every state along the Atlantic Coast to spend tax payers money to deepen every state port.

The Corps of Engineers needs to recommend to the Federal Government which port to help fund. This would save funds currently planned for deepening the Savannah River and yearly dredging funds needed to keep it deep.

Sincerely,

Ms. Cathryn Lee
35 Paces Lndg
Covington, GA 30016-4167

From: Sierra Club Membership Services on behalf of Renee Beidler
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Tuesday, January 25, 2011 9:19:48 AM

Jan 25, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

The current terminals along the Savannah River support hundreds of thousands of jobs throughout Georgia and South Carolina and there is no reason to believe they won't in the future. Even without deepening the Savannah River, Savannah Port will continue to grow and provide even more jobs as current container ships visiting Jacksonville, if deepened, will now use Savannah Port.

The Federal Government can not afford to assist deepening every port along the Atlantic Coast -- nor are state budgets deep enough to allow every state along the Atlantic Coast to spend tax payers money to deepen every state port.

The Corps of Engineers needs to recommend to the Federal Government which port to help fund. This would save funds currently planned for deepening the Savannah River and yearly dredging funds needed to keep it deep.

Sincerely,

Ms. Renee Beidler
6738 Brandon Mill Rd NW
Atlanta, GA 30328-2029
(404) 252-9190

From: Sierra Club Membership Services on behalf of Kim Kroeger
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Tuesday, January 25, 2011 8:50:11 AM

Jan 25, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

The current terminals along the Savannah River support hundreds of thousands of jobs throughout Georgia and South Carolina and there is no reason to believe they won't in the future. Even without deepening the Savannah River, Savannah Port will continue to grow and provide even more jobs as current container ships visiting Jacksonville, if deepened, will now use Savannah Port.

The Federal Government can not afford to assist deepening every port along the Atlantic Coast -- nor are state budgets deep enough to allow every state along the Atlantic Coast to spend tax payers money to deepen every state port.

The Corps of Engineers needs to recommend to the Federal Government which port to help fund. This would save funds currently planned for deepening the Savannah River and yearly dredging funds needed to keep it deep.

Sincerely,

Mrs. Kim Kroeger
2575 Hopewell Plantation Dr
Alpharetta, GA 30004-4235

From: Sierra Club Membership Services on behalf of Mike and Joy Cook
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Tuesday, January 25, 2011 8:50:10 AM

Jan 25, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

The current terminals along the Savannah River support hundreds of thousands of jobs throughout Georgia and South Carolina and there is no reason to believe they won't in the future. Even without deepening the Savannah River, Savannah Port will continue to grow and provide even more jobs as current container ships visiting Jacksonville, if deepened, will now use Savannah Port.

The Federal Government can not afford to assist deepening every port along the Atlantic Coast -- nor are state budgets deep enough to allow every state along the Atlantic Coast to spend tax payers money to deepen every state port.

The Corps of Engineers needs to recommend to the Federal Government which port to help fund. This would save funds currently planned for deepening the Savannah River and yearly dredging funds needed to keep it deep.

Sincerely,

Mr. Mike and Joy Cook
148 Ivy Ridge Dr
Jasper, GA 30143-8375

From: Sierra Club Membership Services on behalf of Margaret Eastham
To: CESAS-PD_SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Tuesday, January 25, 2011 8:50:10 AM

Jan 25, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

The current terminals along the Savannah River support hundreds of thousands of jobs throughout Georgia and South Carolina and there is no reason to believe they won't in the future. Even without deepening the Savannah River, Savannah Port will continue to grow and provide even more jobs as current container ships visiting Jacksonville, if deepened, will now use Savannah Port.

The Federal Government can not afford to assist deepening every port along the Atlantic Coast -- nor are state budgets deep enough to allow every state along the Atlantic Coast to spend tax payers money to deepen every state port.

The Corps of Engineers needs to recommend to the Federal Government which port to help fund. This would save funds currently planned for deepening the Savannah River and yearly dredging funds needed to keep it deep.

Sincerely,

Margaret Eastham
5378 Redfield Rd
Dunwoody, GA 30338-3724

From: Sierra Club Membership Services on behalf of Gary Baker
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Tuesday, January 25, 2011 8:50:09 AM

Jan 25, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

The current terminals along the Savannah River support hundreds of thousands of jobs throughout Georgia and South Carolina and there is no reason to believe they won't in the future. Even without deepening the Savannah River, Savannah Port will continue to grow and provide even more jobs as current container ships visiting Jacksonville, if deepened, will now use Savannah Port.

The Federal Government can not afford to assist deepening every port along the Atlantic Coast -- nor are state budgets deep enough to allow every state along the Atlantic Coast to spend tax payers money to deepen every state port.

The Corps of Engineers needs to recommend to the Federal Government which port to help fund. This would save funds currently planned for deepening the Savannah River and yearly dredging funds needed to keep it deep.

Sincerely,

Dr. Gary Baker
470 McDuffie Dr
Athens, GA 30605-3947

From: Sierra Club Membership Services on behalf of Madeline Reamy
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Tuesday, January 25, 2011 8:50:09 AM

Jan 25, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

Please consider the extreme environmental impact of the proposed industrial corrisor, not only to the beauty of Savannah, bu to the health and future of the entire poulation. The current terminals along the Savannah River support hundreds of
thousands of jobs throughout Georgia and South Carolina and there is no reason to believe they won't in the future. Even without deepening the Savannah River, Savannah Port will continue to grow and provide even more jobs as current container ships visiting Jacksonville, if deepened, will now use Savannah Port.

The Federal Government can not afford to assist deepening every port along the Atlantic Coast -- nor are state budgets deep enough to allow every state along the Atlantic Coast to spend tax payers money to deepen every state port.

The Corps of Engineers needs to recommend to the Federal Government which port to help fund. This would save funds currently planned for deepening the Savannah River and yearly dredging funds needed to keep it deep.

Sincerely,

Madeline Reamy
2394 Harrington Dr
Decatur, GA 30033-4902

From: Sierra Club Membership Services on behalf of Deborah Lewis
To: CESAS-PD_SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Tuesday, January 25, 2011 8:50:09 AM

Jan 25, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

The current terminals along the Savannah River support thousands of jobs throughout Georgia and South Carolina. Even without deepening the Savannah River, Savannah Port will continue to grow and provide even more jobs.

The quality of life in Savannah is critically dependent on the port as well as the quality of the environment. Deepening the Savannah River and expanding the quantity of ships entering the area will have a critically negative impact on the environment.

With the economy of the state of Georgia suffering the funds to deepen and dredge the Savannah River yearly this spending is not in the best interests of the people of Georgia.

Sincerely,

Dr. Deborah Lewis
5069 Fairington Dr
Evans, GA 30809-7011
(706) 650-0576

From: Sierra Club Membership Services on behalf of Teresa Watson
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Tuesday, January 25, 2011 8:50:08 AM

Jan 25, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

Just the thought of more dredging every year will have too great an environmental impact alone, much less adding more polluting facilities. We do not want Savannah to be smog covered like LA.
The current terminals along the Savannah River support hundreds of thousands of jobs throughout Georgia and South Carolina and there is no reason to believe they won't in the future. Even without deepening the Savannah River, Savannah Port will continue to grow and provide even more jobs as current container ships visiting Jacksonville, if deepened, will now use Savannah Port.

The Federal Government can not afford to assist deepening every port along the Atlantic Coast – nor are state budgets deep enough to allow every state along the Atlantic Coast to spend tax payers money to deepen every state port. Brunswick is much more easily accessed than Savannah already.

The Corps of Engineers needs to recommend to the Federal Government which port to help fund. This would save funds currently planned for deepening the Savannah River and yearly dredging funds needed to keep it deep.

Sincerely,

Mrs. Teresa Watson
619 S Hill St
Griffin, GA 30224-4229

From: Sierra Club Membership Services on behalf of Ronelle Moehrke
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Tuesday, January 25, 2011 8:50:08 AM

Jan 25, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

The current terminals along the Savannah River support hundreds of thousands of jobs throughout Georgia and South Carolina and there is no reason to believe they won't in the future. Even without deepening the Savannah River, Savannah Port will continue to grow and provide even more jobs as current container ships visiting Jacksonville, if deepened, will now use Savannah Port.

The Federal Government can not afford to assist deepening every port along the Atlantic Coast -- nor are state budgets deep enough to allow every state along the Atlantic Coast to spend tax payers money to deepen every state port.

The Corps of Engineers needs to recommend to the Federal Government which port to help fund. This would save funds currently planned for deepening the Savannah River and yearly dredging funds needed to keep it deep.

Sincerely,

Ms. Ronelle Moehrke
404 Power Plant Rd
Hogansville, GA 30230-2222

From: Sierra Club Membership Services on behalf of Laura Bimson
To: CESAS-PD, SAS
Subject: Protest the Savannah National Wildlife Refuge
Date: Tuesday, January 25, 2011 8:49:54 AM

Jan 25, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

The current terminals along the Savannah River support hundreds of thousands of jobs throughout Georgia and South Carolina and there is no reason to believe they won't in the future. Even without deepening the Savannah River, Savannah Port will continue to grow and provide even more jobs as current container ships visiting Jacksonville, if deepened, will now use Savannah Port.

The Federal Government can not afford to assist deepening every port along the Atlantic Coast -- nor are state budgets deep enough to allow every state along the Atlantic Coast to spend tax payers money to deepen every state port.

The Corps of Engineers needs to recommend to the Federal Government which port to help fund. This would save funds currently planned for deepening the Savannah River and yearly dredging funds needed to keep it deep.

Savannah's most valuable resource is it's history and wildlife. Destroying it or even impacting it would be a huge mistake. Please don't destroy this beautiful part of the state. We want to be able to enjoy it for years to come.

Sincerely,

Laura Bimson
110 International Dr
Athens, GA 30605-3692

From: Sierra Club Membership Services on behalf of Danna Williams
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Tuesday, January 25, 2011 8:49:53 AM

Jan 25, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

The current terminals along the Savannah River support hundreds of thousands of jobs throughout Georgia and South Carolina and there is no reason to believe they won't in the future. Even without deepening the Savannah River, Savannah Port will continue to grow and provide even more jobs as current container ships visiting Jacksonville, if deepened, will now use Savannah Port.

The Federal Government can not afford to assist deepening every port along the Atlantic Coast -- nor are state budgets deep enough to allow every state along the Atlantic Coast to spend tax payers money to deepen every state port.

The Corps of Engineers needs to recommend to the Federal Government which port to help fund. This would save funds currently planned for deepening the Savannah River and yearly dredging funds needed to keep it deep.

Sincerely,

Ms. Danna Williams
131 Helican Springs Rd
Athens, GA 30601-1087

From: Sierra Club Membership Services on behalf of Edward McDowell
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Tuesday, January 25, 2011 8:49:52 AM

Jan 25, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

The current terminals along the Savannah River support hundreds of thousands of jobs throughout Georgia and South Carolina and there is no reason to believe they won't in the future. Even without deepening the Savannah River, Savannah Port will continue to grow and provide even more jobs as current container ships visiting Jacksonville, if deepened, will now use Savannah Port.

The Federal Government can not afford to assist deepening every port along the Atlantic Coast -- nor are state budgets deep enough to allow every state along the Atlantic Coast to spend tax payers money to deepen every state port.

The Corps of Engineers needs to recommend to the Federal Government which port to help fund. This would save funds currently planned for deepening the Savannah River and yearly dredging funds needed to keep it deep.

Sincerely,

Mr. Edward McDowell
206 Cartwright Dr
Bonaire, GA 31005-3902
(478) 929-1267

From: Sierra Club Membership Services on behalf of Sharon Box
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Tuesday, January 25, 2011 8:19:53 AM

Jan 25, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

The current terminals along the Savannah River support hundreds of thousands of jobs throughout Georgia and South Carolina and there is no reason to believe they won't in the future. Even without deepening the Savannah River, Savannah Port will continue to grow and provide even more jobs as current container ships visiting Jacksonville, if deepened, will now use Savannah Port.

The Federal Government can not afford to assist deepening every port along the Atlantic Coast -- nor are state budgets deep enough to allow every state along the Atlantic Coast to spend tax payers money to deepen every state port.

The Corps of Engineers needs to recommend to the Federal Government which port to help fund. This would save funds currently planned for deepening the Savannah River and yearly dredging funds needed to keep it deep.

Sincerely,

Ms. Sharon Box
3404 N Cook Rd
Powder Springs, GA 30127-5433

From: Sierra Club Membership Services on behalf of Kevin Reed
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Tuesday, January 25, 2011 8:19:53 AM

Jan 25, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

The current terminals along the Savannah River support hundreds of thousands of jobs throughout Georgia and South Carolina and there is no reason to believe they won't in the future. Even without deepening the Savannah River, Savannah Port will continue to grow and provide even more jobs as current container ships visiting Jacksonville, if deepened, will now use Savannah Port.

The Federal Government can not afford to assist deepening every port along the Atlantic Coast -- nor are state budgets deep enough to allow every state along the Atlantic Coast to spend tax payers money to deepen every state port.

The Corps of Engineers needs to recommend to the Federal Government which port to help fund. This would save funds currently planned for deepening the Savannah River and yearly dredging funds needed to keep it deep.

Sincerely,

Mr. Kevin Reed
398 Westchester Way
Canton, GA 30115-4178

From: Sierra Club Membership Services on behalf of Peg Wickham
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Tuesday, January 25, 2011 8:19:53 AM

Jan 25, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

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Sincerely,

Mrs. Peg Wickham
3240 Running Cedar Dr
Marietta, GA 30062-1363

From: Sierra Club Membership Services on behalf of Sylvia Gayle
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Tuesday, January 25, 2011 8:19:52 AM

Jan 25, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

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Sincerely,

Mrs. Sylvia Gayle
5045 Powers Ferry Rd NW
Atlanta, GA 30327-4631

From: Sierra Club Membership Services on behalf of Connie Hargreaves
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Tuesday, January 25, 2011 8:19:52 AM

Jan 25, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

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The Corps of Engineers needs to recommend to the Federal Government which port to help fund. This would save funds currently planned for deepening the Savannah River and yearly dredging funds needed to keep it deep.

Sincerely,

Ms. Connie Hargreaves
128 Bevington Ln
Woodstock, GA 30188-5422
(404) 898-9003

From: Sierra Club Membership Services on behalf of Susan Gaddis
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Tuesday, January 25, 2011 8:19:46 AM

Jan 25, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

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The Corps of Engineers needs to recommend to the Federal Government which port to help fund. This would save funds currently planned for deepening the Savannah River and yearly dredging funds needed to keep it deep.

Sincerely,

Ms. Susan Gaddis
2444 Silver Moss Way
Lawrenceville, GA 30044-2230

From: Sierra Club Membership Services on behalf of Aaron Stearns
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Tuesday, January 25, 2011 8:19:46 AM

Jan 25, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

The current terminals along the Savannah River support hundreds of thousands of jobs throughout Georgia and South Carolina and there is no reason to believe they won't in the future. Even without deepening the Savannah River, Savannah Port will continue to grow and provide even more jobs as current container ships visiting Jacksonville, if deepened, will now use Savannah Port.

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The Corps of Engineers needs to recommend to the Federal Government which port to help fund. This would save funds currently planned for deepening the Savannah River and yearly dredging funds needed to keep it deep.

Sincerely,

Mr. Aaron Stearns
980 Walther Blvd Apt 838
Lawrenceville, GA 30043-8438

From: Sierra Club Membership Services on behalf of Audrey Ruccio
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Tuesday, January 25, 2011 7:49:44 AM

Jan 25, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

The current terminals along the Savannah River support hundreds of thousands of jobs throughout Georgia and South Carolina and there is no reason to believe they won't in the future. Even without deepening the Savannah River, Savannah Port will continue to grow and provide even more jobs as current container ships visiting Jacksonville, if deepened, will now use Savannah Port.

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The Corps of Engineers needs to recommend to the Federal Government which port to help fund. This would save funds currently planned for deepening the Savannah River and yearly dredging funds needed to keep it deep. The impact will be HUGE - and not good.

Sincerely,

Audrey Ruccio
403 Land O Goshen
Clarkesville, GA 30523-0804
(706) 947-0221

From: Sierra Club Membership Services on behalf of Margaret TYson
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Tuesday, January 25, 2011 7:19:43 AM

Jan 25, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

The current terminals along the Savannah River support hundreds of thousands of jobs throughout Georgia and South Carolina and there is no reason to believe they won't in the future. Even without deepening the Savannah River, Savannah Port will continue to grow and provide even more jobs as current container ships visiting Jacksonville, if deepened, will now use Savannah Port.

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The Corps of Engineers needs to recommend to the Federal Government which port to help fund. This would save funds currently planned for deepening the Savannah River and yearly dredging funds needed to keep it deep.

Sincerely,

Ms. Margaret TYson
805 N Broad St
Cairo, GA 39828-1610

From: Sierra Club Membership Services on behalf of Pamela Stogner
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Tuesday, January 25, 2011 7:19:40 AM

Jan 25, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

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Sincerely,

Mrs. Pamela Stogner
760 Kennesaw Due West Rd NW
Kennesaw, GA 30152-6939

From: Sierra Club Membership Services on behalf of Connie Abbott
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Tuesday, January 25, 2011 7:19:39 AM

Jan 25, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

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Sincerely,

Ms. Connie Abbott
3872 Avensong Village Cir
Milton, GA 30004-4903
7

From: Sierra Club Membership Services on behalf of Robert Fredrick
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Tuesday, January 25, 2011 6:19:37 AM

Jan 25, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

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Sincerely,

Mr. Robert Fredrick
2801 Buford Hwy NE
Ste 508
Atlanta, GA 30329-2137
(404) 636-1108

From: Sierra Club Membership Services on behalf of Janis Hastings
To: CESAS-PD_SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Tuesday, January 25, 2011 5:49:32 AM

Jan 25, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

The previous disaster brought on by the Corps of Engineers at Lake Lanier has taken years to correct and is still not resolved. They need to stay out and leave our water and resources alone. The current terminals along the Savannah River support hundreds of thousands of jobs throughout Georgia and South Carolina and there is no reason to believe they won't in the future. Even without deepening the Savannah River, Savannah Port will continue to grow and provide even more jobs as current container ships visiting Jacksonville, if deepened, will now use Savannah Port.

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Sincerely,

Ms. Janis Hastings
2156 Delowe Dr
East Point, GA 30344-1135
(404) 762-7845

From: Sierra Club Membership Services on behalf of Robert John White, Esq
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Tuesday, January 25, 2011 3:19:23 AM

Jan 25, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

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Sincerely,

Robert John White, Esq
PO Box 25
Georgetown, GA 39854-0025

From: Sierra Club Membership Services on behalf of Jennifer Goedken
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Tuesday, January 25, 2011 3:19:23 AM

Jan 25, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

Savannah and the nearby Golden Isles especially Tybee Island are important to Georgia's history and habitat. Do not take a chance on destroying our state's coastal environment!

Sincerely,

Dr. Jennifer Goedken
1097 Amsterdam Ave NE
Atlanta, GA 30306-3576

From: Sierra Club Membership Services on behalf of Bonnie Poland
To: CESAS-PD_SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Tuesday, January 25, 2011 1:19:09 AM

Jan 25, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

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Sincerely,

Ms. Bonnie Poland
295 Wills Ln
Canton, GA 30115-6377
(770) 479-1773

From: Sierra Club Membership Services on behalf of Teri Rogers
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Tuesday, January 25, 2011 1:19:07 AM

Jan 25, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

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Sincerely,

Ms. Teri Rogers
1167 Druid Walk
Decatur, GA 30033-3736
(404) 321-5764

From: Sierra Club Membership Services on behalf of Elizabeth McKeon
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Tuesday, January 25, 2011 1:19:07 AM

Jan 25, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

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Sincerely,

Ms. Elizabeth McKeon
4902B Valley Dale Ct SW
Lilburn, GA 30047-5652
(770) 736-9408

From: Sierra Club Membership Services on behalf of Catherine Chambers
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Tuesday, January 25, 2011 12:51:41 AM

Jan 24, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

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Sincerely,

Ms. Catherine Chambers
46 Bowen St Moonee Ponds
Melbourne, GA 30390
(039) 326-1641

From: Sierra Club Membership Services on behalf of Carolyn Durant
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Tuesday, January 25, 2011 12:51:40 AM

Jan 24, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

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Sincerely,

Ms. Carolyn Durant
PO Box 98
Mountain City, GA 30562-0098
(706) 212-0044

From: Sierra Club Membership Services on behalf of Gerald Gatling
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Tuesday, January 25, 2011 12:50:53 AM

Jan 24, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

The current terminals along the Savannah River support hundreds of thousands of jobs throughout Georgia and South Carolina and there is no reason to believe they won't in the future. Even without deepening the Savannah River, Savannah Port will continue to grow and provide even more jobs as current container ships visiting Jacksonville, if deepened, will now use Savannah Port.

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Sincerely,

Mr. Gerald Gatling
6
Mableton, GA 30126

From: Sierra Club Membership Services on behalf of Steven Nelson
To: CESAS-PD, SAS
Subject: Protest the Savannah National Wildlife Refuge
Date: Monday, January 24, 2011 11:49:12 PM

Jan 24, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

The current terminals along the Savannah River support hundreds of thousands of jobs throughout Georgia and South Carolina and there is no reason to believe they won't in the future. Even without deepening the Savannah River, Savannah Port will continue to grow and provide even more jobs as current container ships visiting Jacksonville, if deepened, will now use Savannah Port.

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The Corps of Engineers needs to recommend to the Federal Government which port to help fund. This would save funds currently planned for deepening the Savannah River and yearly dredging funds needed to keep it deep.

Sincerely,

Mr. Steven Nelson
1484 Willow Lake Dr NE
Atlanta, GA 30329-2821

From: Sierra Club Membership Services on behalf of Andrea Garcia
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Monday, January 24, 2011 11:49:11 PM

Jan 24, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

The current terminals along the Savannah River support hundreds of thousands of jobs throughout Georgia and South Carolina and there is no reason to believe they won't in the future. Even without deepening the Savannah River, Savannah Port will continue to grow and provide even more jobs as current container ships visiting Jacksonville, if deepened, will now use Savannah Port.

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The Corps of Engineers needs to recommend to the Federal Government which port to help fund. This would save funds currently planned for deepening the Savannah River and yearly dredging funds needed to keep it deep.

Sincerely,

Mrs. Andrea Garcia
122 Redford Dr
Grovetown, GA 30813-2213

From: Sierra Club Membership Services on behalf of janet dennis
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Monday, January 24, 2011 11:19:02 PM

Jan 24, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

The current terminals along the Savannah River support hundreds of thousands of jobs throughout Georgia and South Carolina and there is no reason to believe they won't in the future. Even without deepening the Savannah River, Savannah Port will continue to grow and provide even more jobs as current container ships visiting Jacksonville, if deepened, will now use Savannah Port.

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The Corps of Engineers needs to recommend to the Federal Government which port to help fund. This would save funds currently planned for deepening the Savannah River and yearly dredging funds needed to keep it deep.

Sincerely,

Ms. janet dennis
2515 Bradford Sq NE
Atlanta, GA 30345-1338

From: Sierra Club Membership Services on behalf of Mary Alpern
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Monday, January 24, 2011 11:19:02 PM

Jan 24, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

The current terminals along the Savannah River support hundreds of thousands of jobs throughout Georgia and South Carolina and there is no reason to believe they won't in the future. Even without deepening the Savannah River, Savannah Port will continue to grow and provide even more jobs as current container ships visiting Jacksonville, if deepened, will now use Savannah Port.

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Sincerely,

Mary Alpern
206 E 39th St
Savannah, GA 31401-9020

From: Sierra Club Membership Services on behalf of Chris Carroll
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Monday, January 24, 2011 11:19:02 PM

Jan 24, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

The current terminals along the Savannah River support hundreds of thousands of jobs throughout Georgia and South Carolina and there is no reason to believe they won't in the future. Deepening the river may have unforeseeable enivronmental consequences and is not likely to improve the quality of the air that Georgians in the region breathe.

The Federal Government can not afford to assist deepening every port along the Atlantic Coast – nor are state budgets deep enough to allow every state along the Atlantic Coast to spend tax payers money to deepen every state port.

The Corps of Engineers needs to recommend to the Federal Government that only a few ports be funded, and the enivronmental study needs to be detailed and scientifically valid. Please take the time to do an extensive study of the impacts.

Sincerely,

Ms. Chris Carroll
815 Pinetree Dr
Decatur, GA 30030-2332

From: Sierra Club Membership Services on behalf of Takosha Lewis
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Monday, January 24, 2011 10:49:23 PM

Jan 24, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

The current terminals along the Savannah River support hundreds of thousands of jobs throughout Georgia and South Carolina and there is no reason to believe they won't in the future. Even without deepening the Savannah River, Savannah Port will continue to grow and provide even more jobs as current container ships visiting Jacksonville, if deepened, will now use Savannah Port.

The Federal Government can not afford to assist deepening every port along the Atlantic Coast -- nor are state budgets deep enough to allow every state along the Atlantic Coast to spend tax payers money to deepen every state port.

The Corps of Engineers needs to recommend to the Federal Government which port to help fund. This would save funds currently planned for deepening the Savannah River and yearly dredging funds needed to keep it deep.

Sincerely,

Ms. Takosha Lewis
1788 Broad River Rd
Atlanta, GA 30349-9159
(706) 593-3244

From: Sierra Club Membership Services on behalf of Ralph Emerson
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Monday, January 24, 2011 10:49:23 PM

Jan 24, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

The Federal Government can not afford to assist deepening every port along the Atlantic Coast -- nor are state budgets deep enough to allow every state along the Atlantic Coast to spend tax payers' money to deepen every state port, even in the name of job creation.

The Corps of Engineers needs to recommend to the Federal Government which port to help fund. This would probably save funds currently planned for deepening the Savannah River and yearly dredging funds needed to keep it deep.

Sincerely,

Mr. Ralph Emerson
150 Gibbons Way
Athens, GA 30605-4417
(706) 546-7490

From: Sierra Club Membership Services on behalf of Habib Torab
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Monday, January 24, 2011 10:49:20 PM

Jan 24, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

The current terminals along the Savannah River support hundreds of thousands of jobs throughout Georgia and South Carolina and there is no reason to believe they won't in the future. Even without deepening the Savannah River, Savannah Port will continue to grow and provide even more jobs as current container ships visiting Jacksonville, if deepened, will now use Savannah Port.

The Federal Government can not afford to assist deepening every port along the Atlantic Coast -- nor are state budgets deep enough to allow every state along the Atlantic Coast to spend tax payers money to deepen every state port.

The Corps of Engineers needs to recommend to the Federal Government which port to help fund. This would save funds currently planned for deepening the Savannah River and yearly dredging funds needed to keep it deep.

Sincerely,

Habib Torab
806 E Morningside Dr NE
Atlanta, GA 30324-5223

From: Sierra Club Membership Services on behalf of Susan Bearden
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Monday, January 24, 2011 10:49:15 PM

Jan 24, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

The current terminals along the Savannah River support hundreds of thousands of jobs throughout Georgia and South Carolina and there is no reason to believe they won't in the future. Even without deepening the Savannah River, Savannah Port will continue to grow and provide even more jobs as current container ships visiting Jacksonville, if deepened, will now use Savannah Port.

The Federal Government can not afford to assist deepening every port along the Atlantic Coast -- nor are state budgets deep enough to allow every state along the Atlantic Coast to spend tax payers money to deepen every state port.

The Corps of Engineers needs to recommend to the Federal Government which port to help fund. This would save funds currently planned for deepening the Savannah River and yearly dredging funds needed to keep it deep.

Sincerely,

Mrs. Susan Bearden
3438 Sunderland Cir NE
Atlanta, GA 30319-1950
(770) 986-0289

From: Sierra Club Membership Services on behalf of Jennifer Korndor
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Monday, January 24, 2011 10:49:14 PM

Jan 24, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

The current terminals along the Savannah River support hundreds of thousands of jobs throughout Georgia and South Carolina and there is no reason to believe they won't in the future. Even without deepening the Savannah River, Savannah Port will continue to grow and provide even more jobs as current container ships visiting Jacksonville, if deepened, will now use Savannah Port.

The Federal Government can not afford to assist deepening every port along the Atlantic Coast -- nor are state budgets deep enough to allow every state along the Atlantic Coast to spend tax payers money to deepen every state port.

The Corps of Engineers needs to recommend to the Federal Government which port to help fund. This would save funds currently planned for deepening the Savannah River and yearly dredging funds needed to keep it deep.

Sincerely,

Miss Jennifer Korndor
3420 Harding Ave
Atlanta, GA 30354-1908

From: Sierra Club Membership Services on behalf of Soney Wadford
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Monday, January 24, 2011 10:49:09 PM

Jan 24, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

The current terminals along the Savannah River support hundreds of thousands of jobs throughout Georgia and South Carolina and there is no reason to believe they won't in the future. Even without deepening the Savannah River, Savannah Port will continue to grow and provide even more jobs as current container ships visiting Jacksonville, if deepened, will now use Savannah Port.

The Federal Government can not afford to assist deepening every port along the Atlantic Coast -- nor are state budgets deep enough to allow every state along the Atlantic Coast to spend tax payers money to deepen every state port.

The Corps of Engineers needs to recommend to the Federal Government which port to help fund. This would save funds currently planned for deepening the Savannah River and yearly dredging funds needed to keep it deep.

Sincerely,

Mr. Soney Wadford
435 Millwater Ct
Grovetown, GA 30813-2011

From: Sierra Club Membership Services on behalf of Jenifer Alexander
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Monday, January 24, 2011 10:49:09 PM

Jan 24, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

The current terminals along the Savannah River support hundreds of thousands of jobs throughout Georgia and South Carolina and there is no reason to believe they won't in the future. Even without deepening the Savannah River, Savannah Port will continue to grow and provide even more jobs as current container ships visiting Jacksonville, if deepened, will now use Savannah Port.

The Federal Government can not afford to assist deepening every port along the Atlantic Coast -- nor are state budgets deep enough to allow every state along the Atlantic Coast to spend tax payers money to deepen every state port.

The Corps of Engineers needs to recommend to the Federal Government which port to help fund. This would save funds currently planned for deepening the Savannah River and yearly dredging funds needed to keep it deep.

Sincerely,

Ms. Jenifer Alexander
310 Rainbow Row Ct
Alpharetta, GA 30022-7665

From: Sierra Club Membership Services on behalf of Robert Elder
To: CESAS-PD_SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Monday, January 24, 2011 10:49:05 PM

Jan 24, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

The current terminals along the Savannah River support hundreds of thousands of jobs throughout Georgia and South Carolina and there is no reason to believe they won't in the future. Even without deepening the Savannah River, Savannah Port will continue to grow and provide even more jobs as current container ships visiting Jacksonville, if deepened, will now use Savannah Port.

The Federal Government can not afford to assist deepening every port along the Atlantic Coast -- nor are state budgets deep enough to allow every state along the Atlantic Coast to spend tax payers money to deepen every state port.

The Corps of Engineers needs to recommend to the Federal Government which port to help fund. This would save funds currently planned for deepening the Savannah River and yearly dredging funds needed to keep it deep.

Sincerely,

Mr. Robert Elder
3702 Cambridge Dr
Valdosta, GA 31605-7913

From: Sierra Club Membership Services on behalf of Timothy Dodd
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Monday, January 24, 2011 10:49:03 PM

Jan 24, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

The current terminals along the Savannah River support hundreds of thousands of jobs throughout Georgia and South Carolina and there is no reason to believe they won't in the future. Even without deepening the Savannah River, Savannah Port will continue to grow and provide even more jobs as current container ships visiting Jacksonville, if deepened, will now use Savannah Port.

The Federal Government can not afford to assist deepening every port along the Atlantic Coast -- nor are state budgets deep enough to allow every state along the Atlantic Coast to spend tax payers money to deepen every state port.

The Corps of Engineers needs to recommend to the Federal Government which port to help fund. This would save funds currently planned for deepening the Savannah River and yearly dredging funds needed to keep it deep.

Sincerely,

Mr. Timothy Dodd
1502 Park Lake Ln
Norcross, GA 30092-5234

From: Sierra Club Membership Services on behalf of Joan Harper
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Monday, January 24, 2011 10:48:59 PM

Jan 24, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

The current terminals along the Savannah River support hundreds of thousands of jobs throughout Georgia and South Carolina and there is no reason to believe they won't in the future. Even without deepening the Savannah River, Savannah Port will continue to grow and provide even more jobs as current container ships visiting Jacksonville, if deepened, will now use Savannah Port.

The Federal Government can not afford to assist deepening every port along the Atlantic Coast -- nor are state budgets deep enough to allow every state along the Atlantic Coast to spend tax payers money to deepen every state port.

The Corps of Engineers needs to recommend to the Federal Government which port to help fund. This would save funds currently planned for deepening the Savannah River and yearly dredging funds needed to keep it deep.

Sincerely,

Ms. Joan Harper
1032 Riverbend Club Dr SE
Atlanta, GA 30339-2803
(770) 956-9009

From: Sierra Club Membership Services on behalf of Donjenna Yokley
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Monday, January 24, 2011 10:35:10 PM

Jan 24, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

The current terminals along the Savannah River support hundreds of thousands of jobs throughout Georgia and South Carolina and there is no reason to believe they won't in the future. Even without deepening the Savannah River, Savannah Port will continue to grow and provide even more jobs as current container ships visiting Jacksonville, if deepened, will now use Savannah Port.

The Federal Government can not afford to assist deepening every port along the Atlantic Coast -- nor are state budgets deep enough to allow every state along the Atlantic Coast to spend tax payers money to deepen every state port.

The Corps of Engineers needs to recommend to the Federal Government which port to help fund. This would save funds currently planned for deepening the Savannah River and yearly dredging funds needed to keep it deep.

Sincerely,

Ms. Donjenna Yokley
148 Waverly Way NE
Apt 8
Atlanta, GA 30307-2562
(404) 247-6625

From: Sierra Club Membership Services on behalf of Robby Strozier
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Monday, January 24, 2011 10:35:10 PM

Jan 24, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

The current terminals along the Savannah River support hundreds of thousands of jobs throughout Georgia and South Carolina and there is no reason to believe they won't in the future. Even without deepening the Savannah River, Savannah Port will continue to grow and provide even more jobs as current container ships visiting Jacksonville, if deepened, will now use Savannah Port.

The Federal Government can not afford to assist deepening every port along the Atlantic Coast -- nor are state budgets deep enough to allow every state along the Atlantic Coast to spend tax payers money to deepen every state port.

The Corps of Engineers needs to recommend to the Federal Government which port to help fund. This would save funds currently planned for deepening the Savannah River and yearly dredging funds needed to keep it deep.

Sincerely,

Ms. Robby Strozier
925 Ridge Crest Ct
Macon, GA 31204-1078

From: Sierra Club Membership Services on behalf of Pat Bushong Whitehead
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Monday, January 24, 2011 10:35:09 PM

Jan 24, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

The current terminals along the Savannah River support hundreds of thousands of jobs throughout Georgia and South Carolina and there is no reason to believe they won't in the future. Even without deepening the Savannah River, Savannah Port will continue to grow and provide even more jobs as current container ships visiting Jacksonville, if deepened, will now use Savannah Port.

The Federal Government can not afford to assist deepening every port along the Atlantic Coast -- nor are state budgets deep enough to allow every state along the Atlantic Coast to spend tax payers money to deepen every state port.

The Corps of Engineers needs to recommend to the Federal Government which port to help fund. This would save funds currently planned for deepening the Savannah River and yearly dredging funds needed to keep it deep.

Sincerely,

Ms. Pat Bushong Whitehead
6 Buckboard Trl
Jesup, GA 31546-5204
(912) 427-0788

From: Sierra Club Membership Services on behalf of Robert Miller
To: CESAS-PD_SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Monday, January 24, 2011 10:35:09 PM

Jan 24, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

The current terminals along the Savannah River have supported hundreds of thousands of jobs throughout Georgia and South Carolina for years and will continue to do so for generations to come. There is no reason to doubt that the Savannah Port will continue to grow and provide even more jobs.

Please choose wisely, if not for the aesthetic and environmental quality of the area, then for fiscal reasons. The Federal Government can not afford to assist deepening every port along the Atlantic Coast. The Corps of Engineers needs to recommend to the Federal Government which port development to choose. Passing over Savannah will save funds currently planned for deepening the Savannah River and funds for annual dredging to maintain the depth.

Sincerely,

Mr. Robert Miller
13300 Morris Rd
Alpharetta, GA 30004-6120

From: Sierra Club Membership Services on behalf of Janet Drake
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Monday, January 24, 2011 10:35:01 PM

Jan 24, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

The current terminals along the Savannah River support hundreds of thousands of jobs throughout Georgia and South Carolina and there is no reason to believe they won't in the future. Even without deepening the Savannah River, Savannah Port will continue to grow and provide even more jobs as current container ships visiting Jacksonville, if deepened, will now use Savannah Port.

The Federal Government can not afford to assist deepening every port along the Atlantic Coast -- nor are state budgets deep enough to allow every state along the Atlantic Coast to spend tax payers money to deepen every state port.

The Corps of Engineers needs to recommend to the Federal Government which port to help fund. This would save funds currently planned for deepening the Savannah River and yearly dredging funds needed to keep it deep.

Sincerely.
Janet Drake
10215 Old Woodland Entry
Alpharetta, GA 30022

Sincerely,

Janet Drake
10215 Old Woodland Entry
Alpharetta, GA 30022-5846

From: Sierra Club Membership Services on behalf of Teresa Tucker
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Monday, January 24, 2011 10:35:01 PM

Jan 24, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

The current terminals along the Savannah River support hundreds of thousands of jobs throughout Georgia and South Carolina and there is no reason to believe they won't in the future. Even without deepening the Savannah River, Savannah Port will continue to grow and provide even more jobs as current container ships visiting Jacksonville, if deepened, will now use Savannah Port.

The Federal Government can not afford to assist deepening every port along the Atlantic Coast -- nor are state budgets deep enough to allow every state along the Atlantic Coast to spend tax payers money to deepen every state port.

The Corps of Engineers needs to recommend to the Federal Government which port to help fund. This would save funds currently planned for deepening the Savannah River and yearly dredging funds needed to keep it deep.

Sincerely,

Ms. Teresa Tucker
147 Superior Ave
Decatur, GA 30030-1814
(404) 378-5008

From: Sierra Club Membership Services on behalf of Cheryl Adams
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Monday, January 24, 2011 10:35:01 PM

Jan 24, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

The current terminals along the Savannah River support hundreds of thousands of jobs throughout Georgia and South Carolina and there is no reason to believe they won't in the future. Even without deepening the Savannah River, Savannah Port will continue to grow and provide even more jobs as current container ships visiting Jacksonville, if deepened, will now use Savannah Port.

The Federal Government can not afford to assist deepening every port along the Atlantic Coast -- nor are state budgets deep enough to allow every state along the Atlantic Coast to spend tax payers money to deepen every state port.

The Corps of Engineers needs to recommend to the Federal Government which port to help fund. This would save funds currently planned for deepening the Savannah River and yearly dredging funds needed to keep it deep.

Sincerely,

Miss Cheryl Adams
5070 Ga Highway 196 W
Hinesville, GA 31313-7821

From: Sierra Club Membership Services on behalf of Meredith Baxter
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Monday, January 24, 2011 10:35:01 PM

Jan 24, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

The current terminals along the Savannah River support hundreds of thousands of jobs throughout Georgia and South Carolina and there is no reason to believe they won't in the future. Even without deepening the Savannah River, Savannah Port will continue to grow and provide even more jobs as current container ships visiting Jacksonville, if deepened, will now use Savannah Port.

The Federal Government can not afford to assist deepening every port along the Atlantic Coast -- nor are state budgets deep enough to allow every state along the Atlantic Coast to spend tax payers money to deepen every state port.

The Corps of Engineers needs to recommend to the Federal Government which port to help fund. This would save funds currently planned for deepening the Savannah River and yearly dredging funds needed to keep it deep.

Sincerely,

Ms. Meredith Baxter
1000 Northside Dr NW
Apt 1326
Atlanta, GA 30318-5487
(828) 238-9038

From: Sierra Club Membership Services on behalf of David Quinn
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Monday, January 24, 2011 10:35:00 PM

Jan 24, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

The current terminals along the Savannah River support hundreds of thousands of jobs throughout Georgia and South Carolina and there is no reason to believe they won't in the future. Even without deepening the Savannah River, Savannah Port will continue to grow and provide even more jobs as current container ships visiting Jacksonville, if deepened, will now use Savannah Port.

The Federal Government can not afford to assist deepening every port along the Atlantic Coast -- nor are state budgets deep enough to allow every state along the Atlantic Coast to spend tax payers money to deepen every state port.

The Corps of Engineers needs to recommend to the Federal Government which port to help fund. This would save funds currently planned for deepening the Savannah River and yearly dredging funds needed to keep it deep.

Sincerely,

David Quinn
3031 Gables Way NE
Atlanta, GA 30329-3235
(404) 790-6645

From: Sierra Club Membership Services on behalf of WALTER DENLEY
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Monday, January 24, 2011 10:35:00 PM

Jan 24, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

The current terminals along the Savannah River support hundreds of thousands of jobs throughout Georgia and South Carolina and there is no reason to believe they won't in the future. Even without deepening the Savannah River, Savannah Port will continue to grow and provide even more jobs as current container ships visiting Jacksonville, if deepened, will now use Savannah Port.

The Federal Government can not afford to assist deepening every port along the Atlantic Coast – nor are state budgets deep enough to allow every state along the Atlantic Coast to spend tax payers money to deepen every state port.

The Corps of Engineers needs to recommend to the Federal Government which port to help fund. This would save funds currently planned for deepening the Savannah River and yearly dredging funds needed to keep it deep.

Sincerely,

Mr. WALTER DENLEY
2546 Oakwood Trce SE
Smyrna, GA 30080-8291

From: Sierra Club Membership Services on behalf of Heather Herlocher
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Monday, January 24, 2011 10:35:00 PM

Jan 24, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

The current terminals along the Savannah River support hundreds of thousands of jobs throughout Georgia and South Carolina and there is no reason to believe they won't in the future. Even without deepening the Savannah River, Savannah Port will continue to grow and provide even more jobs as current container ships visiting Jacksonville, if deepened, will now use Savannah Port.

The Federal Government can not afford to assist deepening every port along the Atlantic Coast -- nor are state budgets deep enough to allow every state along the Atlantic Coast to spend tax payers money to deepen every state port.

The Corps of Engineers needs to recommend to the Federal Government which port to help fund. This would save funds currently planned for deepening the Savannah River and yearly dredging funds needed to keep it deep.

Further "transparent" analysis of the ecological impact is needed. It is apparent that this aspect of the recommendation has been glossed over. Please take the time to look at what your proposal will mean, not only in terms of jobs, but of the environment, the quality of life and the long-term viability of Savannah as a historic city.

Sincerely,

Mrs. Heather Herlocher
6091 Rachel Rdg
Norcross, GA 30092-1312

From: Sierra Club Membership Services on behalf of Laura Breyfogle
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Monday, January 24, 2011 10:35:00 PM

Jan 24, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

The current terminals along the Savannah River support hundreds of thousands of jobs throughout Georgia and South Carolina and there is no reason to believe they won't in the future. Even without deepening the Savannah River, Savannah Port will continue to grow and provide even more jobs as current container ships visiting Jacksonville, if deepened, will now use Savannah Port.

The Federal Government can not afford to assist deepening every port along the Atlantic Coast -- nor are state budgets deep enough to allow every state along the Atlantic Coast to spend tax payers money to deepen every state port.

The Corps of Engineers needs to recommend to the Federal Government which port to help fund. This would save funds currently planned for deepening the Savannah River and yearly dredging funds needed to keep it deep.

Sincerely,

Mrs. Laura Breyfogle
208 Springdale Dr
Lagrange, GA 30240-2648

From: Sierra Club Membership Services on behalf of Robin Kemp
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Monday, January 24, 2011 10:35:00 PM

Jan 24, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

As a native New Orleanian, Katrina first resonder, and avid diver, I am concerned that dredging will further upset the relatively stable Atlantic coastline . Given the present devastation along the Gulf Coast, we must protect the fragile wetlands and sediments in this corner of the Southeast.

Tybee Island is one of the few relatively non-commercial barrier islands within half a day's drive from metro Atlanta. Its succes as a quiet vacation getaway will be compromised by dredges and the piles of seafloor material. Greater industrialization will further endanger stressed marine life, lower property values, and harm small businesses and captains who depend on Tybee for survival.

I have seen what MR. GO did firsthand, as I used to work for a small boatyard across from the Lower Ninth Ward. Can this country afford another manmade disaster like the post-Katrina levee failures or the Deepwater Horizon blowout? Can the Corps guarantee 100% failsafe engineering in this ecosystem?

I strongly believe that talented engineers such as those in the Corps consider the problem from another angle: perhaps advances in naval architecture could pose practical 21st-century alternatives to major channel dredging. The present approach is akin to blowing up mountaintops so planes might fly lower.

f deepened, will now use Savannah Port.

The Federal Government can not afford to assist deepening every port along the Atlantic Coast – nor are state budgets deep enough to allow every state along the Atlantic Coast to spend tax payers money to deepen every state port.

The Corps of Engineers needs to recommend to the Federal Government which port to help fund. This would save funds currently planned for deepening the Savannah River and yearly dredging funds needed to keep it deep.

Sincerely,

Ms. Robin Kemp

5253 Lyndale Cir
Forest Park, GA 30297-2737

From: Sierra Club Membership Services on behalf of Janet Blackmon
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Monday, January 24, 2011 10:34:59 PM

Jan 24, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

The current terminals along the Savannah River support hundreds of thousands of jobs throughout Georgia and South Carolina and there is no reason to believe they won't in the future. Even without deepening the Savannah River, Savannah Port will continue to grow and provide even more jobs as current container ships visiting Jacksonville, if deepened, will now use Savannah Port.

The Federal Government can not afford to assist deepening every port along the Atlantic Coast -- nor are state budgets deep enough to allow every state along the Atlantic Coast to spend tax payers money to deepen every state port.

The Corps of Engineers needs to recommend to the Federal Government which port to help fund. This would save funds currently planned for deepening the Savannah River and yearly dredging funds needed to keep it deep.

Sincerely,

Janet Blackmon
PO Box 756
Lilburn, GA 30048-0756

From: Sierra Club Membership Services on behalf of Jim Norris
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Monday, January 24, 2011 10:34:58 PM

Jan 24, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

The current terminals along the Savannah River support hundreds of thousands of jobs throughout Georgia and South Carolina and there is no reason to believe they won't in the future. Even without deepening the Savannah River, Savannah Port will continue to grow and provide even more jobs as current container ships visiting Jacksonville, if deepened, will now use Savannah Port.

The Federal Government can not afford to assist deepening every port along the Atlantic Coast -- nor are state budgets deep enough to allow every state along the Atlantic Coast to spend tax payers money to deepen every state port.

The Corps of Engineers needs to recommend to the Federal Government which port to help fund. This would save funds currently planned for deepening the Savannah River and yearly dredging funds needed to keep it deep.

Sincerely,

Mr. Jim Norris
239 Broadway St
St Simons Island, GA 31522-2738

From: Sierra Club Membership Services on behalf of Peter Followill
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Monday, January 24, 2011 10:34:57 PM

Jan 24, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

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Sincerely,

Mr. Peter Followill
2345 Peachwood Cir NE
Apt 1107
Atlanta, GA 30345-8034

From: Sierra Club Membership Services on behalf of Franklin Naves
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Monday, January 24, 2011 10:02:53 PM

Jan 24, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

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Sincerely,

Mr. Franklin Naves
PO Box 117
Trion, GA 30753-0117

From: Sierra Club Membership Services on behalf of frances eubanks
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Monday, January 24, 2011 10:02:52 PM

Jan 24, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

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Sincerely,

Ms. frances eubanks
106 Franklin Ct
Decatur, GA 30030-2920
(404) 474-7913

From: Sierra Club Membership Services on behalf of Selma Kuurstra
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Monday, January 24, 2011 10:02:52 PM

Jan 24, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

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Sincerely,

Selma Kuurstra
47 Sloan St
Roswell, GA 30075-4919

From: Sierra Club Membership Services on behalf of Deborah Huntley
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Monday, January 24, 2011 10:02:52 PM

Jan 24, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

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Sincerely,

Deborah Huntley
11675 Northgate Trl
Roswell, GA 30075-2335

From: Sierra Club Membership Services on behalf of Anna Tiwoni
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Monday, January 24, 2011 10:02:52 PM

Jan 24, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

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Sincerely,

Mrs. Anna Tiwoni
4303 Ascot Rd
Hephzibah, GA 30815-4459
n/a

From: Sierra Club Membership Services on behalf of Gladys T. Lee
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Monday, January 24, 2011 10:02:52 PM

Jan 24, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

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Sincerely,

Mrs. Gladys T. Lee
511 N Laurel St
Quitman, GA 31643-1219

From: Sierra Club Membership Services on behalf of Katharine Heika
To: CESAS-PD_SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Monday, January 24, 2011 10:02:50 PM

Jan 24, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

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Sincerely,

Mrs. Katharine Heika
2397 Cardinal Way
Tucker, GA 30084-3337

From: Sierra Club Membership Services on behalf of Kristen Karnes
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Monday, January 24, 2011 10:02:50 PM

Jan 24, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

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Sincerely,

Ms. Kristen Karnes
1035 Presidents Ln
Lawrenceville, GA 30043-4176

From: Sierra Club Membership Services on behalf of L Camear Baxter III
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Monday, January 24, 2011 10:02:49 PM

Jan 24, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

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Sincerely,

Mr. L Camear Baxter III
7721 Lyle Dr
Riverdale, GA 30296-7187
(404) 219-3013

From: Sierra Club Membership Services on behalf of Sonia Swartz
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Monday, January 24, 2011 10:02:32 PM

Jan 24, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

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Sincerely,

Mrs. Sonia Swartz
1030 W Wesley Rd NW
Atlanta, GA 30327-1312
(404) 355-7032

From: Sierra Club Membership Services on behalf of Shari Barr
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Monday, January 24, 2011 10:02:31 PM

Jan 24, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

Thank you for considering long term consequences to people and other animals who live in the affected area, rather than just short term economic interests.

Sincerely,

Shari Barr
212 E Mockingbird Ln
Statesboro, GA 30461-6970

From: Sierra Club Membership Services on behalf of holiday lammon
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Monday, January 24, 2011 10:02:31 PM

Jan 24, 2011

William Bailey

Dear Bailey,

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Sincerely,

Ms. holiday lammon
3012 Whispering Hills Ct
Chamblee, GA 30341-5136

From: Sierra Club Membership Services on behalf of Jackie Parker
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Monday, January 24, 2011 10:02:31 PM

Jan 24, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

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Sincerely,

Jackie Parker
933 Verdi Way
Clarkston, GA 30021-1057

From: Sierra Club Membership Services on behalf of James R Stockley Sr
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Monday, January 24, 2011 10:02:31 PM

Jan 24, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

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Sincerely,

Mr. James R Stockley Sr
458 Staten St
Jonesboro, GA 30238-5767
(770) 473-4356

From: Sierra Club Membership Services on behalf of Jack Jones
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Monday, January 24, 2011 10:02:31 PM

Jan 24, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

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Sincerely,

Mr. Jack Jones
901 Pritchard Pl
Marietta, GA 30068-2656

From: Sierra Club Membership Services on behalf of Sarah Horgan
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Monday, January 24, 2011 10:02:29 PM

Jan 24, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

Please do not turn Savannah into the Port of Los Angeles!!!!
The current terminals along the Savannah River support hundreds of thousands of jobs throughout Georgia and South Carolina and there is no reason to believe they won't in the future. Even without deepening the Savannah River, Savannah Port will continue to grow and provide even more jobs as current container ships visiting Jacksonville, if deepened, will now use Savannah Port.

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Sincerely,

Mrs. Sarah Horgan
130 Farm Valley Dr
Canton, GA 30115-6484
(678) 880-8382

From: Sierra Club Membership Services on behalf of Clayton Holloway
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Monday, January 24, 2011 10:02:29 PM

Jan 24, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

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Sincerely,

Clayton Holloway
114 High Pointe Dr
Rincon, GA 31326-5243
(912) 826-3339

From: Sierra Club Membership Services on behalf of Robyn Smith
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Monday, January 24, 2011 10:01:19 PM

Jan 24, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

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Sincerely,

Ms. Robyn Smith
1358 Diamond Head Cir
Decatur, GA 30033-2302

From: Sierra Club Membership Services on behalf of John Kominoski
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Monday, January 24, 2011 10:01:12 PM

Jan 24, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

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Sincerely,

Dr. John Kominoski
Odum School of Ecology
University of Georgia
Athens, GA 30602-0001

From: Sierra Club Membership Services on behalf of Scott Lee
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Monday, January 24, 2011 10:01:12 PM

Jan 24, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

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Sincerely,

Mr. Scott Lee
581 Greenwood Ave NE
Atlanta, GA 30308-1839

From: Sierra Club Membership Services on behalf of Mary Anna Bone
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Monday, January 24, 2011 10:01:12 PM

Jan 24, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

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Sincerely,

Ms. Mary Anna Bone
3319 Lawrence Dr
Columbus, GA 31907-2525
(706) 568-0879

From: Sierra Club Membership Services on behalf of Lucy Hines
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Monday, January 24, 2011 10:01:11 PM

Jan 24, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

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Sincerely,

Ms. Lucy Hines
343 Club Dr
LAWRENCEVILLE, GA 30045

From: Sierra Club Membership Services on behalf of Sukoshi Rice
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Monday, January 24, 2011 10:01:11 PM

Jan 24, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

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Sincerely,

Mrs. Sukoshi Rice
PO Box 574
Blairsville, GA 30514-0574

From: Sierra Club Membership Services on behalf of L. D. Holland
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Monday, January 24, 2011 10:01:10 PM

Jan 24, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

The current terminals along the Savannah River support hundreds of thousands of jobs throughout Georgia and South Carolina and there is no reason to believe they won't in the future. Even without deepening the Savannah River, Savannah Port will continue to grow and provide even more jobs as current container ships visiting Jacksonville, if deepened, will now use Savannah Port.

The Federal Government can not afford to assist deepening every port along the Atlantic Coast -- nor are state budgets deep enough to allow every state along the Atlantic Coast to spend tax payers money to deepen every state port.

The Corps of Engineers needs to recommend to the Federal Government which port to help fund. This would save funds currently planned for deepening the Savannah River and yearly dredging funds needed to keep it deep.

Sincerely,

Mr. L. D. Holland
14125 Freemanville Rd
Alpharetta, GA 30004-3514
(770) 343-8428

From: Sierra Club Membership Services on behalf of Patricia Wallis
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Monday, January 24, 2011 10:01:03 PM

Jan 24, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

The current terminals along the Savannah River support hundreds of thousands of jobs throughout Georgia and South Carolina and there is no reason to believe they won't in the future. Even without deepening the Savannah River, Savannah Port will continue to grow and provide even more jobs as current container ships visiting Jacksonville, if deepened, will now use Savannah Port.

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The Corps of Engineers needs to recommend to the Federal Government which port to help fund. This would save funds currently planned for deepening the Savannah River and yearly dredging funds needed to keep it deep.

Sincerely,

Patricia Wallis
2485 Conley Dr
Cumming, GA 30040-7152
(678) 357-7439

From: Sierra Club Membership Services on behalf of Timothy Leech
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Monday, January 24, 2011 10:01:02 PM

Jan 24, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

The current terminals along the Savannah River support hundreds of thousands of jobs throughout Georgia and South Carolina and there is no reason to believe they won't in the future. Even without deepening the Savannah River, Savannah Port will continue to grow and provide even more jobs as current container ships visiting Jacksonville, if deepened, will now use Savannah Port.

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The Corps of Engineers needs to recommend to the Federal Government which port to help fund. This would save funds currently planned for deepening the Savannah River and yearly dredging funds needed to keep it deep.

Sincerely,

Mr. Timothy Leech
310 Great Oak Dr
Athens, GA 30605-4507

From: Sierra Club Membership Services on behalf of Mathieu Erramuzpe
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Monday, January 24, 2011 10:01:00 PM

Jan 24, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

The current terminals along the Savannah River support hundreds of thousands of jobs throughout Georgia and South Carolina and there is no reason to believe they won't in the future. Even without deepening the Savannah River, Savannah Port will continue to grow and provide even more jobs as current container ships visiting Jacksonville, if deepened, will now use Savannah Port.

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The Corps of Engineers needs to recommend to the Federal Government which port to help fund. This would save funds currently planned for deepening the Savannah River and yearly dredging funds needed to keep it deep.

Sincerely,

Mr. Mathieu Erramuzpe
814 Aumond Pl E
Augusta, GA 30909-3220
(706) 267-1439

From: Sierra Club Membership Services on behalf of David Cook
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Monday, January 24, 2011 10:00:59 PM

Jan 24, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

The current proposal amounts to another bailout, this time to the shipping industry. It is a risky gamble with taxpayer dollars, delicate ecosystems, public water supply, and Georgia's heritage at stake. What citizen of Georgia or the United States truly has the right to toss these invaluable resources under the bow of shipping progress? No one. Anyone, or group, who does will be seen has a criminal and a greedy scoundrel in our history books.

The Federal Government can not afford to assist deepening every port along the Atlantic Coast -- nor are state budgets deep enough to allow every state along the Atlantic Coast to spend tax payers money to deepen every state port.

The Corps of Engineers needs to recommend to the Federal Government which port to help fund. This would save funds currently planned for deepening the Savannah River and yearly dredging funds needed to keep it deep.

Sincerely,

Mr. David Cook
5157 W Chapel Hill Rd
Douglasville, GA 30135-4937

From: Sierra Club Membership Services on behalf of Jannine Roads
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Monday, January 24, 2011 10:00:59 PM

Jan 24, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

The current terminals along the Savannah River support hundreds of thousands of jobs throughout Georgia and South Carolina and there is no reason to believe they won't in the future. Even without deepening the Savannah River, Savannah Port will continue to grow and provide even more jobs as current container ships visiting Jacksonville, if deepened, will now use Savannah Port.

The Federal Government can not afford to assist deepening every port along the Atlantic Coast -- nor are state budgets deep enough to allow every state along the Atlantic Coast to spend tax payers money to deepen every state port.

The Corps of Engineers needs to recommend to the Federal Government which port to help fund. This would save funds currently planned for deepening the Savannah River and yearly dredging funds needed to keep it deep.

Sincerely,

Ms. Jannine Roads
6234 Castlewood Dr
Morrow, GA 30260-2010
(770) 960-1363

From: Sierra Club Membership Services on behalf of Janet Leavell
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Monday, January 24, 2011 10:00:57 PM

Jan 24, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

The current terminals along the Savannah River support hundreds of thousands of jobs throughout Georgia and South Carolina and there is no reason to believe they won't in the future. Even without deepening the Savannah River, Savannah Port will continue to grow and provide even more jobs as current container ships visiting Jacksonville, if deepened, will now use Savannah Port.

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The Corps of Engineers needs to recommend to the Federal Government which port to help fund. This would save funds currently planned for deepening the Savannah River and yearly dredging funds needed to keep it deep.

Sincerely,

Ms. Janet Leavell
3293 Westmart Ln
Atlanta, GA 30340-4513

From: Sierra Club Membership Services on behalf of Laurie Wilder
To: CESAS-PD_SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Monday, January 24, 2011 10:00:56 PM

Jan 24, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

My concern is the environmental havoc this kind of project will wreak on the area. Whales come to the area and although I don't know much about what kind or when they come I can only imagine what this would do to their already threatened lives. The current terminals along the Savannah River support hundreds of
thousands of jobs throughout Georgia and South Carolina and there is no reason to believe they won't in the future. Even without deepening the Savannah River, Savannah Port will continue to grow and provide even more jobs as current container ships visiting Jacksonville, if deepened, will now use Savannah Port.

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The Corps of Engineers needs to recommend to the Federal Government which port to help fund. This would save funds currently planned for deepening the Savannah River and yearly dredging funds needed to keep it deep.

Sincerely,

Ms. Laurie Wilder
1305 Cherokee Rd
Winterville, GA 30683-2904

From: Sierra Club Membership Services on behalf of MELBA SCOTT
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Monday, January 24, 2011 10:00:52 PM

Jan 24, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

The current terminals along the Savannah River support hundreds of thousands of jobs throughout Georgia and South Carolina and there is no reason to believe they won't in the future. Even without deepening the Savannah River, Savannah Port will continue to grow and provide even more jobs as current container ships visiting Jacksonville, if deepened, will now use Savannah Port.

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The Corps of Engineers needs to recommend to the Federal Government which port to help fund. This would save funds currently planned for deepening the Savannah River and yearly dredging funds needed to keep it deep.

Sincerely,
Melba Scott
722 Calibre Springs Way
Atlanta, GA 30342

Sincerely,

Ms. MELBA SCOTT
722 Calibre Springs Way NE
Atlanta, GA 30342-1877
(646) 358-7283

From: Sierra Club Membership Services on behalf of Sandi Tax
To: CESAS-PD_SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Monday, January 24, 2011 10:00:52 PM

Jan 24, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

The current terminals along the Savannah River support hundreds of thousands of jobs throughout Georgia and South Carolina and there is no reason to believe they won't in the future. Even without deepening the Savannah River, Savannah Port will continue to grow and provide even more jobs as current container ships visiting Jacksonville, if deepened, will now use Savannah Port.

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Sincerely,

Mrs. Sandi Tax
2230 Kitfox Cir
Cumming, GA 30041-7871
(770) 781-6593

From: Sierra Club Membership Services on behalf of Sharon Coogle
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Monday, January 24, 2011 10:00:52 PM

Jan 24, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

The current terminals along the Savannah River support hundreds of thousands of jobs throughout Georgia and South Carolina and there is no reason to believe they won't in the future. Even without deepening the Savannah River, Savannah Port will continue to grow and provide even more jobs as current container ships visiting Jacksonville, if deepened, will now use Savannah Port.

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The Corps of Engineers needs to recommend to the Federal Government which port to help fund. This would save funds currently planned for deepening the Savannah River and yearly dredging funds needed to keep it deep.

Sincerely,

Ms. Sharon Coogle
115 Old Hickory Trl
Blue Ridge, GA 30513-5586
(706) 633-4520

From: Sierra Club Membership Services on behalf of Janet Wright
To: CESAS-PD_SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Monday, January 24, 2011 10:00:51 PM

Jan 24, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

The current terminals along the Savannah River support hundreds of thousands of jobs throughout Georgia and South Carolina and there is no reason to believe they won't in the future. Even without deepening the Savannah River, Savannah Port will continue to grow and provide even more jobs as current container ships visiting Jacksonville, if deepened, will now use Savannah Port.

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The Corps of Engineers needs to recommend to the Federal Government which port to help fund. This would save funds currently planned for deepening the Savannah River and yearly dredging funds needed to keep it deep.

Sincerely,

Janet Wright
125 Meadowview Rd
Athens, GA 30606-4265

From: Sierra Club Membership Services on behalf of julie Ransom
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Monday, January 24, 2011 10:00:51 PM

Jan 24, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

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Sincerely,

julie Ransom
948 Vistavia Cir
Decatur, GA 30033-3426
(404) 633-9165

From: Sierra Club Membership Services on behalf of John Temples
To: CESAS-PD_SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Monday, January 24, 2011 10:00:51 PM

Jan 24, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

The current terminals along the Savannah River support hundreds of thousands of jobs throughout Georgia and South Carolina and there is no reason to believe they won't in the future. Even without deepening the Savannah River, Savannah Port will continue to grow and provide even more jobs as current container ships visiting Jacksonville, if deepened, will now use Savannah Port.

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The Corps of Engineers needs to recommend to the Federal Government which port to help fund. This would save funds currently planned for deepening the Savannah River and yearly dredging funds needed to keep it deep.

Sincerely,

Mr. John Temples
9448 Coleman Rd
Roswell, GA 30075-4761

From: Sierra Club Membership Services on behalf of Matteo Moore
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Monday, January 24, 2011 10:00:50 PM

Jan 24, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

The current terminals along the Savannah River support hundreds of thousands of jobs throughout Georgia and South Carolina and there is no reason to believe they won't in the future. Even without deepening the Savannah River, Savannah Port will continue to grow and provide even more jobs as current container ships visiting Jacksonville, if deepened, will now use Savannah Port.

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The Corps of Engineers needs to recommend to the Federal Government which port to help fund. This would save funds currently planned for deepening the Savannah River and yearly dredging funds needed to keep it deep.

Sincerely,

Mr. Matteo Moore
20 10th St NW
Atlanta, GA 30309-3866

From: Sierra Club Membership Services on behalf of Steve Boudreaux
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Monday, January 24, 2011 10:00:50 PM

Jan 24, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

Developing the Savannah River, from Garden City to Tybee Island, as a regional megaport and heavy industrial corridor? Seriously? Surely, there are other options that have far fewer environmental and historic ramifications. The current terminals along the Savannah River support hundreds of
thousands of jobs throughout Georgia and South Carolina and there is no reason to believe they won't in the future. Even without deepening the Savannah River, Savannah Port will continue to grow and provide even more jobs as current container ships visiting Jacksonville, if deepened, will now use Savannah Port.

The Federal Government can not afford to assist deepening every port along the Atlantic Coast -- nor are state budgets deep enough to allow every state along the Atlantic Coast to spend tax payers money to deepen every state port.

The Corps of Engineers needs to recommend to the Federal Government which port to help fund. This would save funds currently planned for deepening the Savannah River and yearly dredging funds needed to keep it deep.

As a former New Orleanian, I wept when I saw the devistation wraught by Katrina, and yes, by poor planning and execution on the part of the Army Corps of Engineers. One of the lessons that should have been learned from that disaster is that we have a responsibility to consider the ramifications of such "improvement" projects, to both natural ecosystems, and to communities in the area. Yes, jobs are important- but the people who might fill those jobs are at least as important, as are their homes and quality of life. It is high time our governmental agencies gave due considerations to that view of the picture, even if it is at a modest expense to the industrial and business interest. Alternatives that have less environmental and historic impact MUST be explored, and, where ever possible, adopted.

Sincerely,

Mr. Steve Boudreaux
1525 Rubes Lndg
Marietta, GA 30066-1232

From: Sierra Club Membership Services on behalf of Adriaan Roggeveen
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Monday, January 24, 2011 10:00:50 PM

Jan 24, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

The current terminals along the Savannah River support hundreds of thousands of jobs throughout Georgia and South Carolina and there is no reason to believe they won't in the future. Even without deepening the Savannah River, Savannah Port will continue to grow and provide even more jobs as current container ships visiting Jacksonville, if deepened, will now use Savannah Port.

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The Corps of Engineers needs to recommend to the Federal Government which port to help fund. This would save funds currently planned for deepening the Savannah River and yearly dredging funds needed to keep it deep.

All of us in Georgia are concerned about what you have done in Lousiana, along the Mississippi, andall the marshlands that no longer support life or protection fromthe elements.

My Daddy would roll over in his grave if he knew that the Army Corps of Engineers was attacking another "Friendly Port."

Sincerely,

Mr. Adriaan Roggeveen
220 Stadium Dr
Camilla, GA 31730-2316

From: Sierra Club Membership Services on behalf of Alice Ramirez-Hanselman
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Monday, January 24, 2011 10:00:50 PM

Jan 24, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

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The Corps of Engineers needs to recommend to the Federal Government which port to help fund. This would save funds currently planned for deepening the Savannah River and yearly dredging funds needed to keep it deep.

Sincerely,

Alice Ramirez-Hanselman
2031 Spring End Ct
Lawrenceville, GA 30044-5395

From: Sierra Club Membership Services on behalf of Oreon Mann
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Monday, January 24, 2011 10:00:50 PM

Jan 24, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

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The Federal Government can not afford to assist deepening every port along the Atlantic Coast -- nor are state budgets deep enough to allow every state along the Atlantic Coast to spend tax payers money to deepen every state port.

The Corps of Engineers needs to recommend to the Federal Government which port to help fund. This would save funds currently planned for deepening the Savannah River and yearly dredging funds needed to keep it deep.

Sincerely,

Mr. Oreon Mann
877 Edgewood Ave NE
Atlanta, GA 30307-2547
(404) 522-3469

From: Sierra Club Membership Services on behalf of Meg Sniderman
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Monday, January 24, 2011 10:00:50 PM

Jan 24, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

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The Corps of Engineers needs to recommend to the Federal Government which port to help fund. This would save funds currently planned for deepening the Savannah River and yearly dredging funds needed to keep it deep.

Sincerely,

Ms. Meg Sniderman
1384 McLendon Ave NE
Atlanta, GA 30307-2030
(615) 785-2823

From: Sierra Club Membership Services on behalf of Angie Ostertag
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Monday, January 24, 2011 10:00:40 PM

Jan 24, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

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Sincerely,

Mrs. Angie Ostertag
2065 Hembree Grove Dr
Roswell, GA 30076-1273

From: Sierra Club Membership Services on behalf of Valerie Robbins
To: CESAS-PD_SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Monday, January 24, 2011 10:00:40 PM

Jan 24, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

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Sincerely,

Valerie Robbins
1511 N Amanda Cir NE
Atlanta, GA 30329-3319
(404) 633-7997

From: Sierra Club Membership Services on behalf of Sandra Workman
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Monday, January 24, 2011 10:00:40 PM

Jan 24, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

The current terminals along the Savannah River support hundreds of thousands of jobs throughout Georgia and South Carolina and there is no reason to believe they won't in the future. Even without deepening the Savannah River, Savannah Port will continue to grow and provide even more jobs as current container ships visiting Jacksonville, if deepened, will now use Savannah Port.

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The Corps of Engineers needs to recommend to the Federal Government which port to help fund. This would save funds currently planned for deepening the Savannah River and yearly dredging funds needed to keep it deep.

Sincerely,

Sandra Workman
245 Waverly Hall Dr
Roswell, GA 30075-2143

From: Sierra Club Membership Services on behalf of Julia Blissard
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Monday, January 24, 2011 10:00:40 PM

Jan 24, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

The current terminals along the Savannah River support hundreds of thousands of jobs throughout Georgia and South Carolina and there is no reason to believe they won't in the future. Even without deepening the Savannah River, Savannah Port will continue to grow and provide even more jobs as current container ships visiting Jacksonville, if deepened, will now use Savannah Port.

The Federal Government can not afford to assist deepening every port along the Atlantic Coast -- nor are state budgets deep enough to allow every state along the Atlantic Coast to spend tax payers money to deepen every state port.

The Corps of Engineers needs to recommend to the Federal Government which port to help fund. This would save funds currently planned for deepening the Savannah River and yearly dredging funds needed to keep it deep.

Sincerely,

Mrs. Julia Blissard
1120 Olivine Dr
Alpharetta, GA 30022-7924

From: Sierra Club Membership Services on behalf of Tanja Mletzko Crowe
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Monday, January 24, 2011 10:00:39 PM

Jan 24, 2011

William Bailey

Dear Bailey,

I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.

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Sincerely,

Mrs. Tanja Mletzko Crowe
55 Montgomery St SE
Atlanta, GA 30317-1907

From: Sierra Club Membership Services on behalf of Nancy Mills
To: CESAS-PD_SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Monday, January 24, 2011 10:00:39 PM

Jan 24, 2011

William Bailey

Dear Bailey,

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Sincerely,

Ms. Nancy Mills
1538 Dresden Dr NE Apt H
Atlanta, GA 30319-3500

From: Sierra Club Membership Services on behalf of Stephanie Lingecum
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Monday, January 24, 2011 10:00:38 PM

Jan 24, 2011

William Bailey

Dear Bailey,

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Sincerely,

Ms. Stephanie Lincecum
115 Tom Chapman Blvd
Apt 1604
Warner Robins, GA 31088-7870

From: Sierra Club Membership Services on behalf of Larry Winslett
To: CESAS-PD_SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Monday, January 24, 2011 10:00:38 PM

Jan 24, 2011

William Bailey

Dear Bailey,

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Sincerely,

Mr. Larry Winslett
PO Box 1962
Dahlonega, GA 30533-0033
(404) 375-8405

From: Sierra Club Membership Services on behalf of Amy Budow
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Monday, January 24, 2011 10:00:38 PM

Jan 24, 2011

William Bailey

Dear Bailey,

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Sincerely,

Ms. Amy Budow
800 Peachtree St
Atlanta, GA 30308-1216

From: Sierra Club Membership Services on behalf of Randy Brooks
To: CESAS-PD, SAS
Subject: Protect the Savannah National Wildlife Refuge
Date: Monday, January 24, 2011 10:00:38 PM

Jan 24, 2011

William Bailey

Dear Bailey,

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The Corps of Engineers needs to recommend to the Federal Government which port to help fund. This would save funds currently planned for deepening the Savannah River and yearly dredging funds needed to keep it deep.

I have visited Savannah and have fallen in love with it's character and charm each time. Please don't let the magic disappear.

Sincerely,

Dr. Randy Brooks
292 Brooks Rackley Rd
Dallas, GA 30157-9515
(678) 410-8677

Sierra Club- Form Letter

1107-JK-06-EC01, 1107-JK-06-EV01, 1107-JK-06-EN01, 692-MR-04-EV01

Comment: *I am concerned about the proposal to deepen the Savannah River by 48 feet. Studies have not demonstrated that the project is needed to keep the Port viable, nor have they considered alternatives. The threats to the freshwater aquifer, the wildlife habitat and to Georgia's most historic city are not worth the risks.*

Response: The District evaluates its water resource projects from a National Economic Development (NED) perspective, which in essence is the alternative [meeting project objectives] having the greatest net economic benefits [benefits minus costs]. Generally, this option will become the preferred alternative for implementation; however, there are situations in which compelling circumstances [long-term economics] dictate another choice. In this instance, the NED benefits are comprised primarily of the reduced transportation costs resulting from removing the current constraints of draft. It is important to note that these economic benefits accrue from the use of larger, more cost-effective container ships, not an increase in the number of containers expected to move through then Port. In performing the NED, analysts are mindful not to claim benefits that result from a redistribution of commerce from one port to another.

As discussed in EIS-Section 5, the impacts to habitat were assessed through extensive studies, modeling efforts, and federal/state resource agency coordination. That section also addresses potential impacts to cultural and historic resources, including investigations made in coordination with the South Carolina and Georgia State Historic Preservation Offices. Appendix C discusses the District's step-by-step approach to mitigation planning, i.e., avoidance, minimization, and mitigation for unavoidable impacts. Appendix D discusses monitoring and adaptive management measures undertaken to assure the success of the mitigation efforts.

The purpose of the SHEP is to identify and evaluate feasible, environmentally-acceptable alternatives that will: reduce congestion in the river channel; accommodate recent and anticipated future growth in containerized cargo and container ship traffic; improve the efficiency of operations for container ships within the Savannah Harbor Navigation Project; and allow larger and more efficient container ships to use the Port.

The Corps considered the reasonable and practicable alternatives, as required by NEPA and the Clean Water Act. The SHEP NEPA alternatives analysis ranged from considering other potential options or sites for the project, including other South Atlantic ports, to evaluating potential specific locations for disposal of dredged or fill material along Savannah Harbor and in the Atlantic Ocean along the entrance channel. The NEPA alternatives analysis is found in various places in the EIS and GRR including EIS Section 2.0, Purpose and Need for Action; EIS Section 3.0, Alternatives; EIS Appendix H, Section 404(b)(1) Evaluation (Practicable Alternatives); EIS Appendix O, Formulation of Alternatives; GRR Section 6, Formulation of Alternatives; various other sections in the GRR; GRR Appendix A, Economics; GRR Appendix A, Attachment 3 (Regional Port Analysis); GRR Appendix A, Attachment 5 (Multi-Port Analysis); and GRR Appendix D, Plan Formulation Appendix. The Corps initial evaluation of measures that could address the existing navigation problems can be found in the Appendix O of the EIS. The DEIS documents the Corps' consideration of numerous potential methods [structural/nonstructural] of solving its navigation problems. Management measures which showed potential for addressing the noted constraints of draft were evaluated based on technical, economic, and environmental considerations. The evaluations were conducted in accordance with NEPA, the Clean Water Act, criteria

established in the Economic and Environmental Principles and Guidelines for Water and Related Land Resources Implementation Studies (US Water Resources Council, 1983) and the policies and procedures established by ER 1105-2-100, Planning Guidance Notebook, April 22, 2000.

Extensive analysis has been conducted on all potential impacts attendant to SHEP's implementation. Project impacts to freshwater wetlands' wildlife habitat functions [due to marsh conversion] would be completely mitigated during project construction. Any unanticipated impacts would be addressed through a very robust monitoring and adaptive management process. Impacts to groundwater of the Upper Floridan aquifer as a result of proposed harbor deepening are expected to be minimal [GRR-Appendix C: Engineering, Supplemental Studies, Potential Ground-Water Impacts to the Upper Floridan Aquifer, 2007]. The post-construction monitoring includes monitoring of chloride levels in groundwater wells along the river.

1107-JK-06-EC02, 692-MR-04-EV02

Comment: *The current terminals along the Savannah River support hundreds of thousands of jobs throughout Georgia and South Carolina and there is no reason to believe they won't in the future. Even without deepening the Savannah River, Savannah Port will continue to grow and provide even more jobs as current container ships visiting Jacksonville, if deepened, will now use Savannah Port.*

Response: The Corps expects the number of cargo containers moved through GCT to increase over time; however, the subject harbor deepening will have no material effect on the rate of that increase. Under both the without and with project conditions, the Garden City Terminal will reach its build-out capacity [annual] in about 2030 at 6.5 million TEUs per year. This is the maximum number of containers that the facility could reasonably process, based on factors such as the size of the terminal, the number of gates that provide access to the property, the number and size of the berths, the number and size of the container cranes, the number of jockey trucks that move the containers within the terminal, how the containers are stacked within the terminal, and the number of railroads that service the terminal and the frequency of their trains. It is predicted that without deepening, more vessels will be required to transport the cargo that transits the port. With deepening, the total number of vessels would decrease (when compared to the without project condition) as they will be able to load/unload without the current constraints of draft.

1107-JK-06-EC03, 692-MR-04-EV03

Comment: *The Federal Government can not afford to assist deepening every port along the Atlantic Coast -- nor are state budgets deep enough to allow every state along the Atlantic Coast to spend tax payers money to deepen every state port.*

Response: The Corps considers every proposed port improvement on its individual merits and the deepening of one port in no way means that all competing ports would likewise be improved. All studies must follow the same rigorous process detailed in Engineering Regulation (ER) 1105-2-100 as well as other guidance and regulations. All analyses and documents are subject to iterative review, including an assessment by independent parties.

1107-JK-06-EC04, 692-MR-04-EV04

Comment: *The Corps of Engineers needs to recommend to the Federal Government which port to help fund. This would save funds currently planned for deepening the Savannah River and yearly dredging funds needed to keep it deep.*

Response: See previous response. Congress has not authorized or funded the Corps of Engineers to conduct a comprehensive evaluation of all ports to identify where port improvements would be most cost-effective. Through the procedures Congress has established that the Corps uniformly applies (including the benefit: cost ratio), it is able to compare the cost-effectiveness of various improvements as they are presented to it for funding consideration.

#4

Citizens for Environmental Justice
1115 Habershan St., Savannah, GA 31401
912-233-0907

First African Baptist Church
23 Montgomery Street, Savannah, GA 31401
912-233-2244

Gethsemane Baptist Church
301 West 41st Street , Savannah, GA 31401
912-660-3708

Cross Over Ministries
1019 Old Louisville Road, Garden City, GA 31408
912-966-1606

Key Street Neighborhood Association
6947 Key Street, Savannah, GA 31406
912-355-1076

AL Massey Community Association
1906 Toomer Street, Savannah, GA 31405
912-631-7843

EPREO Financial, Inc.
12469 Northwood Road, Savannah, GA 31419
912-376-0185

Coalition For A Safe Environment
1601 N. Wilmington Blvd., Wilmington, California 90744
wilmingtoncoalition @ prodigy.net 310-704-1265

January 25, 2011

Colonel Jeffrey M. Hall
District Commander & Chief Engineer
Department of the Navy
Savannah District, Corps of Engineers

Mr. William G. Bailey
ATTN: PD
US Army Corps of Engineers, Savannah District
100 West Oglethorpe Avenue
Savannah, GA 31401-3640
cesas-pd@usace.army.gov
912-652-5781

Re: USACOE, Savannah District- Savannah Harbor Expansion Project
Su: Submission of Public Comments

USACOE:

The Coalition For A Safe Environment (CFASE) requests the U.S. Army Corp of Engineers (USACOE) the cancel the proposed Savannah Harbor Expansion Project and rescind the Draft Tier II Environmental Impact Statement (DEIS) for its non-compliance and violations of the requirements of the National Environmental Protection Act (NEPA), the Federal Clean Air Act, Clean Water Act, Executive Order 12898 Federal Actions To Address Environmental Justice In Minority Populations And Low Income Populations, Council on Environmental Quality (CEQ) Guidance for Environmental Justice Under NEPA (CEQ, 1997), Executive Order 13045 Protection of Children from Environmental Health Risks and Safety Risks and the U.S. Civil Rights Act.

We find the Savannah Harbor Expansion Project Proposal and Draft Tier II Environmental Impact Statement (DEIS) to be in non-compliance because it fails to meet evaluation factors approval criteria, fails to justify its purpose, fails to perform all legally required assessments, fails to eliminate where feasible all negative impacts, fails to mitigate negative impacts where feasible to less than significant and fails to include all reasonable and available feasible mitigation measures, fails to protect environmental justice community interests and fails to protect children's health & safety interests..

The following information, identified DEIS deficiencies, outlined points, concerns, references, examples, issues, recommendations and requests describe the inadequacies of the DEIS:

1. The USACOE Savannah District is unqualified to make a decision that "the proposed action would not impact minority communities or low income populations." The Savannah District office does not have an Environmental Justice Office, deputy, chief, director, manager or scientist, therefore no professional expert to determine the need for an assessment or conduct a comprehensive environmental justice impact assessment and assure compliance with federal laws and executive orders. Furthermore the Savannah District has no EJ Community outreach program, conducts no training on NEPA for the EJ Communities, other applicable federal laws and executive orders, conducts no training on how to prepare public comments, conducts no ongoing community meetings or dialogue.

As a result the DEIS failed to include an Environmental Justice Community Impact Assessment which would have required them to identify EJ Communities, minority and low income populations, sensitive receptors, number of elderly, pregnant women, preexisting conditions, number of children, available health and public services in the community, use Census and other available data.

2. The USACOE Savannah District has no environmental justice public advocate or representative, therefore, no one to represent environmental justice community interests, communicate with EJ Communities, advise and research appropriate mitigation and provide public information needs.

3. The USACOE Savannah District failed to hire and consult with an Environmental Justice: consultant firm, professional expert, community organization, legal firm or academic institution professor. It does however hire numerous other categories of consultants.

4. The USACOE Savannah District is unqualified to make a decision that "there would be no short or long term impacts on the health and safety of children." The Savannah District office does not have a Children Office of Health & Safety, deputy, chief, director, manager or scientist, therefore no professional expert to determine the need for an assessment or conduct a comprehensive children's health and safety impact assessment and assure compliance with federal laws and executive orders. Furthermore the Savannah District has no EJ Community outreach program, conducts no training on NEPA, other applicable federal laws and executive orders, conducts no training on how to prepare public comments, conducts no ongoing community meetings or dialogue.

5. The USACOE Savannah District has no children's health & safety advocate or representative, therefore, no one to represent children's health & safety interests, communicate with communities with children, advise and research appropriate mitigation and provide public information needs. I have attached Appendices A1 – A9 which lists over 160 health studies that validate public health impacts that can be caused Ports business operations and the Goods Movement Industry.

6. The USACOE Savannah District failed to hire and consult with a children's health & safety: consultant firm, professional expert, community organization, legal firm or academic institution professor. It does however hire numerous other categories of consultants.

7. USACOE Savannah District refused to hold a public hearing regarding the Draft Tier II Environmental Impact Statement (DEIS) and Draft General Reevaluation Report (DGRR) that was requested by City of Savannah and neighboring Environmental Justice Communities, organizations and individuals. Public hearings provide an opportunity for the USACOE to give comprehensive presentations on the detailed elements of the GRR and DEIES so that Environmental Justice Organizations and individuals can learn and ask relevant questions. The USACOE is also required to have a legal court reporter at public hearings to record all questions, discussions and public comments. The USACOE intentionally refused to have a public hearing so as to have no legal record of EJ

community participation and concerns violating NEPA, Executive Orders and Civil Rights Laws.

8. The USACOE states in the Tier II EIS 5-145 that the, "Environmental justice population have not expressed substantial concerns about the project,' and "No one identified impacts to environmental justice communities or children as issues of concern," which is not entirely accurate. Environmental Justice Communities and organizations have been concerned however; the General Re-evaluation Report and Tier II Environmental Impact Statement have been prepared omitting information that discloses impacts to EJ Communities. Over 100 EJ Community members attended the December 15, 2010 workshop and were told that only the media could ask questions.

9. The USACOE Savannah District sponsored workshop held on December 15, 2010 was unresponsive towards Environmental Justice Communities, organizations and individuals who attended when they wanted to engage in in-depth discussions and asked detailed questions. Over 100 EJ Community members attended the workshop and were told that only the media could ask questions.

10. The USACOE Savannah District prepared Draft Tier II Environmental Impact Statement (DEIS) contains numerous emissions of data, emission data is based on models and no actual on-site port air emissions studies, EJ Community air quality studies, some stated decisions are based on unsubstantiated facts and based on numerous assumptions. As an example of additional research, the California Air Resources Board sponsored a Port of Los Angeles – Wilmington EJ Community Wind Dispersion Study to show how air pollution from the Port is dispersed into a community. The study validated that air pollution does not stay on port property and does disperse through long distances into a community.

11. The USACOE Savannah District prepared Draft Tier II Environmental Impact Statement failed to include a comprehensive Cumulative Impact Assessment in its failure to research, identify and assess all sources of emissions. The California Office of Environmental Health Hazards Assessment (OEHHA) recently released an excellent Cumulative Impact Assessment Guidance Document and Toolkit.

12. DEIS has significantly underestimated ship emissions and future emissions. The DEIS failed to disclose that a larger Post Panamex Ship that carries 8,400 TEU's vs the current smaller 4,000 TEU Ship will cause a significant spike in air pollution emissions actually doubling the air emission in the same amount time as a smaller ship. The Port will need twice as many diesel trucks and cargo handling equipment for a large ship. This spike will also cause significantly public health problems and increase emergency hospital visits. In addition, what happens when the number of large ships exceeds the original number of smaller ships, even with the low sulfur fuel they will emit more emissions? Also what is the mitigation contingency plan when the number of large ships visiting the port increases? Will the public have to listen to the excuses of the Port of Savannah and the USACOE 5, 10 years from now that did not know this would happen? The Port of Los Angeles under-estimated the China Shipping Terminal container volume by over

20% in less than five years. Good examples of Port Emissions Inventories are the Port of Los Angeles and Port of Long Beach which can viewed on their websites.

Emission estimates did not include emissions from ship engine aging which causes more pollution as ships get older, ship boilers, ship cue time emissions while waiting to enter port river entrance and destination terminal, multiple ship staging idling, emissions from delays due to ship breakdowns, equipment breakdowns, accidents and adverse weather conditions. Estimates are also grossly in error due to the fact that larger cleaner ships will not arrive at the Port of Savannah in the near future and will in fact be phased in over a significant long period of time, therefore providing no near term benefits to the public.

13. The DEIS has significantly underestimated the current port and goods movement transportation corridor emissions and future emissions. Their studies did not include truck travel from their home location to the port to pick up containers and freight, the truck emissions when returning home, numerous side trips to chassis storage yards, container storage yards, inspection facilities, fumigation facilities, trans-loading locations, traffic congestion idling, on-port property idling, fugitive HFC's from A/C units, inefficient engine fuel combustion VOC's, pulverized tire rubber and brake dust. It did not contain estimates for fugitive green house gas HFC's emissions from reefer containers.

14. The DEIS failed to include an Environmental Justice Community Health Impact Assessment (HIA) to determine the current public health impacts of the Port of Savannah and its Goods Movement Transportation Corridors which include both rail and truck. The USACOE failed to research, consider and conduct a Environmental Justice Community Health Impact Assessment to determine the current public health impacts of the Port of Savannah and its Goods Movement Transportation Corridors which include both rail and truck.

HIA's identify, ascertain and mitigate all the public health, environmental, land use and socio-economic impacts. This would include public health care costs, health care facility availability, loss of income from loss school days due to illness, loss of income from temporary and long term disabilities, increased health insurance, deductibles & prescriptions, increased car insurance due to increased truck accidents, loss of police and fire department response time and repair maintenance and replacement of traffic infrastructure. The uninsured rate of Savannah is 17% - 24% and higher in EJ Communities. The Savannah EJ Communities of Woodville and Hudson Hill living below poverty rate is as high as 75.5%

As an example both the Los Angeles County Health Department and the US Environmental Protection Agency Region 9 support the inclusion of Health Impact Assessments. USEPA Region 9 released a Health Impact Assessment Scoping Plan for the Ports of Los Angeles and Long Beach.

We request that the study include all residents within 15 miles and along the length of Port of Savannah and Savannah River Corridor. I have attached Appendices A1 – A9 which lists over 160 health studies that validate public health impacts that can be caused Ports business operations and the Goods Movement Industry. USEPA Region 9

released a Health Impact Assessment Scoping Plan for the Ports of Los Angeles and Long Beach. The DEIS failed to include any public health studies or data of the City of Savannah and the Environmental Justice Communities that border the Port of Savannah and the Port Freight Transportation Corridors.

15. The DEIS failed to include an Environmental Justice Community Impact Nexus Study to determine the off-port property community impacts from its business operations, tenant operations and freight transportation. The USACOE failed to research, consider and conduct a Environmental Justice Community Impact Nexus Study to determine the extent of the Port of Savannah and its Goods Movement Transportation Corridors.

16. The DEIS failed to assess the significant negative socio-economic impacts to environmental justice communities who are predominantly low income who will be forced to subsidize port growth while private corporations like Walmart pay nothing. Low income EJ families pay a disproportionately higher percentage of their income on taxes to pay the costs of infrastructure and bond debt. Freeways, highways, bridges, transportation corridors and power plants construction costs will be subsidized by taxing the public and diverting other state and local revenues when the port user should be charged container and freight fees to pay all costs of expansion and improvement that benefit them. Public services such as highway patrol, city police, fire department, paramedics and emergency response for the public will be diverted to service the ports and goods movement transportation corridors.

17. The DIES failed to disclose that the project will have a significant and negative socio-economic impact on the tourism industry. Savannah will become the # 1 most polluted city in Georgia, will have a permanent brown smog cloud and odor from diesel fuel emissions. This will become more exasperated on hot summer days during peak tourist visits. Tourist will choose some other cleaner and healthier travel destination. Tourism is also one of the major employers of Environmental Justice Communities who will lose their jobs, financial security, peace of mind and quality of life.

18. The DEIS failed to include mitigation for job re-training for EJ Communities residents who will be displaced, lose employment and need to be trained in other job skills.

19. The DEIS failed to disclose that building the Jasper County Terminal would eliminate the need for dredging the Savannah River. Jasper County Terminal would be a higher priority Alternative that would eliminate the increase in environmental, public health, land, water and socio-economic impacts to Savannah.

20. The DEIS fails to identify and mitigate the noise impacts to residents, schools and sensitive receptors. Noise not only includes loud noise over 65db, but also non-stop and constant low level noise 40db-60db during the day, rest hours and sleep time hours. This includes honking, braking, acceleration, gunning of engines and stopped traffic congestion. When does the public have an 8hr respite from noise? We request sound proofing glass windows and doors with an STS rating of 90% or better and sound proof curtains during construction. We request that a Noise Mitigation Fund be established and funds provided from the mitigation fund.

We request the following:

1. The USACOE cancel the Savannah Harbor Expansion Project because the Draft General Reevaluation Report fails to validate all claims of need.

2. The DEIS be rescinded for non-compliance to NEPA, the Clean Air Act and Executive Orders 12898 and 13045 and or revised and re-circulated.

3. The DEIS and Final EIS include an on-site real time Port of Savannah and EJ Community Air Quality Study and inventory of all categories of emissions: criteria pollutants, toxic pollutants, HAP's, VOC's and all green house gases. To include all off-port property secondary and indirect emissions. Inventories must also include all truck routes, train routes, ship routes, container storage locations, inspection facilities, chassis locations, detours, operating time, idling time and storage fugitive emissions. We request that three air quality monitoring stations be established in EJ Communities.

4. The DEIS and Final EIS include an Environmental Justice Community Health Impact Assessment and allocate a $250,000 budget to hire an EJ Consultant. We want the HIA to be based on a comprehensive Public Health Survey (PHS) and establishment of a Public Health Baseline (PHB) of the impacted EJ Communities that border the Port, are near the port and along the ports freight transportation corridors, warehouses and distribution centers.

5. The DEIS and Final DEIS include an Environmental Justice Community Impact Nexus Study and allocate a $250,000 budget to hire an EJ Consultant.

6. The USACOE Savannah District establish an Office of Environmental Justice Compliance with staff and an annual budget of $ 500,000.

7. The USACOE contract with an Environmental Justice Community Organization to establish an Environmental Justice Outreach Program with an annual budget of $100,000 and $50,000 for a Environmental Justice Community Regional Conference.

8. The USACOE contract with the City of Savannah, Savannah Technical College and the Moses Jackson Advancement Center for the provision of Job Training Certification Programs in Port of Savannah and Goods Movement Transportation Technologies such as Drayage Truck Driver Class 7 & 8 License, Diesel Truck Mechanic, Truck A/C Mechanic, Logistics and Computer skills. We recommend an annual budget of $500,000.

9. The USACOE and Port of Savannah charge a $ 25 per TEU tariff to go into a fund for purchasing and replacing old diesel fuel polluting trucks with 2011 similar to the Port of Los Angeles and establish a Clean Truck Program, replacing all diesel fuel cargo moving equipment and cranes.

10. The USACOE and Port of Savannah establish an Off-Port Community Impact Nexus Mitigation Fund of $1 million and charge a $ 3.50 per TEU tariff and a $1.00 per barrel or ton of bulk cargo to go into a fund for the Off-Port Community Impact Nexus Mitigation Fund. Funds can be used to pay for the installation of Air Purification Systems for public schools and child care centers, like the recently approved Port of Los Angeles TraPac Settlement.

11. The USACOE and Port of Savannah establish an annual $10 million Technology Advancement Program to support R&D and demonstration projects of new emerging zero emissions freight transportation systems and maximum achievable emissions control technologies such as the Advanced Cleanup Technology, Inc. Advanced Maritime Emissions Control System to capture all ship emissions, Vision Motor Corp Zero Emissions Hydrogen Gas Fuel Cell Trucks and Miracle Mile Solutions VATT Systems Diesel Truck Fuel combustion Efficiency Retrofit Technology.

12. The USACOE and Port of Savannah establish an annual $10 million Public Health Care Mitigation Fund with priority going to fund local community based clinics, hospitals, convalescent care and health counseling.

13. The USACOE and Port of Savannah establish a Clean Air Action Plan like the Ports of Los Angles and Long Beach.

14. The USACOE and Port of Savannah establish a Port Community Advisory Committee like the Port of Los Angeles.

15. The USACOE and Port of Savannah conduct a new Port Hazards Risk & Liability Assessment to determine homeland security adequacy, explosions, fires and accident risks of Port expansion and water dredging. The Risk Assessment must also include multiple and cascading incidents and their impacts on the public for a 10 mile radius. EJ Communities are concerned of potential terrorist attacks, disgruntled employees, mentally ill public members incidents and ship, train and truck accidents. The Port of Savannah a few years ago had a ship crash into a dock near the Port LNG facility, there have been train derailments and numerous drayage truck accidents. We want all port tenants to provide an insurance policy that would equal the amount of catastrophic damage a tenant could cause to the public and community.

16. The USACOE and Port of Savannah conduct an expanded assessment and mitigation plan for the short and long term impacts to the commercial fishing and shellfish industry and public fishing for home food consumption. The USACOE and Port of Savannah are responsible for assuring that public members and Environmental Justice Communities dependent upon fishing and shell fish for their daily sustenance be identified and equal food quality support be provided when they are unable to obtain food for their families. The USACOE has made many assumptions and proposed mitigation measures based on technologies and engineering theories which are unproven and may not succeed as proposed. EJ Communities want a Contingency Plan in place with reserved funds set aside. This is another EJ Community negative socio-economic impact that was not identified and addressed.

On behalf of the Environmental Justice Organizations who have signed onto these public comments we respectfully submit them to you.

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Public Health Impact Studies Index

(1.15.2011)

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Note:
1. Primary Public Health Studies Research Conducted By: USC Southern California Environmental Health Sciences Center - Children's Environmental Health Center
2. Petroleum Industry & light Pollution Public Health Studies Research Conducted By: Coalition For A Safe Environment
3. List is periodically updated by the Coalition For A Safe Environment

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Appendix A-9: Light Pollution

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Citizens for Environmental Justice

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810-MM-28-EV01

Comment: *"As a result the DEIS failed to include an Environmental Justice Community Impact Assessment which would have required them to identify EJ Communities, minority and low income populations, sensitive receptors, number of elderly, pregnant women, preexisting conditions, number of children, available health and public services in the community, use Census and other available data."*

Response: There is no requirement for federal agencies to appoint an *"Environmental Justice Office, deputy, chief, director, manager or scientist therefore no professional expert to determine the need for an assessment or conduct a comprehensive environmental justice impact assessment"* in Executive Order 12898. However, Section 1-101[responsibilities] of EO 12898 does state that each agency shall "to the greatest extent practicable" make environmental justice a part of its mission by identifying adverse human health or environmental effects of its programs on minority populations and/or low income populations.

The *Environmental Justice Assessment* for this proposal is found in EIS-Section 5.19. It includes a description and evaluation of the proposed action's impacts on both Environmental Justice (Executive Order 12898) and the Protection of Children (Executive Order 13045). Section 5.19 states the following: *Throughout the extensive public involvement process that began in 1999, representatives of the environmental justice population have not expressed substantial concerns about the project. The project has held* ***nearly 70 public meetings, i.e.,*** *approximately 65 full meetings were held for the Stakeholders Evaluation Group (SEG), plus numerous committee meetings.* ***Three of those full meetings were held in Garden City within the area of concern noted for environmental justice issues*** *– two meetings at the Masters Inn and one at the GPA Annex 1 located on Highway 25. Two public workshops were held at the beginning of the project (NEPA scoping) to identify issues that the public believed would be important during the course of the study.* ***No one identified impacts to environmental justice communities and/or children as issues of concern.***

The meetings were announced on the web site of the Georgia Ports Authority, the local sponsor for the project; extensive reports and findings were posted to the site as well. The *Savannah Morning News*, the local newspaper, regularly published information about upcoming SEG meetings, and later wrote about the discussions that took place at same.

The project received a comment of support from Mr. Lawrence Reynolds with the Brownsville Cuyler Association, an organization which represents residents of the neighborhood at the junction of I-16 and Montgomery Street [during GPA's public scoping meeting in 2000].

Nevertheless, all environmental justice-related comments received on the Draft EIS have been addressed in the revised evaluation of environmental justice issues in Final EIS Section 5.19.

810-MM-28-EV02

Comment: *"The USACOE Savannah District is unqualified to make a decision that "there would be no short or long term impacts on the health and safety of children." The Savannah District office does not have a Children Office of Health & Safety, deputy, chief, director, manager or scientist, therefore no professional expert to determine the need for an assessment or conduct a comprehensive children's health and safety impact assessment and assure compliance with federal laws and executive orders.*

Furthermore the Savannah District has no EJ Community outreach program, conducts no training on NEPA, other applicable federal laws and executive orders, conducts no training on how to prepare public comments, conducts no ongoing community meetings or dialogue."

Response: There is no statutory requirement in EO 12898 to appoint "*Children Office of Health & Safety, deputy, chief, director, manager or scientist* ". Moreover, there is no provision in EO 12898 for the Corps to conduct an EJ Community outreach program, training on NEPA/other applicable federal laws/ executive orders, or training on how to prepare public comments.

Nevertheless, the District addressed and fully evaluated environmental justice issues, including potential impacts to health and safety of children, in Final EIS Section 5.19.

810-MM-28-EV03

Comment: "*USACOE Savannah District refused to hold a public hearing regarding the Draft Tier II Environmental Impact Statement (DEIS) and Draft General Reevaluation Report (DGRR) that was requested by City of Savannah and neighboring Environmental Justice Communities, organizations and individuals. Public hearings provide an opportunity for the USACOE to give comprehensive presentations on the detailed elements of the GRR and DEIES so that Environmental Justice Organizations and individuals can learn and ask relevant questions. The USACOE is also required to have a legal court reporter at public hearings to record all questions, discussions and public comments. The USACOE intentionally refused to have a public hearing so as to have no legal record of EJ community participation and concerns violating NEPA, Executive Orders and Civil Rights Laws.*"

Response: Factually these allegations are incorrect. Since 1999, the project has held nearly 70 public meetings. Approximately 65 of these meetings were held with the Stakeholders Evaluation Group in addition to numerous committee meetings. Three meetings were held in Garden City within an area of concern for environmental justice issues – two at the Masters Inn and one at the GPA Annex 1 located on Highway 25. Two public workshops were held at the beginning of the project (NEPA scoping) to identify issues the public believed should be examined by the forth coming environmental impact study. At one of those scoping meetings in 2000, the project received a comment of support from Mr. Lawrence Reynolds with the Brownsville Culyer Association, an organization which represents residents of a neighborhood at the junction of I-16 and Montgomery Street.

The 70 public meeting [held since 1999] included the services of a court reporter who transcribed the statements made at each meeting. Once the meeting transcriptions were completed, they were posted on the SAS web site.

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810-MM-28-EV04

Comment: *The USACOE states in the Tier II EIS 5-145 that the, "Environmental justice population have not expressed substantial concerns about the project,' and "No one identified impacts to environmental justice communities or children as issues of concern," which is not entirely accurate. Environmental Justice Communities and organizations have been concerned however; the General Re-evaluation Report and Tier II Environmental Impact Statement have been prepared omitting information that discloses impacts to EJ Communities. Over 100 EJ Community members attended the December 15, 2010 workshop and were told that only the media could ask questions.*

Response: The District stands by the statement in EIS-Section 5.19, i.e., since 1999, in all of the public meetings and scoping meetings "*No one identified impacts to environmental justice communities and/or children as issues of concern*.

It is true that an introductory news conference was held during the first ten minutes of a [previously mentioned] four-hour event. During that period the District Commander accepted questions from the media. However, the District Commander was also present during the portion of the workshop specifically designed for members of the public to interact with him as well as the District's technical staff who had conducted the SHEP investigations.

The District designed and staffed several exhibits for this workshop, one of which was specifically tailored to environmental issues. Using this workshop, the District engaged in exactly the type of in-depth discussions the comment mentions as being desirable. In fact, the District selected the workshop format to maximize its interaction with attendees and answer their questions directly. Over 600 members of the public attended the workshop and the District staff remained at the ready to respond to all the questions brought forward by those in attendance. The District received 332 comments that evening from a combination of hand-written comment cards, material submitted via an on-site computer, and concerns/observations provided verbally to a court recorder.

Again, all environmental justice-related comments received on the Draft EIS have been addressed in the revised evaluation of environmental justice issues in Final EIS Section 5.19.

810-MM-28-EV05

Comment: *The USACOE Savannah District prepared Draft Tier II Environmental Impact Statement failed to include a comprehensive Cumulative Impact Assessment in its failure to research, identify and assess all sources of emissions. The California Office of Environmental Health Hazards Assessment (OEHHA) recently released an excellent Cumulative Impact Assessment Guidance Document and Toolkit.*

Response: The air emission inventory conducted by the District [described in EIS-Appendix K] was a comprehensive analysis of port-dependent emissions. All air emissions including criteria pollutants, air toxics, and greenhouse gas emissions were calculated for the no-action alternative [-42 foot depth], all depth alternatives [42, 44, 45, 46, 47, and 48 feet], and all years [2015, 2020, 2025, 2030, 2032, and 2065]. It included emissions from the following sources:

- Dredges used during the new work dredging
- Dredges used during maintenance dredging
- Ocean-Going Vessels
- LNG Vessels
- Tug Boats
- Intra-Harbor Shifts
- Tour Boats
- Landside equipment at GPA terminals
- Landside equipment at non-GPA terminals
- Trucks calling at the Garden City Terminal
- Locomotives serving the Garden City Terminal
- GPA fleet vehicles
- Air Toxics
- Greenhouse gases

The District followed the procedures outlined in EPA's 2009 Final Report titled "Current Methodologies in Preparing Mobile Source Port-Related Emission Inventories". The District's analysis disclosed that harbor deepening would result in lesser air emissions than the no-action alternative [when compared against the baseline existing depth of -42 foot].

Currently, the Georgia Ports Authority is conducting dispersion modeling of the air emissions at the Garden City Terminal [with/without project]. This analysis will provide insight into how air emissions originating from its facility disperse under without-project conditions. Unfortunately, these analyses will not be available for inspection until after circulation of the FEIS for review. However, since overall emissions have already been determined to remain [at most] unchanged by the proposed harbor deepening, the results of the dispersion analysis were not considered critical to evaluate the proposed action. However, upon completion, GPA will share the results with EPA and the general public.

Background: The GPA will expand the Garden City Terminal [GCT] to accommodate 6.5 million TEUs regardless of whether or not the Savannah Harbor navigation channel is deepened. Under both without- and with- project conditions, the District expects the GCT to reach its build-out capacity in 2032 [at 6.5 million TEUs]. This is the maximum number of containers that can reasonably be processed through the GCT. This determination is based on factors such as the size of the terminal, the number of gates that provide access to the property, the number and size of the berths, the number and size of the container cranes, the number of jockey trucks that move the containers within the terminal, how the containers are stacked within the terminal, and the number of railroads that service the terminal and the return frequency of their trains. It is anticipated that without deepening, more vessels will be required to transport the cargo expected to move through the port. With deepening, the total number of vessels decreases as vessels will be able to load/unload closer to capacity without the present constraints of draft.

No incremental increases in cargo are expected to occur as a result of the proposed harbor deepening. As a result, the project will not affect the number of containers that move through the areas surrounding the port. The project's economic benefits result from the use of larger, more cost-effective container ships, not an increase in the number of containers. Noise, air emissions (including air toxics) from landside handling equipment, and traffic would not be increased [versus the no-action alternative] as a result of the proposed deepening.

810-MM-28-EV06

Comment: *DEIS has significantly underestimated ship emissions and future emissions. The DEIS failed to disclose that a larger Post Panamex Ship that carries 8,400 TEU's vs the current smaller 4,000 TEU Ship will cause a significant spike in air pollution emissions actually doubling the air emission in the same amount time as a smaller ship. The Port will need twice as many diesel trucks and cargo handling equipment for a large ship. This spike will also cause significantly public health problems and increase emergency hospital visits. In addition, what happens when the number of large ships exceeds the original number of smaller ships, even with the low sulfur fuel they will emit more emissions? Also what is the mitigation contingency plan when the number of large ships visiting the port increases? Will the public have to listen to the excuses of the Port of Savannah and the USACOE 5, 10 years from now that did not know this would happen? The Port of Los Angeles under-estimated the China Shipping Terminal container volume by over 20% in less than five years. Good examples of Port Emissions Inventories are the Port of Los Angeles and Port of Long Beach which can viewed on their websites.*

Response: The EIS reasonably estimates present and future air emissions from ocean-going vessels and cargo handling equipment. Appendix K describes the procedures the District used to estimate the amount of emissions that occur in Savannah from these sources. [see EV05 response]

Section 5.20 in the EIS states: *GPA continues to work closely with the State of Georgia to develop more improvements to the highway system outside the terminal. GPA has developed a plan that would provide expressway connection of Interstate highways directly to the Terminal. In 2010, the State of Georgia approved $120 million in bond revenue for use toward completing the Jimmy DeLoach Highway from Interstate 95 to the Garden City Terminal. That work is scheduled to begin in 2011 and be complete by the base year of the project. Additionally, the Georgia Department of Transportation's long-term highway plan includes construction of the Brampton Road Connector which will provide direct access from the Garden City Terminal to Interstate 516 and connections to Interstate 16. No other terminal in the US has such an expressway of highways directly to the terminal. Those road improvements are shown in the following figure. The completion of those roads will remove terminal traffic from neighborhoods and lessen congestion and the accompanying air quality impacts.* Also see Figure 5-57, which graphically shows these proposed road improvements.

GPA also plans to increase the percentage of containers that are handled by rail in the future. Since rail moves cargo with more fuel efficiency than trucks, use of rail will reduce future diesel emissions from port operations.

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810-MM-28-EV07

Comment: *The DEIS has significantly underestimated the current port and goods movement transportation corridor emissions and future emissions. Their studies did not include truck travel from their home location to the port to pick up containers and freight, the truck emissions when returning home, numerous side trips to chassis storage yards, container storage yards, inspection facilities, fumigation facilities, trans-loading locations, traffic congestion idling, on-port property idling, fugitive HFC's from NC units, inefficient engine fuel combustion VOC's, pulverized tire rubber and brake dust. It did not contain estimates for fugitive green house gas HFC's emissions from reefer containers.*

Response: The District's emission inventory for the port [EIS-Appendix K] was developed using the procedures established and recommended by U.S. Environmental Protection Agency (EPA) to identify air emissions from port facilities. EPA's guidance document is titled **"Current Methodologies in Preparing Mobile Source Port-Related Emission Inventories, Final Report, dated April 2009"**. That document provides the framework used throughout the U.S. to determine air emission estimates at ports from a combination of ocean going vessels and land-based port equipment. The District used the EPA protocols together with site-specific data provided by GPA and the Harbor Pilots Association. The District also consulted with EPA while conducting its analysis to ensure its guidance had been interpreted correctly and included the most up-to-date emission relationships.

810-MM-28-EV08

Comment: *The DEIS failed to include an Environmental Justice Community Health Impact Assessment (HIA) to determine the current public health impacts of the Port of Savannah and its Goods Movement Transportation Corridors which include both rail and truck. The USACOE failed to research, consider and conduct a Environmental Justice Community Health Impact Assessment to determine the current public health impacts of the Port of Savannah and its Goods Movement Transportation Corridors which include both rail and truck.*

Response: Concerns about environmental justice were addressed in EIS-Section 5.20. Specifically discussed was compliance of the proposed action with Executive Order 13045 (Protection of Children) and Executive Order 12898 (Environmental Justice) together with an overview of the project's effects on communities surrounding GCT, demographics of Chatham/Jasper counties and Garden City, landside transportation of cargo, dredging activities, terminal operations, noise and lighting, employment, considerations of other terminals, and a summary of project effects specifically on EJ populations and children. Figures in Section 5-20 show the following: poverty levels within the vicinity of the upper end of Savannah Harbor, locations of schools, hospitals and child care facilities along the navigation channel; and proposed road improvements within the vicinity of Garden City Terminal.

Comparisons between the Ports of Los Angeles/Long Beach (LA/LB) and Savannah may not yield a great deal of useful information. According to the USEPA website, the Ports of LA/LB are currently designated as "nonattainment" for ozone (severe-17) and PM2.5. As indicated in Section 4.03: *The Georgia Department of Natural Resources, Environmental Protection Division, Air Protection Branch (GADNR, EPD, APB) and the South Carolina Department of Health and Environmental Control, Bureau of Air Quality (SCDHEC, BAQ), have air quality jurisdiction for the project area for Chatham County, Georgia and Jasper County, South Carolina, respectively. They have determined the ambient air quality for Chatham County, Georgia and Jasper County, South Carolina is in compliance with the National Ambient Air Quality Standards, and both counties have been designated as Attainment Areas (Personal Communication, 20 February 2007, Jim Kelly, GADNR, EPD, APB and Fatina Washburn, SCDHEC, BAQ).* Bottom line: the Port of Savannah generally has good air quality; hence, there is no requirement to complete a Health Impact Assessment as was the case for the Ports of LA/LB. Further, a detailed Health Impact Assessment for the proposed action is not warranted because harbor deepening would result in fewer adverse impacts [air quality and otherwise] to the surrounding communities than would the case for the no-action alternative.

810-MM-28-EV09

Comment: *We request that the study include all residents within 15 miles and along the length of Port of Savannah and Savannah River Corridor. I have attached Appendices A 1 - A9 which lists over 160 health studies that validate public health impacts that can be caused Ports business operations and the Goods Movement Industry. USEPA Region 9 released a Health Impact Assessment Scoping Plan for the Ports of Los Angeles and Long Beach. The DEIS failed to include any public health studies or data of the City of Savannah and the Environmental Justice Communities that border the Port of Savannah and the Port Freight Transportation Corridors.*

Response: EIS-Section 5.19 characterizes the demographic area adjacent to the Garden City Terminal. Figures 5-57 and 5-58 show the location[s] of different income levels [census tract data] in the vicinity of the Garden City Terminal [GCT] where most of the project effects are/will be experienced. Figure 5-57 shows that the area with the lowest income level (40-100 percent) is roughly a mile distant from the terminal. Similarly, Figure 5-58 shows the same area as having the highest percentage of minority residents (40-100 percent). Figure 5-59 depicts the locations of schools, hospitals, and child care facilities, in relation to the navigation channel/terminal facilities where the majority of the construction would occur. As can be seen, these facilities are dispersed throughout the community and will not be disproportionately affected by SHEP. Lastly, Figure 5-63 shows the proposed road improvements which are designed to route traffic directly from area interstate highways to the Garden City Terminal thereby lessening existing traffic congestion in adjacent residential neighborhoods.

The District expects the number of cargo containers moved through GCT to increase over time; however, the subject harbor deepening will have no material effect on the rate of that increase. Hence, by extension, SHEP will have no significant effect on air emissions in the vicinity of GCT. A deeper channel would allow fewer, larger vessels to carry the cargo transiting the port, resulting in a decrease in the number of vessel calls [compared to the status quo]. The reduction in vessel numbers is predicted to result in a minor decrease in the amount of pollutants emitted.

Notably, the existing air quality at Savannah is very different from that in the Ports of LA/LB. The Port of Savannah **is not** in a "nonattainment" area for Ozone and PM2.5. Given Chatham County's designation as an "attainment" area for ozone and PM2.5 and that the project would not cause increased emissions, there is no requirement for the Port of Savannah to complete the noted detailed public health studies.

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810-MM-28-EV10

Comment: *The DEIS failed to include an Environmental Justice Community Impact Nexus Study to determine the off-port property community impacts from its business operations, tenant operations and freight transportation. The USACOE failed to research, consider and conduct a Environmental Justice Community Impact Nexus Study to determine the extent of the Port of Savannah and its Goods Movement Transportation Corridors.*

Response: There is no requirement in EO 12898 or in NEPA to conduct an Environmental Justice Community Impact Nexus Study for a major federal action. The District has already evaluated potential project impacts to Environmental Justice communities. See previous response for details.

810-MM-28-EV11

Comment: *The DEIS failed to assess the significant negative socio-economic impacts to environmental justice communities who are predominantly low income who will be forced to subsidize port growth while private corporations like Walmart pay nothing. Low income EJ families pay a disproportionately higher percentage of their income on taxes to pay the costs of infrastructure and bond debt. Freeways, highways, bridges, transportation corridors and power plants construction costs will be subsidized by taxing the public and diverting other state and local revenues when the port user should be charged container and freight fees to pay all costs of expansion and improvement that benefit them. Public services such as highway patrol, city police, fire department, paramedics and emergency response for the public will be diverted to service the ports and goods movement transportation corridors.*

Response: The District thoroughly evaluated potential negative socio-economic impacts to environmental justice communities. DEIS-Section 5 included information on income levels, school locations, hospitals, and child care facilities, proposed road improvement as well as GPA programs which seek to avoid, minimize and mitigate air quality, traffic, noise, and lighting impacts on the surrounding communities. However, the District has expanded the demographic information about the communities adjacent to the port [to include transportation corridors]. Minority and low-income residents within this tract were considered to assess the project's impacts on environmental justice and children's health (EO 12898 and EO 13045) issues. Compliance with EO 12898 and EO 13045 is based on review/analysis of all the information mentioned above, as well as data obtained during the public meetings described in EIS-Section 5. FEIS-Section 5.19 [Overview] was revised to include a list of the types of information collected/analyzed in addressing EO 12898 and EO 13045.

810-MM-28-EV12

Comment: *The DIES failed to disclose that the project will have a significant and negative socioeconomic impact on the tourism industry. Savannah will become the # 1 most polluted city in Georgia, will have a permanent brown smog cloud and odor from diesel fuel emissions. This will become more exasperated on hot summer days during peak tourist visits. Tourist will choose some other cleaner and healthier travel destination. Tourism is also one of the major employers of Environmental Justice Communities who will lose their jobs, financial security, peace of mind and quality of life.*

Response: The proposed deepening of the harbor will result in lesser air emissions than the status quo [no-action alternative]. For perspective, the Port of Savannah is just a small subset of the overall air quality emissions in Chatham County [2002 and 2005 EPA NEI data]. Therefore, the proposed action will not have a significant impact on the County's air shed. The Chamber of Commerce, an organization which represents community interests – including the tourist industry, stated in its January 19, 2011 letter that "*On behalf of our 2,100 business members representing over 77,000 employees in our area, we strongly encourage the U.S. Army Corps of Engineers to proceed with the Savannah Harbor Expansion Project.*" The Chamber of Commerce does not agree with the commenter on his expectations about significant and negative socioeconomic impact on the tourism industry.

810-MM-28-EV13

Comment: *The DEIS failed to include mitigation for job re-training for EJ Communities residents who will be displaced, lose employment and need to be trained in other job skills.*

Response: Based on prior experience with similar port upgrades, there is little reason to believe that SHEP would result in a loss in overall employment and/or create a need for extensive job re-training [especially in comparison to the status quo].

810-MM-28-EV14

Comment: *The DEIS failed to disclose that building the Jasper County Terminal would eliminate the need for dredging the Savannah River. Jasper County Terminal would be a higher priority Alternative that would eliminate the increase in environmental, public health, land, water and socio-economic impacts to Savannah.*

Response: The EIS/GRR fully considered a proposed Jasper County terminal. See other responses to this issue.

810-MM-28-EV15

Comment: *The DEIS fails to identify and mitigate the noise impacts to residents, schools and sensitive receptors. Noise not only includes loud noise over 65db, but also non-stop and constant low level noise 40db-60db during the day, rest hours and sleep time hours. This includes honking, braking, acceleration, gunning of engines and stopped traffic congestion. When does the public have an 8hr respite from noise? We request sound proofing glass windows and doors with an STS rating of 90% or better and sound proof curtains during construction. We request that a Noise Mitigation Fund be established and funds provided from the mitigation fund.*

Response: The EIS discusses the noted noise issues in the following locations: Section 5.07.1-Dredging Impacts, Section 5.19-Terminal Operations, Noise and Lighting; Section 5.20.1-Noise, and in Appendix B-Biological Assessment.

The GPA will expand the Garden City Terminal [GCT] to accommodate 6.5 million TEUs regardless of whether or not the Savannah Harbor navigation channel is deepened. Under both without- and with-project conditions, the District expects the GCT to reach this build-out capacity in 2032. This is the maximum number of containers that can reasonably be processed through the GCT. This determination is based on factors such as the size of the terminal, the number of gates that provide access to the property, the number and size of the berths, the number and size of the container cranes, the number of jockey trucks that move the containers within the terminal, how the containers are stacked within the terminal, and the number of railroads that service the terminal and the return frequency of their trains. It is anticipated that without deepening, more vessels will be required to transport the cargo expected to move through the port. With deepening, the total number of vessels decreases as vessels will be able to load/unload closer to capacity without the present constraints of draft.

No incremental increases in cargo are expected to occur as a result of the proposed harbor deepening. As a result, the project will not affect the number of containers that move through the areas surrounding the port. The project's economic benefits result from the use of larger, more cost-effective container ships, not an increase in the number of containers. Noise, air emissions (including air toxics), and traffic would not be increased [versus the no-action alternative] as a result of the proposed deepening.

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810-MM-28-EV16

Comment: *The USACOE cancel the Savannah Harbor Expansion Project because the Draft General Reevaluation Report fails to validate all claims of need.*

Response: Section 3.1-Problems and Section 3.2-Opportunities in the GRR provide complete and detailed information on the need for the proposed harbor deepening. For example, Section 3.1 in the GRR states:

"The primary problems identified in this analysis relate to the inefficient operation of containerships in the Federal channel at Savannah Harbor, which affect the Nation's international trade transportation costs. The following problem statements describe these inefficiencies:

1. Existing shippers are experiencing increased/ inflated operations costs due to light loading and tidal delays;

2. Light loading and tidal delays will increase as present harbor users increase their annual tonnage and as larger, more efficient ships replace older, smaller ones;

3. Existing ships are experiencing problems associated with turning capabilities and overall maneuverability in certain reaches of the inner harbor;

4. The severity of problems associated with turning capabilities and overall maneuverability in certain reaches of the inner harbor will increase as vessel size increases."

GRR-Appendix A contains detailed information on the economic analyses, including data on existing light loading and tidal delays, and expected changes in the container fleet that calls at Savannah.

810-MM-28-EV17

Comment: *The DEIS be rescinded for non-compliance to NEPA, the Clean Air Act and Executive Orders 12898 and 13045 and or revised and re-circulated.*

Response: The multi-step NEPA process provides a framework for compliance with other environmental statutory requirements, such as the Clean Air and Water Acts, Executives Orders 12898 and 13045, etc. NEPA requires federal agencies to prepare environmental impact statements (EISs) for major federal actions that significantly affect the quality of the human environment [which covers both natural and cultural factors]. An EIS is a disclosure document that details the process by which a project is developed and includes consideration of a range of reasonable alternatives, analyzes the potential impacts resulting from the alternatives, along with demonstrating compliance with other applicable environmental laws and executive orders. State statutes are also germane in the ultimate decision-making objective of the NEPA process. The EIS process is completed in the following ordered steps: Notice of Intent (NOI), draft EIS (DEIS), final EIS (FEIS), and record of decision (ROD).

Public involvement and agency coordination are a very important part of the NEPA process and continue throughout all of the above steps. The DEIS provides a detailed description of the proposal, the purpose and need, reasonable alternatives, the affected environment, and presents an analysis of the anticipated beneficial and adverse environmental effects of each of the alternatives. DEISs are not "rescinded" per se, but are modified and/or revised as appropriate to resolve the comments received during public review. Following the formal DEIS comment period, the FEIS will be developed and issued with appropriate modifications [as necessary]. The FEIS addresses the comments on the draft and identifies, based on analysis and comments, the "preferred alternative". The ROD is the final step in the NEPA process and is only issued after the FEIS has been approved and full compliance on all applicable laws and regulations has been achieved. In summary, the DEIS is one step in the NEPA process and full compliance with it and all other applicable laws and regulations will not be achieved until the FEIS is completed and the ROD is signed.

810-MM-28-EV18

Comment: *The DEIS and Final EIS include an on-site real time Port of Savannah and EJ Community Air Quality Study and inventory of all categories of emissions: criteria pollutants, toxic pollutants, HAP's, VOC's and all green house gases. To include all off-port property secondary and indirect emissions. Inventories must also include all truck routes, train routes, ship routes, container storage locations, inspection facilities, chassis locations, detours, operating time, idling time and storage fugitive emissions. We request that three air quality monitoring stations be established in EJ Communities.*

Response: The air quality of the Port of Savannah is generally good, unlike the ports of LA/LB which are in "nonattainment" areas for ozone and PM2.5. There is no requirement for the District to conduct "an on-site real time Port of Savannah and EJ Community Air Quality Study". The District has already completed a detailed emission inventory of the port; it is found in Appendix K of the EIS.

The proposed request for three air quality monitoring stations in EJ Communities is not warranted because the proposed harbor deepening will not cause measurable adverse impacts to the noted neighborhoods.

810-MM-28-EV19

Comment: *The DE IS and Final EIS include an Environmental Justice Community Health Impact Assessment and allocate a $250,000 budget to hire an EJ Consultant. We want the HIA to be based on a comprehensive Public Health Survey (PHS) and establishment of a Public Health Baseline (PHB) of the impacted EJ Communities that border the Port, are near the port and along the ports freight transportation corridors, warehouses and distribution centers.*

Response: The air quality within the port's air shed is generally good. There is no requirement for the District to prepare the noted health impact assessment or establish a public health baseline in the vicinity of the port. This is especially true, given the fact that the impacts associated with SHEP are less than would be experienced from maintaining the status quo [no-action alternative]. For these reasons, preparation of an Environmental Justice Community Impact Nexus Study and hiring an EJ Consultant would also be an unnecessary project expense.

810-MM-28-EV20

Comment: *The USACOE Savannah District establish an Office of Environmental Justice Compliance with staff and an annual budget of $ 500,000.*

Response: Executive Order 12898 does not require the District to establish an Office of Environmental Justice Compliance, an Environmental Justice Outreach Program, or fund an Environmental Justice Community Regional Conference. The District expects the number of containers transiting GCT to remain the same whether or not the harbor is deepened. Further, their movement through the surrounding communities is independent of whether or not the project is implemented. Therefore, the establishment of these programs and funding is not warranted by the type or level of impacts expected from the proposed harbor deepening.

810-MM-28-EV21

Comment: *The USACOE and Port of Savannah charge a $ 25 per TEU tariff to go into a fund for purchasing and replacing old diesel fuel polluting trucks with 2011 similar to the Port of Los Angeles and establish a Clean Truck Program, replacing all diesel fuel cargo moving equipment and cranes.*

Response: The referenced *Clean Truck Program* was deemed necessary by the Ports of LA/LB because their air sheds have been designated as "nonattainment" for ozone and PM2.5. In contrast, the air quality in Savannah is designated as "attainment" for ozone and PM2.5. More broadly, the air quality in both Chatham and Jasper County is relatively good; neither county is designated as "nonattainment".

Nonetheless, EIS-Section 5.20 states the following: *GPA continually evaluates methods to reduce diesel consumption and emissions. These actions protect the environment and the local population. Examples include the following:*

** GPA has converted the older ship-to-shore cranes to electric and purchased new cranes that run off of electricity. Of the 23 ship to shore cranes, 21 are electric which avoids the use of 1.9 million gallons of diesel each year.*

** The Garden City Terminal is the largest shipper of refrigerated cargo on the east coast and has installed electric refrigerated container racks which eliminate the use of diesel generators for the refrigerated containers. The use of these racks in place of generators avoids the consumption of nearly 2.4 million gallons of diesel annually.*

** In 2010, EPA awarded GPA a Diesel Emissions Reduction Grant to repower 17 rubber tire gantry cranes (RTGs), which is one of the primary types of container handling equipment. By repowering these RTGs, GPA will avoid using 129,000 gallons annually throughout the life of the equipment.*

** GPA recently conducted a pilot project on use of a diesel additive in the container handling equipment. The study showed that the additive reduced fuel consumption and lowered emissions. GPA now uses the additive in all container handling equipment. This avoids use of 100,000 gallons of diesel fuel annually.*

** The Garden City Terminal has a total of 33 on-road truck container interchange lanes divided between two locations on the terminal, which have processed over 8,200 gate transactions on a single day. GPA's facility master plan includes construction of a third set of gates which would then provide access to the terminal from the east, west and south, thereby spreading out traffic and reducing waiting times at the gates. The dispersal of truck traffic reduces congestion and its accompanying air emissions. GPA expects to implement this improvement within the next 10 years.*

** Containers are shipped by rail using the two Intermodal Container Transfer Facilities (rail yards). At those facilities, trains are built for particular destinations as far west as Chicago. This effort reduces transit times of up to 3 days and avoids central train yard switching of cars, thereby reducing emissions. Moving freight by rail emits three times less NOx and PM than on-road trucks. With the only East Coast ICTFs located on the container terminal, GPA's on-dock rail volumes have increased 135% over the past five years (2008).*

** During periods of heavy cargo volumes, GPA coordinates extended gate hours (earlier morning and later evening hours and Saturdays) to decrease on-road and terminal congestion. This improves productivity, reduces truck idling, and decreases diesel emissions.*

** Forklifts of 15,500 pound capacity or smaller (86) are now fueled with LP gas, rather than diesel. As a result of programs GPA implemented throughout the Garden City Terminal, approximately 4.5 million gallons of diesel and the associated emissions are avoided on an annual basis. While GPA has increased the total volume of containers moved, the gallons of diesel per container handled decreased 54% from FY01 to FY10.*

The reduction in air emissions in the movement of cargo through the port reduces local and multi-state regional air pollution. The improved air quality benefits the thousands of personnel on GPA terminals and on neighboring industrial sites, as well as those who reside in nearby Georgia and South Carolina communities. A TEU tariff to fund establishment of a *Clean Truck Program* to replace older diesel trucks is not warranted by the type or level of impacts expected from the proposed harbor deepening.

Page 8

S10-MM-28-EV22

Comment: *The USACOE and Port of Savannah establish an Off-Port Community Impact Nexus Mitigation Fund of $1 million and charge a $ 3.50 per TEU tariff and a $1.00 per barrel or ton of bulk cargo to go into a fund for the Off-Port Community Impact Nexus Mitigation Fund. Funds can be used to pay for the installation of Air Purification Systems for public schools and child care centers, like the recently approved Port of Los Angeles TraPac Settlement.*

Response: The noted funding mechanisms are unnecessary because an Off-Port Community Impact Nexus Mitigation Fund is not warranted by the type or level of impacts expected from the proposed harbor deepening. Since the number of containers moved through the Garden City Terminal would not

be affected by harbor deepening, the proposed deepening would not affect the movement of those containers.

810-MM-28-EV23

Comment: *The USACOE and Port of Savannah establish an annual $10 million Technology Advancement Program to support R&D and demonstration projects of new emerging zero emissions freight transportation systems and maximum achievable emissions control technologies such as the Advanced Cleanup Technology, Inc. Advanced Maritime Emissions Control System to capture all ship emissions, Vision Motor Corp Zero Emissions Hydrogen Gas Fuel Cell Trucks and Miracle Mile Solutions VATT Systems Diesel Truck Fuel combustion Efficiency Retrofit Technology.*

Response: Establishment of a Technology Advancement Program to support R&D and demonstration projects of new emerging zero emissions freight transportation systems and maximum emissions control technologies is not warranted by the type or level of impacts expected from the proposed harbor deepening. The District believes that the number of containers processed through the Garden City Terminal would not be affected by harbor deepening. It follows that the movement of those containers through the communities adjacent to the Garden City Terminal is also unaffected.

810-MM-28-EV24

Comment: *The USACOE and Port of Savannah establish an annual $10 million Public Health Care Mitigation Fund with priority going to fund local community based clinics, hospitals, convalescent care and health counseling.*

Response: Establishment of a Public Health Care Mitigation Fund is not warranted by the type or level of impacts expected from the proposed harbor deepening. Since the number of containers moved through the Garden City Terminal would not be affected by harbor deepening, the proposed deepening would not affect the transit of those containers to their final destination[s].

810-MM-28-EV25

Comment: *The USACOE and Port of Savannah establish a Clean Air Action Plan like the Ports of Los Angles and Long Beach.*

Response: Establishment of a Clean Air Action Plan is not warranted by the type or level of impacts expected from the proposed harbor deepening. Since the number of containers moved through the Garden City Terminal would not be affected by harbor deepening, the proposed deepening would not affect container movement beyond the terminal's boundaries.

810-MM-28-EV26

Comment: *The USACOE and Port of Savannah establish a Port Community Advisory Committee like the Port of Los Angeles.*

Response: Establishment of a Port Community Advisory Committee is not warranted by the type or level of impacts expected from the proposed harbor deepening. Since the number of containers moved through the Garden City Terminal would not be affected by harbor deepening, the proposed deepening would not affect the movement of those containers near the Garden City Terminal.

As indicated in EIS-Section 5.19, GPA established a Stakeholders Evaluation Group (SEG) in the late 1990's. The SEG has as its mission, purpose, and function the providing of advice to the Georgia Ports Authority (GPA) pertaining to the Savannah Harbor Expansion Project to help insure that all issues

pertaining to the project are addressed to the fullest extent practicable. To accomplish this mission, purpose, and function, the SEG shall operate with the following Operating Guidelines: The SEG shall provide the following: **A public forum to permit members of the general public to voice their support or concerns, to become acquainted with the project, and to provide whatever input they wish (emphasis added).** The SEG meets about every other month.

The meetings are announced on the web site of the Georgia Ports Authority, the local sponsor for the project, and extensive reports and findings were posted to the site as well. The *Savannah Morning News*, the local newspaper, regularly published information about upcoming SEG meetings, and later wrote about the discussions that took place at those meetings.

Since 1999, approximately 65 full meetings were held with the SEG, plus numerous committee meetings. Three of those full meetings were held in Garden City within an area of concern for environmental justice issues – two meetings at the Masters Inn and one at the GPA Annex 1 located on Highway 25. Additionally, the meetings are transcribed by a court recorder and the meeting minutes are posted to the Savannah District's webpage.

The SEG provided a valuable public information function to the project and to the community. The SEG advised GPA on suggested issues to consider and studies to evaluate those issues. While District staff attended most of the SEG meetings, GPA verified that this advice was made known to all interested parties. The SEG provided a valuable link between the GPA, the District, and the stakeholders residing within the project area.

810-MM-28-EV27

Comment: *The USACOE and Port of Savannah conduct a new Port Hazards Risk & Liability Assessment to determine homeland security adequacy, explosions, fires and accident risks of Port expansion and water dredging. The Risk Assessment must also include multiple and cascading incidents and their impacts on the public for a 10 mile radius. EJ Communities are concerned of potential terrorist attacks, disgruntled employees, mentally ill public members incidents and ship, train and truck accidents. The Port of Savannah a few years ago had a ship crash into a dock near the Port LNG facility, there have been train derailments and numerous drayage truck accidents. We want all port tenants to provide an insurance policy that would equal the amount of catastrophic damage a tenant could cause to the public and community.*

Response: A Port Hazards Risk & Liability Assessment to determine the noted health/safety concerns together with the larger issue of homeland security is not needed. GPA has emergency response plans in place for its terminals-Garden City and Ocean Terminals. Additionally, the US Coast Guard has completed a risk assessment of the entire Port of Savannah. Most commercial organizations carry some type of liability insurance for the remainder of the matters raised.

810-MM-28-EV28

Comment: *The USACOE and Port of Savannah conduct an expanded assessment and mitigation plan for the short and long term impacts to the commercial fishing and shellfish industry and public fishing for home food consumption. The USACOE and Port of Savannah are responsible for assuring that public members and Environmental Justice Communities dependent upon fishing and shell fish for their daily sustenance be identified and equal food quality support be provided when they are unable to obtain food for their families. The USACOE has made many assumptions and proposed mitigation measures based on technologies and engineering theories which are unproven and may not succeed as proposed. EJ*

Communities want a Contingency Plan in place with reserved funds set aside. This is another EJ Community negative socio-economic impact that was not identified and addressed.

Response: EIS-Section 4.12 discusses Recreational and Commercial Fishing, and Section 5.17 discusses impacts of the project on Recreational and Commercial Fishing. The EIS also shows shellfish harvesting areas (Figure 4-3), Spawning Sites of Black Drum, Weakfish, and Spotted Seatrout (Figure 4-4), as well as the Spawning Seasons of Spotted Seatrout, Red Drum, Weakfish, and Black Drum. Section 5 provides locations of American Shad habitat, Southern Flounder habitat, Stripped Bass habitat, and Shortnose sturgeon habitat. Section 4.04 and Section 5.07 discuss Marine and Estuarine Resources. The Essential Fish Habitat section in the EIS (Section 4.05 and 5.14) and Appendix S discusses these same issues. This material adequately addresses potential adverse impacts to the commercial fishing, shellfish industry, as well as fishing by the public for home consumption.

EIS-Section 4.12 states: *Commercial and sport fishing within Savannah Harbor is low due to heavy vessel traffic levels and high shoaling rates which limit benthic communities and required recurring maintenance dredging.*

The District does not expect harbor deepening to produce significant adverse impacts to existing [low levels] commercial and recreational fishing activities. Hence, no mitigation is warranted.

EDITOR'S NOTE: Responses to Comments #828 to 883 are grouped together (after the letters) because of the similar content of the concerns expressed in the letters.

#818

Savannah Residents For Responsible Government

Mr. William G. Bailey
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cesas-pd@usace.army.gov
912-652-5781

January 23, 2011

Su: Opposition to Proposed Savannah Harbor Expansion Project

US Army Corps of Engineers:

I a resident of the Port of Savannah Environmental Justice Community oppose the approval of the Savannah Harbor Expansion Project and wish to submit my public comment in opposition. I am oppose the project because the Tier II Environmental Impact Statement significantly under-estimated air emissions from all on-port and off-port property sources, failed to include an assessment of all public health and socio-economic impacts, failed to include all current and reasonable future projects in the Cumulative Impact Assessment, failed to include an Off-Port Community Impacts Nexus Study, a Health Impact Assessment, mitigation to reduce all negative impacts to less than significant and the USACOE refused to hold a public hearing on the Savannah Harbor Expansion Project as requested by the Savannah Environmental Justice Community. The Ports of Los Angeles and Long Beach hold public hearings for all USACOE project Draft EIS's and Final EIS's.

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The USACOE has significantly underestimated ship emissions and future emissions. Emission estimates did not include emissions from ship engine aging which causes more pollution as ships get older, ship boilers, ship cue time emissions while waiting to enter the port river entrance and destination terminal, multiple ship staging idling, emissions from delays due to ship breakdowns, equipment breakdowns, accidents and adverse weather conditions. Information and estimates failed to disclose the fact that larger cleaner ships will not arrive at the Port of Savannah in the near future and will in fact be phased in over a significant long period of time, therefore providing no near term benefits to the public.

The USACOE failed to assess the significant negative socio-economic impacts to environmental justice communities who are predominantly low income who will be forced to subsidize port growth while private corporations like Walmart pay nothing. Low income EJ families pay a disproportionately higher percentage of their income on taxes to pay the costs of infrastructure and bond debt. Freeways, highways, bridges, transportation corridors and power plants construction costs will be subsidized by taxing the public when the port user should be charged container and freight fees to pay all costs of expansion and improvement that benefit them. Public services such as highway patrol, city police, fire department, paramedics and emergency response for the public will be diverted to service the ports and goods movement transportation corridors.

I request that the USACOE: Conduct additional real time on-port property and off-port community air pollution studies and a comprehensive socio-economic impact study, create an annual $5 million Public Health Care Mitigation Fund, allocate $ 500,000 for an Off-Port Community Impacts Nexus Study and $ 500,000 Health Impact Assessment and establish a annual $ 10 million mitigation fund such as the Ports of Los Angeles and Long Beach Technology Advancement Program to support the Research, Development and Demonstration Projects of new emerging Zero Emissions and Maximum Emissions Control Technologies such as the Advanced Cleanup Technology, Inc. Advanced Maritime Emissions Control System to capture all ship emissions and Vision Motor Corp Zero Emissions Hydrogen Gas Fuel Cell Trucks.

Savannah Resident For Responsible Government,

Myrone Abrams
Myrone Abrams
309 Stiles Ave
Savannah Ga 31415

#879

Citizens For Healthy Communities Against Port Expansion

Mr. William G. Bailey
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cesas-pd@usace.army.gov
912-652-5781

January 23, 2011

Dear Mr. William G. Bailey:

I wish to submit my public comment against the Savannah Harbor Expansion Project. I am against the project because it will increase air pollution which will impact my health and that of my family. It will also cause negative socio-economic impacts to me, my family and environmental justice community.

1. The USACOE has significantly underestimated the current port and goods movement transportation corridor emissions and future emissions. Their studies did not include truck travel to the port to pick up containers and freight, numerous side trips to chassis storage yards, container storage yards, inspection facilities, fumigation facilities, trans-loading locations, traffic congestion idling, on-port property idling, fugitive HFC's from A/C units, inefficient engine fuel combustion VOC's, pulverized tire rubber and brake dust. It did not contain estimates for fugitive green house gas HFC's emissions from reefer containers.

2. The USACOE has significantly underestimated ship emissions and future emissions. Emission estimates did not include emissions from ship engine aging which causes more pollution as ships get older, ship boilers, ship cue time emissions while waiting to enter port river entrance and destination terminal, multiple ship staging idling, emissions from delays due to ship breakdowns, equipment breakdowns, accidents and adverse weather conditions. Estimates are also grossly in error due to the fact that larger cleaner ships will not arrive at the Port of Savannah in the near future and will in fact be phased in over a significant long period of time, therefore providing no near term benefits to the public.

3. The USACOE failed to assess the significant negative socio-economic impacts to environmental justice communities who are predominantly low income who will be forced to subsidize port growth while private corporations like Walmart pay nothing. Low income EJ families pay a disproportionately higher percentage of their income on taxes to pay the costs of infrastructure and bond debt. Freeways, highways, bridges, transportation corridors and power plants construction costs will be subsidized by taxing the public when the port user should be charged container and freight fees to pay all costs of expansion and improvement that benefit them. Public services such as highway patrol, city police, fire department, paramedics and emergency response for the public will be diverted to service the ports and goods movement transportation corridors.

I request that the USACOE conduct additional real time on-port property and off-port community air pollution studies, off-port community impacts nexus study, health impact assessment and a socio-economic impact study. I request that the USACOE and Port of Savannah establish a $ 10 million annual mitigation fund to reduce all negative public and environmental justice community impacts to less than significant. I request that the USACOE create a $ 10 million annual mitigation fund for Public Health Care and $ 25 million annual mitigation fund for the purchase of the Advanced Cleanup Technology, Inc. Advanced Maritime Emissions Control System to capture all ship emissions, Vision Motor Corp Zero Emissions Hydrogen Gas Fuel Cell Trucks and $ 50,000 every two years for a regional public education conference.

Citizen For Healthy Communities,

Coordinator Pawlow Sr. 309 Stiles Ave.
Savannah, GA 31415
(912)-651-0909

4

Savannah Seniors Against Port Expansion

#831

January 23, 2011

Mr. William G. Bailey
ATTN: PD - US Army Corps of Engineers
Savannah District
100 West Oglethorpe Avenue
Savannah, GA 31401-3640
cesas-pd@usace.army.gov
912-652-5781

Dear Mr. Bailey:

I am submitting this letter as my public comment against the Savannah Harbor Expansion Project. I oppose the project because:

a. I live on limited income and I do not want my taxpayer monies to go for a project that will primarily benefit billion dollar private corporations like Walmart who will make even greater profits and who can afford to pay for port improvements. This will cause a negative socio-economic impact on me.
b. Larger container ships that will enter the Savannah River and harbor will emit more air pollution than smaller container ships in a shorter period of time as they unload or load containers that will have a significant negative impact on the health of me, my family and environmental justice community.
c. Larger container ships that carry 8,500 containers will enter the Savannah Harbor will require thousands of more diesel fuel polluting trucks who will emit more air pollution as they pick-up and transfer thousands of additional containers as compared to a smaller ship that carries 4,600 containers in the same shorter period of time which will also have a significant negative impact on my, my families health and environmental justice community.
d. The US Army Corps of Engineers have significantly underestimated the secondary and indirect off-port property community nexus air pollution impacts on the environmental and public health from larger ships, more ships, more trucks moving containers, increased port cargo moving equipment and related requirements such as visits to inspection facilities, chassis storage facilities and container storage yards.

I request that the USACOE conduct additional real time on-port property and off-port community air pollution studies, off-port community impacts nexus study, health impact assessment and a socio-economic impact study. I request that the USACOE and Port of Savannah establish $ 25 million annual mitigation fund by imposing a $ 25.00 per TEU tariff to reduce all negative public and environmental justice community impacts to less than significant. I do not approve of my taxes and future new taxes paying for private business development, supporting the region, state or East Coast economy when I and my Port harbor Environmental Justice Community receives little to no benefits. I want to see a study that lists the specific City of Savannah EJ Community benefits.

Sincerely, Jah'Shea Mike 4656 Lanier Drive.

1-23-11

Savannah Seniors Against Port Expansion

#83

January 23, 2011

Mr. William G. Bailey
ATTN: PD - US Army Corps of Engineers
Savannah District
100 West Oglethorpe Avenue
Savannah, GA 31401-3640
cesas-pd@usace.army.gov
912-652-5781

Dear Mr. Bailey:

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Sincerely,

Rev Dennis Frazer
2605 Elarian St
Sav Ga 31405

#433

Savannah Residents For Responsible Government

Mr. William G. Bailey
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Savannah, GA 31401-3640
cesas-pd@usace.army.gov
912-652-5781

January 23, 2011

Sub: Opposition to Proposed Savannah Harbor Expansion Project

US Army Corps of Engineers:

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Roscoe Floyd

Savannah Resident For Responsible Government, 1813 Archer St
912 23-63842

#834

Citizens For Healthy Communities Against Port Expansion

Mr. William G. Bailey
ATTN: PD - US Army Corps of Engineers, Savannah District
100 West Oglethorpe Avenue
Savannah, GA 31401-3640
cesas-pd@usace.army.gov
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January 23, 2011

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Citizen For Healthy Communities,

#835

Savannah Residents For Responsible Government

Mr. William G. Bailey
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100 West Oglethorpe Avenue
Savannah, GA 31401-3640
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Savannah Resident For Responsible Government,

Dwayne Atkins
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(912)651-5966

#457

Savannah Residents For Responsible Government

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Robert Whaley
Robert Whaley (912) 651-0927
309 Sales Ave

Savannah Resident For Responsible Government.

#438

Savannah Residents For Responsible Government

Mr. William G. Bailey
ATTN: PD - US Army Corps of Engineers, Savannah District
100 West Oglethorpe Avenue
Savannah, GA 31401-3640
cesas-pd@usace.army.gov
912-652-5781

January 23, 2011

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Savannah Resident For Responsible Government.

Tyreik L. Watson

#637

Savannah Residents For Responsible Government

Mr. William G. Bailey
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Savannah Resident For Responsible Government.

Cinthy Green

#7140

Citizens For Healthy Communities Against Port Expansion

Mr. William G. Bailey
ATTN: PD - US Army Corps of Engineers, Savannah District
100 West Oglethorpe Avenue
Savannah, GA 31401-3640
cesas-pd@usace.army.gov
912-652-5781

January 23, 2011

Dear Mr. William G. Bailey:

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Citizen For Healthy Communities,

William Ryles 309 Stiles Ave
Sav Ga. 31401

#641

Savannah Seniors Against Port Expansion

January 23, 2011

Mr. William G. Bailey
ATTN: PD - US Army Corps of Engineers
Savannah District
100 West Oglethorpe Avenue
Savannah, GA 31401-3640
cesas-pd@usace.army.gov
912-652-5781

Dear Mr. Bailey:

I am submitting this letter as my public comment against the Savannah Harbor Expansion Project. I oppose the project because:

a. I live on limited income and I do not want my taxpayer monies to go for a project that will primarily benefit billion dollar private corporations like Walmart who will make even greater profits and who can afford to pay for port improvements. This will cause a negative socio-economic impact on me.
b. Larger container ships that will enter the Savannah River and harbor will emit more air pollution than smaller container ships in a shorter period of time as they unload or load containers that will have a significant negative impact on the health of me, my family and environmental justice community.
c. Larger container ships that carry 8,500 containers will enter the Savannah Harbor will require thousands of more diesel fuel polluting trucks who will emit more air pollution as they pick-up and transfer thousands of additional containers as compared to a smaller ship that carries 4,600 containers in the same shorter period of time which will also have a significant negative impact on my, my families health and environmental justice community.
d. The US Army Corps of Engineers have significantly underestimated the secondary and indirect off-port property community nexus air pollution impacts on the environmental and public health from larger ships, more ships, more trucks moving containers, increased port cargo moving equipment and related requirements such as visits to inspection facilities, chassis storage facilities and container storage yards.

I request that the USACOE conduct additional real time on-port property and off-port community air pollution studies, off-port community impacts nexus study, health impact assessment and a socio-economic impact study. I request that the USACOE and Port of Savannah establish $ 25 million annual mitigation fund by imposing a $ 25.00 per TEU tariff to reduce all negative public and environmental justice community impacts to less than significant. I do not approve of my taxes and future new taxes paying for private business development, supporting the region, state or East Coast economy when I and my Port harbor Environmental Justice Community receives little to no benefits. I want to see a study that lists the specific City of Savannah EJ Community benefits.

Sincerely, Marcus B. Hayes

722 Atlanta St.
Savannah, GA 31405

Citizens For Healthy Communities Against Port Expansion

#895

Mr. William G. Bailey
ATTN: PD - US Army Corps of Engineers, Savannah District
100 West Oglethorpe Avenue
Savannah, GA 31401-3640
cesas-pd@usace.army.gov
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January 23, 2011

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Citizen For Healthy Communities,

Eugene Cummings Sr
1115 Habersham SAV. 31401
Harambee House INC.

#9411

Citizens For Healthy Communities Against Port Expansion

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ATTN: PD - US Army Corps of Engineers, Savannah District
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Citizen For Healthy Communities, Mattie Jones
Mattie Jones
146 Lawrenced Dr.
Sav 31419

#845

Citizens For Healthy Communities Against Port Expansion

Mr. William G. Bailey
ATTN: PD - US Army Corps of Engineers, Savannah District

January 23, 2011

#839

Savannah Residents For Responsible Government

Mr. William G. Bailey
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Savannah Residents For Responsible Government

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Savannah Resident For Responsible Government,

ERIC D. MARRQUIN
HARRIBEE HOUSE
1115 HABERSHAM
SAVANNAH GA 31401

Citizens For Healthy Communities Against Port Expansion

#445

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Citizen For Healthy Communities, Curtis P. Bacon Jr. Harambee House
1115 Habersham Str.
Sav. GA. 31401

#849

Savannah Residents For Responsible Government

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Savannah Resident For Responsible Government,

Phillip Jong
Phillip Jong
[redacted] 241 Carolan Street
Savannah, GA 31415

Citizens For Healthy Communities Against Port Expansion

#96

Mr. William G. Bailey
ATTN: PD - US Army Corps of Engineers, Savannah District
100 West Oglethorpe Avenue
Savannah, GA 31401-3640
cesas-pd@usace.army.gov
912-652-5781

January 23, 2011

Dear Mr. William G. Bailey:

I wish to submit my public comment against the Savannah Harbor Expansion Project. I am against the project because it will increase air pollution which will impact my health and that of my family. It will also cause negative socio-economic impacts to me, my family and environmental justice community.

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Citizen For Healthy Communities,

George Anderson 1424 130 Great Oaks Ct
Hesse Anderson 31419

#561

Savannah Residents For Responsible Government

Mr. William G. Bailey
ATTN: PD - US Army Corps of Engineers, Savannah District
100 West Oglethorpe Avenue
Savannah, GA 31401-3640
cesas-pd@usace.army.gov
912-652-5781

January 23, 2011

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Savannah Resident For Responsible Government,

Gladys Coker 1/25/11 6947 Kay St 31406

Citizens For Healthy Communities Against Port Expansion

Mr. William G. Bailey
ATTN: PD - US Army Corps of Engineers, Savannah District
100 West Oglethorpe Avenue
Savannah, GA 31401-3640
cesas-pd@usace.army.gov
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January 23, 2011

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Citizen For Healthy Communities, Martyn Terrell
Martyn Terrell
Jan. 23, 2011

551 Yamacraw Village
31406

Citizens For Healthy Communities Against Port Expansion

#853

Mr. William G. Bailey
ATTN: PD - US Army Corps of Engineers, Savannah District
100 West Oglethorpe Avenue
Savannah, GA 31401-3640
cesas-pd@usace.army.gov
912-652-5781

January 23, 2011

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Citizen For Healthy Communities,

Jamontray Mike

Jamontray Mike 1/23/11
1656 Lanier Dr. 31404

Savannah Residents For Responsible Government

#254

Mr. William G. Bailey
ATTN: PD - US Army Corps of Engineers, Savannah District
100 West Oglethorpe Avenue
Savannah, GA 31401-3640
cesas-pd@usace.army.gov
912-652-5781

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Savannah Resident For Responsible Government,

Rosa L. Simmons Rosa L. Simmons
2213 Oak St.
Savannah, GA 31404
01-23-11

Savannah Residents For Responsible Government

#95

Mr. William G. Bailey
ATTN: PD - US Army Corps of Engineers, Savannah District
100 West Oglethorpe Avenue
Savannah, GA 31401-3640
cesas-pd@usace.army.gov
912-652-5781

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Savannah Resident For Responsible Government,

Anthony Mckelvia Anthony Mckelvia
316 W 39th St Savannah GA 31415
912-663-0633

Savannah Seniors Against Port Expansion

#856

January 23, 2011

Mr. William G. Bailey
ATTN: PD - US Army Corps of Engineers
Savannah District
100 West Oglethorpe Avenue
Savannah, GA 31401-3640
cesas-pd@usace.army.gov
912-652-5781

Dear Mr. Bailey:

I am submitting this letter as my public comment against the Savannah Harbor Expansion Project. I oppose the project because:

a. I live on limited income and I do not want my taxpayer monies to go for a project that will primarily benefit billion dollar private corporations like Walmart who will make even greater profits and who can afford to pay for port improvements. This will cause a negative socio-economic impact on me.
b. Larger container ships that will enter the Savannah River and harbor will emit more air pollution than smaller container ships in a shorter period of time as they unload or load containers that will have a significant negative impact on the health of me, my family and environmental justice community.
c. Larger container ships that carry 8,500 containers will enter the Savannah Harbor will require thousands of more diesel fuel polluting trucks who will emit more air pollution as they pick-up and transfer thousands of additional containers as compared to a smaller ship that carries 4,600 containers in the same shorter period of time which will also have a significant negative impact on my, my families health and environmental justice community.
d. The US Army Corps of Engineers have significantly underestimated the secondary and indirect off-port property community nexus air pollution impacts on the environmental and public health from larger ships, more ships, more trucks moving containers, increased port cargo moving equipment and related requirements such as visits to inspection facilities, chassis storage facilities and container storage yards.

I request that the USACOE conduct additional real time on-port property and off-port community air pollution studies, off-port community impacts nexus study, health impact assessment and a socio-economic impact study. I request that the USACOE and Port of Savannah establish $ 25 million annual mitigation fund by imposing a $ 25.00 per TEU tariff to reduce all negative public and environmental justice community impacts to less than significant. I do not approve of my taxes and future new taxes paying for private business development, supporting the region, state or East Coast economy when I and my Port harbor Environmental Justice Community receives little to no benefits. I want to see a study that lists the specific City of Savannah EJ Community benefits.

Sincerely, Matthew Hauser

1821 E 41 St
Sav Ga 31406

Citizens For Healthy Communities Against Port Expansion

Mr. William G. Bailey
ATTN: PD - US Army Corps of Engineers, Savannah District
100 West Oglethorpe Avenue
Savannah, GA 31401-3640
cesas-pd@usace.army.gov
912-652-5781

January 23, 2011

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Citizen For Healthy Communities, Andrea Johnson

Andrea Johnson
1/23/11

1821 84th St

Citizens For Healthy Communities Against Port Expansion

#654

Mr. William G. Bailey
ATTN: PD - US Army Corps of Engineers, Savannah District
100 West Oglethorpe Avenue
Savannah, GA 31401-3640
cesas-pd@usace.army.gov
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714 West 48th St. 31405

Citizen For Healthy Communities,

Precious Hawks
Precious Hawks 1/25/11

#651

Savannah Residents For Responsible Government

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ATTN: PD - US Army Corps of Engineers, Savannah District
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I request that the USACOE: Conduct additional real time on-port property and off-port community air pollution studies and a comprehensive socio-economic impact study, create an annual $5 million Public Health Care Mitigation Fund, allocate $ 500,000 for an Off-Port Community Impacts Nexus Study and $ 500,000 Health Impact Assessment and establish a annual $ 10 million mitigation fund such as the Ports of Los Angeles and Long Beach Technology Advancement Program to support the Research, Development and Demonstration Projects of new emerging Zero Emissions and Maximum Emissions Control Technologies such as the Advanced Cleanup Technology, Inc. Advanced Maritime Emissions Control System to capture all ship emissions and Vision Motor Corp Zero Emissions Hydrogen Gas Fuel Cell Trucks.

Lancaster Graham
1-23-11 1869 Montrose St

Savannah Resident For Responsible Government.

#466

Citizens For Healthy Communities Against Port Expansion

Mr. William G. Bailey
ATTN: PD - US Army Corps of Engineers, Savannah District
100 West Oglethorpe Avenue
Savannah, GA 31401-3640
cesas-pd@usace.army.gov
912-652-5781

January 23, 2011

Dear Mr. William G. Bailey:

I wish to submit my public comment against the Savannah Harbor Expansion Project. I am against the project because it will increase air pollution which will impact my health and that of my family. It will also cause negative socio-economic impacts to me, my family and environmental justice community.

1. The USACOE has significantly underestimated the current port and goods movement transportation corridor emissions and future emissions. Their studies did not include truck travel to the port to pick up containers and freight, numerous side trips to chassis storage yards, container storage yards, inspection facilities, fumigation facilities, trans-loading locations, traffic congestion idling, on-port property idling, fugitive HFC's from A/C units, inefficient engine fuel combustion VOC's, pulverized tire rubber and brake dust. It did not contain estimates for fugitive green house gas HFC's emissions from reefer containers.

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Citizen For Healthy Communities, Jerson Jenkins

[illegible] Collins

1009 ½ A West 55th 31415

#661

Savannah Residents For Responsible Government

Mr. William G. Bailey
ATTN: PD - US Army Corps of Engineers, Savannah District
100 West Oglethorpe Avenue
Savannah, GA 31401-3640
cesas-pd@usace.army.gov
912-652-5781

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US Army Corps of Engineers:

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Savannah Resident For Responsible Government,

X Robert E Cohen
6947 Key St
Sav Ga 31401

#86

Savannah Seniors Against Port Expansion

January 23, 2011

Mr. William G. Bailey
ATTN: PD - US Army Corps of Engineers
Savannah District
100 West Oglethorpe Avenue
Savannah, GA 31401-3640
cesas-pd@usace.army.gov
912-652-5781

Dear Mr. Bailey:

I am submitting this letter as my public comment against the Savannah Harbor Expansion Project. I oppose the project because:

a. I live on limited income and I do not want my taxpayer monies to go for a project that will primarily benefit billion dollar private corporations like Walmart who will make even greater profits and who can afford to pay for port improvements. This will cause a negative socio-economic impact on me.
b. Larger container ships that will enter the Savannah River and harbor will emit more air pollution than smaller container ships in a shorter period of time as they unload or load containers that will have a significant negative impact on the health of me, my family and environmental justice community.
c. Larger container ships that carry 8,500 containers will enter the Savannah Harbor will require thousands of more diesel fuel polluting trucks who will emit more air pollution as they pick-up and transfer thousands of additional containers as compared to a smaller ship that carries 4,600 containers in the same shorter period of time which will also have a significant negative impact on my, my families health and environmental justice community.
d. The US Army Corps of Engineers have significantly underestimated the secondary and indirect off-port property community nexus air pollution impacts on the environmental and public health from larger ships, more ships, more trucks moving containers, increased port cargo moving equipment and related requirements such as visits to inspection facilities, chassis storage facilities and container storage yards.

I request that the USACOE conduct additional real time on-port property and off-port community air pollution studies, off-port community impacts nexus study, health impact assessment and a socio-economic impact study. I request that the USACOE and Port of Savannah establish $ 25 million annual mitigation fund by imposing a $ 25.00 per TEU tariff to reduce all negative public and environmental justice community impacts to less than significant. I do not approve of my taxes and future new taxes paying for private business development, supporting the region, state or East Coast economy when I and my Port harbor Environmental Justice Community receives little to no benefits. I want to see a study that lists the specific City of Savannah EJ Community benefits.

Sincerely,

Gladys Cohen
6947 Key St
Sav Ga 31406

Gladys Cohen

#96

Savannah Seniors Against Port Expansion

January 23, 2011

Mr. William G. Bailey
ATTN: PD - US Army Corps of Engineers
Savannah District
100 West Oglethorpe Avenue
Savannah, GA 31401-3640
cesas-pd@usace.army.gov
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Sincerely,

[illegible]
3605 [illegible]
Sav Ga 31405

#464

Savannah Seniors Against Port Expansion

January 23, 2011

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Savannah District
100 West Oglethorpe Avenue
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Sincerely,

Bernice McKinney
Bernice McKinney
410 McKenzie Place
Savannah Ga 31405

#265

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100 West Oglethorpe Avenue
Savannah, GA 31401-3640
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Savannah Resident For Responsible Government.

Roosevelt Rosen Roosevelt Rosen
19a E 41st
Sav Ga 3404

#668

Savannah Residents For Responsible Government

Mr. William G. Bailey
ATTN: PD - US Army Corps of Engineers, Savannah District
100 West Oglethorpe Avenue
Savannah, GA 31401-3640
cesas-pd@usace.army.gov
912-652-5781

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Savannah Resident For Responsible Government,

James Billings

309 Stiles Avenue
Savannah 31415

#667

Citizens For Healthy Communities Against Port Expansion

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100 West Oglethorpe Avenue
Savannah, GA 31401-3640
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912-652-5781

January 23, 2011

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Citizen For Healthy Communities,

Donald Jackson

309 Stiles Ave
Sav. Ga 31415

Savannah Residents For Responsible Government

#470

Mr. William G. Bailey
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100 West Oglethorpe Avenue
Savannah, GA 31401-3640
cesas-pd@usace.army.gov
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January 23, 2011

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Savannah Resident For Responsible Government,

Shamaud Aleon E Brown
1115 Nakeathom St.
Savannah, Georgia, 31401

Savannah Residents For Responsible Government

#871

Mr. William G. Bailey
ATTN: PD - US Army Corps of Engineers, Savannah District
100 West Oglethorpe Avenue
Savannah, GA 31401-3640
cesas-pd@usace.army.gov
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I request that the USACOE: Conduct additional real time on-port property and off-port community air pollution studies and a comprehensive socio-economic impact study, create an annual $5 million Public Health Care Mitigation Fund, allocate $ 500,000 for an Off-Port Community Impacts Nexus Study and $ 500,000 Health Impact Assessment and establish a annual $ 10 million mitigation fund such as the Ports of Los Angeles and Long Beach Technology Advancement Program to support the Research, Development and Demonstration Projects of new emerging Zero Emissions and Maximum Emissions Control Technologies such as the Advanced Cleanup Technology, Inc. Advanced Maritime Emissions Control System to capture all ship emissions and Vision Motor Corp Zero Emissions Hydrogen Gas Fuel Cell Trucks.

[illegible] 309 St. Los AVE Sav, GA 31415

Savannah Resident For Responsible Government.

Citizens For Healthy Communities Against Port Expansion

#872

Mr. William G. Bailey
ATTN: PD - US Army Corps of Engineers, Savannah District
100 West Oglethorpe Avenue
Savannah, GA 31401-3640
cesas-pd@usace.army.gov
912-652-5781

January 23, 2011

Dear Mr. William G. Bailey:

I wish to submit my public comment against the Savannah Harbor Expansion Project. I am against the project because it will increase air pollution which will impact my health and that of my family. It will also cause negative socio-economic impacts to me, my family and environmental justice community.

1. The USACOE has significantly underestimated the current port and goods movement transportation corridor emissions and future emissions. Their studies did not include truck travel to the port to pick up containers and freight, numerous side trips to chassis storage yards, container storage yards, inspection facilities, fumigation facilities, trans-loading locations, traffic congestion idling, on-port property idling, fugitive HFC's from A/C units, inefficient engine fuel combustion VOC's, pulverized tire rubber and brake dust. It did not contain estimates for fugitive green house gas HFC's emissions from reefer containers.

2. The USACOE has significantly underestimated ship emissions and future emissions. Emission estimates did not include emissions from ship engine aging which causes more pollution as ships get older, ship boilers, ship cue time emissions while waiting to enter port river entrance and destination terminal, multiple ship staging idling, emissions from delays due to ship breakdowns, equipment breakdowns, accidents and adverse weather conditions. Estimates are also grossly in error due to the fact that larger cleaner ships will not arrive at the Port of Savannah in the near future and will in fact be phased in over a significant long period of time, therefore providing no near term benefits to the public.

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Citizen For Healthy Communities, Curtis Bullock 309 Stiles Ave. Savannah, GA 31415

Citizens For Healthy Communities Against Port Expansion

Mr. William G. Bailey
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Citizen For Healthy Communities,

Edward J. Stanley
Edward J. Stanley
1115 Hebrew Stanley Dr
Savannah GA 31411

Savannah Residents For Responsible Government

Ia 741

Mr. William G. Bailey
ATTN: PD - US Army Corps of Engineers, Savannah District
100 West Oglethorpe Avenue
Savannah, GA 31401-3640
cesas-pd@usace.army.gov
912-652-5781

January 23, 2011

Su: Opposition to Proposed Savannah Harbor Expansion Project

US Army Corps of Engineers:

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Savannah Resident For Responsible Government, Robert Mills
1115 Hellerstein Dr
Savannah Ga 31401

Savannah Residents For Responsible Government

#875

Mr. William G. Bailey
ATTN: PD - US Army Corps of Engineers, Savannah District
100 West Oglethorpe Avenue
Savannah, GA 31401-3640
cesas-pd@usace.army.gov
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Savannah Resident For Responsible Government, TYRONE GARVIN
1115 HABERSHAM
SAV. GA 31401

Savannah Residents For Responsible Government

#976

Mr. William G. Bailey
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100 West Oglethorpe Avenue
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cesas-pd@usace.army.gov
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Savannah Resident For Responsible Government, Clifford Sapp
1115 Hakersham
Savannah GA, 31401

Savannah Residents For Responsible Government

#87

Mr. William G. Bailey
ATTN: PD - US Army Corps of Engineers, Savannah District
100 West Oglethorpe Avenue
Savannah, GA 31401-3640
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Savannah Resident For Responsible Government,

Cornelius Howell
Hurambee House
1115 Hamberstum
Savannah, GA 31401

#679

Savannah Residents For Responsible Government

Mr. William G. Bailey
ATTN: PD - US Army Corps of Engineers, Savannah District
100 West Oglethorpe Avenue
Savannah, GA 31401-3640
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Savannah Resident For Responsible Government.

Vander Hickling
Harambee House
1115 Habersham St
SAVANNAH, GA. 31401

Savannah Residents For Responsible Government

#679

Mr. William G. Bailey
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Savannah Resident For Responsible Government,

Gregory Flair
1115 Watersham Dr.
Savannah, GA. 31401

Savannah Residents For Responsible Government

#850

Mr. William G. Bailey
ATTN: PD - US Army Corps of Engineers, Savannah District
100 West Oglethorpe Avenue
Savannah, GA 31401-3640
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Savannah Resident For Responsible Government,

Leslie N. Winn
Leslie N. Winn
1115 Habersham Dr
Savannah Ga 31401

Citizens For Healthy Communities Against Port Expansion

#39

Mr. William G. Bailey
ATTN: PD - US Army Corps of Engineers, Savannah District
100 West Oglethorpe Avenue
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Dear Mr. William G. Bailey:

I wish to submit my public comment against the Savannah Harbor Expansion Project. I am against the project because it will increase air pollution which will impact my health and that of my family. It will also cause negative socio-economic impacts to me, my family and environmental justice community.

1. The USACOE has significantly underestimated the current port and goods movement transportation corridor emissions and future emissions. Their studies did not include truck travel to the port to pick up containers and freight, numerous side trips to chassis storage yards, container storage yards, inspection facilities, fumigation facilities, trans-loading locations, traffic congestion idling, on-port property idling, fugitive HFC's from A/C units, inefficient engine fuel combustion VOC's, pulverized tire rubber and brake dust. It did not contain estimates for fugitive green house gas HFC's emissions from reefer containers.

2. The USACOE has significantly underestimated ship emissions and future emissions. Emission estimates did not include emissions from ship engine aging which causes more pollution as ships get older, ship boilers, ship cue time emissions while waiting to enter port river entrance and destination terminal, multiple ship staging idling, emissions from delays due to ship breakdowns, equipment breakdowns, accidents and adverse weather conditions. Estimates are also grossly in error due to the fact that larger cleaner ships will not arrive at the Port of Savannah in the near future and will in fact be phased in over a significant long period of time, therefore providing no near term benefits to the public.

3. The USACOE failed to assess the significant negative socio-economic impacts to environmental justice communities who are predominantly low income who will be forced to subsidize port growth while private corporations like Walmart pay nothing. Low income EJ families pay a disproportionately higher percentage of their income on taxes to pay the costs of infrastructure and bond debt. Freeways, highways, bridges, transportation corridors and power plants construction costs will be subsidized by taxing the public when the port user should be charged container and freight fees to pay all costs of expansion and improvement that benefit them. Public services such as highway patrol, city police, fire department, paramedics and emergency response for the public will be diverted to service the ports and goods movement transportation corridors.

I request that the USACOE conduct additional real time on-port property and off-port community air pollution studies, off-port community impacts nexus study, health impact assessment and a socio-economic impact study. I request that the USACOE and Port of Savannah establish a $ 10 million annual mitigation fund to reduce all negative public and environmental justice community impacts to less than significant. I request that the USACOE create a $ 10 million annual mitigation fund for Public Health Care and $ 25 million annual mitigation fund for the purchase of the Advanced Cleanup Technology, Inc. Advanced Maritime Emissions Control System to capture all ship emissions, Vision Motor Corp Zero Emissions Hydrogen Gas Fuel Cell Trucks and $ 50,000 every two years for a regional public education conference.

Citizen For Healthy Communities,

Steve Wilds
801 E. Victory Drive
Savannah, Ga. 31405

#68

Savannah Residents For Responsible Government

Mr. William G. Bailey
ATTN: PD - US Army Corps of Engineers, Savannah District
100 West Oglethorpe Avenue
Savannah, GA 31401-3640
cesas-pd@usace.army.gov
912-652-5781

January 23, 2011

Su: Opposition to Proposed Savannah Harbor Expansion Project

US Army Corps of Engineers:

I a resident of the Port of Savannah Environmental Justice Community oppose the approval of the Savannah Harbor Expansion Project and wish to submit my public comment in opposition. I am oppose the project because the Tier II Environmental Impact Statement significantly under-estimated air emissions from all on-port and off-port property sources, failed to include an assessment of all public health and socio-economic impacts, failed to include all current and reasonable future projects in the Cumulative Impact Assessment, failed to include an Off-Port Community Impacts Nexus Study, a Health Impact Assessment, mitigation to reduce all negative impacts to less than significant and the USACOE refused to hold a public hearing on the Savannah Harbor Expansion Project as requested by the Savannah Environmental Justice Community. The Ports of Los Angeles and Long Beach hold public hearings for all USACOE project Draft EIS's and Final EIS's.

The USACOE has significantly underestimated the current port and goods movement transportation corridor emissions and future emissions. Their studies did not include truck travel to the port to pick up containers and freight, numerous side trips to chassis storage yards, container storage yards, inspection facilities, fumigation facilities, trans-loading locations, traffic congestion idling, on-port property idling, HFC"s from A/C units, pulverized tire rubber and brake dust.

The USACOE has significantly underestimated ship emissions and future emissions. Emission estimates did not include emissions from ship engine aging which causes more pollution as ships get older, ship boilers, ship cue time emissions while waiting to enter the port river entrance and destination terminal, multiple ship staging idling, emissions from delays due to ship breakdowns, equipment breakdowns, accidents and adverse weather conditions. Information and estimates failed to disclose the fact that larger cleaner ships will not arrive at the Port of Savannah in the near future and will in fact be phased in over a significant long period of time, therefore providing no near term benefits to the public.

The USACOE failed to assess the significant negative socio-economic impacts to environmental justice communities who are predominantly low income who will be forced to subsidize port growth while private corporations like Walmart pay nothing. Low income EJ families pay a disproportionately higher percentage of their income on taxes to pay the costs of infrastructure and bond debt. Freeways, highways, bridges, transportation corridors and power plants construction costs will be subsidized by taxing the public when the port user should be charged container and freight fees to pay all costs of expansion and improvement that benefit them. Public services such as highway patrol, city police, fire department, paramedics and emergency response for the public will be diverted to service the ports and goods movement transportation corridors.

I request that the USACOE: Conduct additional real time on-port property and off-port community air pollution studies and a comprehensive socio-economic impact study, create an annual $5 million Public Health Care Mitigation Fund, allocate $ 500,000 for an Off-Port Community Impacts Nexus Study and $ 500,000 Health Impact Assessment and establish a annual $ 10 million mitigation fund such as the Ports of Los Angeles and Long Beach Technology Advancement Program to support the Research, Development and Demonstration Projects of new emerging Zero Emissions and Maximum Emissions Control Technologies such as the Advanced Cleanup Technology, Inc. Advanced Maritime Emissions Control System to capture all ship emissions and Vision Motor Corp Zero Emissions Hydrogen Gas Fuel Cell Trucks.

Savannah Resident For Responsible Government,

Verena Charles Davis
309 Stiles Ave
Savannah Ga. 31415

#443

Name: Dai'yana Pollard 1st Grade
Address: 01 Fair St.

State/Zip: Savannah, GA 31408

Aaliyah Cohen 3rd grade
aaliyah Cohen
110 Darling St.
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Diamond Washington 3rd grade
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31408

Destiny Washington
Kinegärdten

EDITOR'S NOTE: The following pages contain the responses to Comments #828 to 883, which have been grouped together because of the similar content of the concerns expressed in the letters.

Comment: *The Corps refused to hold a public hearing regarding the Draft Environmental Impact Statement (DEIS) and Draft General Reevaluation Report (DGRR).*

Response: Since 1999, the project has held nearly 70 public meetings. Approximately 65 of these meetings were held with the Stakeholders Evaluation Group in addition to numerous committee meetings. Three meetings were held in Garden City within an area of concern for environmental justice issues – two at the Masters Inn and one at the GPA Annex 1 located on Highway 25. Two public workshops were held at the beginning of the project (NEPA scoping) to identify issues the public believed should be examined by the forth coming environmental impact study.

The 70 public meeting [held since 1999] included the services of a court reporter who transcribed the statements made at each meeting. Once the meeting transcriptions were completed, they were posted on the SAS web site.

The public was afforded opportunities to provide comments at the November 2010 public workshop that the Corps held during the review period for the Draft GRR and DEIS. One avenue to provide comments was through the use of a court recorder.

Comment: *The Corps EIS failed to include a comprehensive Cumulative Impact Assessment in its failure to research, identify and assess all sources of emissions.*

Response: The air emission inventory conducted by the District [described in EIS-Appendix K] was a comprehensive analysis of port-dependent emissions. All air emissions including criteria pollutants, air toxics, and greenhouse gas emissions were calculated for the no-action alternative [-42 foot depth], all depth alternatives [42, 44, 45, 46, 47, and 48 feet], and all years [2015, 2020, 2025, 2030, 2032, and 2065]. It included emissions from the following sources:

- Dredges used during the new work dredging
- Dredges used during maintenance dredging
- Ocean-Going Vessels
- LNG Vessels
- Tug Boats
- Intra-Harbor Shifts
- Tour Boats
- Landside equipment at GPA terminals
- Landside equipment at non-GPA terminals
- Trucks calling at the Garden City Terminal
- Locomotives serving the Garden City Terminal
- GPA fleet vehicles
- Air Toxics
- Greenhouse gases

The District followed the procedures outlined in EPA's 2009 Final Report titled "Current Methodologies in Preparing Mobile Source Port-Related Emission Inventories". The District's analysis disclosed that harbor deepening would result in lesser air emissions than the no-action alternative [when compared against the baseline existing depth of -42 foot].

Currently, the Georgia Ports Authority is conducting dispersion modeling of the air emissions at the Garden City Terminal [with/without project]. This analysis will provide insight into how air emissions originating from its facility disperse under without-project conditions. Unfortunately, these analyses will not be available for inspection until after circulation of the FEIS for review. However, since overall emissions have already been determined to remain [at most] unchanged by the proposed harbor deepening, the results of the dispersion analysis were not considered critical to evaluate the proposed action. However, upon completion, GPA will share the results with EPA and the general public.

Background: The GPA will expand the Garden City Terminal [GCT] to accommodate 6.5 million TEUs regardless of whether or not the Savannah Harbor navigation channel is deepened. Under both without- and with- project conditions, the District expects the GCT to reach its build-out capacity in 2032 [at 6.5 million TEUs]. This is the maximum number of containers that can reasonably be processed through the GCT. This determination is based on factors such as the size of the terminal, the number of gates that provide access to the property, the number and size of the berths, the number and size of the container cranes, the number of jockey trucks that move the containers within the terminal, how the containers are stacked within the terminal, and the number of railroads that service the terminal and the return frequency of their trains. It is anticipated that without deepening, more vessels will be required to transport the cargo expected to move through the port. With deepening, the total number of vessels decreases as vessels will be able to load/unload closer to capacity without the present constraints of draft.

No incremental increases in cargo are expected to occur as a result of the proposed harbor deepening. As a result, the project will not affect the number of containers that move through the areas surrounding the port. The project's economic benefits result from the use of larger, more cost-effective container ships, not an increase in the number of containers. Noise, air emissions (including air toxics) from landside handling equipment, and traffic would not be increased [versus the no-action alternative] as a result of the proposed deepening.

Comment: *The DEIS significantly underestimated ship emissions and future emissions. The DEIS failed to disclose that a larger Post-Panamax ship that carries 8,400 TEU's vs the current smaller 4,000 TEU Ship will cause a significant spike in air pollution emissions actually doubling the air emission in the same amount time as a smaller ship. The Port will need twice as many diesel trucks and cargo handling equipment for a large ship. This spike will also cause significantly public health problems and increase emergency hospital visits. In addition, what happens when the number of large ships exceeds the original number of smaller ships, even with the low sulfur fuel they will emit more emissions?*

Response: The EIS reasonably estimates present and future air emissions from ocean-going vessels of various sizes and cargo handling equipment. The District followed the procedures described in EPA's 2009 Final Report titled "Current Methodologies in Preparing Mobile Source Port-Related Emission Inventories". Appendix K describes those procedures which estimate the amount of emissions that occur in Savannah from these sources.

Section 5.20 in the EIS states: *GPA continues to work closely with the State of Georgia to develop more improvements to the highway system outside the terminal. GPA has developed a plan that would provide expressway connection of Interstate highways directly to the Terminal. In 2010, the State of Georgia approved $120 million in bond revenue for use toward completing the Jimmy DeLoach Highway from Interstate 95 to the Garden City Terminal. That work is scheduled to begin in 2011 and be complete by the base year of the project. Additionally, the Georgia Department of Transportation's long-term highway plan includes construction of the Brampton Road Connector which will provide direct access from the Garden City Terminal to Interstate 516 and connections to Interstate 16. No other terminal in the US has such an expressway of highways directly to the terminal. Those road improvements are shown in the following figure. The completion of those roads will remove terminal traffic from neighborhoods and lessen congestion and the accompanying air quality impacts.* Also see Figure 5-57, which graphically shows these proposed road improvements.

GPA also plans to increase the percentage of containers that are handled by rail in the future. Since rail moves cargo with more fuel efficiency than trucks, use of rail will reduce future diesel emissions from port operations.

Comment: *The DEIS significantly underestimated the current port and goods movement transportation corridor emissions and future emissions. The studies did not include truck travel from their home location to the port to pick up containers and freight, the truck emissions when returning home, numerous side trips to chassis storage yards, container storage yards, inspection facilities, fumigation facilities, trans-loading locations, traffic congestion idling, on-port property idling, fugitive HFC's from NC units, inefficient engine fuel combustion VOC's, pulverized tire rubber and brake dust. It did not contain estimates for fugitive green house gas HFC's emissions from reefer containers.*

Response: The Corps' emission inventory for the port [EIS-Appendix K] was developed using the procedures established and recommended by U.S. Environmental Protection Agency (EPA) to identify air emissions from port facilities. EPA's guidance document is titled **"Current Methodologies in Preparing Mobile Source Port-Related Emission Inventories, Final Report, dated April 2009"**. That document provides the framework used throughout the U.S. to determine air emission estimates at ports from a combination of ocean going vessels and land-based port equipment. The District used the EPA protocols together with site-specific data provided by GPA and the Harbor Pilots Association. The District also consulted with EPA while conducting its analysis to ensure its guidance had been interpreted correctly and included the most up-to-date emission relationships.

Comment: *The DEIS failed to include an Environmental Justice Community Health Impact Assessment (HIA) to determine the current public health impacts of the Port of Savannah and its Goods Movement Transportation Corridors which include both rail and truck. The USACOE failed to research, consider and conduct a Environmental Justice Community Health Impact Assessment to determine the current public health impacts of the Port of Savannah and its Goods Movement Transportation Corridors which include both rail and truck.*

Response: Concerns about environmental justice were addressed in EIS-Section 5.20. Specifically discussed was compliance of the proposed action with Executive Order 13045 (Protection of Children) and Executive Order 12898 (Environmental Justice) together with an overview of the project's effects on communities surrounding GCT, demographics of Chatham/Jasper counties and Garden City, landside transportation of cargo, dredging activities, terminal operations, noise and lighting, employment,

considerations of other terminals, and a summary of project effects specifically on EJ populations and children. Figures in Section 5-20 show the following: poverty levels within the vicinity of the upper end of Savannah Harbor, locations of schools, hospitals and child care facilities along the navigation channel; and proposed road improvements within the vicinity of Garden City Terminal.

Comparisons between the Ports of Los Angeles/Long Beach (LA/LB) and Savannah may not yield a great deal of useful information. According to the USEPA website, the Ports of LA/LB are currently designated as "nonattainment" for ozone (severe-17) and PM2.5. As indicated in Section 4.03: *The Georgia Department of Natural Resources, Environmental Protection Division, Air Protection Branch (GADNR, EPD, APB) and the South Carolina Department of Health and Environmental Control, Bureau of Air Quality (SCDHEC, BAQ), have air quality jurisdiction for the project area for Chatham County, Georgia and Jasper County, South Carolina, respectively. They have determined the ambient air quality for Chatham County, Georgia and Jasper County, South Carolina is in compliance with the National Ambient Air Quality Standards, and both counties have been designated as Attainment Areas (Personal Communication, 20 February 2007, Jim Kelly, GADNR, EPD, APB and Fatina Washburn, SCDHEC, BAQ).* Bottom line: the Port of Savannah generally has good air quality; hence, there is no requirement to complete a Health Impact Assessment as was the case for the Ports of LA/LB. Further, a detailed Health Impact Assessment for the proposed action is not warranted because harbor deepening would result in fewer adverse impacts [air quality and otherwise] to the surrounding communities than would the case for the no-action alternative.

Comment: *The DEIS failed to include any public health studies or data of the City of Savannah and the Environmental Justice Communities that border the Port of Savannah and the Port Freight Transportation Corridors.*

Response: EIS-Section 5.19 characterizes the demographic area adjacent to the Garden City Terminal. Figures 5-57 and 5-58 show the location[s] of different income levels [census tract data] in the vicinity of the Garden City Terminal [GCT] where most of the project effects are/will be experienced. Figure 5-57 shows that the area with the lowest income level (40-100 percent) is roughly a mile distant from the terminal. Similarly, Figure 5-58 shows the same area as having the highest percentage of minority residents (40-100 percent). Figure 5-59 depicts the locations of schools, hospitals, and child care facilities, in relation to the navigation channel/terminal facilities where the majority of the construction would occur. As can be seen, these facilities are dispersed throughout the community and will not be disproportionately affected by SHEP. Lastly, Figure 5-63 shows the proposed road improvements which are designed to route traffic directly from area interstate highways to the Garden City Terminal thereby lessening existing traffic congestion in adjacent residential neighborhoods.

The District expects the number of cargo containers moved through GCT to increase over time; however, the subject harbor deepening will have no material effect on the rate of that increase. Hence, by extension, SHEP will have no significant effect on air emissions in the vicinity of GCT. A deeper channel would allow fewer, larger vessels to carry the cargo transiting the port, resulting in a decrease in the number of vessel calls [compared to the status quo]. The reduction in vessel numbers is predicted to result in a minor decrease in the amount of pollutants emitted.

Notably, the existing air quality at Savannah is very different from that in the Ports of LA/LB. The Port of Savannah **is not** in a "nonattainment" area for Ozone and PM2.5. Given Chatham County's designation as an "attainment" area for ozone and PM2.5 and that the project would not cause increased emissions, there is no requirement for the Port of Savannah to complete the noted detailed public health studies.

Comment: *The DEIS failed to include an Environmental Justice Community Impact Nexus Study to determine the off-port property community impacts from its business operations, tenant operations and freight transportation. The USACOE failed to research, consider and conduct a Environmental Justice Community Impact Nexus Study to determine the extent of the Port of Savannah and its Goods Movement Transportation Corridors.*

Response: There is no requirement in EO 12898 or in NEPA to conduct an Environmental Justice Community Impact Nexus Study for a major federal action. The District evaluated potential project impacts to Environmental Justice communities. See previous responses to comments on this issue.

Comment: *The DEIS failed to assess the significant negative socio-economic impacts to environmental justice communities.*

Response: The District thoroughly evaluated potential negative socio-economic impacts to environmental justice communities. DEIS-Section 5 included information on income levels, school locations, hospitals, and child care facilities, proposed road improvement as well as GPA programs which seek to avoid, minimize and mitigate air quality, traffic, noise, and lighting impacts on the surrounding communities. However, the District has expanded the demographic information about the communities adjacent to the port [to include transportation corridors]. Minority and low-income residents within this tract were considered to assess the project's impacts on environmental justice and children's health (EO 12898 and EO 13045) issues. Compliance with EO 12898 and EO 13045 is based on review/analysis of all the information mentioned above, as well as data obtained during the public meetings described in EIS-Section 5. FEIS-Section 5.19 [Overview] was revised to include a list of the types of information collected/analyzed in addressing EO 12898 and EO 13045.

Comment: *The DEIS failed to disclose that the project will have a significant and negative socioeconomic impact on the tourism industry.*

Response: The proposed deepening of the harbor will result in lesser air emissions than the status quo [no-action alternative]. For perspective, the Port of Savannah is just a small subset of the overall air quality emissions in Chatham County [2002 and 2005 EPA NEI data]. Therefore, the proposed action will not have a significant impact on the County's air shed. The Chamber of Commerce, an organization which represents community interests – including the tourist industry, stated in its January 19, 2011 letter that *"On behalf of our 2,100 business members representing over 77,000 employees in our area, we strongly encourage the U.S. Army Corps of Engineers to proceed with the Savannah Harbor Expansion Project."* The Chamber of Commerce does not agree with the commenter on his expectations about significant and negative socioeconomic impact on the tourism industry.

Comment: *The DEIS fails to identify and mitigate the noise impacts to residents, schools and sensitive receptors. Noise not only includes loud noise over 65db, but also non-stop and constant low level noise 40db-60db during the day, rest hours and sleep time hours. This includes honking, braking, acceleration, gunning of engines and stopped traffic congestion. When does the public have an 8hr respite from noise? We request sound proofing glass windows and doors with an STS rating of 90% or better and sound proof curtains during construction. We request that a Noise Mitigation Fund be established and funds provided from the mitigation fund.*

Response: The EIS discusses the noted noise issues in the following locations: Section 5.07.1-Dredging Impacts, Section 5.19-Terminal Operations, Noise and Lighting; Section 5.20.1-Noise, and in Appendix B-Biological Assessment.

The GPA will expand the Garden City Terminal [GCT] to accommodate 6.5 million TEUs regardless of whether or not the Savannah Harbor navigation channel is deepened. Under both without- and with-project conditions, the District expects the GCT to reach this build-out capacity in 2032. This is the maximum number of containers that can reasonably be processed through the GCT. This determination is based on factors such as the size of the terminal, the number of gates that provide access to the property, the number and size of the berths, the number and size of the container cranes, the number of jockey trucks that move the containers within the terminal, how the containers are stacked within the terminal, and the number of railroads that service the terminal and the return frequency of their trains. It is anticipated that without deepening, more vessels will be required to transport the cargo expected to move through the port. With deepening, the total number of vessels decreases as vessels will be able to load/unload closer to capacity without the present constraints of draft.

No incremental increases in cargo are expected to occur as a result of the proposed harbor deepening. As a result, the project will not affect the number of containers that move through the areas surrounding the port. The project's economic benefits result from the use of larger, more cost-effective container ships, not an increase in the number of containers. Noise, air emissions (including air toxics), and traffic would not be increased [versus the no-action alternative] as a result of the proposed deepening.

Comment: *The Corps should conduct an on-site real time Port of Savannah and EJ Community Air Quality Study and inventory of all categories of emissions: criteria pollutants, toxic pollutants, HAP's, VOC's and all green house gases; to include all off-port property secondary and indirect emissions. Inventories must also include all truck routes, train routes, ship routes, container storage locations, inspection facilities, chassis locations, detours, operating time, idling time and storage fugitive emissions. We request that three air quality monitoring stations be established in EJ Communities.*

Response: The air quality of the Port of Savannah is generally good, unlike the ports of LA/LB which are in "nonattainment" areas for ozone and PM2.5. There is no requirement for the District to conduct "an on-site real time Port of Savannah and EJ Community Air Quality Study". The District has already completed a detailed emission inventory of the port; it is found in Appendix K of the EIS.

Comment: *The Corps should conduct an Environmental Justice Community Health Impact Assessment.*

Response: The air quality within the port's air shed is generally good. There is no requirement for the District to prepare the noted health impact assessment or establish a public health baseline in the vicinity of the port. This is especially true, given the fact that the impacts associated with SHEP are less than would be experienced from maintaining the status quo [no-action alternative]. For these reasons, preparation of an Environmental Justice Community Impact Nexus Study and hiring an EJ Consultant would also be an unnecessary project expense.

Comment: *The Corps should establish an Off-Port Community Impact Nexus Mitigation Fund.*

Response: An Off-Port Community Impact Nexus Mitigation Fund is not warranted by the type or level of impacts expected from the proposed harbor deepening. Since the number of containers moved through the Garden City Terminal would not be affected by harbor deepening, the proposed deepening would not alter impacts that occur as a result of their movement through the harbor and surrounding area.

Comment: *The Corps should establish a Technology Advancement Program to support R&D and demonstration projects of new emerging zero emissions freight transportation systems and maximum achievable emissions control technologies such as the Advanced Cleanup Technology, Inc. Advanced Maritime Emissions Control System to capture all ship emissions, Vision Motor Corp Zero Emissions Hydrogen Gas Fuel Cell Trucks and Miracle Mile Solutions VATT Systems Diesel Truck Fuel combustion Efficiency Retrofit Technology.*

Response: Establishment of a Technology Advancement Program to support R&D and demonstration projects of new emerging zero emissions freight transportation systems and maximum emissions control technologies is not warranted by the type or level of impacts expected from the proposed harbor deepening. The District believes that the number of containers processed through the Garden City Terminal would not be affected by harbor deepening. It follows that the movement of those containers through the communities adjacent to the Garden City Terminal is also unaffected.

Comment: *The Corps should establish a Public Health Care Mitigation Fund.*

Response: Establishment of a Public Health Care Mitigation Fund is not warranted by the type or level of impacts expected from the proposed harbor deepening. Since the number of containers moved through the Garden City Terminal would not be affected by harbor deepening, the proposed deepening would not affect the transit of those containers to their final destination[s].

#830

Phillip Jung
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Savannah, GA 31415
1-24-11
Phillip Jung

what are the negative affects of the dredging?

what efforts are being made to better the environment of the communities at the higher risk of the contaminated air?

what type of jobs are going to be created?

Phillip Jung

830-MM-03-EV01
Comment: *What are the negative affects of the dredging?*

Response: The effects of dredging on the natural resources in Savannah Harbor are addressed [in depth] in EIS-Chapter 5. They include the direct physical effects of the dredging and sediment placement operations on the marine and aquatic environment, as well as the indirect consequences on the dissolved oxygen and water quality regimes in the estuary. Direct effects consist of water column impacts during [and after] actual excavation, perturbations to the benthic habitat in affected dredged areas, wetland losses, immediate influences to fishery resources, and impacts resulting from the physical disposal of the dredged material. The District attempts to avoid and minimize such impacts [where/whenever possible] by avoiding dredging in the certain areas of the estuary during fish spawning seasons, equipment selection, timing [not using hopper dredges in the entrance channel when sea turtles are prevalent], and monitoring water quality conditions in the vicinity of active dredges along with the effluent from the disposal areas to ensure applicable water quality standards are not violated. In those cases where adverse impacts cannot be avoided [such as the marsh loss associated with the excavation requirements of the project], the project provides appropriate mitigation.

The indirect effects of the dredging are centered around the project's impacts on the dissolved oxygen and salinity regimes within the affected area. That is, deepening will lower dissolved oxygen levels and increase upstream salinity levels, which in turn would adversely affect the habitat of some fish species, e.g., Shortnose sturgeon and Striped bass. Consequently the project includes mitigation features [to include adaptive management] to compensate for these adverse impacts.

830-MM-03-EV02
Comment: *What efforts are being made to better the environment of the communities at the higher of contaminated air?*

Response: Future growth in cargo movements and accompanying air emissions are expected for the GCT. However, those increases will result from heightened demand for the goods which would move through the port and would occur independently of SHEP. SHEP's construction could actually lessen future increases in vessel emissions if fewer large container vessels call at the port versus more of the existing, smaller ships. [see Paragraph 5.6 of the EIS].

830-MM-03-EC01
Comment: *What type of jobs are going to be created?*

Response: Local employment associated with the proposed harbor deepening would occur during the construction phase of the project. There is little expectation of any fundamental [long-term] change in employment levels as a result of a channel deepening. The forecasted rate of additional cargo transiting the port is expected to remain unchanged irrespective of harbor deepening. This will be mirrored in the port's overall employment numbers. Tranportation cost savings attributed to port improvements are small in comparision to the total cost of moving goods from their origin to destination. Hence, those savings are not expected to cause shifts in the port through which the goods are moved.

Surfrider Foundation.

COASTAL GEORGIA/ LOW COUNTRY CHAPTER

100 Druid Circle
Savannah, GA 31410

William Bailey
ATTN: PD
US Army Corps of Engineers, Savannah District
100 W. Oglethorpe Ave.
Savannah GA 31401-3640

January 18, 2011

Dear Mr. Bailey,

As a member and representative of the Coastal Georgia Low Country Chapter of the Surfrider Foundation, I would like to express my interest and our chapters interest in the location planned for the deposit of dredge material from the planned Savannah River Deepening.

As the local Surfrider Chapter, we do not oppose the locations planned for the deposits of the dredged material at the locations on the beaches of Tybee Island.

Tybee Island is one of the barrier islands on the Georgia coast that is accessible to the public by automobiles and other vehicles, which make it a popular destination for persons of multiple interest from both the local area and from farther distances away, such as Atlanta. These persons come to Tybee for the ecological and recreational aspects of the beach. Recreational activities like surfing, beach kayaking, body boarding, fishing are amongst the few that will be impacted by the placement of the dredge material at the on-shore locations described in the Draft EIS. Ecological activities that involve the lagerhead sea turtles and other wild and sea life.

The placement of the dredge material at area described as MLW 200 in the EIS (reference Draft EIS pages 3-22 through 3-26) as "sediment that would be deposited at the mean low tide water (MLW) line and be allowed to mound up to mean sea level (MSL) or mid-tide. When filled to capacity [217,000 CY], the placement would create a mid-tide berm about 200 feet wide and 3,200 fee long." The creation of this would create a sand bar that is 200 feet by 3,200 feet long out in front of the current beach. This area of Tybee Island at the North End, which extends westward from the North Jetty 3,200 feet. This area also provides one of the few natural point breaks in the south eastern part of the US to which surfers, kayakers, windsurfers, kite boarders, body boarders, and skim boarders use for recreation. This also is an area enjoyed by many of the fisherman and other beach goers flock to.

The placement of the dredge material at the area described as MLW 500 would extend from the North Jetty southward for 11,000 feet (2 miles). The dredge material would extend this purposed distance and out a distance from the beach to 500 feet. This material would be placed in a similar design as the dredge material is planned for location MLW 200.

The creation of this would not only serve to decrease the wave energy in these areas, but it also could have a potential impact on the swimmers and water goers safety. Has the Corps of Engineers evaluated this plan for an increase in riptides over the life of this berm, as which it will erode away or any safety issues such as longshore tidal rip currents that would occur as a result of design? Is this up to the City of Tybee to take responsibility for this?

Other potential safety concerns would be how the lifeguards propose to cover this area effectively and the dangers for beach goers outside of 200 ft or 500 ft extended beach, because the profiles I have seen appear to ascend to deeper depths at an aggressive angle. What causalities will occur as a result of this design?

Surfrider Coastal Georgia P.O. Box 31033 Savannah, GA 31410

The creation of this could also lead to an environmental impact on the beach. The sediment in this area of the Savannah River has been exposed to chemical and heavy metals. While the Corps has stated the material put at the Tybee Beach will be 80% compatible with the current sand at the beach, what is the guarantee? Also what is the impact on the ecological life like the sea turtles?

All of the items discussed also have an economical impact on Tybee Island.

There are concerns not enough studies have been done to prove this. And I, myself, even have concerns about where the sediment with the heavy metals are currently planned to be placed. If this material is to be put at any location, isn't it the responsibilities of the companies to which benefit from it to assist in the funds to clean it up, not just leave it to the taxpayers.

It is understood by us at the Coastal Georgia Low Country Chapter that the Corps has other locations to put the sediment where there would not be negative impact on Tybee Island, or alternative designs for the how the dredge material is placed at both the on-shore and near-shore locations.

In summary, I oppose the current plan for the deposit of the dredge material at the on-shore locations at Tybee Island and I suggest the current plan be revised to have the material moved to a different location or new design for how this material will be placed at Tybee Island.

Regards,

Patrick Carver
Chairperson
Coastal Georgia Low Country Chapter of the Surfrider Foundation

Surfrider Foundation, Coastal Georgia/Low Country Chapter

613-MR-04-EN01

Comment: *The creation of this would not only serve to decrease the wave energy in these areas, but it also could have a potential impact on the swimmers and water goers safety. Has the Corps of Engineers evaluated this plan for an increase in riptides over the life of this berm, as which it will erode away or any safety issues such as longshore tidal rip currents that would occur as a result of design? Is this up to the City of Tybee to take responsibility for this?*

Response: The project's potential impacts to long shore currents were considered during design analysis of potential effects on Tybee Island and the originally-proposed nearshore placement plan. Modeling predicted that if the sediment were placed in the nearshore during the winter months [when there is nominal recreational use of the nearshore zone], it would become incorporated into the shoreline prior to the summer season. However, due to concerns expressed by the Georgia Department of Natural Resources and the City of Tybee Island concerning the quality (sand content) of the material, the Corps revised the placement plan for sediments excavated from the entrance channel. The project described in the final reports includes deposition of entrance channel sediments in previously-approved sites (Ocean Dredged Material Disposal Site or Jones/Oysterbed Island CDF). Nearshore placement of new work sediments has been removed from the SHEP.

613-MR-04-EV01

Comment: *Other potential safety concerns would be how the lifeguards propose to cover this area effectively and the dangers for beach goers outside of 200 ft or 500 ft extended beach, because the profiles I have seen appear to ascend to deeper depths at an aggressive angle. What causalities will occur as a result of this design?*

Response: The SHEP no longer includes plans for the nearshore deposition of any new work dredged sediment. The dredged material placement plan was revised to show all sediments excavated from the entrance channel being deposited in previously-approved areas: the Offshore Dredged Material Disposal Site or an upland confined disposal site. The Final EIS details these revisions to the plan.

613-MR-04-EV02, 613-MR-04-EV03, 613-JK-05-EC01

Comment: *The creation of this could also lead to an environmental impact on the beach. The sediment in this area of the Savannah River has been exposed to chemical and heavy metals. While the Corps has stated the material put at the Tybee Beach will be 80% compatible with the current sand at the beach, what is the guarantee? Also what is the impact on the ecological life like the sea turtles?*

Response: After coordination with GADNR-CRD, the dredged material placement plan has been revised and now calls for placement of all new work entrance channel material in previously-approved areas: the Ocean Dredged Material Disposal Site or an existing upland confined disposal facility. Project plans for placement of dredged material into the nearshore area off Tybee Island included measures to protect nesting sea turtles such as restricting the placement of sediment to periods of the year outside the nesting season. However, since no nearshore [sediment] placement of new work sediments will occur, the beach ecology [including sea turtle activities] should be unchanged from the status quo.

Surfrider Foundation.

COASTAL GEORGIA/ LOW COUNTRY CHAPTER

401 N. Cromwell Road #B1
Savannah, GA 31410

William Bailey
ATTN: PD
US Army Corps of Engineers, Savannah District
100 W. Oglethorpe Ave.
Savannah GA 31401-3640

January 21, 2011

Dear Mr. Bailey,

As a member of the Coastal Georgia Low Country Chapter of the Surfrider Foundation, citizen of Chatham County and tax payer, I would like to express my interest in and oppostion to the location planned for the deposit of dredge material from the planned Savannah River Deepening.

My review of pages 3-22 through 3-26 of the Draft EIS indicate:

- The placement of the dredge material at area described as MLW 200 in the EIS (reference Draft EIS pages 3-22 through 3-26) would act as an area that would create a sandbar and berm about 200 feet wide and 3,200 feet long, in front the current beach.

- The placement of the dredge material at the area described as MLW 500 would extend from the North Jetty southward for 11,000 feet (2 miles). The dredge material would extend this purposed distance and out a distance from the beach to 500 feet. This material would be placed in a similar design as the dredge material is planned for location MLW 200.

The creation of this would serve to:

- Decrease the natural wave energy in these locations and eliminate natural sources of recreation for the public.
- Have potential safety implications on the swimmers, fisherman, beach and water goers, and on the City of Tybee Lifegaurds.
- Increase environmental and ecological impact from the material and the placement of the dredge material.
- Produce a negative economical impact on the Tybee Island, if tourism is reduced in any way.

It is understood that the Corps has other locations to put the sediment where there would not be negative impact on Tybee Island, or alternative designs for the how the dredge material is placed at both the on-shore and near-shore locations. I suggest one of these approaches be used as an alternate to the current plan.

Regards,

Ronald L. Abbott
Member At Large
Coastal Georgia Low Country Chapter of the Surfrider Foundation

Surfrider Coastal Georgia P.O. Box 31033 Savannah, GA 31410

28 Morningside Dr.
Savannah, GA 314XX

William Bailey
ATTN: PD
US Army Corps of Engineers, Savannah District
100 W. Oglethorpe Ave.
Savannah GA 31401-3640

January **20**, 2011

Dear Mr. Bailey,

As a member of the Coastal Georgia Low Country Chapter of the Surfrider Foundation, citizen of Chatham County and tax payer, I would like to express my interest in and opposition to the location planned for the deposit of dredge material from the planned Savannah River Deepening.

My review of pages 3-22 through 3-26 of the Draft EIS indicate:

- The placement of the dredge material at area described as MLW 200 in the EIS (reference Draft EIS pages 3-22 through 3-26) would act as an area that would create a sandbar and berm about 200 feet wide and 3,200 fee long out in front the current beach.

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The creation of this would serve to:

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- Have potential safety implications on the swimmers, fisherman, beach and water goers, and on the City of Tybee Lifegaurds.
- Increase environmental and ecological impact from the material and the placement of the dredge material.
- Produce a negative economical impact on the Tybee Island, if tourism is reduced in any way.

It is understood that the Corps has other locations to put the sediment where there would not be negative impact on Tybee Island, or alternative designs for the how the dredge material is placed at both the on-shore and near-shore locations. I suggest one of these approaches be used as an alternate to the current plan.

Regards,

Steven L Horton
Member At Large
Coastal Georgia Low Country Chapter of the Surfrider Foundation

From: WilsonJG@aol.com
To: CESAS-PD, SAS
Subject: REGARDING: Dredge Material from the Savannah Harbor Expansion Project
Date: Monday, January 24, 2011 11:52:49 PM

Mr. William Bailey
ATTN: PD
US Army Corps of Engineers, Savannah District
100 W. Oglethorpe Ave.
Savannah GA 31401-3640

Dear Mr. Bailey,

I am writing to express opposition to certain locations planned for the deposit of dredge material from the Savannah Harbor Expansion Project (SHEP).

The Draft Environmental Impact Statement (EIS) identifies the following placement sites, among others, for dredge materials (reference Draft EIS pages 3-22 through 3-26):

- The placement of the dredge material at area described as MLW 200 would create a berm about 200 feet wide and 3,200 feet long directly in front the current beach.
- The placement of the dredge material at the area described as MLW 500 would extend from the North Jetty southward for 11,000 feet (2 miles). The dredge material would be placed 500 feet from the beach for the length of the placement site.
- The placement of the dredge material at the area described as ERDC Nearshore would extend seaward from Tybee Island below the MLW contour in the nearshore area. At total capacity, the top elevation of the placement site would be -4 feet so as not to interfere with boaters but such placement would allow potential for movement of material towards the Tybee Island shoreline by wave action. (It is important to note that this location is already reserved as a borrow site for Tybee's Island's beach renourishment program.)

The placement of this material at MLW 200, MLW 500, and ERDC Nearshore would:

- Decrease the natural wave energy in these locations and eliminate natural sources of recreation for the public.
- Have potential safety implications on swimmers, surfers, fishermen, lifeguards, and others.
- Increase environmental and ecological impact in sensitive onshore and nearshore areas, including from dredging materials washing up on beaches.
- Produce a negative economic impact on the Tybee Island due to reduced tourism.

In addition, the placement of this material at the ERDC Nearshore location could contaminate sand reserved for Tybee Island's beach renourishment program.

The placement of dredge materials at MLW 200, MLW 500 and the ERDC Nearshore locations are not necessary for SHEP to move forward. Alternative, more suitable sites are available. The Corps of Engineers should conduct additional studies and collect additional data prior to selecting any location for depositing dredge materials.

Thank you,
Joey Wilson

From: Steve Combs
To: CESAS-PD, SAS
Cc: info@surfrideratlanta.org
Subject: Opposition to Dredge Material Sites for Savannah Harbor Expansion Project (SHEP)
Date: Monday, January 24, 2011 10:59:04 PM

VIA EMAIL to CESAS-PD@usace.army.mil

January 24, 2010

Mr. William Bailey
ATTN: PD
US Army Corps of Engineers, Savannah District
100 W. Oglethorpe Ave.
Savannah GA 31401-3640

Dear Mr. Bailey:

I am writing to express opposition to certain locations planned for the deposit of dredge material from the Savannah Harbor Expansion Project (SHEP).

The Draft Environmental Impact Statement (EIS) identifies the following placement sites, among others, for dredge materials (reference Draft EIS pages 3-22 through 3-26):

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The placement of this material at MLW 200, MLW 500, and ERDC Nearshore would:

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- Produce a negative economic impact on the Tybee Island due to reduced tourism.

In addition, the placement of this material at the ERDC Nearshore location could contaminate sand reserved for Tybee Island's beach renourishment program.

The placement of dredge materials at MLW 200, MLW 500 and the ERDC Nearshore locations are not necessary for SHEP to move forward.

Alternative, more suitable sites should be used. The Corps of Engineers should conduct additional studies and collect additional data prior to selecting any location for depositing dredge materials.

Regards,
Surfrider Foundation Atlanta Chapter
Executive Committee
By Stephen Combs
PO Box 191653
Atlanta, GA 31119
Tel. 404-455-3822
info@surfrideratlanta.org

From: Nick Nixon
To: CESAS-PD, SAS,
Cc: Nick Nixon
Subject: Tybee Island
Date: Monday, January 24, 2011 10:00:49 PM

Mr. William Bailey
ATTN: PD
US Army Corps of Engineers, Savannah District
100 W. Oglethorpe Ave.
Savannah GA 31401-3640

Dear Mr. Bailey,

I am writing to express opposition to certain locations planned for the deposit of dredge material from the Savannah Harbor Expansion Project (SHEP).
The Draft Environmental Impact Statement (EIS) identifies the following placement sites, among others, for dredge materials (reference Draft EIS pages 3-22 through 3-26):

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The placement of this material at MLW 200, MLW 500, and ERDC Nearshore would:

- Decrease the natural wave energy in these locations and eliminate natural sources of recreation for the public.
- Have potential safety implications on swimmers, surfers, fishermen, lifeguards, and others.
- Increase environmental and ecological impact in sensitive onshore and nearshore areas, including from dredging materials washing up on beaches.
- Produce a negative economic impact on the Tybee Island due to reduced tourism.

In addition, the placement of this material at the ERDC Nearshore location could contaminate sand reserved for Tybee Island's beach renourishment program.
The placement of dredge materials at MLW 200, MLW 500 and the ERDC Nearshore locations are not necessary for SHEP to move forward. Alternative, more suitable sites are available. The Corps of Engineers should conduct additional studies and collect additional data prior to selecting any location for depositing dredge materials.

Regards,

Thomas Nixon

From: Coty P
To: CESAS-PD_SAS
Subject: Concern for Tybee Island
Date: Monday, January 24, 2011 10:01:10 PM

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24 January 2011

Surfrider Foundation Member: Coty Pinckney 4013 Morgan Road, Tucker, GA 30084

Mr. William Bailey
ATTN: PD
US Army Corps of Engineers, Savannah District
100 W. Oglethorpe Ave.
Savannah GA 31401-3640

Dear Mr. Bailey,

I am writing to express opposition to certain locations planned for the deposit of dredge material from the Savannah Harbor Expansion Project (SHEP).

The Draft Environmental Impact Statement (EIS) identifies the following placement sites, among others, for dredge materials (reference Draft EIS pages 3-22 through 3-26):

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The placement of this material at MLW 200, MLW 500, and ERDC Nearshore would:

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- Produce a negative economic impact on the Tybee Island due to reduced tourism.

In addition, the placement of this material at the ERDC Nearshore location could contaminate sand reserved for Tybee Island's beach renourishment program.

The placement of dredge materials at MLW 200, MLW 500 and the ERDC Nearshore locations are not necessary for SHEP to move forward. Alternative, more suitable sites are available. The Corps of Engineers should conduct additional studies and collect additional data prior to selecting any location for depositing dredge materials.

Regards,

Coty Pinckney

From: wphraner@comcast.net
To: CESAS-PD, SAS
Subject: Savannah Harbor Expansion Project
Date: Monday, January 24, 2011 10:34:55 PM

January 24, 2011

Wendy Phraner
430 Tara Oaks Court
Lawrenceville, GA 30043

Mr. William Bailey
ATTN: PD
US Army Corps of Engineers, Savannah District
100 W. Oglethorpe Ave.
Savannah GA 31401-3640

Dear Mr. Bailey,
I am writing to express opposition to certain locations planned for the deposit of dredge material from the Savannah Harbor Expansion Project (SHEP).
The Draft Environmental Impact Statement (EIS) identifies the following placement sites, among others, for dredge materials (reference Draft EIS pages 3-22 through 3-26):

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In addition, the placement of this material at the ERDC Nearshore location could contaminate sand reserved for Tybee Island's beach renourishment program.
The placement of dredge materials at MLW 200, MLW 500 and the ERDC Nearshore locations are not necessary

for SHEP to move forward. Alternative, more suitable sites are available. The Corps of Engineers should conduct additional studies and collect additional data prior to selecting any location for depositing dredge materials.
Regards,
Wendy Phraner

From: matt jones
To: CESAS-PD, SAS
Subject: Please consider this, please.
Date: Monday, January 24, 2011 10:34:56 PM

---

24 January 2011
Matthew Jones
Department of Ecology and Environmental Science
University of Maine.

Mr. William Bailey
ATTN: PD
US Army Corps of Engineers, Savannah District
100 W. Oglethorpe Ave.
Savannah GA 31401-3640

Dear Mr. Bailey,

I am writing to express opposition to certain locations planned for the deposit of dredge material from the Savannah Harbor Expansion Project (SHEP).

The Draft Environmental Impact Statement (EIS) identifies the following placement sites, among others, for dredge materials (reference Draft EIS pages 3-22 through 3-26):

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•Produce a negative economic impact on the Tybee Island due to reduced tourism.
In addition, the placement of this material at the ERDC Nearshore location could contaminate sand reserved for Tybee Island's beach renourishment program.

The placement of dredge materials at MLW 200, MLW 500 and the ERDC Nearshore locations are not necessary for SHEP to move forward.

Alternative, more suitable sites are available. The Corps of Engineers should conduct additional studies and collect additional data prior to selecting any location for depositing dredge materials.

Thanks for your concern,
-matt jones

From: shorton912@aol.com
To: CESAS-PD, SAS
Subject: Attn: Mr. Bailey / Savannah River Dredging
Date: Thursday, January 20, 2011 12:06:16 PM
Attachments: coe2.docx

To Whom :

I am vehemently opposed to the plan to place dredge material anywhere near Tybee Island. The dredge material should be widely dispersed in water as deep as possible so as to minimize any effect on the natural environment. Please see attached letter.

Steve Horton
28 Morningside Dr.
Wilmington Island

From: Elliott Baumgardner
To: CESAS-PD_SAS
Subject: dredging near Tybee
Date: Monday, January 24, 2011 10:44:24 PM

Mr. William Bailey
ATTN: PD
US Army Corps of Engineers, Savannah District
100 W. Oglethorpe Ave.
Savannah GA 31401-3640

Dear Mr. Bailey,

I am writing to express opposition to certain locations planned for the deposit of dredge material from the Savannah Harbor Expansion Project (SHEP).

The Draft Environmental Impact Statement (EIS) identifies the following placement sites, among others, for dredge materials (reference Draft EIS pages 3-22 through 3-26):

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Regards,

Elliott Baumgardner

From: Michelle Emrich
To: CESAS-PD, SAS
Subject: I oppose the Savannah Harbor Expansion Project (SHEP)
Date: Monday, January 24, 2011 10:57:37 PM

Mr. William Bailey

ATTN: PD
US Army Corps of Engineers, Savannah District
100 W. Oglethorpe Ave.
Savannah GA 31401-3640

Dear Mr. Bailey,

I am writing to express opposition to certain locations planned for the deposit of dredge material from the Savannah Harbor Expansion Project (SHEP).

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collect additional data prior to selecting any location for depositing dredge materials.

Regards,
Michelle Emrich MD

From: Matthew Wynne
To: CESAS-PD, SAS
Subject: Concerned Citizen
Date: Monday, January 24, 2011 10:55:48 PM

January 24, 2011

Matthew Wynne

461 Miner Dr.

Richmond Hill, GA 31324

Mr. William Bailey

ATTN: PD

US Army Corps of Engineers, Savannah District

100 W. Oglethorpe Ave.

Savannah GA 31401-3640

Dear Mr. Bailey,

I am writing to express opposition to certain locations planned for the deposit of dredge material from the Savannah Harbor Expansion Project (SHEP).

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Have potential safety implications on swimmers, surfers, fishermen, lifeguards, and others.

Increase environmental and ecological impact in sensitive onshore and nearshore areas, including from dredging materials washing up on beaches.

Produce a negative economic impact on the Tybee Island due to reduced tourism.

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Regards,

Matthew Wynne

From: Charles Sparkman
To: CESAS-PD_SAS
Subject: Savannah Harbor Expansion Project - OPPOSED
Date: Tuesday, January 25, 2011 1:08:32 AM

January 25, 2011

Charles Sparkman
202 14th Street
Tybee Island, GA 31328
and
410 North Errol Court
Atlanta, GA 30327

Mr. William Bailey
ATTN: PD
US Army Corps of Engineers, Savannah District
100 W. Oglethorpe Ave.
Savannah GA 31401-3640

Dear Mr. Bailey,

I am writing to express opposition to certain locations planned for the deposit of dredge material from the Savannah Harbor Expansion Project (SHEP).

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* The placement of the dredge material at the area described as ERDC Nearshore would extend seaward from Tybee Island below the MLW contour in the nearshore area. At total capacity, the top elevation of the placement site would be -4 feet so as not to interfere with boaters but such placement would allow potential for movement of material towards the Tybee Island shoreline by wave action. (It is important to note that this location is already reserved as a borrow site for Tybee's Island's beach renourishment program.)

The placement of this material at MLW 200, MLW 500, and ERDC Nearshore would:

* Decrease the natural wave energy in these locations and eliminate natural sources of recreation for the public.
* Have potential safety implications on swimmers, surfers, fishermen, lifeguards, and others.

* Increase environmental and ecological impact in sensitive onshore and nearshore areas, including from dredging materials washing up on beaches.
* Produce a negative economic impact on the Tybee Island due to reduced tourism.

In addition, the placement of this material at the ERDC Nearshore location could contaminate sand reserved for Tybee Island's beach renourishment program.

The placement of dredge materials at MLW 200, MLW 500 and the ERDC Nearshore locations are not necessary for SHEP to move forward. Alternative, more suitable sites should be used. The Corps of Engineers should conduct additional studies and collect additional data prior to selecting any location for depositing dredge materials.

Regards,
Charles Sparkman

From: JamesTMcKean@comcast.net
To: CESAS-PD_SAS
Subject: SHEP input
Date: Tuesday, January 25, 2011 9:00:13 AM

Dear Mr. Bailey,

I am writing to express opposition to certain locations planned for the deposit of dredge material from the Savannah Harbor Expansion Project (SHEP).
The Draft Environmental Impact Statement (EIS) identifies the following placement sites, among others, for dredge materials (reference Draft EIS pages 3-22 through 3-26):

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Best regards,
James McKean

From: Ellen Schoolar
To: CESAS-PD_SAS
Subject: Savannah Harbor Expansion Project comment
Date: Tuesday, January 25, 2011 9:07:52 AM

Dear Mr. Bailey:

I am very concerned about the impact that the harbor deepening will have on beach erosion at Tybee Island. I do not think that sufficient due diligence was performed to determine what the impact will be or how to mitigate further erosion. The Corps' near-shore disposal plan, which included dumping a 500 foot-wide platform of dredged clay and mud just three feet off the low-tide watermark, and creating a physical "island" of over 4 million cubic feet of dredged marine clay and silt just off Tybee's beach, was grossly negligent at best. I am very grateful to the Tybee City Council for hiring its own engineering consultant to evaluate the risks to Tybee that the Corps failed to consider in its plan. Furthermore, I find it preposterious that, even though Tybee's rejection of the dredged material dumping will supposedly save $10 million on the project, Tybee will not get one dime of that saved money to help renourish its beach.

I am also very concerned that the potential effects of off-shore dumping have not been evaluated. My understanding is that the ODMDS is filling up rapidly, and I do not believe that there has been any consideration of how the material in this site may shift as the site reaches capacity.

Furthermore, to be quite frank, I am perturbed that the tax payers are footing the bill for this project. I attended the information workshop at the Civic Center a few months ago, and although the information was useful and I commend the Corps for making efforts to educate the public, I was very disturbed to see that the room was filled mostly by wealthy business people (who will greatly benefit from the harbor deepening) giving themselves figurative pats on the back. The "creation of jobs" has been thrown around ad nauseam to justify this project, but the real benefit to the harbor deepening is to private corporations; not to the public. Accordingly, I emphatically feel that the costs of the harbor deepening should come from private sources. If the government wishes to create more jobs, it could do so by putting our teachers back in schools and restoring other jobs that truely benefit the public.

I strongly oppose the harbor deepening project.

Respectfully,

Ellen L. Schoolar

From: Marilyn Cramer
To: CESAS-PD, SAS
Subject: Savannah Harbor Expansion Project
Date: Tuesday, January 25, 2011 9:49:40 AM

Mr. William Bailey
ATTN: PD
US Army Corps of Engineers, Savannah District
100 W. Oglethorpe Ave.
Savannah GA 31401-3640
Dear Mr. Bailey,
I am writing to express opposition to certain locations planned for the deposit of dredge material from the Savannah Harbor Expansion Project (SHEP).
The Draft Environmental Impact Statement (EIS) identifies the following placement sites, among others, for dredge materials (reference Draft EIS pages 3-22 through 3-26):

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The placement of this material at MLW 200, MLW 500, and ERDC Nearshore would:

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- Have potential safety implications on swimmers, surfers, fishermen, lifeguards, and others.
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In addition, the placement of this material at the ERDC Nearshore location could contaminate sand reserved for Tybee Island's beach re-nourishment program.
The placement of dredge materials at MLW 200, MLW 500 and the ERDC Nearshore locations is not necessary for SHEP to move forward. Alternative, more suitable sites should be used. The Corps of Engineers should conduct additional studies and collect additional data prior to selecting any location for depositing dredge materials.
Regards,
Marilyn Cramer

Wisie, Inc.
Marilyn Cramer, *VP of Content*
1010 Olde Towne Lane

Woodstock, GA 30189
(800) 518-9760 Ext. 1012
mcramer@wisie.com
www.Wisie.com

From: Elena Corns
To: CESAS-PD, SAS
Subject: Savannah Harbor Expansion Project
Date: Tuesday, January 25, 2011 11:14:38 AM

Dear Mr. Bailey,

I am writing to express opposition to certain locations planned for the deposit of dredge material from the Savannah Harbor Expansion Project (SHEP).

The Draft Environmental Impact Statement (EIS) identifies the following placement sites, among others, for dredge materials (reference Draft EIS pages 3-22 through 3-26):

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In addition, the placement of this material at the ERDC Nearshore location could contaminate sand reserved for Tybee Island's beach renourishment program.

The placement of dredge materials at MLW 200, MLW 500 and the ERDC Nearshore locations is not necessary for SHEP to move forward. Alternative, more suitable sites should be used. The Corps of Engineers should conduct additional studies and collect additional data prior to selecting any location for depositing dredge materials.

Regards,

From: Greg McMenamy
To: CESAS-PD_SAS
Subject: Savannah Harbor Expansion Project
Date: Tuesday, January 25, 2011 10:39:11 AM

Mr. William Bailey
ATTN: PD
US Army Corps of Engineers, Savannah District
100 W. Oglethorpe Ave.
Savannah GA 31401-3640

Dear Mr. Bailey,

I am writing to express opposition to certain locations planned for the deposit of dredge material from the Savannah Harbor Expansion Project (SHEP).

The Draft Environmental Impact Statement (EIS) identifies the following placement sites, among others, for dredge materials (reference Draft EIS pages 3-22 through 3-26):

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Regards,
Greg McMenamy

Gregory B. McMenamy, Jr., Esq.
McMenamy Law

1410 Resurgens Plaza
945 East Paces Ferry Road, N.E.
Atlanta, Georgia 30326
404.846.2828
404.846.2829 (fax)
www.mcmenamylaw.com

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From: Clay Davidson
To: CESAS-PD, SAS
Subject: Georgia surf-going Community opposes proposed dumping sites that will destroy surf
Date: Tuesday, January 25, 2011 11:49:08 AM

Mr. William Bailey
ATTN: PD
US Army Corps of Engineers, Savannah District
100 W. Oglethorpe Ave.
Savannah GA 31401-3640

Dear Mr. Bailey,

While I support the dredging of the Savannah port and welcome its very real benefits it will bring statewide, I am writing to express opposition to certain locations planned for the deposit of dredge material from the Savannah Harbor Expansion Project (SHEP).

The Draft Environmental Impact Statement (EIS) identifies the following placement sites, among others, for dredge materials (reference Draft EIS pages 3-22 through 3-26):

- The placement of the dredge material at area described as MLW 200 would create a berm about 200 feet wide and 3,200 feet long directly in front the current beach.
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In addition, the placement of this material at the ERDC Nearshore location could contaminate sand reserved for Tybee Island's beach renourishment program.

The placement of dredge materials at MLW 200, MLW 500 and the ERDC Nearshore

locations is not necessary for SHEP to move forward. Alternative, more suitable sites should be used. The Corps of Engineers should conduct additional studies and collect additional data prior to selecting any location for depositing dredge materials.

Mr. Bailey, I recently moved to Georgia from Southern California. Tybee Island is a very special place that provides unique public beach access for all Georgian's to use and enjoy surfside activities. Currently, it is the best spot for a surfer to be able to access surfable waves, which are rare in Georgia given the continental shelf. While I support the port deepening, I am adamant that the Corp's consider the real negative effects the proposed dumping areas will have on all Georgian's access to surfside activities, and remain hopeful you will consider changing the location of the three contested dumping grounds to preserve the unique treasure that Tybee Island provides for all Georgians.

Kind regards,

Clay Davidson
806 Charles Allen Dr, NE
Atlanta, Georgia, 30308

From: Ginny Grigsby
To: CESAS-PD_SAS
Subject: Protect the Tybee Beaches
Date: Tuesday, January 25, 2011 1:15:20 PM

1/25/11

Ginny Grigsby

803 Creekgarden Ct.

Atlanta, GA 30339

Mr. William Bailey
ATTN: PD
US Army Corps of Engineers, Savannah District
100 W. Oglethorpe Ave.
Savannah GA 31401-3640

Dear Mr. Bailey,

I am writing to express opposition to certain locations planned for the deposit of dredge material from the Savannah Harbor Expansion Project (SHEP).

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Regards,
Ginny Grigsby, Ph.D., ABD

--
Ginny Grigsby, Ph.D., ABD
Grigsby Family Solutions, LLC
404.606.2795

From: Mike VanWagenen
To: CESAS-PD, SAS
Subject: Opposed to SHEP
Date: Tuesday, January 25, 2011 1:47:22 PM

VIA EMAIL to CESAS-PD@usace.army.mil

1/25/2011

Mr. William Bailey
ATTN: PD
US Army Corps of Engineers, Savannah District
100 W. Oglethorpe Ave.
Savannah GA 31401-3640

Dear Mr. Bailey,

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Regards.

Michael Van Wagenen
National Sales Manager
Yamaha Watercraft

From: Shelly Krueger
To: CESAS-PD_SAS
Subject: Dredge material
Date: Tuesday, January 25, 2011 1:42:40 PM

VIA EMAIL to CESAS-PD@usace.army.mil.

January 24, 2011

Shelly Krueger
907 Jones Ave
Tybee Island, GA 31328

Mr. William Bailey
ATTN: PD
US Army Corps of Engineers, Savannah District
100 W. Oglethorpe Ave.
Savannah GA 31401-3640

Dear Mr. Bailey,

I am writing to express opposition to certain locations planned for the deposit of dredge material from the Savannah Harbor Expansion Project (SHEP).

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Regards,

Shelly Krueger

VIA EMAIL to CESAS-PD@usace.army.mil.

January 24, 2011

[Organization or Individual Name and Address]

Mr. William Bailey
ATTN: PD
US Army Corps of Engineers, Savannah District
100 W. Oglethorpe Ave.
Savannah GA 31401-3640

Dear Mr. Bailey,

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Regards,

Tim Malins

Tybee retail business owner

Surfider Event Coordinator

From: Downes, Tim
To: CESAS-PD_SAS
Subject: SHEP Opposition
Date: Tuesday, January 25, 2011 5:34:48 PM

Mr. William Bailey
ATTN: PD
US Army Corps of Engineers, Savannah District
100 W. Oglethorpe Ave.
Savannah GA 31401-3640

Dear Mr. Bailey,

I am writing to express opposition to certain locations planned for the deposit of dredge material from the Savannah Harbor Expansion Project (SHEP).

The Draft Environmental Impact Statement (EIS) identifies the following placement sites, among others, for dredge materials (reference Draft EIS pages 3-22 through 3-26):

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Regards,

Tim Downes

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From: Justin Remais
To: CESAS-PD_SAS
Subject: Savannah Harbor Expansion Project
Date: Tuesday, January 25, 2011 6:04:36 PM

Mr. William Bailey
ATTN: PD
US Army Corps of Engineers, Savannah District
100 W. Oglethorpe Ave.
Savannah GA 31401-3640

Dear Mr. Bailey,

I write to express deep concern about planned locations for the deposit of dredge material from the Savannah Harbor Expansion Project (SHEP). The Draft EIS, on pages 3-22 through 3-26, identifies the following placement sites, among others, for dredge materials:

* The placement of the dredge material at area described as MLW 200 would create a berm about 200 feet wide and 3,200 feet long directly in front the current beach.
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* The placement of the dredge material at the area described as ERDC Nearshore would extend seaward from Tybee Island below the MLW contour in the nearshore area. At total capacity, the top elevation of the placement site would be -4 feet so as not to interfere with boaters but such placement would allow potential for movement of material towards the Tybee Island shoreline by wave action. (It is important to note that this location is already reserved as a borrow site for Tybee's Island's beach renourishment program.)

I am concerned that the placement of dredge material at MLW 200, MLW 500, and ERDC Nearshore would:
* Reduce natural wave energy in these locations, and impact public recreation and swimmer and fisher safety.
* Impact ecological health in sensitive onshore and nearshore areas, including from dredging materials washing up on beaches.
* Negatively impact the economy of Tybee Island, particularly by threatening the tourism industry.

What is more, the placement of dredge material at the ERDC Nearshore location could contaminate sand reserved for Tybee Island's beach renourishment program.

I urge the placement of dredge materials at locations *other than* MLW 200, MLW 500 and the ERDC Nearshore, and I request that the Corps of Engineers conduct additional studies regarding alternative placement sites, including the collection of additional ecological data, to support the selection of any locations for depositing dredge materials.

Regards,
Justin Remais
Atlanta, GA

From: Michael Collier
To: CESAS-PD, SAS
Subject: Savannah Harbor Expansion Project
Date: Tuesday, January 25, 2011 6:07:32 PM

Mr. William Bailey
ATTN: PD
US Army Corps of Engineers, Savannah District
100 W. Oglethorpe Ave.
Savannah GA 31401-3640

Dear Mr. Bailey,

I am writing to express opposition to certain locations planned for the deposit of dredge material from the Savannah Harbor Expansion Project (SHEP).

The Draft Environmental Impact Statement (EIS) identifies the following placement sites, among others, for dredge materials (reference Draft EIS pages 3-22 through 3-26):

--The placement of the dredge material at area described as MLW 200 would create a berm about 200 feet wide and 3,200 feet long directly in front the current beach.

--The placement of the dredge material at the area described as MLW 500 would extend from the North Jetty southward for 11,000 feet (2 miles). The dredge material would be placed 500 feet from the beach for the length of the placement site.

--The placement of the dredge material at the area described as ERDC Nearshore would extend seaward from Tybee Island below the MLW contour in the nearshore area. At total capacity, the top elevation of the placement site would be -4 feet so as not to interfere with boaters but such placement would allow potential for movement of material towards the Tybee Island shoreline by wave action. (It is important to note that this location is already reserved as a borrow site for Tybee's Island's beach renourishment program.)

The placement of this material at MLW 200, MLW 500, and ERDC Nearshore would:

--Decrease the natural wave energy in these locations and eliminate natural sources of recreation for the public.

--Have potential safety implications on swimmers, surfers, fishermen, lifeguards, and others.

--Increase environmental and ecological impact in sensitive onshore and nearshore areas, including from dredging materials washing up on beaches.

--Produce a negative economic impact on the Tybee Island due to reduced tourism.

In addition, the placement of this material at the ERDC Nearshore location could contaminate sand reserved for Tybee Island's beach renourishment program.

The placement of dredge materials at MLW 200, MLW 500 and the ERDC Nearshore locations is not necessary for SHEP to move forward. Alternative, more suitable sites should be used. The Corps of Engineers should conduct additional studies and collect additional data prior to selecting any location for depositing dredge materials.

Regards,

Dr. Michael J. Collier
4211 Mundy Mill Place
Oakwood, GA 30566
770-535-8160

From: Pam Longobardi
To: CESAS-PD, SAS
Subject: STOP!! Save Tybee"s Ocean Playground
Date: Tuesday, January 25, 2011 6:10:39 PM

Mr. William Bailey
ATTN: PD
US Army Corps of Engineers, Savannah District
100 W. Oglethorpe Ave.
Savannah GA 31401-3640

Dear Mr. Bailey,

As an educator deeply involved in the future of the Georgia Coast, I am writing to express opposition to certain locations planned for the deposit of dredge material from the Savannah Harbor Expansion Project (SHEP).

The Draft Environmental Impact Statement (EIS) identifies the following placement sites, among others, for dredge materials (reference Draft EIS pages 3-22 through 3-26):

--The placement of the dredge material at area described as MLW 200 would create a berm about 200 feet wide and 3,200 feet long directly in front the current beach.

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--The placement of the dredge material at the area described as ERDC Nearshore would extend seaward from Tybee Island below the MLW contour in the nearshore area. At total capacity, the top elevation of the placement site would be -4 feet so as not to interfere with boaters but such placement would allow potential for movement of material towards the Tybee Island shoreline by wave action. (It is important to note that this location is already reserved as a borrow site for Tybee's Island's beach renourishment program.)

The placement of this material at MLW 200, MLW 500, and ERDC Nearshore would:

--Decrease the natural wave energy in these locations and eliminate natural sources of recreation for the public.

--Have potential safety implications on swimmers, surfers, fishermen, lifeguards, and others.

--Increase environmental and ecological impact in sensitive onshore and nearshore areas, including from dredging materials washing up on beaches.

--Produce a negative economic impact on the Tybee Island due to reduced tourism.

In addition, the placement of this material at the ERDC Nearshore location could contaminate sand reserved for Tybee Island's beach renourishment program.

The placement of dredge materials at MLW 200, MLW 500 and the ERDC Nearshore locations is not necessary for SHEP to move forward. Alternative, more suitable sites should be used. The Corps of Engineers should conduct additional studies and collect additional data prior to selecting any location for depositing dredge materials.

Regards,
Pam Longobardi

Professor of Art, Georgia State University

1090 Standard Drive NE

Atlanta, GA 30319

From: clwisner03@aol.com
To: CESAS-PD, SAS
Subject: Savannah River Deepening
Date: Tuesday, January 25, 2011 6:27:54 PM

January 25, 2011

Mr. William Bailey
ATTN: PD
US Army Corps of Engineers, Savannah District
100 W. Oglethorpe Ave.
Savannah GA 31401-3640

Dear Mr. Bailey,
I am writing to express opposition to certain locations planned for the deposit of dredge material from the Savannah Harbor Expansion Project (SHEP).
The Draft Environmental Impact Statement (EIS) identifies the following placement sites, among others, for dredge materials (reference Draft EIS pages 3-22 through 3-26):
The placement of the dredge material at area described as MLW 200 would create a berm about 200 feet wide and 3,200 feet long directly in front the current beach.
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The placement of the dredge material at the area described as ERDC Nearshore would extend seaward from Tybee Island below the MLW contour in the nearshore area. At total capacity, the top elevation of the placement site would be -4 feet so as not to interfere with boaters but such placement would allow potential for movement of material towards the Tybee Island shoreline by wave action. (It is important to note that this location is already reserved as a borrow site for Tybee's Island's beach renourishment program.)
The placement of this material at MLW 200, MLW 500, and ERDC Nearshore would:
Decrease the natural wave energy in these locations and eliminate natural sources of recreation for the public.
Have potential safety implications on swimmers, surfers, fishermen, lifeguards, and others.
Increase environmental and ecological impact in sensitive onshore and nearshore areas, including from dredging materials washing up on beaches.
Produce a negative economic impact on the Tybee Island due to reduced tourism.
In addition, the placement of this material at the ERDC Nearshore location could contaminate sand reserved for Tybee Island's beach renourishment program.
The placement of dredge materials at MLW 200, MLW 500 and the ERDC Nearshore locations are not necessary for SHEP to move forward. Alternative, more suitable sites are available. The Corps of Engineers should conduct additional studies and collect additional data prior to selecting any location for depositing dredge materials.

Regards,
Cynthia Wisner
Coastal Georgia/ Low Cuntry Surfrider Foundation

From: deangp4
To: CESAS-PD, SAS
Subject: Savannah Harbor Expansion is a bad idea...
Date: Tuesday, January 25, 2011 6:29:34 PM

1/25/011

Mr. William Bailey
ATTN: PD
US Army Corps of Engineers, Savannah District
100 W. Oglethorpe Ave.,
Savannah GA 31401-3640

Dear Mr. Bailey,

I am writing to express opposition to certain locations planned for the deposit of dredge material from the Savannah Harbor Expansion Project (SHEP).

The Draft Environmental Impact Statement (EIS) identifies the following placement sites, among others, for dredge materials (reference Draft EIS pages 3-22 through 3-26):

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--The placement of the dredge material at the area described as ERDC Nearshore would extend seaward from Tybee Island below the MLW contour in the nearshore area. At total capacity, the top elevation of the placement site would be -4 feet so as not to interfere with boaters but such placement would allow potential for movement of material towards the Tybee Island shoreline by wave action. (It is important to note that this location is already reserved as a borrow site for Tybee's Island's beach renourishment program.)

The placement of this material at MLW 200, MLW 500, and ERDC Nearshore would:

--Decrease the natural wave energy in these locations and eliminate natural sources of recreation for the public.

--Have potential safety implications on swimmers, surfers, fishermen, lifeguards, and others.

--Increase environmental and ecological impact in sensitive onshore and nearshore areas, including from dredging materials washing up on beaches.

--Produce a negative economic impact on the Tybee Island due to reduced tourism.

In addition, the placement of this material at the ERDC Nearshore location could contaminate sand reserved for Tybee Island's beach renourishment program.

The placement of dredge materials at MLW 200, MLW 500 and the ERDC Nearshore locations is not necessary for SHEP to move forward. Alternative, more suitable sites should be used. The Corps of Engineers should conduct additional studies and collect additional data prior to selecting any location for depositing dredge materials.

Regards,
Dean A. Gower
Surfrider member

From: Keith
To: CESAS-PD, SAS
Subject: Dredge Material Placement
Date: Tuesday, January 25, 2011 8:45:46 PM

1/25/011

Mr. William Bailey
ATTN: PD
US Army Corps of Engineers, Savannah District
100 W. Oglethorpe Ave.
Savannah GA 31401-3640

Dear Mr. Bailey,

I am writing to express opposition to certain locations planned for the deposit of dredge material from the Savannah Harbor Expansion Project (SHEP).

The Draft Environmental Impact Statement (EIS) identifies the following placement sites, among others, for dredge materials (reference Draft EIS pages 3-22 through 3-26):

--The placement of the dredge material at area described as MLW 200 would create a berm about 200 feet wide and 3,200 feet long directly in front the current beach.

--The placement of the dredge material at the area described as MLW 500 would extend from the North Jetty southward for 11,000 feet (2 miles). The dredge material would be placed 500 feet from the beach for the length of the placement site.

--The placement of the dredge material at the area described as ERDC Nearshore would extend seaward from Tybee Island below the MLW contour in the nearshore area. At total capacity, the top elevation of the placement site would be -4 feet so as not to interfere with boaters but such placement would allow potential for movement of material towards the Tybee Island shoreline by wave action. (It is important to note that this location is already reserved as a borrow site for Tybee's Island's beach renourishment program.)

The placement of this material at MLW 200, MLW 500, and ERDC Nearshore would:

--Decrease the natural wave energy in these locations and eliminate natural sources of recreation for the public.

--Have potential safety implications on swimmers, surfers, fishermen, lifeguards, and others.

--Increase environmental and ecological impact in sensitive onshore and nearshore

areas, including from dredging materials washing up on beaches.

--Produce a negative economic impact on the Tybee Island due to reduced tourism.

In addition, the placement of this material at the ERDC Nearshore location could contaminate sand reserved for Tybee Island's beach renourishment program.

The placement of dredge materials at MLW 200, MLW 500 and the ERDC Nearshore locations is not necessary for SHEP to move forward. Alternative, more suitable sites should be used. The Corps of Engineers should conduct additional studies and collect additional data prior to selecting any location for depositing dredge materials.

Regards,

Keith J. Kuns
PO Box 2032
Loganville, GA 30052
678.227.9386

From: Caroline Tsuji
To: CESAS-PD_SAS
Subject: Tybee Island
Date: Wednesday, January 26, 2011 12:06:55 AM

January 25, 2011

Mr. William Bailey
ATTN: PD
US Army Corps of Engineers, Savannah District
100 W. Oglethorpe Ave.
Savannah GA 31401-3640

Dear Mr. Bailey,

I am writing to express opposition to certain locations planned for the deposit of dredge material from the Savannah Harbor Expansion Project (SHEP).

The Draft Environmental Impact Statement (EIS) identifies the following placement sites, among others, for dredge materials (reference Draft EIS pages 3-22 through 3-26):

--The placement of the dredge material at area described as MLW 200 would create a berm about 200 feet wide and 3,200 feet long directly in front the current beach.

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The placement of this material at MLW 200, MLW 500, and ERDC Nearshore would:

--Decrease the natural wave energy in these locations and eliminate natural sources of recreation for the public.

--Have potential safety implications on swimmers, surfers, fishermen, lifeguards, and others.

--Increase environmental and ecological impact in sensitive onshore and nearshore areas, including from dredging materials washing up on beaches.

--Produce a negative economic impact on the Tybee Island due to reduced tourism.

In addition, the placement of this material at the ERDC Nearshore location could contaminate sand reserved for Tybee Island's beach renourishment program.

The placement of dredge materials at MLW 200, MLW 500 and the ERDC Nearshore locations is not necessary for SHEP to move forward. Alternative, more suitable sites should be used. The Corps of Engineers should conduct additional studies and collect additional data prior to selecting any location for depositing dredge materials.

Regarus

From: Savannah Canoe
To: CESAS-PD, SAS
Subject: SHEP PROPOSAL
Date: Wednesday, January 26, 2011 9:02:18 AM

January 25, 2011

Nigel Law
Savannah Canoe & Kayak

Mr. William Bailey
ATTN: PD
US Army Corps of Engineers, Savannah District
100 W. Oglethorpe Ave.
Savannah GA 31401-3640

Dear Mr. Bailey,
I am writing to express opposition to certain locations planned for the deposit of dredge material from the Savannah Harbor Expansion Project (SHEP).
The Draft Environmental Impact Statement (EIS) identifies the following placement sites, among others, for dredge materials (reference Draft EIS pages 3-22 through 3-26):

- The placement of the dredge material at area described as MLW 200 would create a berm about 200 feet wide and 3,200 feet long directly in front the current beach.
- The placement of the dredge material at the area described as MLW 500 would extend from the North Jetty southward for 11,000 feet (2 miles). The dredge material would be placed 500 feet from the beach for the length of the placement site.
- The placement of the dredge material at the area described as ERDC Nearshore would extend seaward from Tybee Island below the MLW contour in the nearshore area. At total capacity, the top elevation of the placement site would be -4 feet so as not to interfere with boaters but such placement would allow potential for movement of material towards the Tybee Island shoreline by wave action. (It is important to note that this location is already reserved as a borrow site for Tybee's Island's beach renourishment program.)

The placement of this material at MLW 200, MLW 500, and ERDC Nearshore would:

- Decrease the natural wave energy in these locations and eliminate natural sources of recreation for the public.
- Have potential safety implications on swimmers, surfers, fishermen, lifeguards, and others.
- Increase environmental and ecological impact in sensitive onshore and nearshore areas, including from dredging materials washing up on beaches.
- Produce a negative economic impact on the Tybee Island due to reduced tourism.

In addition, the placement of this material at the ERDC Nearshore location could contaminate sand reserved for Tybee Island's beach renourishment program.
The placement of dredge materials at MLW 200, MLW 500 and the ERDC Nearshore locations are not necessary for SHEP to move forward. Alternative, more suitable sites are available. The Corps of Engineers should conduct additional studies and collect additional data prior to selecting any location for depositing dredge materials.

Regards,

N. Law

Savannah Canoe and Kayak
Nigel & Kristin Law
(912) 341-9502
info@savannahcanoeandkayak.com

Join the SC&K NEWSLETTER..
www.savannahcanoeandkayak.com

The following responses address the concerns of the previous 33 emails and letters, which express similar concerns.

Surfrider Foundation - Form Letter

604-MR-04-EN01, 604-MR-04-EV01, 604-MR-04-EV02, 604-MR-04-EC01

Comment: *The creation of this would serve to:*

- *Decrease the natural wave energy in these locations and eliminate natural sources of recreatio for the public.*
- *Have potential safety implications on the swimmers, fisherman, beach and water goers, and on the City of Tybee Lifegaurds.*
- *Increase environmental and ecological impact from the material and the placement of the dredge material.*
- *Produce a negative economical impact on the Tybee Island, if tourism is reduced in any way.*

Response: The project's potential impacts to longshore currents were considered during design of the nearshore placement sites. Modeling predicted that if placement occurred during the winter months [nominal recreational use], the material would become incorporated into the shoreline prior to the swimming season.

After receipt of this letter and others during the public comment period together with coordination wil GA DNR-CRD and the City of Tybee Island, the District has revised the dredged material placement plan for sediments excavated from the entrance channel. Now, new work sediments excavated from the entrance channel will be deposited only in previously-approved areas: the Offshore Dredged Material Disposal Site or an upland confined disposal area. Since these locations are currently used for disposal negative impacts to tourism would be unlikely.

The Final EIS details the revised sediment placement plan.

From: Gene Best
To: CESAS-PD, SAS
Subject: Lake Hartwell
Date: Monday, December 27, 2010 2:19:14 PM

I am in agreement with all of the below, and would like to know who authorizes the Corp to release water to the Savannah River, and why, or if the Corps has authority where does the authority come from ?

First the Corps has issued a timid request for comments on dropping Lake Thurmond releases January 1 - February 15.

Second the Corps has requested comments on deepening the harbour at Savannah.

Item 1 is ridiculous. The drought of 2008 gave us all the data anyone could want saying lower releases to prevent losing the lakes is acceptable. The Corps is now acting as if they have no previous information and is timidly offering a token reduction in flows for one and a half months. This measure after the lake is already down over 6ft and for only a month and a half is like spitting in the ocean.

Please request the Corps to use the information gathered in the last drought and follow the recommendations of Save Our Lakes Now, Friends of the Savannah River Basin, and Lake Hartwell Association to drop flows to 3600 cfs anytime Lake Thurmond is down more than 2' from full pool.

Item 2 is deceptive. Hidden in the proposal to deepen the harbour is a provision to put a fish ladder in around the Augusta Lock and Dam so Sturgeon can swim up river to the Augusta Shoals. This would greatly complicate future drought plans in that the sturgeon spawning in the shoals would tie our hands on lake releases during a drought. The Sturgeon have not been able to get to the shoals since 1937 so is very unwise to tamper with mother nature and suddenly have an endangered species in harms way during droughts.

Please request the Corps not to tamper with mother nature by putting a fish ladder in around the Augusta Lock and Dam which could endanger an already endangered species during droughts.

Overall it would be good if your response could include one question. Who authorized the Corps to release more water to the Savannah River than nature provides. Such a practice is bound to get us in trouble repeatedly.

Your comments should be emailed to: cesas-pd.sas@usace.army.mil or mailed to: William Bailey, USACE Savannah District, PO Box 889, Savannah, GA 31402 and your comments should be labeled COMMENTS CONCERNING DEEPENING SAVANNAH HARBOUR AND TEMPORARY REDUCTION OF FLOWS FROM THURMOND DAM

From: Rex Millsap
To: CESAS-PD_SAS
Subject: COMMENTS CONCERNING DEEPENING SAVANNAH HARBOUR AND TEMPORARY REDUCTION OF FLOWS FROM THURMOND DAM.
Date: Tuesday, December 28, 2010 10:31:20 AM

William Bailey, USACE Savannah District

Dear Mr. Bailey,

After going through the drought of 2008 and having the lake down 22 feet, I am extremely concerned about this sturgeon program being considered.

The corps used drastic measures in closing the Hartwell dam for 51 days and that flexibility would disappear completely if the sturgeon program goes through.

It is my understanding that the sturgeon haven't been able to reach the Augusta shoals since 1937. I'm sure that putting the entire Savannah basin lakes at economic risk is not worth creating a new sturgeon spawn area.

Thank you for your efforts.

Rex N. Millsap

Executive Data Services

770-314-5077 Skype 678-534-8512

From: Fox, Warner S.
To: CESAS-PD, SAS
Subject: Comments concerning deepening Savannah Harbour and temporary reduction of flows from Thurmond dam
Date: Monday, January 03, 2011 9:53:01 PM

Mr. Bailey,

As a life long frequenter of Lake Hartwell I write to express extreme concern about the impact your potential plans above will have on Lake Hartwell water levels if the plan comes to fruition. There is no reason that those of us that frequent lake Hartwell should suffer reduced water levels to benefit a deepening of the harbor. I personally do not believe for a second that this won't have a deleterious impact on lake Hartwell. We just came through a multi year drought and dramatically decreased lake levels. Now is not the time to further tamper with lake levels. Frankly, I can't comprehend why Hartwell is currently down as far as it is. It assumes frequent rain in the Spring. What if that assumption is mistaken as has happened too often in the past? We all know the answer. Hartwell will suffer yet another year of levels below "normal"

Please looks back at the information you gathered in the last drought. It's not difficult science as you know. I would ask that you follow the recommendations of Save Our Lakes Now and the LWA and drop flows to 3600 cfs if Thurmond drops more than 2 feet from full pool.

Why would you install a fish ladder? We don't need tampering with nature although I do understand that is in the corps nature. It can only lead to the alleged "need" to release more water.

Those of us that use the lake, own property there, or simply enjoy the beauty of it should not have to suffer further for the benefit of those downstream. I have personally seen the consequences (economic and otherwise) of droughts at Hartwell. No "study" will convince those of use closely connected with the lake otherwise. Thank you for your consideration.

Warner S Fox.

From: Rex Millsap
To: CESAS-PD_SAS
Subject: COMMENTS CONCERNING DEEPENING SAVANNAH HARBOUR AND TEMPORARY REDUCTION OF FLOWS FROM THURMOND DAM.
Date: Tuesday, December 28, 2010 10:31:20 AM

William Bailey, USACE Savannah District

Dear Mr. Bailey,

After going through the drought of 2008 and having the lake down 22 feet, I am extremely concerned about this sturgeon program being considered.

The corps used drastic measures in closing the Hartwell dam for 51 days and that flexibility would disappear completely if the sturgeon program goes through.

It is my understanding that the sturgeon haven't been able to reach the Augusta shoals since 1937. I'm sure that putting the entire Savannah basin lakes at economic risk is not worth creating a new sturgeon spawn area.

Thank you for your efforts.

Rex N. Millsap

Executive Data Services

770-314-5077 Skype 678-534-8512

From: Rex Millsap
To: CESAS-PD_SAS
Subject: COMMENTS CONCERNING DEEPENING SAVANNAH HARBOUR AND TEMPORARY REDUCTION OF FLOWS FROM THURMOND DAM.
Date: Tuesday, December 28, 2010 10:31:20 AM

William Bailey, USACE Savannah District

Dear Mr. Bailey,

After going through the drought of 2008 and having the lake down 22 feet, I am extremely concerned about this sturgeon program being considered.

The corps used drastic measures in closing the Hartwell dam for 51 days and that flexibility would disappear completely if the sturgeon program goes through.

It is my understanding that the sturgeon haven't been able to reach the Augusta shoals since 1937. I'm sure that putting the entire Savannah basin lakes at economic risk is not worth creating a new sturgeon spawn area.

Thank you for your efforts.

Rex N. Millsap

Executive Data Services

770-314-5077 Skype 678-534-8512

From: Jerry Clontz
To: CESAS-PD_SAS
Subject: Response to two Corps Requests for Comment
Date: Tuesday, December 28, 2010 7:19:53 PM

---

1) Concerning the proposed lowering of release rate from Lake Thurmond for January - February 15,

First we at Save Our Lakes Now would like to know by what authority the Corps is sending more water down the Savannah than that provided by mother nature. Such practices in banking lead to bankruptcy and in managing lake releases lead to the possibility of destroying the whole system. We can not find anywhere a proclamation or law or communication from any responsible authority such as congress, the state of SC or GA, to follow such a practice. Second we can not see any reason to run a 1 1/2 month test when we have already run a 14 month test during the last drought. While we like the idea of reducing release rates we see no reason for an EA or for increasing flows above 3600 once the decrease has started until Lake Thurmond is again at full pool.

2) Concerning the deepening of Savannah Harbor

We at Save Our Lakes Now feel we have no reason to discourage the deepening of Savannah. But at the same time we are totally against the idea of building a fish ladder around the lock and dam to permit Short Nosed Sturgeon to reach the Augusta Shoals. The Short Nosed Sturgeon have not been able to reach the shoals since 1937. In our opinion suddenly opening a way for them to reach the Shoals is man tampering with nature which in itself is usually not wise. But additionally in view of all the past discussions about how drought flows complicate Sturgeon spawning (I wonder what they did before there was a dam; did they just die off when a drought occured) introducing them to the shoals potentially is endangering and endangered species and shoud not be done.

Jerry Clontz, Spokesman for Save Our Lakes Now

From: Rick and Pat Carter
To: CESAS-PD_SAS
Subject: COMMENTS CONCERNING DEEPENING SAVANNAH HARBOUR AND TEMPORARY REDUCTION OF FLOWS FROM THURMOND DAM.
Date: Wednesday, December 29, 2010 9:17:33 AM

I am a home owner on Lake Hartwell. Here are my comments:

Please use the information gathered in the last drought and follow the recommendations of Save Our Lakes Now, Friends of the Savannah River Basin, and Lake Hartwell Association to drop flows to 3600 cfs anytime Lake Thurmond is down more than 2' from full pool. WHICH IS RIGHT NOW!!!!! . I would like to know who authorized the Corps to release more water to the Savannah River than nature provides. Such a practice is bound to get us in trouble repeatedly. STOP STEALING MY WATER FOR BENEFIT OF OTHERS DOWN STREAM! I am paying significantly increased property taxes for waterfront property which goes to pay your salary and for all the corp, so I have a right to this water and you are STEALING it.

Also, please do not to tamper with mother nature by putting a fish ladder in around the Augusta Lock and Dam which could endanger an already endangered species during droughts.

Regards,

Richard Carter

From: jerry clontz [mailto:clontz_jerry@bellsouth.net]
Sent: Thursday, December 23, 2010 10:09 AM
To: Undisclosed-Recipient: ;@smtp101.sbc.mail.ac4.yahoo.com
Subject: YOUR HELP NEEDED WITH RESPONSE TO CORPS ON LAKE THURMOND

First the Corps has issued a timid request for comments on dropping Lake Thurmond releases January 1 - February 15.

Second the Corps has requested comments on deepening the harbour at Savannah.

Item 1 is ridiculous. The drought of 2008 gave us all the data anyone could want saying lower releases to prevent losing the lakes is acceptable. The Corps is now acting as if they have no previous information and is timidly offering a token reduction in flows for one and a half months. This measure after the lake is already down over 6ft and for only a month and a half is like spitting in the ocean.

Please request the Corps to use the information gathered in the last drought and follow the recommendations of Save Our Lakes Now, Friends of the Savannah River Basin, and Lake Hartwell Association to drop flows to 3600 cfs anytime Lake Thurmond is down more than 2' from full pool.

Item 2 is deceptive. Hidden in the proposal to deepen the harbour is a provision to put a fish ladder in around the Augusta Lock and Dam so Sturgeon can swim up river to the Augusta Shoals. This would greatly complicate future drought plans in that the sturgeon spawning in the shoals would tie our hands on lake releases during a drought. The Sturgeon have not been able to get to the shoals since 1937 so is very unwise to tamper with mother nature and suddenly have an endangered species in harms way during droughts.

Please request the Corps not to tamper with mother nature by putting a fish ladder in around the Augusta Lock and Dam which could endanger an already endangered species during droughts.

Overall it would be good if your response could include one question. Who authorized the Corps to release more water to the Savannah River than nature provides. Such a practice is bound to get us in trouble repeatedly.

Your comments should be emailed to: cesas-pd.sas@usace.army.mil or mailed to:

William Bailey, USACE Savannah District, PO Box 889, Savannah, GA 31402

and your comments should be labeled COMMENTS CONCERNING DEEPENING SAVANNAH HARBOUR AND TEMPORARY REDUCTION OF FLOWS FROM THURMOND DAM.

From: Mike Massey
To: CESAS-PD_SAS
Cc: Don Bowen; Kevin Bryant
Subject: Corps Requests for Comment
Date: Wednesday, December 29, 2010 8:46:42 AM

To the Corps –

A - Attached are my comments regarding the reduction of water flows out of the dam –

I agree with the reduction of water from Thurmond Dam. However:

1. This six week reduction just seems too little, too late. It does not make sense to me that this effort to request comments for an EA would start in Mid-December and the plan to reduce water would start in Mid-January. This potential issue was anticipated many months ago – even if the winter is the best time to reduce flows. Billions of gallons have been sent downriver already and there has been little definition to anyone why that was necessary. PLEASE make that clear! It MAY HAVE BEEN necessary but the Corps does not clearly define why to the basin stakeholders. This is part of the GROWING gathering of individuals and organizations into a grass roots attempt to change the current process.
2. A similar EA was completed during the prior drought. It would be nice if the Corps could define for us what the difference is from that time period so we can make a more informed comment this time. We realize the Federal Government has strict rules to follow but we also know there are ways to change them. Continuing studies when variables are similar each time (if they are) will provide a wealth of information to assist the public (and therefore the Corps) to have the rules changed. Having all the information provided to the Corps regarding similar or prior requests/reviews is significant in that effort.
3. We would like to recommend the Corps publish ALL comments they have received regarding this request on a web site that anyone can access so everyone can review the comments.

B - The Savannah Harbor Deepening –

1. We agree with many other people that the deepening of the harbor is necessary to maintain future commerce in the area.
2. We do not agree that a process to spend millions of dollars and have millions of gallons of water virtually lost in order to provide an extremely questionable process to allow the potential passage of short-nosed sturgeon further up the river. I have reviewed most reports and studies – Federal and State – regarding these fish and almost all of them present very inconclusive results. No money or time should be spent on this process until a clear result has been identified. It may be possible to design and plan for a future passage without the actual construction. I expect not to do so may result in law suits to prevent it.

Mike and Petra Massey

103 Shady Lane

Anderson, SC 29625

From: JAMES WILKES
To: CESAS-PD_SAS
Subject: COMMENTS CONCERNING DEEPENING SAVANNAH HARBOUR AND TEMPORARY REDUCTION OF FLOWS FROM THURMOND DAM
Date: Wednesday, December 29, 2010 9:37:01 PM

Dear Mr Baily,

I am an engineer who works and lives in Greenville, SC. I grew up in Lincolnton Ga and have enjoyed all the lakes on the Savannah river since I was a kid. It has been very disappointing to see the lake levels drop to such low levels while the corp ignores all the data gathered over the last 50 years. Why is it necessary to let the lakes drop to dangerously low levels before we start adjusting the flows. That's like having a canteen of water in the desert and knowing you have a hole in it but you ignore the problem until it's almost empty. I have read many of the documents on the lake and can't find any requirement for the lakes to insure that the river keeps flowing, nor can I find any requirement or approval for the corp to release more water than mother nature provides. On the contrary, the lakes were put in for flood control and water conservation. Based on data from the last drought, outflows at 3600cfs were proved to be successful so why don't we start these flows when the lake drops more than 2 feet instead of at dangerously low levels. This helps the lake maintain a reasonable level and insures that the river does have water in an extended drought.

One other practice I don't understand is why the lakes are dropped 4 feet in the fall and winter. I keep hearing that it's because of heavy rains during this period but based on the data from your website the average rainfall over the area is pretty consistent at around 5" for every month of the year. Even if you look at the highest months rainfall over the past 50 years it doesn't occur during this period. I know the drought plan was composed many years ago but with all the technology we have today you think we could develop a better plan.

Lake Hartwell was 3 feet over normal pool back in July and is now down almost 10 feet from that level in 6 months. We are only a few inches behind in the yearly rainfall. Being an engineer, I would think that the engineers at the corp could use the data they have and learn from the past to better manage the precious water we have.

On the other subject, I support deepening the harbor but I don't understand why we need to waste tax payers money to install a fish ladder. It's tag on legislation like this that is killing this country so please take this out of the proposal. Not sure what is trying to be achieved with this ladder but I don't see that it will benefit anyone, it will only create more problems in the future.

Sincerely,

Jimmy Wilkes

From: Toni Gleeson
To: CESAS-PD_SAS
Subject: Comments on Proposal to Deeping Savanah Harbour, Lower Lake Levels and Build Fish Ladder
Date: Thursday, December 30, 2010 8:36:54 AM

William Bailey
USACE Savannah District
PO Box 889
Savannah, GA 31402

Dear Mr. Bailey,

We have read the ACofE proposal for deepening the Savannah harbor, lowering the Savannah River lake levels, and building fish ladders for Sturgeon and we are deeply concerned.

The impact from the 2007 and 2008 drought should have furthered encouraged the ACofE that the lake levels need to be maintained and conserved not lowered. During these time of drought and Lake Thurmond drops 2 feet below full pool, then outflows should be limited to no more than 3600 cfs. If water is not entering the lake during natural weather systems, then the lake does not have the extra water to provide.

What is more concerning, it the proposal to install fish ladders so that the Sturgeons, can swim up stream, a process they can not currently accomplish in a natural environment. Why would the ACofE want to provide the Sturgeons a tool that is not necessary? In addition, to the wasted money, this would require additional release of water to maintain the ladder system. Additional pressure on an already over taxed river system is not viable.

We understand the economic impact of the Savannah River systems is not a concern for the ACofE. However, as resident what the ACofE is proposing is devastating to our communities, the natural beauty of the area, and future growth.

We implore you to consider a much more conservative approach, including leaveing lake levels alone, reducing outflows during drought, and do not installing fish ladders.

Sincerely,

Antoinette and Todd Gleeson

From: CESAS-PD, SAS
To: CESAS-PD, SAS
Subject: FW: COMMENTS CONCERNING DEEPENING SAVANNAH HARBOUR AND TEMPORARY REDUCTION OF FLOWS FROM THURMOND DAM (UNCLASSIFIED)
Date: Thursday, December 30, 2010 3:36:19 PM

Classification: UNCLASSIFIED
Caveats: NONE

From: JAMES WILKES [mailto:rwilkes1@bellsouth.net]
Sent: Wednesday, December 29, 2010 9:37 PM
To: CESAS-PD, SAS
Subject: COMMENTS CONCERNING DEEPENING SAVANNAH HARBOUR AND TEMPORARY REDUCTION OF FLOWS FROM THURMOND DAM

Dear Mr Baily,

I am an engineer who works and lives in Greenville, SC. I grew up in Lincolnton Ga and have enjoyed all the lakes on the Savannah river since I was a kid. It has been very disappointing to see the lake levels drop to such low levels while the corp ignores all the data gathered over the last 50 years. Why is it necessary to let the lakes drop to dangerously low levels before we start adjusting the flows. That's like having a canteen of water in the desert and knowing you have a hole in it but you ignore the problem until it's almost empty. I have read many of the documents on the lake and can't find any requirement for the lakes to insure that the river keeps flowing, nor can I find any requirement or approval for the corp to release more water than mother nature provides. On the contrary, the lakes were put in for flood control and water conservation. Based on data from the last drought, outflows at 3600cfs were proved to be successful so why don't we start these flows when the lake drops more than 2 feet instead of at dangerously low levels. This helps the lake maintain a reasonable level and insures that the river does have water in an extended drought.

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Sincerely,

Jimmy Wilkes

Classification: UNCLASSIFIED
Caveats: NONE

From: CESAS-PD, SAS
To: CESAS-PD, SAS
Subject: FW: Lake Thurmond Releases/Deepening Harbor (UNCLASSIFIED)
Date: Monday, January 03, 2011 6:45:21 PM

Classification: UNCLASSIFIED
Caveats: FOUO

From: Steve & Brenda Bigelow [mailto:bigelowlake@gmail.com]
Sent: Thursday, December 23, 2010 3:53 PM
To: CESAS-PD, SAS
Subject: Lake Thurmond Releases/Deepening Harbor

I am very concerned about the disregard of the information gathered in the last drought by the Save Our Lakes Now, Friends of the Savannah River Basin and Lake Hartwell Assoicaiton. These groups requested that flows drop to 3600 cfs anytime Thurmond is down more than 2' from full pool. It is down more than 6' and has been for more than a month. Please consider the former proposal and act more proactively when the lake levels drop.

As to the harbor proposal, I am not in favor of creating a fish ladder around the August Lock and Dam. This will create additional complications to lake releases by introducting an endangered species where not has existed in this area for more than 70 years.

I do not believe that the Corps has authority or an obligation to release more water to the Savannah River than nature provides. Please take my comments into consideration when making decisions on the above proposals. Thank you.

Brenda Bigelow

Classification: UNCLASSIFIED
Caveats: FOUO

From: CESAS-PD, SAS
To: CESAS-PD, SAS
Subject: FW: COMMENTS CONCERNING DEEPENING SAVANNAH HARBOUR AND TEMPORARY REDUCTION OF FLOWS FROM THURMOND DAM. (UNCLASSIFIED)
Date: Monday, January 03, 2011 6:56:08 PM

Classification: UNCLASSIFIED
Caveats: FOUO

From: lynnesewell@comcast.net [mailto:lynnesewell@comcast.net]
Sent: Sunday, December 26, 2010 11:59 AM
To: CESAS-PD, SAS
Subject: COMMENTS CONCERNING DEEPENING SAVANNAH HARBOUR AND TEMPORARY REDUCTION OF FLOWS FROM THURMOND DAM.

Hello,

I would like to make the following requests:

1. Please use the information gathered in the last drought and follow the recommendations of Save Our Lakes Now, Friends of the Savannah River Basin, and Lake Hartwell Association to drop flows to 3600 cfs anytime Lake Thurmond is down more than 2' from full pool.

2. Please do not to tamper with mother nature by putting a fish ladder in around the Augusta Lock and Dam which could endanger an already endangered species during droughts.

I would also like to ask the following question:

Who authorized the Corps to release more water to the Savannah River than nature provides? Such a practice is bound to get us in trouble repeatedly.

Lynne Sewell

Classification: UNCLASSIFIED
Caveats: FOUO

From: CESAS-PD, SAS
To: CESAS-PD, SAS
Subject: FW: COMMENTS TO CORPS ON LAKE THURMOND water releases (UNCLASSIFIED)
Date: Monday, January 03, 2011 6:57:02 PM

Classification: UNCLASSIFIED
Caveats: FOUO

From: RONALD K STEPP [mailto:stepprbw1@bellsouth.net]
Sent: Sunday, December 26, 2010 3:14 PM
To: CESAS-PD, SAS
Cc: stepprbw1@bellsouth.net
Subject: Fw: COMMENTS TO CORPS ON LAKE THURMOND water releases

As a home owner on lake Hartwell, I respectfully ask the corps for the following:

Item 1. follow the recommendations of Save our Lakes Now and drop outflows to 3600 cfs anytime Lake Thurmond is down more than 2 ft. from full pool.

Item 2. Do not put fish ladder in around Augusta Lock and Dam..
Item 3. Who Authorized the Corps to the release more water to the Savannah River than nature provides?

THANKS,
Ronnie Stepp

First the Corps has issued a timid request for comments on dropping Lake Thurmond releases January 1 - February 15.

Second the Corps has requested comments on deepening the harbour at Savannah.

Item 1 is ridiculous. The drought of 2008 gave us all the data anyone could want saying lower releases to prevent losing the lakes is acceptable. The Corps is now acting as if they have no previous information and is timidly offering a token reduction in flows for one and a half months. This measure after the lake is already down over 6ft and for only a month and a half is like spitting in the ocean.

Please request the Corps to use the information gathered in the last drought and follow the recommendations of Save Our Lakes Now, Friends of the Savannah River Basin, and Lake Hartwell Association to drop flows to 3600 cfs anytime Lake Thurmond is down more than 2' from full pool.

Item 2 is deceptive. Hidden in the proposal to deepen the harbour is a provision to put a fish ladder in around the Augusta Lock and Dam so Sturgeon can swim up river to the Augusta Shoals. This would

greatly complicate future drought plans in that the sturgeon spawning in the shoals would tie our hands on lake releases during a drought. The Sturgeon have not been able to get to the shoals since 1937 so is very unwise to tamper with mother nature and suddenly have an endangered species in harms way during droughts.

Please request the Corps not to tamper with mother nature by putting a fish ladder in around the Augusta Lock and Dam which could endanger an already endangered species during droughts.

Overall it would be good if your response could include one question. Who authorized the Corps to release more water to the Savannah River than nature provides. Such a practice is bound to get us in trouble repeatedly.

Your comments should be emailed to: cesas-pd.sas@usace.army.mil or mailed to:

William Bailey, USACE Savannah District, PO Box 889, Savannah, GA 31402

and your comments should be labeled COMMENTS CONCERNING DEEPENING SAVANNAH HARBOUR AND TEMPORARY REDUCTION OF FLOWS FROM THURMOND DAM.

Classification: UNCLASSIFIED
Caveats: FOUO

From: CESAS-PD, SAS
To: CESAS-PD, SAS
Subject: FW: Comments on Proposal to Deeping Savanah Harbour, Lower Lake Levels and Build Fish Ladder (UNCLASSIFIED)
Date: Monday, January 03, 2011 7:09:21 PM

Classification: UNCLASSIFIED
Caveats: FOUO

From: Toni Gleeson [mailto:antoinette_gleeson@yahoo.com]
Sent: Thursday, December 30, 2010 8:37 AM
To: CESAS-PD, SAS
Subject: Comments on Proposal to Deeping Savanah Harbour, Lower Lake Levels and Build Fish Ladder

William Bailey

USACE Savannah District

PO Box 889

Savannah, GA 31402

Dear Mr. Bailey,

We have read the ACofE proposal for deepening the Savannah harbor, lowering the Savannah River lake levels, and building fish ladders for Sturgeon and we are deeply concerned.

The impact from the 2007 and 2008 drought should have furthered encouraged the ACofE that the lake levels need to be maintained and conserved not lowered. During these time of drought and Lake Thurmond drops 2 feet below full pool, then outflows should be limited to no more than 3600 cfs. If water is not entering the lake during natural weather systems, then the lake does not have the extra water to provide.

What is more concerning, it the proposal to install fish ladders so that the Sturgeons, can swim up stream, a process they can not currently accomplish in a natural environment. Why would the ACofE want to provide the Sturgeons a tool that is not necessary? In addition, to the wasted money, this would require additional release of water to maintain the ladder system. Additional pressure on an already over taxed river system is not viable.

We understand the economic impact of the Savannah River systems is not a concern for the ACofE. However, as resident what the ACofE is proposing is devastating to our communities, the natural beauty of the area, and future growth.

We implore you to consider a much more conservative approach, including leaveing lake levels alone, reducing outflows during drought, and do not installing fish ladders.

Sincerely,

Antoinette and Todd Gleeson

Classification: UNCLASSIFIED
Caveats: FOUO

The following responses address the concerns of the previous 15 emails, which express similar concerns.

514-MR-01-EV01, 515-MR-01-EV01, 517-MR-01-EV01, 518-MR-01-EV01, 519-MR-01-EV01, 520-MR-01-EV01, 522-MR-01-EV01, 523-MR-01-EV01, 544-MR-01-EV01, 545-MR-01-EV01, 546-MR-01-EV01, 547-MR-01-EV01, 548-MR-01-EV01, 549-MR-01-EV01

Comment: ***Item 2*** *is deceptive. Hidden in the proposal to deepen the harbour is a provision to put a fish ladder in around the Augusta Lock and Dam so Sturgeon can swim up river to the Augusta Shoals. This would greatly complicate future drought plans in that the sturgeon spawning in the shoals would tie our hands on lake releases during a drought. The Sturgeon have not been able to get to the shoals since 1937 so is very unwise to tamper with mother nature and suddenly have an endangered species in harms way during droughts.*

Response: Passage upstream by anadromous fish [during the later winter/spring spawning season] is permanently blocked by the New Savannah Bluff Lock and Dam . Given this situation, all Cooperating Agencies and the Fisheries Interagency Coordination Team support a fish bypass structure [at the Dam] since it will provide Shortnose sturgeon with access to historic spawning areas at the Augusta Shoals. The intent is to increase the population levels of the endangered Shortnose sturgeon. Release rates [duration/amount] from the upstream dams will not be changed due to the proposed fish passage. NOAA Fisheries, who has the responsibility to manage SNS under the Endangered Species Act, believes that the proposed bypass is needed to compensate for adverse impacts to sturgeon habitat in the estuary.

From: Waters, Charles (SAVANNAH, GA)
To: CESAS-PD, SAS
Subject: Port Deepening - Against
Date: Wednesday, December 15, 2010 10:22:29 AM

I'm not so sure that this is a good idea. I'm sure it would help the Savannah economy grow, but we are really getting to the limits on what we can accept as we continue to degrade our environment. We substantially impact the wildlife preserve (a major flyway) and the river bottom ecosystem.

How much can we endanger the aquifer before we are drinking brackish water?

I was born here and have lived here most of my life.

Environmental replacement costs are not calculated in the P/L statement of companies – they are "externalities" that the public looses. We pay for them.

If I had a vote, I would vote "no".

Don Waters

221 E 44th St

Savannah GA 31405

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Charles Waters

182-MR-02-EV01
Comment: *How much can we endanger the aquifer before we are drinking brackish water?*

Response: The Corps performed extensive analyses to determine potential SHEP-related impacts to the Upper Floridan aquifer [documented in GRR- Section 8.2.1, GRR-Appendix C Attachment 3, Supplemental Materials, and EIS-Section 5.05. These analyses concluded harbor deepening will have a minimal incremental effect on the present rate of saltwater intrusion into the aquifer. It was also determined that deepening will produce an insignificant change in penetration of chlorides through the confining layer when compared to the status quo [no-action alternative]. In model simulations, chloride concentrations decrease significantly upon entering the Upper Floridan aquifer, due to mixing [dilution] with the aquifer's considerable horizontal freshwater flows. Hence, the proposed dredging would have negligible impacts on water quality in production wells that tap the Upper Floridan aquifer in the environs of Savannah.

182-MR-02-EC01
Comment: *Environmental replacement costs are not calculated in the P/L statement of companies – they are "externalities" that the public looses. We pay for them.*

Response: Mitigation costs are included as part of the benefit/cost analysis of the SHEP, along with any associated expenses that would be required to make a project functional. Appendix C –Mitigation Planning details how the referenced concerns were addressed.

From: workshop Savannah
To: CESAS-PD, SAS
Subject: air quality
Date: Wednesday, December 15, 2010 4:44:06 PM

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what are the implications to savannah's already diminished qir quality?

Public Comment

183-MR-01-EV01

Comment: *what are the implications to savannah's already diminished air quality?*

Response: The air quality in the harbor area is generally good (see Sections 4.03 and 5.06 in the EIS and Appendix K in the DEIS). According to US EPA Region 4, both Chatham County, GA and Jasper County, SC are considered as "attainment" areas for the 8-hour Ozone Standard. The Savannah area is under no Federal or State restrictions for the purpose of improving air quality to meet any air quality standard.

According to the 2002 and 2005 EPA National Emission Inventory (NEI) data for Chatham County, Georgia, the Port of Savannah is a small subset of the County's total air emissions. The NEI data for Chatham County was provided by the Emissions Inventory & Analysis Group, AQAD/OAQPS, US EPA, Research Triangle Park, NC.

The Georgia Ports Authority is working with EPA to comply with recent regulations regarding the use of ultra low sulfur fuel (15 ppm) for their cargo handling equipment. The private tugs in the port have converted to using ultra low sulfur fuel. The Ocean Going Vessels (OGV) arriving at the port will be reducing their emissions of NOx and Sulfur. EPA estimates that once the final rule is in place for OGV, there may be reductions of about 90% PM and 80% NOx.

The Corps believes that the port will grow with or without the proposed harbor deepening. It anticipates that without deepening, it will take more vessels to transport cargo. If the port is deepened, fewer larger vessels would be able to carry the cargo through the port (compared to the without project condition). The proposed harbor deepening would not significantly impact air quality in the project area.

From: workshop Savannah
To: CESAS-PD, SAS
Subject: shep comment card
Date: Wednesday, December 15, 2010 7:02:01 PM

I'm greatly concerned with the impact of offshore and near shore dumping of dredged material on wave height and swell frequency. many Tybee businesses depend on recreation created by wave action which in turn create tourist dollars. people come to visit the ocean because it looks and behave like an ocean rather than a lake.

Public Comment

184-MR-01-EV01

Comment: *I'm greatly concerned with the impact of offshore and near shore dumping of dredged material on wave height and swell frequency. many Tybee businesses depend on recreation created by wave action which in turn create tourist dollars. people come to visit the ocean because it looks and behave like an ocean rather than a lake.*

Response: Based on concerns (sand content of the material) expressed by the GA DNR-CRD and the City of Tybee Island, Georgia, the dredged material placement plan has been changed. There will be no placement of new work dredged sediment into the nearshore area off Tybee Island. Placement of all sediments excavated from the entrance channel will be in previously-approved areas: the Offshore Dredged Material Disposal Site (ODMDS) or an upland confined disposal site. The Corps has placed dredged material into the ODMDS for many years, and its continued use is not expected to have any impacts on wave height and frequency at Tybee Island. The Final EIS details the noted revisions.

From: Dean Moss
To: CESAS-PD, SAS
Subject: Advance maintenance
Date: Tuesday, December 21, 2010 7:55:24 AM

Bill:

Can you clarify for me the policy that the Corps proposes to follow with respect to advance maintenance and extra depth for sedimentation?

In other words, how deep will the potentially authorized 48 ft channel actually be dredged? Did the modeling of the impacts take any extra depth into account?

Thanks and Merry Christmas, Dean

Dean Moss

185-JK-02-EN01

Comment: *Can you clarify for me the policy that the Corps proposes to follow with respect to advance maintenance and extra depth for sedimentation?*

Response: Current and proposed channel depths are compared in Table 6.3.1-2 of the Engineering Appendix [Appendix C of the GRR]. Advance maintenance provides the most cost effective means of maintaining a channel's authorized depth in high shoaling areas by excavating below the navigation depth to extend the interval between maintenance dredging events. In addition to the advance maintenance, up to two feet of overdepth is allowed in recognition of inaccuracies inherent in the excavation process. That is, in order to ensure that the specified navigation depth is fully achieved, the contractor removes additional material below that depth [to realize this certitude]. Given this recognition, the contractor is reimbursed for the extra material. Both overdepth and advance maintenance were considered in all of the hydrodynamic, water quality, and aquifer model studies.

185-JK-02-EN02

Comment: *In other words, how deep will the potentially authorized 48 ft channel actually be dredged? Did the modeling of the impacts take any extra depth into account?*

Response: Dredging depths, including advance maintenance and over depth, for each of the alternative project depths are shown in Table 6.3.1-2 of the Engineering Appendix.

1. As outlined on page 104 of the GRR, Appendix C- The hydrodynamic and water quality models (EFDC & WASP) incorporated bathymetry data sets from several different sources including USACE's annual surveys of the channel [1999 and 2002]. Those surveys provide depth information throughout the harbor at a snapshot in time. The surveys incorporate areas where maintenance dredging has just been completed (depths where the advance maintenance layer is empty) and areas where maintenance dredging is about to begin (depths where the advance maintenance layer is full and sediment has built up into the authorized navigation channel).

2. The Supplemental Study, "Development of the Water Quality Models" [2006] includes more detailed information on the model grid bathymetry [Section 4.2].

3. To evaluate each depth alternative, the model grid within the channel was lowered by the appropriate amount, i.e., the -48-foot project depth required adjusting the model grid bathymetry by 6-feet, the -47-foot project depth required adjusting the model grid bathymetry by 5-feet, etc. The original model grid was based on actual annual surveys which included advance maintenance and over depth. Therefore, the alternative project depths also account for these same parameters.

As stated in the previous response, both overdepth and advance maintenance were considered in all of the hydrodynamic, water quality, and aquifer model studies.

From: John Hamm
To: CESAS-PD, SAS
Subject: Details please
Date: Friday, December 10, 2010 11:40:46 AM

---

1. What is the % of super ships that will not to use our port and what is the real $ loss if not upgraded?
2. Are there better ways to increase the value of our shipping business for similar or lower cost?
3. Is 48 ft. deep enough when PC is going to 50 ft. and some ships have a 49.5 ft. draft?

John Hamm

188-MR-03-EC01
Comment: *What is the % of super ships that will not to use our port and what is the real $ loss if not upgraded?*

Response: The largest vessels calling the US East Coast, including at the Garden City Terminal in Savannah, are expected to be about 8,000 TEUs in capacity. Page 51 of the Economic Appendix explains the reasons why the largest vessels in the world would not likely call at Savannah, with or without the proposed harbor deepening. Vessels much larger than 8,000 TEUs are more likely to be deployed on Asia to Europe and Transpacific trade routes. Vessels in excess of 9,500 TEUs may also have difficulties in Savannah Harbor due to length and width limitations and air draft restrictions created by the Talmadge Bridge. Such super ships currently make up about 3 percent of the world fleet and are expected to increase to roughly 11 percent of the world fleet by 2030.

Table 42 on Page 73 displays the forecasted vessel calls by vessel class for the "without project condition" and for each of the project alternatives. The transportation costs of keeping the channel at its present depth is compared to the transportation costs for each of the project alternatives to derive the project savings (benefits).

188-MR-03-EC02
Comment: *Are there better ways to increase the value of our shipping business for similar or lower cost?*

Response: Right now, shippers are already engaging in profit maximizing, "just in time" delivery practices, and they seek to optimize their scheduling and minimize delays wherever possible. Landside efficiencies are being planned and implemented to remain industry competitive. The present channel depth limits shippers from loading more completely and taking full advantage of larger vessels. The deepening project would reduce annual transportation costs by over $200 million.

188-MR-03-EV01
Comment: *Is 48 ft. deep enough when PC is going to 50 ft. and some ships have a 49.5 ft. draft?*

Response: The study authority was very specific regarding depths that could be evaluated as part of the SHEP and did not authorize the Corps to consider depths greater than 48 feet.

SAVANNAH HARBOR EXPANSION PROJECT

ENVIRONMENTAL IMPACT STATEMENT

NEARSHORE PLACEMENT OF DREDGED MATERIALS

REVIEW COMMENTS – BILL FARMER 1-11-11

The Environmental Impact Statement describes the planned dredging and placement of dredged materials from the Savannah Harbor Expansion Project. The following are review comments pertaining to the Environmental Impact Statement plus a 5/31/07 letter from Brad Gane, Assistant Director, Ecological Services Section, Coastal Resources Division, Georgia Department of Natural Resources, to Bill Bailey, U.S. Army Corps of Engineers.

1. Applicable law regarding the project includes the Georgia Rivers and Harbor Development (O.C.G.A. 52-9-2), which requires, in part, that all sand that is suitable for beach replenishment originating from the dredging of navigation channels within the inlets, as well as the entrances to harbors and rivers, shall be used to replenish the adjacent coastal beaches, if feasible, either by deposition of sand into the nearshore littoral zone or direct placement on affected beaches, and the deposition of sand shall be completed in cooperation with and, when required by applicable state or federal law, with the approval of the local governing authority and the Department of Natural Resources, according to the requirements of Part 2 Article 4 of Chapter 5 of Title 12, the "Shore Protection Act".
   The Environmental Impact Statement indicates the Savannah Harbor Expansion Project is consistent with these applicable laws.
   The Environmental Impact Statement also indicates that the Project complies with the requirements of the Georgia Coastal Management Act (O.C.G.A. 12-5-320, et.seq) 12-5-321. The EIS also indicates "The Corps performed an analysis of the proposed project with respect to resources under the purview of Georgia and South Carolina's programs concerning Coastal Zone Management Consistency…The Corps believes the proposed project is consistent with both programs."

2. Regarding the expression "…sand that is suitable…" as mentioned in the Georgia Rivers and Harbor Development (O.C.G.A. 52-9-2), it has been established to mean dredged material that has at least 90% sand and a maximum of 10% fines is suitable for placement on beaches, and dredged material suitable for nearshore placement should have a minimum sand content of at least 80% sand and a maximum of 20% fines. The Department of Natural Resources has indicated in a 2007 letter that the Department of Natural Resources would be willing to agree to some other standard should the City of Tybee Island determine that another standard should be used for placement on or near their beaches for this particular project.

3. The project identifies the portion of the shipping channel extending from 4,000 feet upriver from the river entrance outward into the ocean 98,600 feet from the river entrance, for a total of 102,600 feet (19.43 miles), as the area from which dredged materials would be taken for possible use to replenish the adjacent coastal beaches, if feasible, either by deposition of sand into the nearshore littoral zone or direct placement on affected beaches. The project identifies a plan to dredge to a total depth of 52 feet, 50 feet project depth plus 2 feet allowance of over-dredging, yielding a total volume of 13,325,513 total cubic yards of material from the 19.43 miles of ocean channel, of which 8,242,352 cubic yards would be placed in nearshore disposal sites. **TABLE AAA illustrates that the 8.24 MCY of dredged material planned for nearshore disposal has an 80% Sand and 20% Fines composition.**

4. The volume of dredged material in the region from 53,500 feet from the river entrance to 98,600 feet from the entrance channel has a volume of 5,083,161 cubic yards, with a dredged material composition of 93% sand and 7% Fines. Since this region of the bar channel has its closest point more than six (6) miles from the Tybee Shoreline, the cost to place this material in the nearshore region would be excessive.

5. Utilizing all this material for placement in the nearshore area of Tybee Island would require the use of booster pumps "which would greatly increase cost", so the Environmental Impact Statement indicates the area of the channel from which dredged materials would be deposited in the nearshore areas would be from a point 4,000 feet upriver from the river entrance to a point 53,500 feet into the ocean from the river entrance, for a total distance of 57,500 feet (10.89 miles). Data indicates the volume of dredged materials from this 57,500 foot section of the channel would yield 8,242,352 cubic yards of material having a content of 1,687,835 cubic yards (20%) fines and 6,563,517 cubic yards (80%) sand.

6. The year 2000 Tybee Island Beach Renourishment Project resulted in approximately 1,700,000 cubic yards of beach quality dredged materials (minimum 90% Sand, minimum 10% Fines). Comparing this volume of material with the volume of material planned for near shore placement, yields a ratio of 8,242,352 / 1,700,000 = 4.85. **This means that the total volume of planned nearshore placement of beneficially used dredged materials is about 4.8 times the volume of dredged materials placed on the Tybee beaches in the year 2000 Tybee Beach Renourishment Project.** Visualizing this volume in a different perspective, by imagining a rectangular sand dune constructed one football filed wide, and 5 miles long, the height of such a sand dune would be computed as follows: HT. = 8,242,352 / (5 x 1760 x 100) = 9.37 yards, 28 feet tall. **To summarize,**

the total volume of planned nearshore placement of beneficially used dredged material would fill a volume of a theoretical rectangular sand dune 100 yards wide by 5 miles long by 28 feet tall, which is about 4.85 times the volume of the Year 2000 Beach Renourishment Project of 1,700,000 cubic yards of dredged material.

7. Test boring data was summarized in the Environmental Impact Statement according to sub-regions in the entrance channel locations, and all of these sub-regions had a content of less that 20% fines except in two segments, namely the 10,000 to 20,000 foot and the 30,000 to 40,000 foot segments (measured from the river entrance). These two segments or sub-regions had a combined length of 20,000 feet (3.79 miles) and dredged volume of 3,169,671 cubic yards, and a content of 918,915 cubic yards (29%) fines and 2,249,756 cubic yards (71%) sand, for a 52 foot total dredged depth (50 foot project with 2 feet over-dredge allowed). Removing these two sub-regions from the areas used for nearshore beach replenishment would result in a dredged length of 37,500 feet (7.10 miles) and a nearshore beach replenishment volume of 5,072,681 cubic yards having a content of 759,920 cubic yards (15%) fines and 4,313,761 cubic yards (85%) sand. The Department of Natural Resources letter of 2007 indicates that these two sub-regions "...should be removed from the beneficial use plan/feasibility analysis and disposed at approved sites." The further-most portion of the 10,000 to 20,000 bar channel region is more than 6 miles to the ODMDS Offshore Disposal Site, and the further-most portion of the 30,000 to 40,000 bar channel region is about 3 ½ miles to the ODMDS Offshore Disposal Site, and the removal of this 3,169,671 cubic yards from the 8,242,352 cubic yards of planned beneficial use nearshore placement would be an approximate 38% reduction in planned nearshore beneficial use of dredged materials, but would decrease the Fines/Sand Ratio from 20/80 to 15/80.

8. The Draft Environmental Impact Statement also contains data on the content and composition of the Estimated Annual Maintenance (O&M) Dredged materials. This data is summarized in Table BBB. Since the Bar Channel acts as an almost complete sink for all sand in the littoral zone that would otherwise come from the South Carolina nearshore zones and reach the Tybee Island beaches and nearshore areas, the volume and composition of this same Estimated Annual Maintenance (O&M) Dredged Materials would reflect what would naturally reach Tybee if the channel was not there. The data indicates the annual maintenance dredging would total about 1,181,000 cubic yards, of which about 1,054,000 could be placed in the nearshore area of Tybee Island. This material has a content of 20% Fines and 80% Sand. **This means that the natural flow of sand that would come to Tybee if the ocean channel did not exist has essentially the same average content of Fines (20%) and Sand (80%) as does the planned beneficial nearshore use of dredged material from the Project.** Also, the 1,054,000 cubic yards of nearshore beneficially used Estimated Annual Maintenance (O&M) dredged material,

when compared to the 1,700,000 cubic yards of dredged material in the Year 2000 Tybee Island Beach Renourishment Project, results in a ratio of 0.62 (1,054,000/ 1,700,000 =). **This means that the Estimated Annual Maintenance (O&M) Dredged Volume is about 62% of the volume of the Year 2000 Tybee Island Beach Renourishment Project.** The Draft EIS indicates that placing the entrance channel maintenance sediments into the Savannah Harbor ODMDS is the least cost disposal alternative for long term maintenance of the proposed harbor deepening project, but that "...**Those other placement locations could also be used in a specific maintenance dredging event <u>if a non-Federal sponsor paid the expected additional costs</u> to deposit the O&M sediments in that location." The "other placement locations" include the project's nearshore disposal sites. The economics of possibly extending the periods between periodic Beach Renourishment Projects by beneficially using the annual maintenance dredging materials appears to be worthy of analysis.**

9. The Environmental Impact Statement identifies a **variety of benefits** resulting from the beneficial use of the dredged sediments, as follows:
   a. **Help restore sand that has been lost from the nearshore zone** in the past as a result of the entrance channel dredging.
   b. Decreasing depths in the nearshore area should **reduce the wave climate** that reaches the Tybee shoreline, providing shelter from the ocean waves, thereby **reducing its beach erosion rate.**
   c. The nearshore placement should also **provide a source of sands** which waves could subsequently move toward the beach, also **reducing the beach erosion rate**.
   d. Some sediment would be used to create an offshore intertidal island that would **provide valuable resting and loafing habitat for seabirds and shorebirds.**
   e. A small amount of sediments would be used to enhance deep-water fishing habitat.
   f. Distinct changes in bottom depths alter the ocean currents, thereby enhancing fish habitat.
   g. The beneficial placement of these entrance channel sediments keeps them from being deposited in the Savannah Harbor Dredged Material Disposal site (ODMDS), which theoretically has a defined sediment placement capacity and useful life, thereby extending the useful life of the ODMDS.
   h. **Additionally,** although not specifically mentioned in the Draft EIS, the benefits listed above should result in **significantly extending the period between periodic Beach Renourishment Projects that have historically occurred about once every 10 years at a cost of about $10 Million each.**

10. Attaching a monetary value to the dredged materials is imprecise, but acknowledging the fact that periodic Tybee Beach Renourishment Projects occur approximately every 10 years and have a cost of about $10 Million, and the volume of beach quality sand (90/10

Sand/Fines) is in the 1 to 2 MCY range, an estimated value of nearshore-placed dredged materials (80/20 Sand/Fines) of about $5.00 per cubic yard would be reasonable. **The monetary value of the 8,242,352 cubic yards of dredged material planned for placement in the nearshore area of Tybee Island would therefore be about $41 Million; and the monetary value of the subsequent 1,054,000 Estimated Annual Maintenance (O&M) Dredged material placed in the nearshore area would be about $5 Million per year.**

11. The Draft EIS itemizes the various project components together with the expected adverse impact of each, as well as the planned mitigation for each adverse impact. There is no reference to anticipated adverse impacts associated with the beneficial use of dredged materials in the Tybee Island nearshore area, and therefore there is no planned mitigation funding for this project component. However, The Draft EIS does have an after-project monitoring component for the purpose of detecting unexpected adverse impacts and correcting for such impacts.

In Summary:

Beneficially using both the New Work Harbor Deepening dredged materials plus the Annual Maintenance (O&M) dredged materials from the ocean channel by placing these dredged materials in the nearshore area of Tybee Island should significantly extend the period between expensive Tybee Beach Renourishment Projects that occur approximately every 10 years at an approximate cost of about $10 Million each.

Using past (cost and dredged volume) history for Tybee Island Beach Renourishment Projects, the monetary value of a cubic yard of dredged material that is suitable for beneficial use in the nearshore area of Tybee Island can be estimated at about $5.00 per cubic yard. Using $5.00 per cubic yard as a value estimate, the monetary value of the Project's 8.24 MCY of beneficially used New Work dredged material placed in the nearshore area of Tybee Island is about $41 Million; and the monetary value of the subsequent 1.0 MCY Estimated Annual Maintenance (O&M) Dredged material placed in the nearshore area would be about $5 Million per year.

Bill Farmer 1-11-11

(Attached Tables AAA and BBB

	A	B	C	D	E	F	G	H	I
1	TABLE AAA Dredging Plan, New Work, Bar Channel, 48' River Depth, 50' Ocean Channel Depth								
2		plus 2' = 52' Total Ocean Bar Channel Depth							
3									
4									
5	Entrance Channel			Excavation		%	Volume	%	Volume
6	Location (-)			Volume (CY)		Fines	Fines (CY)	Sand	Sand (CY)
7									
8	0 to +4000			375,403		14	52,556	86	322,847
9	0/10,000			1,110,713		17	188,821	83	921,892
10	10,000/20,000			1,595,871		29	462,513	71	1,132,358
11	20,000/30,000			1,628,379		15	244,257	85	1,384,122
12	30,000/40,000			1,573,800		29	456,402	71	1,117,398
13	40,000/45,000			1,959,186		14	274,286	86	1,684,900
14	45,000/50,000			incl. 40/45		incl	incl		incl
15	50,000/53,500			incl 40/45		incl	incl		incl
16									
17		Subtotal		8,242,352		20	1,678,835	80	6,563,517
18									
19	53,500/57,000			469,252		12	56,310	88	412,942
20	57,000/61,000								
21	61,000/64,500								
22	64,500/68,000								
23	68,000/72,000								
24	72,000/75,500								
25	75,500/79,000								
26	79,000/82,500								
27	82,500/85,000								
28									
29	57,000/60,000			401,409		9	36,127	91	365,282
30	60,000/98,600			4,212,500		6	252,750	94	3,959,750
31									
32		Subtotal		5,083,161		7	345,187	93	4,737,974
33									
34		TOTAL		13,325,513		15	2,024,022	85	11,301,491
35									
36									
37	NOTE: Above Dredging Data was developed using Table 3-9, page 3-38 in Alternatives Section								
38	of Draft EIS for Volume information; plus Tables 8 & 12 on pages 86 and 87 of Appendix I								
39	of Draft EIS for Composition information. Some interpolation was required.								

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	A	B	C	D	E	F	G	H	I
1	TABLE B8B Estimated Annual Maintenance (O&M) Dredging Data								
2									
3	Entrance Channel			Excavation		%	Volume	%	Volume
4	Location (-)			Volume (CY)		FINES	Fines (CY)	Sand	Sand (CY)
5									
6	0 to +4000			76,000		14	10,640	86	65,360
7	0/10000			155,000		14	21,700	86	133,300
8	10000/20000			163,000		19	30,970	81	132,030
9	20000/30000			281,000		21	59,010	79	221,990
10	30000/40000			325,000		23	74,750	77	250,250
11	40000/53500			54,000		26	14,040	74	39,960
12									
13		Subtotal		1,054,000		20	211,110	80	842,890
14									
15	53500/98600			127,000		7	8,890	93	118,110
16									
17		TOTAL		1,181,000		19	220,000	81	961,000
18									
19									
20	NOTE: Data was developed from two Tables in Draft EIS, namely Table 3-10, page 3-30,								
21	Alternatives; and Table 1, page 6, Appendix H. Some minor interpolation done,								
22	since the two tables used some different Entrance Channel locations.								

Bill Farmer

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Comment: *Using past (cost and dredged volume) history for Tybee Island Beach Renourishment Projects, the monetary value of a cubic yard of dredged material that is suitable for beneficial use in the nearshore area of Tybee Island can be estimated at about $5.00 per cubic yard. Using $5.00 per cubic yard as a value estimate, the monetary value of the Project's 8.24 MCY of beneficially used New Work dredged material placed in the nearshore area of Tybee Island is about $41 Million; and the monetary value of the subsequent 1.0 MCY Estimated Annual Maintenance (O&M) Dredged material placed in the nearshore area would be about $5 Million per year.*

Response: Due to concerns (sand content of the material) expressed by the Georgia Department of Natural Resources and the City of Tybee Island, the Corps revised the placement plan for sediments excavated from the entrance channel. The project described in the final reports includes deposition of new work entrance channel sediments in previously-approved sites (Ocean Dredged Material Disposal Site or Jones/Oysterbed Island CDF). Nearshore placement of new work sediments has been removed from the SHEP.

#494

4 Dorset Ct.
Savannah, GA 31410

William Bailey
ATTN: PD
US Army Corps of Engineers, Savannah District
100 W. Oglethorpe Ave.
Savannah GA 31401-3640

December 18, 2010

Dear Mr. Bailey,

As a citizen of Chatham County and a regular visitor and active beach user of Tybee Island's beach, I am writing to oppose the plan to place Savannah River Entrance Channel dredge deposits in the nearshore zone of Tybee Island as described in the Draft EIS (pages 3-22 through 3-26). The primary reasons for my opposition to the plans are public safety and the creation of dangerous nearshore currents and beach topographic features for beach users (swimmers, surfers, life guards, beach rescue personnel, surf fishermen).

As you are aware, Tybee Island is one of the few barrier islands accessible to the driving public on the Georgia coast. Tybee Island beach is thus an important resource not only for area residents but also for Georgia citizens and others from throughout the southeast. Locally, the City of Tybee Island realizes the importance of providing a safe and accessible beach for its economy. Therefore any activities or alterations to the beach that make beach activities less safe and accessible for the public on Tybee Island will have negative economic impacts for the City and the businesses that depend on beach activities and visitors.

According to the Draft EIS (pages 3-22 through 3-26) nearshore deposition of Savannah River Entrance Channel dredged material will include two areas (MLW 200 and MLW 500) adjacent to the front public beaches along Tybee Island. The placement of dredged material in both of these areas as described in the Draft EIS will create extremely unsafe conditions for people entering the water for almost 3 miles along Tybee Island.

Area MLW 200 extends westward from the North Beach jetty for 3,200 feet. This area is presently a popular surfing, skim boarding, wind surfing and fishing area, and it is served by one of the largest public parking areas for beach goers on Tybee Island. According to the Draft EIS (p. 3-25), "sediment would be deposited at the mean low water (MLW) line and be allowed to mound up to mean sea level (MSL) or mid-tide. When filled to capacity [217,000 CY], the placement would create a mid-tide berm about 200 feet wide and 3,200 feet long." Essentially, a sand bar (3,200 x 200 ft.) will be built out in front of the beach. This new sand bar will be built at the current low tide mark, and it will be high enough so that it will just be covered with water when the tide is half high. At higher tide, it will be just below the surface (maybe 3 ft). During the times between low and mid tide levels, it will be necessary to go from the current beach, out into the water (a new tidal channel), then up onto the new sand bar, then out to the waves. This new shoal will create a channel between our current beach and the new sand bar further out. This channel will be fed and drained by tide forces, and I can only imagine the magnitude of the longshore tidal rip currents that will be running through this channel. Depending on where you

are and whether the tide is rising or falling, the currents will sweep people into the jetty or out toward the river entrance. Certainly over time, low places, breaches and channels will form across the sand bar, and these will create strong tidal-driven rip currents seaward. During the periods between mid-tide and high tide, the sand bar will not be exposed, but the longshore current dynamics will remain and will probably be even more dangerous because people will not see the offshore bar (as is the case currently at the south end of Tybee Island).

Area MLW 500 extends from the North Beach jetty southward along the front of Tybee Island for 11,000 feet (2 miles), and it is to be 500 feet wide. According to the Draft EIS (P. 3-25), "The sediment would be deposited at the MLW line [low tide line] and be allowed to mound up to MSL or mid-tide. When filled to capacity, the placement would create a mid-tide berm about 500 feet wide and 11,000 feet long." So again, a sand bar will be built at the present low tide level, and this sand bar will be 500 feet wide (for 2 miles in front of Tybee's current beach). At low tide, a beach goer will walk across the current beach, down/out the wet intertidal sand to the current low tide line, then up onto a sand bar, walk another 500 ft across the sand bar, and then get to the waves/water. At mid tide, one will walk across the current beach, out into the water until it is about 3 ft deep, then climb up on the new sand bar, walk across it for 500 ft, and then to the waves. As the person walks/wades through the channel between the current beach and the offshore sand bar, he/she must fight the longshore tidal current in that channel. The same dangers and dynamics described above for MLW 200 (tidal currents and rip currents during all tidal stages except dead low tide) will exist for 2 miles of Tybee's beach front. I don't think Tybee will be winning any more prizes for a healthy beach with the longshore, parallel flows that we will be getting in this channel, and the number of folks that will be getting pulled out of it. Certainly nature will create multiple breaks in the sand bar along its width as the tidal water tries to flow out as the tide falls. These will make for some subtle, unseen rip currents outward. What is going to look like a giant 2-mile long tide pool along the front of Tybee will be a dangerous place for swimmers. I have no idea how life guards will be able to work effectively being well over 600 feet from the shore and also deal with the swimmers in the tidal channel.

I feel that these are very critical issues for Tybee Island. It is a recreational beach that serves thousands of people daily throughout most of the year. As you know, our coast is much more affected by tidal dynamics than wave dynamics, and to create a tidal-fed and drained channel along the front of this recreation beach just seems very irresponsible.

I will appreciate your consideration of revising the Channel Entrance deposition plans.

Thank you.

Sincerely,

Joseph P Richardson

Joseph P. Richardson, Ph.D

cc: Jason Buelterman, Mayor Tybee Island
Patrick Carver, Chairperson, Surfrider Foundation Coastal Georgia Low Country Chapter
Ed Mazzarella, Director of Chapters, Surfrider Foundation

Joseph P. Richardson

494-JK-05-EV01

Comment: *As a citizen of Chatham County and a regular visitor and active beach user of Tybee Island's beach, I am writing to oppose the plan to place Savannah River Entrance Channel dredge deposits in the nearshore zone of Tybee Island as described in the Draft EIS (pages 3-22 through 3-26). The primary reasons for my opposition to the plans are public safety and the creation of dangerous nearshore currents and beach topographic features for beach users (swimmers, surfers, life guards, beach rescue personnel, surf fishermen).*

Response: The location of the proposed dredged material placement sites in the Tybee Island nearshore were based on detailed modeling and design studies. The design took into account potential impacts to longshore currents, required depths for commercial and recreational boating, etc. Based on concerns (sand content of the material) expressed by the GA DNR-CRD and the City of Tybee Island, Georgia, the dredged sediment placement plan has been revised, and placement of all new work sediments excavated from the entrance channel would be deposited in previously-approved areas: either in the Offshore Dredged Material Disposal Site or an upland confined disposal site. The Final EIS includes the revised sediment placement plan.

494-JK-05-EV02

Comment: *According to the Draft EIS (pages 3-22 through 3-26) nearshore deposition of Savannah River Entrance Channel dredged material will include two areas (MLW 200 and MLW 500) adjacent to the front public beaches along Tybee Island. The placement of dredged material in both of these areas as described in the Draft EIS will create extremely unsafe conditions for people entering the water for almost 3 miles along Tybee Island.*

Response: As noted above, the sediment placement plan has been revised in the Final EIS. Based on input from the GA DNR-CRD and the City of Tybee Island, the Corps no longer seeks environmental clearances to place new work sediment in the previously proposed nearshore sites (Site MLW 200, Site MLW 500, ERDC Nearshore, Site 2 Site 2 Extension, Sites 3, 4, 5, 6, 11, and 12) as part of SHEP. Placement of all sediments excavated from the entrance channel would be deposited in previously-approved areas: either in the Offshore Dredged Material Disposal Site or an upland confined disposal site. The Final EIS includes the revised sediment placement plan.

494-JK-05-EN01

Comment: *Area ML W 200 extends westward from the North Beach jetty for 3,200 feet. This area is presently a popular surfing, skim boarding, wind surfing and fishing area, and it is served by one of the largest public parking areas for beach goers on Tybee Island. According to the Draft EIS (p. 3-25), "sediment would be deposited at the mean low water (ML W) line and be allowed to mound up to mean sea level (MSL) or mid-tide. When filled to capacity [2 J 7,000 CYJ, the placement would create a mid-tide berm about 200 feet wide and 3,200 feet long." Essentially, a sand bar (3 ,200 x 200 ft.) will be built out in front of the beach. This new Sand bat· will be built at the current low tide mark, and it will be high enough so that it will just be covered with water when the tide is half high. At higher tide, it will be just below the surface (maybe 3 ft). During the times between low and mid tide levels, it will be necessary to go from the current beach, out into the water (a new tidal channel), then up onto the new sand bar, then out to the waves. This new shoal will create a channel between our current beach and the new sand bar further out. This channel will be fed and drained by tide forces, and I can only imagine the magnitude of the longshore tidal rip currents that will be running through this channel. Depending on where you are*

and whether the tide is rising or falling, the currents will sweep people into the jetty or out toward the river entrance. Certainly over time, low places, breaches and channels will form across the sand bar, and these will create strong tidal-driven rip currents seaward. During the periods between mid-tide and high tide, the sand bar will not be exposed, but the longshore current dynamics will remain and will probably be even more dangerous because people will not see the offshore bar (as is the case currently at the south end of Tybee Island).

Response: The project's potential impacts to longshore currents were considered during design analysis of potential effects on Tybee Island and the originally-proposed nearshore placement plan. Modeling predicted that if the sediment were placed in the nearshore during the winter months [when there is nominal recreational use of the nearshore zone], it would become incorporated into the shoreline prior to the summer season. However, due to concerns expressed by the Georgia Department of Natural Resources and the City of Tybee Island, the Corps revised the placement plan for new work sediments excavated from the entrance channel. The project described in the final reports includes deposition of entrance channel sediments in previously-approved sites (Ocean Dredged Material Disposal Site or Jones/Oysterbed Island CDF). Nearshore placement of new work sediments has been removed from the SHEP.

494-JK-05-EN02

Comment: *Area ML W 500 extends from the North Beach jetty southward along the front of Tybee Island for 11,000 feet (2 miles), and it is to be 500 feet wide. According to the Draft EIS (P. 3-25), "The sediment would be deposited at the ML W line [low tide line] and be allowed to mound up to MSL or mid-tide. When filled to capacity, the placement would create a mid-tide berm about 500 feet wide and 11,000 feet long." So again, a sand bar will be built at the present low tide level, and this sand bar will be 500 feet wide (for 2 miles in front of Tybee's current beach). At low tide, a beach goer will walk across the current beach, down/out the wet intertidal sand to the current low tide line, then up onto a sand bar, walk another 500 ft across the sand bar, and then get to the waves/water. At mid tide, one will walk across the current beach, out into the water until it is about 3 ft deep, then climb up on the new sand bar, walk across it for 500 ft, and then to the waves. As the person walks/wades through the channel between the current beach and the offshore sand bar, he/she must fight the longshore tidal current in that channel. The same dangers and dynamics described above for ML W 200 (tidal currents and rip currents during all tidal stages except dead low tide) will exist for 2 miles of Tybee's beach front. I don't think Tybee will be winning any more prizes for a healthy beach with the longshore, parallel flows that we will be getting in this channel, and the number of folks that will be getting pulled out of it. Certainly nature will create multiple breaks in the sand bar along its width as the tidal water tries to flow out as the tide falls. These will make for some subtle, unseen rip currents outward. What is going to look like a giant 2-mile long tide pool along the front of Tybee will be a dangerous place for swimmers. I have no idea how life guards will be able to work effectively being well over 600 feet from the shore and also deal with the swimmers in the tidal channel.*

Response: See previous responses.

494-JK-05-END3

Comment: *I feel that these are very critical issues for Tybee Island. It is a recreational beach that serves thousands of people daily throughout most of the year. As you know, our coast is much more affected by tidal dynamics than wave dynamics, and to create a tidal-fed and drained channel along the front of this recreation beach just seems very irresponsible.*

Response: See previous responses.

US Army Corps of Engineers
Savannah District

Comment on the Savannah Harbor Expansion Project

The Savannah District, U.S. Army Corps of Engineers welcomes your comments on the Savannah Harbor Expansion Project. Once completed, place the card in the "comments" box or add postage and mail it back to us. Comments can also be provided online at **CESAS-PD@usace.army.mil**.

From: (optional) Kay Scardino

Comments:

I'm worried about the expansion + its affect on the marshes. In the '20's Frank Exley told me he could set the shrimp on an incoming tide at the Sugar Refinery dock.

Kay Scardin

502-MR-01-EV01

Comment: *I'm worried about the expansion & its effect on the marshes. In the 20's Frank Exley told me he could catch shrimp on an incoming tide at the Sugar Refinery dock.*

Response: The proposed harbor deepening could result in converting up to 740 acres of saltmarsh to its brackish marsh counterpart. However, given the wide range of salinity reported in the scientific literature for brackish marsh systems, the inherent variability in salinity that exists for all estuarine systems, and the numerous scenarios that were considered, it was concluded that 740 acres is a worst case value. Actual vegetative changes may not be noticeable in the Savannah Harbor estuary. That said, the District chose to be conservative in its assessment of project-related effects and elected to include the saltmarsh to brackish marsh conversion in its calculation of project impacts. Bottom line, there would be negligible impacts to existing estuarine habitat that supports larvae, juvenile, or mature shrimp. Further, minor changes to the salinity regime in the vicinity of the Sugar Refinery are not expected to affect the shrimp fishery at that location (see detailed response to a similar EPA comment).

US Army Corps of Engineers
Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) Concerned citizen - SR Collins 912-978-1120

Comments:

we would like to see fresh water marsh created instead of purchasing property for Fish & Wildlife that by property type is naturally protected. create by removing upland soil in freshwater areas and restoring to freshwater marsh. we know where areas are available.

SR Collins

503-MR-01-EV01

Comment: *We would like to see fresh water marsh created instead of purchasing property for Fish & Wildlife that by property type is naturally protected. Create by removing upland soil in Freshwater areas and restoring to Freshwater marsh. We know where areas are available.*

Response: The District evaluated this option when considering mitigation alternatives. A watershed assessment was conducted in the Lower Savannah River Harbor to evaluate specific mitigation measures which could compensate for the potential conversion of freshwater wetlands [223 acres] to its brackish marsh counterpart. This functional assessment concluded the only element of wetland function that would be affected by this conversion was its fish and wildlife habitat component. To rectify these losses, the District reviewed approved mitigation banks in the Lower Savannah River Watershed, but determined there were none with the appropriate tidal, freshwater wetland characteristics. The District and Interagency Review Team determined that the "In-Lieu Fee" program is also functionally unable to provide the requisite compensation. The District considered the creation of tidal freshwater wetlands. The USFWS indicated that it did not believe the Corps could successfully grade down uplands in Savannah to create a viable freshwater marsh. Ultimately the study group concluded that creating freshwater marsh is not a long-term solution, given the unacceptable potential for failure over the extended economic life [50 years] of the project.

The District consulted the Wetland Interagency Coordination Team (ICT), which consists of technical expert representatives from USACE and federal/state natural resource agencies, to identify acceptable mitigation for SHEP. At that time, the USFWS stated that mitigation actions must be performed within the basin for any impacts to wetlands located within the SNWR. The Service suggested preservation of lands as a possible solution and recommended sites that are part of its long-term lands acquisition strategy to compliment the SNWR. The District then consulted with the Stakeholder Evaluation Group, including its non-governmental organizations members, to see if they could identify suitable mitigation options. Over the 10-year study period, no agency/organization could identify another feasible alternative as mitigation for impacts that would occur as a result of the wetland species shifts. Therefore, the District proceeded with the identification of preservation sites.

US Army Corps of Engineers
Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) Dorothy Bambach, Executive Director, Audubon Society (Savannah, GA) & Friends of the Savannah Coastal Wildlife Refuges

Comments: We have grave concerns about the wisdom of pursuing this project.

1. The model used to project increased salinity in the river is just that: a model. In reality, it could have substantial additional detrimental impact on the small amount of remaining fresh water marsh in the Nat'l Wildlife Refuge.

2. The $5.5 million identified as needed for "adaptive management" is an amount that was set arbitrarily as 10% of total initial mitigation project costs. This is the only opportunity, since there would be a total failure of one or more mitigation projects. The adaptive mgmt budget should be set at a much higher amount to cover the cost of having to completely re-do at least 2 projects.

3. As a result of #2 above, the economic analysis of the project's benefits is inflated and overstated. It should be adjusted downward by a realistic estimate of the cost of replacing or re-engineering mitigation projects.

4. What seems to be lacking in this entire analysis is a regional or even national policy overview -- why do we have so many ports competing for the same business? We should pick one or two ports that can accommodate larger ships with minimal damage to the environment and use revenue-sharing to spread the wealth.

Dorothy Bambach

504-MR-04-EN01

Comment: *The model used to project increased salinity in the river is just that: a model. An error could have substantial additional detrimental impact on the small amount of remaining tidal fresh water marsh in the Nat'l Wildlife Refuge.*

Response: The approved, calibrated, and validated hydrodynamic and water quality models are competent to identify project impacts and develop mitigation plans. These models simulate the complex estuarine dynamics, viz., hourly, daily, and monthly tidal variations, salinity and dissolved oxygen dynamics together with their spatial distribution within the system. The models are applicable over a wide range of conditions including low and high freshwater flow. They have been calibrated and validated using field data and were designed to meet the expectations of the Water Quality Interagency Coordination Team, which followed the Modeling Technical Review Group that was established in the late 1990s. The review group's brief was to oversee the development of a technically valid model for determining SHEP's environmental impacts and attendant mitigation features. The group included representatives from the District, US EPA Region 4, USGS, Georgia DNR-EPD, South Carolina DHEC, and private sector technical modeling experts [tasked with actual model development]. An independent technical review and uncertainty analysis have been conducted on the models and the resulting comments/concerns were incorporated into the final version. Details regarding the hydrodynamic and water quality model development process, extensive reviews, and uncertainty analysis can be found in the report, "Development of the Hydrodynamic and Water Quality Models for the Savannah Harbor Expansion Project" dated January 2006 [included in the Supplemental Materials to the Engineering Appendix]. Acceptance letters from agencies involved in the modeling technical review group can be found in the document, "Correspondence Regarding Hydrodynamic & Water Quality Model Acceptability" [included the Supplemental Materials to the Engineering Appendix].

504-MR-04-EV01

Comment: *The $50 million identified as needed for "adaptive management" is an amount that was set arbitrarily as 10% of total initial migration project costs. This is the wrong approach, since here could be a total failure of one or more mitigation projects. The adaptive mgmt budget should be set at a much higher amount to cover the cost of having to completely re-do at least 2 projects.*

Response: As stated in Appendix D (Monitoring and Adaptive Management Plan), the costs presented for the adaptive management measures are [indeed] estimates. Whether any of these measures will need to be implemented will only become known after post-construction results are inspected and project performance is evaluated [to include effectiveness of mitigation features]. The mitigation and adaptive management costs for the SHEP (on a relative basis) well exceed usual percentages for a Corps of Engineers' water resource development project. The amounts identified for adaptive management are to be viewed as a group. Although costs were developed for modifications to specific mitigation features, the funds would be used for any action that is needed for the mitigation features to function as intended. Additional funds could be requested for costs that exceed the present budgeted amount, following established procedures for unexpected cost increases. The Corps considers the project in the "construction" phase until the end of the monitoring and adaptive management period.

504-MR-04-EC01

Comment: *As a result of 2 above, the economic analysis of the project's benefits is inflated and overstated. It should be adjusted downward b a realistic estimate of the cost f replacing or re-engineering mitigation projects.*

Response: The mitigation and adaptive management costs for the SHEP (on a relative basis) well exceed usual percentages for a Corps of Engineers' water resource development project. The amounts identified for adaptive management are to be viewed as a group. Although costs were developed for modifications to specific mitigation features, the funds would be used for any action that is needed for the mitigation features to function as intended. Additional funds could be requested for costs that exceed the present budgeted amount, following established procedures for unexpected cost increases.

504-MR-04-EV02

Comment: *What seems to be lacking in this entire analysis is a regional or even national policy overview – why do we have so many east coast cities competing for the same business? We should pick one or two ports that can accommodate larger ships with minimal damage to the environment and use revenue-sharing to "spread the wealth".*

Response: There is no regional or national policy governing port development. However, a regional port analysis was conducted and its conclusions are found in GRR-Appendix D. Under present conditions, a regional port would not be technically or institutionally feasible. There is no existing or planned East Coast port that could process the total volume of TEUs handled by multiple regional ports. Further, there is no governing authority which would support development of this notional regional port. GEC, Inc. conducted a regional port analysis for the District and concluded that a true regional port would require more land than is currently available at any of the existing Southeast US ports. In addition, institutional issues such as the lack of a non-federal sponsor [required by the Water Resources Development Act of 1986] and the unknowns associated with State coastal zone management plans raise serious questions about viability. Even assuming the theoretical potential at the reconnaissance level of study, a full feasibility level analysis would be necessary to ascertain actual practicability. Experience has shown that a very large/complex project with so many interrelated and often competing issues would require many years and millions of dollars to complete. Deferring critical port improvements to address the concept of a regional facility would seriously constrain the US position in international trade [in the meantime].

US Army Corps of Engineers, Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional)

Comments: I disagree with deepening beyond 45-46' because the impact models used have too many unknown variables that will impact the outcome and proposed contingency plans/mitigation plans have not been proven. Loss of fresh water wetlands cannot be reversed. If the upper aquifer is contaminated possible proposed mitigation of fresh river water injection will compound problems with the introduction of surface water contaminants such as herbicides, pesticides, viruses, bacteria, synthetic chemicals, etc. This will adversely affect the overall health of the population that use this resource, as well as agricultural entities with contaminated irrigation sources. In the end if adverse impacts occur it will be the citizens and natural wildlife and natural resource that will pay the price and overall lowered quality of life.

Public Comment-

505-MR-01-EV01

Comment: *I disagree with deepening beyond 45'-46' because the impact models used have too many unknown variables that will impact the outcome and proposed contingency plans/mitigation plans have not been proven. Loss of freshwater wetlands cannot be reversed. If the upper aquifer if contaminated possible proposed mitigation of fresh river water injection will compound problems with the introduction of surface water contaminants such as herbicides, pesticides, viruses, bacteria, synthetic chemical, etc. This will adversely affect the overall health of the population that uses this resource; as well as agricultural entities with contaminated irrigation sources. In the end if adverse impacts occur it will be the citizens and natural wildlife and natural resource that will pay the price and overall lowered quality of life.*

Response: The proposed SHEP includes adequate mitigation measures for the five channel depth alternatives evaluated (44-48 feet). Basically, the mitigation involves flow diversion to increase the amount of freshwater entering Little Back River and Middle River, measures to decrease the amount of saltwater entering these streams, and oxygen injection at three points to remove the project's incremental effects on the dissolved oxygen regime in Savannah Harbor.

The project provides further mitigation for those impacts that would occur even with the above mitigation measures in place. Namely, marsh restoration to compensate for loss of same because of excavation requirements [bend wideners/meeting areas] of the project, payment to the Georgia DNR-EPD to stock fingerling Striped bass, and construction of a fishway at New Savannah Bluff Lock and Dam to permit passage of Shortnose sturgeon (and other species of anadromous fish) to traditional spawning areas.

It should be noted that the predicted increases in upstream salinity levels as a result of construction of the project will not result in the actual loss of any marsh. Rather, there would be a conversion of some tidal freshwater marsh to its brackish marsh counterpart. Many of the emergent plant species associated with freshwater marsh systems would still be readily observed in a brackish marsh system. Also, the basic wetland functions (water purification, flood protection, shoreline stabilization, etc.) typically associated with these systems would not be altered. There would just be a change in the fish and wildlife function when tidal freshwater marsh is converted to brackish marsh. Consequently, the mitigation plan for the project also provides for the acquisition and preservation of land that is ecologically valuable to the Savannah National Wildlife Refuge. This would ensure that these lands [which are valuable wildlife habitat] would remain protected in perpetuity thereby providing compensation for the change in fish and wildlife function occasioned by the noted conversion.

Notably, studies conducted during the SHEP indicate that construction of the project would not have any appreciable effects on the movement of saltwater through the protective layer (Miocene) into the upper Floridan aquifer. Consequently, the project does not include any mitigation measures to reduce saltwater intrusion into the aquifer. However, the project *does* include extensive monitoring to ensure there is no unanticipated movement of saltwater into the aquifer as a result of construction of the project.

US Army Corps of Engineers
Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) How does your FIS address invasive species?

Comments:

Public Comment

506-MR-01-EV01

Comment: *How does your EIS address invasive species?*

Response: Please see paragraphs 4.06 and 5.20.7 of the EIS which address invasive species.

US Army Corps of Engineers
Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) John S. Niedzwiecki 4309 Augusta Rd 79B GC GA 31408

Comments:

I am a Retired truck Driver, 40 years, My Main concern is the increased truck Traffic, and if the Roads Are going to be Able to handle it. Also the trains are going to be longer and block, West Bay Street and GA 17 & GA 21 longer than they do Now

John Si Niedezwiecki

508-DC-02-EV01

Comment: *I am a retired truck driver, 40 years, my main concern is the increased truck traffic, and if the roads are going to be able to handle it. Also the trains are going to be longer and block West Bay Street and GA 17 and GA 21 longer than they do now.*

Response: The Georgia Ports Authority (GPA) is working closely with the Georgia Department of Transportation to construct the following:

1. Jimmy Deloach Parkway Connector to I-95,
2. Grange Road Upgrade to GA 21,
3. Mason ICTF/Highway 307 Overpass, and
4. Brampton Road Connector to I-516.

These more direct connectors to the terminal would be able to accommodate increases in truck traffic over time with a major increase in traffic on adjacent residential streets.

GPA will be working closely with the operators of the trains and make sure that they don't block West Bay Street, GA 17 and GA 21 for long periods of time.

December 15, 2010

Cecilia F. Morett
5 Leaning Oaks Court
Savannah, GA 31410

Comments on the deepening of the Savannah River:

I am in favor of the deepening as I think it's vital to keep up with competitors. If the port can't accommodate larger ships, it will lose business. That loss of business will have a domino affect in our area and beyond.

As much as I am in favor of the deepening, I have concerns about the impact it will have in other areas.

1. How will the deepening of the channel affect shrimpers and crabbers who make their living in the waters adjacent to the channel? From buoy 22 out to buoy 6 on both sides outside the channel are active shrimping areas. Inside the jetties, but outside of the channel, the waters are used by shrimpers and crabbers.

If the channel is deepened along the areas mentioned above, how will that affect the depth of the waters just outside the channel where the commercial shrimpers and crabbers work now?

How will deepening the channel affect the marine life in general, and specifically the shrimp and crabs that are harvested in waters adjacent to the channel?

2. How will deepening the channel affect the northern area of Tybee Island? What influence will the depth of the channel have on the ship's wake as they move in and out of the area?

At present, the ships' wake pulls water and sand from Tybee along the north side of the island. You can see the water being sucked out and then rushing back in, throwing water 50 linear feet or more back on the beach. When it rushes back out, more sand goes along with it. During beach season, fishing gear, coolers, chairs, radios, umbrellas, cell phones and PEOPLE are caught in the mini-tsunami and pulled out to sea. I have personally pulled a 6 year old child out of the wash before he was swept away. Someone else rescued his grandmother. (I can give you her contact information.) They were walking the shore line in water that did not even cover the tops of their feet just before the wake hit them. The people who have had items swept away *have been well away from the water's edge before the wake hit.*

On October 31, 2009, a small fishing boat in the same area was overturned as the wake of two ships passing. I saw the entire incident and called the Coast Guard. They pulled a man, woman and their two sons from the water. Their boat was never found. (The Coast Guard will have information on this rescue case.)

How will the increased depth of the channel in that area (from inside the jetties out to buoy 15) affect the surrounding beach? Will the increased depth cause the ship's wake to be magnified as it gets in shallower water? How much sand along the northern shore will be lost due to the deepening?

Again, I am in favor of deepening the channel, but it's important to be aware of the impact it will have in other areas. If there is a way to offset any negative impact, those means should be included in the project from the beginning and not treated as an unexpected afterthought.

Thank you,

Cecilia F. Morett

Cecilia F. Morett 912-897-4281 email: sassyshrimper@aol.com

Cecilia F. Morett

509-MR-04-EN01

Comment: *How will the deepening of the channel affect shrimpers and crabbers who make their living in the waters adjacent to the channel? From buoy 22 out to buoy 6 on both sides outside the channel are active shrimping areas. Inside the jetties, but outside of the channel, the waters are used by shrimpers and crabbers.*

Response: There would only be a minimal impact to the shrimp/crab interests. Deepening of the entrance channel would increase its width on each side by 25 feet and is expected to have no effect on depths outside the channel.

509-MR-04-EV01

Comment: *How will deepening the channel affect the marine life in general, and specifically the shrimp and crabs that are harvested in waters adjacent to the channel?*

Response: Section 4.12 Recreational and Commercial Fishing, states the following: *Commercial shrimp trawling is common in the immediate vicinity of the dredged entrance channel, since this is a natural corridor for emigrating shrimp. The Georgia DNR Coastal Resources Division (Personal Communication, 26 February 2007, Mr. Spud Woodard, Assistant Director for Marine Fisheries) indicates that Georgia's territorial waters south of the channel are open to food shrimp trawling during the established season, which is typically mid-June through December. Trawling occurs off the beach at Tybee Island, but is limited because of water depth.* That Section 4.12 also states that: *Commercial and sport fishing within Savannah Harbor is low due to heavy vessel traffic levels and high shoaling rates which limit benthic communities and required recurring maintenance dredging.*

The Draft EIS proposed placing dredged sediment in the nearshore area of Tybee Island and along the entrance channel as depicted in Figure 3.2. However, the Coastal Resources Division of GA DNR and the City of Tybee Island requested that the project not place any new work dredged sediment within the nearshore area due to uncertainties with that proposed action. As a result, the Final EIS describes a revised plan where sediments from the entrance channel would be placed either in the existing upland diked disposal areas and/or the EPA-approved ODMDS. As stated in Section 4.12 in the DEIS: *Commercial and sport fishing within Savannah Harbor is low due to heavy vessel traffic levels and high shoaling rates which limit benthic communities and required recurring maintenance dredging.*

The proposed entrance channel dredging would occur within the confines of the existing navigation channel and the oceanward extension of that channel. All new work sediments removed from the entrance channel would be placed either within the upland CDFs or the ODMDS. Therefore there will not be significant adverse impacts to commercial and non-commercial pelagic and benthic invertebrates.

509-MR-04-EN02

Comment: *How will deepening the channel affect the northern area of Tybee Island? What influence will the depth of the channel have on the ship's wake as they move in and out of the area?*

Response: Model predictions indicate that increasing the depth of the shipping channel (worse case) would not have a measurable effect on Tybee's north shore [located about 3000' distant]. The only significant effect of ships transiting the channel would be the long period drawdown. Based on an examination of the fleet mix, frequency of passage, and speed, the drawdown would slightly decrease in most cases with the deepened channel. While some ships would create an increased drawdown value compared to the without project condition, the magnitude at the shoreline would only be about 0.1 foot. Bottom line: analysis of ship wakes along the north shore of Tybee does not indicate there would be any significant adverse impacts.

509-MR-04-EN03

Comment: *How will the increased depth of the channel in that area (from inside the jetties out to buoy 15) affect the surrounding beach? Will the increased depth cause the ship's wake to be magnified as it gets in shallower water? How much sand along the northern shore will be lost due to the deepening?*

Response: As noted, computations indicate the increased depth of the shipping channel would not have a measureable effect on Tybee's north shore. There is no obvious relationship between the increased depth of the ship channel and whether a wave's energy would increase or decrease during its travel to the shore.

Based on examining the fleet mix, frequency of passage and speed, the drawdown would be slightly decreased [in most instances] with the deepened channel. While some ships would produce a greater drawdown compared to the without project condition, its magnitude at the shoreline would only be about 0.1 foot. Bottom line: analysis of ship wakes along the north shore of Tybee does not show there would be any significant adverse impacts.

1) To [illegible] to economics
2) Inadequate explanation to aquifer damage
3) [illegible] SOSP
4) Increased [illegible] to GPA
5) [illegible]

US Army Corps of Engineers
Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) Robert L. Jones; 631 Rose Dhu Road Stv'n Ga 31419-322

Comments: I am opposed to deepening the Savannah River as now proposed. In general, it is a case of the tail wagging the head. My reasons are (1) economics is being put before all else, giving disengenuous up service to other and very critical matters, (2) inadequate explanation has been given regarding possible damage to the aquifer, (3) at risk is that of damage to the environment, namely increasing salt water intrusion into the Savannah Wildlife Refuge, and other regions, (4) opposed I am to likely increase in tonnage of Georgia Ports Authority, thereby giving use to ingress/egress of trucking hardin on [illegible], and (5) shipping in general should be made to fit the physical geographics of a given region vs vice versa.

Robert L. Jones 12/15/00

PUBLIC COMMENTS

#595 MR. FERGUSON: Richard Ferguson out of the Port of Savannah, Georgia, Longshoreman Officer. I'm sergeant-at-arms, just reelected as an officer, and I work on the docks. We need that river to be deepened. We have a lot of people that do whole lot for the City of Savannah and also the City of Atlanta.

We send -- we export, import, move a lot of cargo. We're going on being the number one port in Savannah and we're depending on a lot of people getting jobs at the harbor, more jobs we can supply.

I want to appreciate that. I hope y'all deepen the river for what we really need. Thank you.

*****

#510a MR. JONES: In fact, I would like to have myself quoted. Robert L. Jones, and I live at 631 Rose Dhu Road, D-H-U, Savannah, Georgia, 31419-3323. My comment is first, in general, it is a matter of the tail wagging the head. I am opposed to deepening the Savannah River as presently proposed for the following reasons; one, inadequate explanation has yet

1 PUBLIC COMMENTS
2 to be given -- excuse me -- adequate
3 explanation has yet been given assuring us, as
4 local residents and citizen, that the
5 deepening will not damage the aquifer.
6 Point number two, opposed to deepening I
7 am out of concerns toward damaging the
8 environment, specifically that of increased
9 saltwater intrusion in the upper areas of
10 Savannah River, namely that of the Savannah
11 Wildlife Refuge.
12 Point number three, I am concerned that
13 the deepening of the river certainly is going
14 to increase the influx of tonnage movement at
15 the port, which in turn will have a direct
16 bearing on the roadway infrastructure, both in
17 terms of the roadway withstanding it, as well
18 as street increase in truck traffic.
19 Point number four, it is my view that
20 economics is being placed in the forefront
21 ahead of all else, with all else simply being
22 given lip service.
23 At the point that these big ships, of
24 themselves an experiment, be found that they
25 and their operation are not economically

PUBLIC COMMENTS

feasible, then the damages that arose, aquifer namely and environment another, will long since have been lost and difficult to gain, making generally the local area in a very difficult circumstance. Those are my comments.

*****

#596 MR. MASHBURN: Michael Mashburn, M-A-S-H-B-U-R-N. I work with Colonial Terminals and one thing -- my comment would be not only would this harbor deepening positively affect the container traffic in the port, but it's also going to greatly, positively affect the liquid tanker traffic in the port.

By that I mean that our customers, our terminal customers are going to have a efficiencies, because they're going to be able to get bigger cargoes in.

The movement of their tankers are going to be less restricted, because a lot of the draft restrictions will be gone, which could result in less inventories, run-outs in the terminal, which would otherwise prevent other

Robert L. Jones

510-MR-04-EN01

Comment: *My comment is first, in general, it is a matter of the tail wagging the head. I am opposed to deepening the Savannah River as presently proposed for the following reasons; one, inadequate explanation has yet to be given – excuse me – adequate explanation has yet been given assuring us, as local residents and citizen, that the deepening will not damage the aquifer.*

Response: The Corps conducted extensive analyses to determine potential SHEP-related impacts to the Upper Floridan aquifer [documented in GRR- Section 8.2.1, GRR-Appendix C Attachment 3, Potential Ground-Water Impacts to the Upper Floridan Aquifer, and EIS-Section 5.5. These analyses concluded harbor deepening will have a minimal incremental effect on the present downward rate of saltwater intrusion into the aquifer. The results also determined that deepening will produce an insignificant change in penetration of chlorides through the confining layer when compared to the status quo [no-action alternative]. In simulations, chloride concentrations decrease significantly upon accessing the Upper Floridan aquifer due to mixing [dilution] with its considerable horizontal freshwater flows. Hence, the proposed dredging would have negligible impacts on water quality in production wells that tap the Upper Floridan aquifer in the environs of Savannah.

510-MR-04-EV01

Comment: *Point number two, opposed to deepening I am out of concerns toward damaging the environment, specifically that of increased saltwater intrusion in the upper areas of Savannah River, namely that of the Savannah Wildlife Refuge.*

Response: The Corps completed all wetland studies/analyses identified by the Wetland Interagency Coordination Team to evaluate the wetland impacts of the various project alternatives. Through years of coordinated efforts with stakeholders, regulators, cooperating/partnering agencies, a mitigation plan was developed that adequately compensates for impacts to wetlands while maximizing project benefits. The USFWS prepared the Fish and Wildlife Coordination Act Report (Appendix E of the EIS). They conclude that the mitigation is adequate. In addition, the selected alternative includes a post-construction monitoring plan to evaluate actual impacts to wetlands, and an adaptive management plan that will permit adjustments to the mitigation features, if required.

510-MR-04-EV02

Comment: *Point number three, I am concerned that the deepening of the river certainly is going to increase the influx of tonnage movement at the port, which in turn will have a direct bearing on the roadway infrastructure, both in terms of the roadway withstanding it, as well as street increase in truck traffic.*

Response: Under both the without and with project conditions, Garden City Terminal will reach its build-out capacity in about 2030 when the total number of TEUs reaches 6.5 million. This is the maximum number of containers that could reasonably be processed through the GCT [annually] based on its size, the number of gates that provide access to the property, the number and size of the berths, the number and size of the container cranes, the number of jockey trucks that move the containers within the terminal, how the containers are stacked within the terminal, and the number of railroads that service the terminal and the frequency of their trains. It is predicted that without deepening, more vessels will be required to transport cargo that moves through the port; however, with deepening, the

total number of vessels decreases as they will be able to load/unload without the current constraints of draft.

No incremental increases in cargo are expected to occur as a result of the proposed harbor deepening. As a result, the project would not affect the number of containers that move through the areas that surround the port. The project's economic benefits result from the use of larger, more cost-effective container ships, not an increase in the number of containers. Noise, air emissions (including air toxics), and traffic would not be increased as a result of the proposed deepening.

Therefore, the proposed harbor deepening will have no adverse landside impacts outside the Garden City Terminal.

510-MR-04-EV03

Comment: *Point number four, it is my View that economics is being placed in the forefront ahead of all else, with all else simply being given lip service.*

Response: The SHEP strategy sought to maximize economic benefits while avoiding and minimizing environmental impacts. The study was conducted pursuant to the project authority and included the following objectives: (1) evaluate the need for increased navigation efficiency and safety. The size of a vessel and its cargo determine its draft (i.e., depth of water required for ship to float). With the current depth of the harbor, many vessels [70%] are operationally constrained, i.e., not able to load to their maximum capacity and travel at any tide. "Light loading" of vessels or use of smaller vessels increase costs to the shipper, which are eventually passed onto the consumer, (2) avoid, minimize, or compensate for adverse environmental impacts associated with the proposed action. See Section 5.0 in the DEIS and the Mitigation Plan in Appendix C for a discussion of environmental commitments incorporated into the proposed plan, and (3) provide adequate dredged material disposal capacity for the construction of the project and for the 50-year period of analysis.

US Army Corps of Engineers
Savannah District

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From: (optional)

Comments: what happens when BIGGER ships are built? when will deepening stop and at what cost to the environment? there can you guarantee the Aquifer will not be damaged in this deepening?

Public Comment-

511-MR-03-EV01
Comment: *What happens when BIGGER Ships are built?*

Response: The largest capacity vessels calling on the US East Coast [including Garden City Terminal] are expected to be about 8,000 TEUs. Vessels much larger than 8,000 TEUs are more apt to be deployed on Asia to Europe and/or Transpacific trade routes. The Economics Appendix explains why these larger vessels are unlikely to call at Savannah, irrespective of SHEP. For example, vessels in excess of 9,500 TEUs would have difficulties negotiating Savannah Harbor due to length and width limitations and air draft restrictions created by the Talmadge Bridge. Such *super* ships currently make up about 3 percent of the world fleet, but are expected to increase to approximately 11 percent by 2030.

Table 42 [Economics Appendix] displays the forecasted vessel calls by size class for the "without project condition" and for each of the deepening alternatives. The transportation costs of keeping the channel at its present depth is compared to same for each of the depth options to derive its project savings (benefits).

511-MR-03-EV02
Comment: *When will deepening stop and at what cost to the environment?*

Response: The study authority for SHEP was very specific regarding depths and did not authorize consideration beyond -48 feet. Transportation improvements would likely stop when the costs exceed the expected benefits.

511-MR-03-EN01
Comment: *How can you guarantee the Aquifer will not be damaged in this deepening?*

Response: The thickness of the protective Miocene confining layer above the Floridan aquifer has been studied via extensive drilling and seismic surveys. The area between river Stations 30+000 (Fields Cut) and -25+000B has been studied in particular detail since the aquifer is very close to the surface and its confining layer is relatively thin. It is well documented that groundwater withdrawals in/around Savannah is a major cause of saltwater intrusion into the aquifer. However, SHEP studies indicate that the proposed channel deepening [worse case] would only be a minor contributor to further downward flow through the confining layer. Notably, the difference between the maximum proposed deepening (-48 foot MLW) and the no-action scenario was minor [and only occurs along the channel alignment]. Nevertheless, dredging [for the proposed deepening] would be closely monitored to lessen the potential for unnecessary over digging. The Corps would also monitor groundwater along the channel after the project to identify any unexpected impacts.

A detailed explanation of study findings can be found in the General Re-Evaluation Report for SHEP, Appendix C: Engineering, Supplemental Studies, Potential Ground-Water Impacts to the Upper Floridan Aquifer, June 2007.

US Army Corps
of Engineers
Savannah District

Comment on the Savannah Harbor Expansion Project

The Savannah District, U.S. Army Corps of Engineers welcomes your comments on the Savannah Harbor Expansion Project. Once completed, place the card in the "comments" box or add postage and mail it back to us. Comments can also be provided online at **CESAS-PD@usace.army.mil**.

From: (optional) ROBERT J GALLETTA

Comments: I HAVE A NEW WAY TO DISSOLVE OXYGEN INTO WATER

GALETTA-AERATOR.COM

Robert Galleha

513-MR-01-EN01
Comment: *"I have a new way to dissolve oxygen into water. Galeha-aerator.com"*

Response: The EIS [Section 5.02] states: "The Corps' studies indicate that oxygen injection is the most cost-effective method for raising D.O. levels in the harbor. Due to the site-specific requirements, a land-based injection system would be the most effective solution." The District reviewed the commenter's posts on YouTube. Alternate methods of adding oxygen to the river that are capable of meeting the project's mitigation objectives could be considered during the design phase.

THE LAMAR INSTITUTE, INC.

#557

December 21, 2010

Mr. William Bailey
U.S. Army Corps of Engineers
Savannah District
P.O. Box 889
Savannah, Georgia 31402-0889

Dear Mr. Bailey:

I am writing in regards to the proposed Savannah River Navigation Project and the Draft EIS that was released by your office in November, 2010. I have reviewed the present draft documents regarding cultural resources and it seems to be a reasonable approach to the problem, if the proposed survey and mitigation efforts are followed.

Our organization has a long-standing interest in the cultural resources of the Savannah River watershed and their responsible identification, protection, investigation, public interpretation and proper mitigation (should destruction of these resources be absolutely necessary). I am requesting that "The LAMAR Institute, Inc." be included as an "Interested Party" in the final EIS documentation process, and as the various surveys and mitigation efforts move forward. We would also appreciate copies of any background documentation (archaeological reports, historical reports) pertaining to the project if extra copies are available. Electronic copies would be fine. I look forward to hearing from you.

Contact information:

Daniel T. Elliott,
President, The LAMAR Institute, Inc.
P.O. Box 2992, Savannah, GA 31402
dantelliott@gmail.com
(706) 341-7796; (912) 826-5214

Sincerely,

Daniel T. Elliott
President
The LAMAR Institute, Inc.

P.O. BOX 2992 • SAVANNAH/GA • 31402
SHIP TO: 101 SAVANNAH AVE., RINCON, GA 31326
PHONE: 912 826-5214, CELL 706 341-7796 • FAX: 912 826-5214 • EMAIL
DANTELLIOTT@WINDSTREAM.NET

The Lamar Institute

557-DC-01-EV01

Comment: *Our organization has a long-standing interest in the cultural resources of the Savannah River watershed and their responsible identification, protection, investigation, public interpretation and proper mitigation (should destruction of these resources be absolutely necessary). I am requesting that "The LAMAR Institute, Inc." be included as an "Interested Party" in the final EIS documentation process, and as the various surveys and mitigation efforts move forward. We would also appreciate copies of any background documentation (archaeological reports, historical reports) pertaining to the project if extra copies are available. Electronic copies would be fine. I look forward to hearing from you.*

Response: The Lamar Institute has taken a leadership role in creating public education and involvement activities for Georgia archaeology. Their assistance in identifying and evaluating these types of activities for the CSS Georgia mitigation and other archaeological investigations associated with the Savannah Harbor Expansion Project would be an asset to the project. The District will include the LAMAR Institute as an interested party in the EIS process and any extra copies of cultural reports (or electronic copies) will be forwarded to them.

US Army Corps of Engineers®
Savannah District

#563

Comment on the Savannah Harbor Expansion Project

The Savannah District, U.S. Army Corps of Engineers welcomes your comments on the Savannah Harbor Expansion Project. Once completed, place the card in the "comments" box or add postage and mail it back to us. Comments can also be provided online at **CESAS-PD@usace.army.mil**.

From: (optional) GEORGE H. CELSCHIG – George H. Celschig

Comments:

I favor expansion of the Harbor! – However, I do not want salt water intrusion into our fresh water!!!

George H. Oelschig

565-MR-01-EV01

Comment: *I favor expansion of the Harbor! –However, I do not want salt water intrusion into our fresh water!!!*

Response: The Corps performed extensive analyses to determine potential SHEP-related impacts to the Upper Floridan aquifer [documented in GRR- Section 8.2.1, GRR-Appendix C Attachment 3, Item 1.1.36, and EIS-Section 5.05. These analyses concluded harbor deepening will have a minimal incremental effect on the present downward rate of saltwater intrusion into the aquifer. It was also determined that deepening will produce an insignificant change in penetration of chlorides through the confining layer when compared to the status quo [no-action alternative]. In simulations, chloride concentrations decrease significantly upon accessing the Upper Floridan aquifer due to mixing [dilution] with its considerable horizontal freshwater flows. Hence, the proposed dredging would have negligible impacts on water quality in production wells that tap the Upper Floridan aquifer in the environs of Savannah.

From: Frank Peeples Jr
To: CESAS-PD_SAS
Subject: SHEP - Savannah Bulk Terminal LLC 1-6-11
Date: Thursday, January 06, 2011 9:10:44 AM

I am the owner and managing member of Savannah Bulk Terminal, LLC located at harbor marker 68, known also as "Woodchip Terminal" in the SHEP documents. I DO NOT SUPPORT the proposed Harbor Expansion Project at the requested permit depth 48 ft. My primary objection is that according to the Bank Stability Report dated July 28, 2010 the proposed widener at our location will result in the "taking" of land. (Page 5, Memorandum for the Record, submitted by Joseph Hudak, Jr. Pe.) In the event a permit to construct is issued by the USCOE, despite my objection, I demand that mitigation measures be taken to protect my land from known accelerated wave actions, bank sloughing, and/or decreased lateral bank stability resultant of the proposed project deepening and subsequent cumulative effects from advanced maintenance dredging and dredge over swing. I am simply requesting the same slope protection measures afforded to other project stakeholders and other cultural resources already protected or planned to be protected under this SHEP (e.g. Additional armoring of spoil disposal dykes on the North Bank of the river, Fort Jackson).

In addition I oppose this project as it does not adequately address a funding source or mitigation plan for the additional costs of future maintenance dredging that WILL be passed on to facilities with agitation dredging permits (GPA included), many that will never require or benefit from a 48 ft channel depth. Current COE practice is to take the average cost of upland silt disposal in Savannah and pass this cost directly on to private terminals per cubic yard operating under maintenance dredging permits. The end effect will be to unfairly and disproportionally increase Savannah marine terminal operating costs related to berth maintenance.

Further, in my opinion, the SHEP does not adequately address a method to pay for the long term maintenance of the proposed project particularly when the USCOE in its own admittance does not have the funds currently to adequately maintain the current 42' channel. The State of Georgia and the GPA will invest $100MM's of dollars of tax payer's money on new inland infrastructure to mirror the SHEP's "you build it, they'll come strategy" when all of this investment could be rendered useless if the channel re-silts with the lack of maintenance dollars.

In my opinion I believe a 45' channel more accurately reflects the current economic situation, regional and national port competitive situation, global ship market and would provide additional capacity to insure continued growth for the GPA. In addition this limited expansion will save well over $200MM per your data which could be redirected to inland infrastructure projects to support the last mile logistics which will have an immediate impact on safety and facilitating cargo through the Port. Regardless of the final outcome, I will expect the same protection afforded to those agencies with the power to stop this project in order to protect my business, employees, piers and land from potential damage resultant of the loss of lateral stability on the South River bank caused by any further deepening or advanced maintenance dredging.

Respectfully,

Frank Peeples, Jr.

Frank Peeples Jr.

566-MR-02-EV01

Comment: *I am the owner and managing member of Savannah Bulk Terminal, LLC located at harbor marker 68, known also as "Woodchip Terminal" in the SHEP documents. I DO NOT SUPPORT the proposed Harbor Expansion Project at the requested permit depth 48 ft. My primary objection is that according to the Bank Stability Report dated July 28, 2010 the proposed widener at our location will result in the "taking" of land. (Page 5, Memorandum for the Record, submitted by Joseph Hudak, Jr. Pe.) In the event a permit to construct is issued by the USCOE, despite my objection, I demand that mitigation measures be taken to protect my land from known accelerated wave actions, bank sloughing, and/or decreased lateral bank stability resultant of the proposed project deepening and subsequent cumulative effects from advanced maintenance dredging and dredge over swing. I am simply requesting the same slope protection measures afforded to other project stakeholders and other cultural resources already protected or planned to be protected under this SHEP (e.g. Additional armoring of spoil disposal dykes on the North Bank of the river, Fort Jackson).*

Response: The Bank Stability Report for the project assessed a proposed widener in the vicinity of the Woodchip Terminal at BN 57. That widener was subsequently determined to be unnecessary and was removed from the project. The navigation channel in that area will be deepened on the existing side slope, thus removing the potential for impacts to adjacent upland property in that location.

A Ship Forces on the Shoreline Study and a Bank Erosion Study were conducted to determine the impact the new vessel fleet operating in the deepened channel would have on wave erosion on the adjacent shoreline. In both the With and Without deepening scenarios, more vessels are expected to navigate through Savannah Harbor. The forecasted fleet for the deeper channel would be composed of fewer larger vessels than the future without project condition, which would have more and smaller vessels. Projections based on vessel design, transit speeds, and vessel numbers indicate that less wave-induced erosion would occur with the deepened channel than with the future without project condition.

566-MR-02-EV02

Comment: *In addition I oppose this project as it does not adequately address a funding source or mitigation plan for the additional costs of future maintenance dredging that WILL be passed on to facilities with agitation dredging permits (GPA included), many that will never require or benefit from a 48 ft channel depth. Current COE practice is to take the average cost of upland silt disposal in Savannah and pass this cost directly on to private terminals per cubic yard operating under maintenance dredging permits. The end effect will be to unfairly and disproportionally increase Savannah marine terminal operating costs related to berth maintenance.*

Response: Deepening the Savannah Harbor navigation channel would increase shoaling in some reaches of its inner harbor. However, the total volume of sediment required to be removed from the inner harbor on an annual basis is expected to remain roughly the same. The volume will remain constant, but the location will change somewhat. The evaluations do not differentiate between shoaling in the channel, per se, versus in the adjacent berths. The District remains fully committed to the harbor's long-term maintenance and, to that end, obtains the necessary funding through the established budget process. Berth owners that choose to use private sediment disposal areas to deposit their maintenance sediments would not experience any share of the increased Federal cost of maintaining the deeper channel.

From: davidschallen@comcast.net
To: CESAS-PD, SAS
Subject: Savannah Harbor Expansion Project
Date: Tuesday, January 18, 2011 5:40:51 PM

Please consider the following comments with regard to the proposed Savannah Harbor Expansion Project (SHEP).

The SHEP is the most studied and scrutinized project of its kind in the United States. More field data and been collected, analyzed and modeled in order to identify potential impacts than in any previous study.

As a result of this comprehensive effort, a very thorough mitigation plan has been developed to address all issues relating to the project. More importantly, an adaptive management plan has been prepared and is included in the project to monitor results of the expansion work for an extended period of time and to immediately implement corrective action when and if called for.

From a historical perspective, the last expansion missed the mark with ultra-conservative estimates of the world fleet, the Savannah fleet and the economic benefits projected to result from that deepening. With a fifty (50) year project life, the estimates for the SHEP appear conservative again. The forty eight (48) foot project depth shows the highest gross benefits and except for the very conservative economic assumptions used by the Corps, 48 feet should be the NED depth. 48 feet is required in order to retain the tremendous economic benefits currently produced as a direct result of the deep draft commercial commerce conducted via the Port of Savannah.

Every aspect of the project to date has been subject to public review and comment. A Stakeholders Evaluation Group (SEG) was assembled early in the study phase and has been closely engaged in the work effort every step of the way. The involvement of numerous environmental groups, not to mention the cooperation and critical input of state and federal resource agencies (including South Carolina) has greatly benefited the project. Every issue, both large and small, has

been identified and addressed as a result of this uncommon yet very effective collaboration.

The project is essential at 48 feet and it will produce wide-ranging economic benefits for the nation. Failure to implement this critical project will negatively impact the capacity and capability of the United States deep draft transportation system and result in higher transportation costs and increased consumer costs at the retail level. With exceedingly thorough study and evaluation and the inclusion of a comprehensive mitigation plan and adaptive management program, as well as significant economic benefits to be produced, the 48 foot expansion project should be implemented as soon as possible.

Thank you.

David Schaller

David Schaller

S87-DC-01-EC01

Comment: *From a historical perspective, the last expansion missed the mark with ultra-conservative estimates of the world fleet, the Savannah fleet and the economic benefits projected to result from that deepening. With a fifty (50) year project life, the estimates for the SHEP appear conservative again. The forty eight (48) foot project depth shows the highest gross benefits and except for the very conservative economic assumptions used by the Corps, 48 feet should be the NED depth. 48 feet is required in order to retain the tremendous economic benefits currently produced as a direct result of the deep draft commercial commerce conducted via the Port of Savannah.*

Response: The world fleet of container vessels has changed more rapidly than the Corps expected when it evaluated deepening Savannah Harbor back in the early 1990's.

The Principles & Guidelines defines the Federal objective as "contributing to National Economic Development (NED) consistent with protecting the environment". The NED Plan represents the plan that reasonably maximizes the NED benefits to the Nation after subtracting out the economic costs.

In the case of Savannah Harbor, the 47-foot deepening alternative resulted in the highest net benefits, thus making it the NED plan. The present channel depth limits shippers from loading more completely and taking full advantage of larger vessels. The deepening project would reduce annual transportation costs by $213 million. Corps policy provides non-Federal sponsors such as the GPA with the opportunity of choosing a plan different from the NED Plan, which is defined as the Locally-Preferred Plan. Departures from the NED have cost sharing implications and need to be approved by the ASA(CW).

CWT Savannah Hotel, LLC
CSX Realty Development, LLC
6737 Southpoint Drive South
Jacksonville, FL 32216

January 21, 2011

U.S. Army Corps of Engineers
Savannah District
Savannah Planning Unit
Attention: Mr. William Bailey
100 West Oglethorpe Avenue
Savannah, Georgia 31401-3640

RE: Savannah Harbor Expansion Project ("SHEP")
Comment on Draft Environmental Impact Statement ("EIS")

Dear Mr. Bailey:

CWT Savannah Hotel, LLC ("CWT") and CSX Realty Development, LLC ("CSXRD") are pleased to have this opportunity to comment on the Draft EIS which was distributed for public comment on November 17, 2010. The SHEP is greatly needed and will enhance shipping as well as the related economic future of the entire area.

Since the project is adjacent to CWT's Westin Savannah Harbor Hotel and CSXRD's properties on Hutchinson Island, both of which rely heavily on the riverwalk and the adjoining docks as well as the proposed yacht basin which was recently approved by the Corps, we had our engineering firm undertake a review of the EIS. Several subject areas investigated need further clarification from your office. I will attempt to list them below:

1. Shoreline Erosion.

The "Savannah Harbor Expansion Bank Erosion Study" reported on specific areas but may not have included the entire shoreline of Hutchinson Island. If at all possible, could your office clarify the exact locations considered for bank erosion analysis identified by channel stationing and offset (which side of the river). CWT and CSXRD are simply trying to assure there will be no increase in bank erosion along the shoreline of CWT properties due to changes in the channel profile or ship traffic.

2. Impacts to Structures Due to Dredging, Bank Slope Failure, or Scour Associated with Channel Deepening.

The CWT and CSXRD properties adjoin sections of the river with two separate allowable advanced maintenance dredging criteria. The section of river above STA 70+000 has an allowable maintenance dredging depth of two feet and the corresponding maximum channel depth would be equal to the allowable overdredge depth of -50 feet. Below STA 70+000, the allowable advanced maintenance dredging depth is four feet and the corresponding maximum channel depth would be -52 feet, exceeding the typical allowable overdredge depth. A portion of CSXRD property, "Parcel 10" fronts this portion of the river. Here the theoretical encroachment towards CSXRD's property could be as great as approximately eight feet. There is concern this encroachment could have the potential to impact the submerged rock jetty that provides shore protection for the southern bank of the downstream end of Figg Island. It appears from a review of COE studies that deepening the channel will not result in undermining of the existing structures at the Westin Hotel property. However, this conclusion is only valid assuming the channel is not widened inadvertently at the time of the project or in subsequent maintenance dredging events. Is there any kind of assurance that can be given that the channel will not be widened along the City Front Reach of the river? Also, is there any information available which will put to rest our concerns that the channel deepening will not have an adverse affect on the shore protection (rock jetty) currently in place adjacent to Parcel 10? We would greatly appreciate a copy of available scour analysis or some other assurance from the Corps that scouring of the channel bottom or side slopes will not pose a problem.

3. Impacts Due to Increased Flooding During Storm Surge.

If possible, CWT and CSXRD would like to request from the Corps, storm surge contour maps delineating flood elevation contours for both the 42' and 48' channel under the 5', 10' and 15' storm surge conditions analyzed. As you are aware, a matter of inches can make the difference in a structure being flooded or not.

The above outlines our present concerns regarding the proposed project. Once again, let us emphasize our support for this endeavor but would like to have the above-captioned information and your response so that we may more fully understand the project and the COE can further minimize its impact. Thank you for your cooperation.

Sincerely yours,

CWT Savannah Hotel, LLC
CSX Realty Development, LLC

By: Richard C. Sibley
Richard C. Sibley
AVP, CSX Real Property, Inc., its agent

CWT Savannah Hotel, CSX Realty Development

616-MR-03-EN01

Comment: *The "Savannah Harbor Expansion Bank Erosion Study" reported on specific areas but may not have included the entire shoreline of Hutchinson Island. If at all possible, could your office clarify the exact locations considered for bank erosion analysis identified by channel stationing and offset (which side of the river). CWT and CSXRD are simply trying to assure there will be no increase in bank erosion along the shoreline of CWT properties due to changes in the channel profile or ship traffic.*

Response: Bank erosion due the Savannah Harbor Expansion Project was addressed by three separate studies: Savannah Harbor Expansion Bank Stability Report, Ship Forces on the Shoreline of the Savannah Harbor Project, and Savannah Harbor Expansion Bank Erosion Study, Fort Pulaski and North Tybee Island, Georgia, with updates. These study reports are included as Supplemental Materials, in Attachment 3 of the Engineering Appendix of the GRR (Appendix C).

The Bank Stability Report addressed predicted direct upland impacts due to channel deepening. Overall, impacts to the shoreline would be minimal since the channel would be deepened on the existing slope. Impacts were identified at a few areas and separate taking studies and recommendations were made for these locations. Those sites are identified in the Bank Stability Report.

The Ship Forces on Shoreline Study and the Bank Erosion Study considered the impact of ship waves on the entire shoreline, including Hutchinson Island, using available information such as aerial photos, ERDC studies, visual inspections, and shoreline configurations. The areas considered at higher risk of erosion were examined in more detail. It was determined by these studies that although there would be erosion due to ship waves for both the with and without project condition, there would be no increase in erosion due to ship waves with channel deepening. No increases in bank erosion due to deepening are predicted for the subject property.

616-MR-03-EN02

Comment: *The CWT and CSXRD properties adjoin sections of the river with two separate allowable advanced maintenance dredging criteria. The section of river above ST A 70+000 has an allowable maintenance dredging depth of two feet and the corresponding maximum channel depth would be equal to the allowable overdredge depth of -50 feet. Below STA 70+000, the allowable advanced maintenance dredging depth is four feet and the corresponding maximum channel depth would be -52 feet, exceeding the typical allowable overdredge depth. A portion of CSXRD property, "Parcel 10" fronts this portion of the river. Here the theoretical encroachment towards CSXRD's property could be as great as approximately eight feet. There is concern this encroachment could have the potential to impact the submerged rock jetty that provides shore protection for the southern bank of the downstream end of Figg Island. It appears from a review of COE studies that deepening the channel will not result in undermining of the existing structures at the Westin Hotel property. However, this conclusion is only valid assuming the channel is not widened inadvertently at the time of the project or in subsequent maintenance dredging events. Is there any kind of assurance that can be given that the channel will not be widened along the City Front Reach of the river? Also, is there any information available which will put to rest our concerns that the channel deepening will not have an adverse affect on the shore protection (rock jetty) currently in place adjacent to Parcel 10? We would greatly appreciate a copy of available scour analysis or some other assurance from the Corps that scouring of the channel bottom or side slopes will not pose a problem.*

Response: The channel prism would be deepened, but excavation will be limited to its bottom plane. The angle[s] of the channel's side slopes in this reach would remain essentially the same, i.e., current design specifications do not include any channel widening at this location. The GRR-Engineering Appendix, Section 6.3.5 describes the areas where the inner harbor side slopes would be dredged. The inner harbor channel's side slopes would not be dredged in other reaches. Section 6.4 discusses the analyses that were performed of the stability of the side slopes.

616-MR-03-EN03

Comment: *If possible, CWT and CSXRD would like to request from the Corps, storm surge contour maps delineating flood elevation contours for both the 42' and 48' channel under the 5', 10' and 15' storm surge conditions analyzed. As you are aware, a matter of inches can make the difference in a structure being flooded or not.*

Response: The objective of the hurricane surge modeling was limited to a determination of how SHEP would affect the propagation of a surge traveling through the estuary and into the river system. Hence, the model grid was not created with the capabilities to provide a detailed inundation map. While the Savannah River, the braided stream network adjacent to the river, and the ocean bar [up to 17 miles offshore] are described in detail in the model grid, the elevated river banks, adjacent beaches, and contiguous uplands are not captured by this network. Admittedly, these areas would be impacted during a hurricane. Moreover, they would affect the propagation of a storm surge through the river system and navigation channel. As noted, the SHEP model is limited in this regard, but it is a useful and adequate tool to compare the potential effects of the various depth alternatives. This work was not an attempt to update FEMA's projections regarding the effects of tropical storm surge inundation.

From: Amber Welsh
To: CESAS-PD, SAS
Subject: Deepening the port of Savannah
Date: Friday, January 21, 2011 11:08:16 AM

To whom it may concern,

In order to increase the depth of the port to increase business, we must be able to protect and sustain our precious wetlands. Savannah and the low country is a true gem and so much of sea life depends on the health of the marsh. We cannot risk the health of this ecosystem because we want to save money. It is crucial that at the very minimum all of Georgia Conservancy's measures are adhered to.

Sincerely,

Amber Welsh, P.E.
LEED® Accredited Professional

397 5th Street NE,
Atlanta, GA 30308
(v) 404.810.9020
(c) 678.488.1967
timmonsdesigneng.com

Amber Welsh

617-MR-01-EV01

Comment: *In order to increase the depth of the port to increase business, we must be able to protect and sustain our precious wetlands. Savannah and the low country is a true gem and so much of sea life depends on the health of the marsh. We cannot risk the health of this ecosystem because we want to save money. It is crucial that at the very minimum all of Georgia Conservancy's measures are adhered to.*

Response: The District is fully committed to wetland protection. Foremost, it always seeks to avoid and minimize impacts to wetlands in the execution of its civil works projects. This is the same policy to which permit applicants are required to adhere when they apply for a Corps Section 404 permit to impact wetlands. When impacts to wetlands cannot be avoided, appropriate mitigation must be provided to compensate for any loss of wetland function [no-net loss].

Construction of the SHEP (no matter which channel depth is ultimately constructed) would result in the loss of 15.68 acres of brackish marsh because of the excavation requirements of the project. The project would include in-kind mitigation for this wetland loss by restoring approximately 24 acres of marsh in Disposal Area 1S.

While the predicted increase in upstream salinity levels from construction of the project would not result in any loss of marsh, areas of tidal freshwater marsh would likely convert to brackish marsh. Many of the emergent plant species associated with freshwater marsh systems would still be readily observed in a brackish marsh system. Notably, the basic wetland functions (water purification, flood protection, shoreline stabilization, etc.) typically associated with these systems would not change. There would be a minor modification in the fish and wildlife function when tidal freshwater marsh is converted to brackish marsh. Consequently, the mitigation plan for the project provides for the acquisition and preservation of land that is ecologically valuable to the Savannah National Wildlife Refuge. This would ensure that these lands [which are valuable wildlife habitat] would remain protected in perpetuity, thereby providing compensation for the change in fish and wildlife function when tidal freshwater marsh is converted to its brackish marsh counterpart.

#641

William Bailey
PD, US Army Corps of Engineers
Savannah District
100 West Oglethorpe Ave
Savannah, GA 31401-3640

January 13,2011

Reference: Savannah River deepening

We want to make sure that there is a plan in place for the Shad and endangered species short-nosed sturgeon to be replenished.

Because the DNR has recently passed laws that will affect the number of Shad caught by shutting-down the Ogeechee, St. Mary's, and Satilla Rivers for Shad fishermen; it is imperative that the Savannah River have full access to this species.

There is a hatchery in Richmond Hill where these fish can be raised, but there is no plan in place as of yet to make sure this "Savannah Delicacy" is not completely depleted.

We did voice our concerns to the DNR board, to no avail, as to the magnitude of their decision. Our Shad customers are all over the country.

Georgia is the only state on the Atlantic Coast that does NOT have a replenishing plan for saltwater fish. We recommend that before the decision is finalized on the deepening of the Savannah River that a plan has been implemented to raise Shad and the endangered short-nose sturgeon.

With the deepening of the harbor, it will affect the natural spawning of the shad. We need a plan in place to make sure than when the river is deepened, the shad can & will be raised.

These fish return to the river that they are born in. The short-nose sturgeon do not leave the river like their cousin the Atlantic sturgeon – therefore if a program is started to raise these species we could, in a few years, have more Shad and short-nose sturgeon and they can be taken off of the endangered species list.

Thank you in advance for your consideration of this matter.

Charles J Russo Jr
Russo's Seafood
201 East 40th St
Savannah, GA 31401
912-234-5196

Charles J Russo Jr.

642-MR-01-EV01

Comment: *Georgia is the only state on the Atlantic Coast that does NOT have a replenishing plan for saltwater fish. We recommend that before the decision is finalized on the deepening of the Savannah River that a plan has been implemented to raise Shad and the endangered short-nose sturgeon.*

Response: EIS-Section 5.03.2 details the proposed actions that would benefit American shad and the Shortnose sturgeon. Although the fish bypass at the New Savannah Bluff Lock and Dam is designed to pass Shortnose sturgeon to allow their access to historic spawning areas at the Augusta Shoals, the design would also readily accommodate American shad, thereby providing similar benefits to that (and other) anadromous species.

From: HONEYSAIL@aol.com
To: CESAS-PD_SAS
Cc: DIMARIAN21@aol.com; jim@connectsavannah.com
Subject: Comments: Savannah Harbour Deepening Project
Date: Sunday, January 23, 2011 2:34:04 PM

Dear Mr. Bailey,

I have only 2 comments/questions for USACE and they are:

1) Who will provide my family with fresh drinking water should there be an accidental salt water contamination of our drinking water supply either via a breach in the Floridian Aquifer or salt water intrusion into the Savannah Industrial Water intake?

2) How long will it take to supply my family with fresh drinking water in the event that the water supply becomes contaminated with salt?

Your answer to the above are very important to me as I pump my drinking water from the aquifer and we all must have fresh water to survive. Thank you

Sincerely yours,

John J. Fitzgerald, Jr.
260 Oatland Island Road
Savannah, GA 31410

(912) 441-2296

John J. Fitzgerald Jr.

647-MR-02-EV01

Comment: *"Who will provide my family with fresh drinking water should there be an accidental salt water contamination of our drinking water supply either via a breach in the Floridian Aquifer or salt water intrusion into the Savannah Industrial Water intake?"*

Response: The results of numerous studies [prepared for the overall evaluation of SHEP] concluded that the project will not adversely affect Savannah's drinking water [ground- or surface water]. For example, extensive analyses were performed to determine potential impacts to the Upper Floridan aquifer [documented in GRR- Section 8.2.1; GRR-Appendix C Attachment 3, Potential Ground-Water Impacts to the Upper Floridan Aquifer, June 2007; and EIS-Section 5.5 of the EIS]. These analyses concluded harbor deepening will have a minimal incremental effect on the present downward movement of saltwater into the aquifer. It was also determined that deepening will produce an insignificant change in penetration of chlorides through the confining layer when compared to the status quo [no-action alternative]. Chloride concentrations would decrease significantly upon accessing the Upper Floridan aquifer due to mixing [dilution] with the considerable horizontal freshwater flows of the aquifer. Hence, the proposed dredging would have negligible impacts on water quality in production wells that tap the Upper Floridan aquifer in the environs of Savannah.

The project includes long-term monitoring of the groundwater to identify any unexpected effects, should they occur.

The potential for elevated chloride levels at Savannah's freshwater surface intake was carefully examined. The Corps coordinated closely with the City concerning possible impacts, additional analysis, and possible solutions. Potential effects associated with elevated chlorides would primarily affect industrial water uses rather than residential customers, since chloride levels would not approach the drinking water standard. The District evaluated whether increased lead and/or copper solubility might pose a secondary effect. The mitigation plan recommended for surface water chlorides is to provide a raw water storage impoundment where water supply can be drawn from on a temporary basis during a high chloride event. Details of this reservoir concept design and operational plan are included in Section 7.7 of the Engineering Appendix and Section 5 of the EIS. The City of Savannah plans to use the proposed reservoir on a permanent basis to reduce the requirement to react to sudden changes in water quality from Abercorn Creek which presently result from the tidal cycle influence on Abercorn Creek water. Pre-mixing the water plant input water before it reaches the treatment plant will have operational benefits for the city which should result in enhanced drinking water quality for the customers. Fortunately, all analyses to date indicate that impacts at the City's intake are minimal and would only occur for short durations during low-flow periods. Section 5.02.3 of the EIS has been revised to reflect the most current data analysis and conclusions.

647-MR-02-EV02

Comment: *"How long will it take to supply my family with fresh drinking water in the event that the water supply becomes contaminated with salt?"*

Response: The Corps and the natural resource agencies responsible for management of groundwater believe that the SHEP would not result in measureable changes in chloride levels in the drinking water aquifer.

Weyerhaeuser

Port Wentworth
Cellulose Fibers

Post Office Box 668
Savannah, Georgia 31402
1 Bonnybridge Road
Port Wentworth, Georgia 31407
(912) 964-1271, (912) 966-4341
FAX: (912) 966-4339

January 21, 2011

OVERNIGHT DELIVERY

Mr. Bill Bailey
US Army Corps of Engineers
Savannah, GA 31402

SUBJECT: Comments on Draft Environmental Impact Statement for the Savannah Harbor Expansion Project

Dear Mr. Bailey:

Please accept Weyerhaeuser NR Port Wentworth's comments concerning the *Current Draft Environmental Impact Statement for the Savannah River Expansion Project*. Weyerhaeuser NR Port Wentworth is a Cellulose Fibers Manufacturing Facility located on the Savannah River in Port Wentworth, GA. The Facility directly employs approximately 320 individuals and due to our business functions could impact an additional 2.5 to 5 times as many individuals. As proposed, the draft EIS could have major impacts on our manufacturing operation, its employees, and the surrounding community. Weyerhaeuser NR Port Wentworth's process operations are supplied water by the City of Savannah's Industrial Water Plant. Weyerhaeuser NR Port Wentworth also has a Non-Contact Cooling Water inlet and associated piping in use, and permitted for 30 MGD maximum daily flow.

The Weyerhaeuser NR Port Wentworth Mill supports expansion of the harbor and resulting Economic Growth and Development. Weyerhaeuser NR Port Wentworth produces approximately 900 Air Dried Metric Tons of Pulp per day (translates to about 350 Sea Containers per week), is a 100% export facility directly to the Georgia Ports Authority, and would benefit by the larger ships and lower shipping costs.

The current Tier II EIS Chloride model in the Draft suggests little to no increase in Chlorides in the Harbor. Weyerhaeuser attended the meeting at the US Army Corps Savannah Office to review the recently revised model/s that indicate there will be significant predictable changes in Chloride Concentrations in the Harbor on December 21, 2010. Significant increases in Chlorides in the Harbor (from 12mg/L to as much as 70 mg/L on certain days) will impact Weyerhaeuser NR Port Wentworth both directly and indirectly.

Direct impacts to Weyerhaeuser include accelerated corrosion rates to our Non Contact Water Intake Screen, pumps, piping, and Heat Exchanger. Accelerated corrosion rates can be calculated if the Salt Water concentration and resulting Chlorides increase are known, based on the Langelier Index and other models. Weyerhaeuser can calculate corrosion rates based upon varying Chloride concentrations when necessary, and will have to undergo a cost-benefit analysis directed towards Capital to be invested to install Cooling Towers and associated equipment, in efforts to save our current piping and system and no longer utilize Savannah River Surface Water for cooling.

Indirect Impacts to Weyerhaeuser from increased Chlorides in the harbor include the fact that our mill's Process and Boiler water is supplied by the City of Savannah Industrial Water Supply. Weyerhaeuser has reviewed and supports the comments that the City of Savannah submitted regarding this Draft EIS in relation to Chlorides. If the City of Savannah takes action to mitigate for Chlorides, then Weyerhaeuser NR Port Wentworth will be penalized by drastically increased costs for water from the city to support the City of Savannah's project. If the City of Savannah does not take action mitigate the increased Chlorides then Weyerhaeuser will be impacted by increased Chlorides. The two specific impacted areas of the facility include the Boiler Water processing units and the Bleach Plant. The Bleach Plant bleaches our final product from brown pulp to white pulp. The impacts to the Bleach Plant are linear based on Chloride concentration, and will demand increase of the Bleaching Chemicals to maintain current production levels. Increased chemical usage will result in additional costs, and possible additional emissions of Air and Water pollutants. Boiler water for high pressure boilers (anything over 200 psi steam) is supposed to have essentially zero Chloride concentration to protect the tubes in the boiler from internal corrosion and erosion. Weyerhaeuser has a Demineralizer Area that takes the current supplied water (approximately 12 mg/L Chlorides) to non-detect levels. Currently the Demineralizer Area has some excess capacity, but increases in Chloride concentrations will impact this capacity negatively, and large increases in Chlorides (concentrations 50 mg/L and above) will exacerbate current capacity, and will require additional Capital to maintain current Boiler water needs possibly including Reverse Osmosis units in addition to our current equipment in the Demineralizer Area.

The current Draft EIS includes a 2 year post dredge monitoring period for Chlorides. If increased Chlorides are detected during the monitoring period, then the current Draft EIS includes statements to implement an Adaptive Management Plan. Any actions required by the Adaptive Management Plan would need funding, and would have to be placed in the 2 year appropriation cycle. The issue with this approach is that if Chlorides increase as high as the updated model predicts immediately after dredging, then either the City of Savannah or Weyerhaeuser will have to provide mitigation on an unplanned emergency basis or suffer downtime. Weyerhaeuser can make some process adjustments to address moderate Chloride increases, but elevated levels of Chloride near or above 50 mg/L will likely result in additional Capital Investments.

All of the above Capital costs and increased operating costs can be estimated, and additional technical references can be located to support calculations as discussed in the December 21, 2010 meeting. Weyerhaeuser will need additional time and will obtain additional resources in efforts to provide this cost data and supporting information to the US Army Corps under separate letter.

Weyerhaeuser

Weyerhaeuser appreciates this opportunity to offer comments on the Draft EIS as an impacted stakeholder. We believe our comments are significant, and identify non-technical and technical issues that must be resolved prior to the establishment of a Final EIS. If you have any questions concerning these comments, please contact me at (912) 966-4377.

Sincerely,

Weyerhaeuser NR Port Wentworth

Robert C. Grygotis
VP/Mill Manager

Chris Blocker
Environmental Manager

Weyerhaeuser

694-MR-01-EV01

Comment: *All of the above Capital costs and increased operating costs can be estimated, and additional technical references can be located to support calculations as discussed in the December 21, 2010 meeting. Weyerhaeuser will need additional time and will obtain additional resources in efforts to provide this cost data and supporting information to the US Army Corps under separate letter.*

Response: Weyerhaeuser's concerns regarding capital costs related to dealing with potential increases in chlorides are acknowledged. The Corps' consultant obtained additional information from the company in 2011 when it evaluated potential ways to treat higher chloride levels in the City's water supply. Since this comment was received, the Corps' more detailed and updated analysis of potential impacts to chlorides in surface water supplies has been completed and provided to Weyerhaeuser. This

analysis can be found in the Engineering Appendix, Section 7.7 and summarized in Section 5 of the EIS..

From: chris rice
To: CESAS-PD_SAS
Subject: SHEP comments
Date: Monday, January 24, 2011 5:43:44 PM

Dear Mr. William Bailey:

It is important that the Savannah Harbor be expanded to 48 ft, as this expansion is vital to the growth, and success of Georgia, United States, and to maritime partners around the globe. The proposed project depth of 48 feet will improve safer navigation for deep draft vessels, and will allow vessels a deeper draft with an unconstrained transit. In addition, it will enhance the queuing of vessels, minimize impacts to deeper draft vessels, and with the realignment of the channel for passing areas will improve safer navigable transit for deep draft vessels.

The expansion is critical to all vessel traffic using the Savannah River, and by having 48 feet you allow for more hours in a tide window for vessel with more capacity to arrive and depart without causing delays to other vessels not tidally constrained and allows for safer conditions for pilotage, asset management, and vessel transit. The expansion will equally enhance and adequately support the vessel movements for two-way traffic in Savannah River.

The documents and information supports harbor expansion from the economics, the engineering, and evaluation to maintain and improve the environmental mitigation of the Savannah River, and it is clear that justification for 6 more feet speaks volumes to deepening this harbor to 48 feet.

Respectfully,

Chris Rice

Chris Rice

700-DC-01-EC01

Comment: *It is important that the Savannah Harbor be expanded to 48 ft, as this expansion is vital to the growth, and success of Georgia, United States, and to maritime partners around the globe. The proposed project depth of 48 feet will improve safer navigation for deep draft vessels, and will allow vessels a deeper draft with an unconstrained transit. In addition, it will enhance the queuing of vessels, minimize impacts to deeper draft vessels, and with the realignment of the channel for passing areas will improve safer navigable transit for deep draft vessels.*

Response: Thank you for your feedback on the project.

From: SBOOHER@aol.com
To: CESAS-PD, SAS
Subject: America cannot afford more tidal freshwater wetland loss.
Date: Monday, January 24, 2011 6:25:07 PM

Mr William Bailey 24 January 2011
Attn: CESAS- PD

Subject: America cannot afford more tidal freshwater wetland loss.
If the tidal freshwater wetlands of the Savannah National Wildlife Refuge cannot be protected and previously lost tidal freshwater wetlands restored, then Savannah River Harbor Deepening plans should be held without funding.
At such time as permanent protection of existing area and Refugee tidal freshwater wetlands is secured and past destroyed Refuge tidal freshwater wetlands identified and funding for permanent restoration are secured, then the Harbor Deepening plans can move forward.

For past River Deepening and this planned Deepening, I have not read where any of the proposed mitigation properties are tidal freshwater wetlands. I am asking that the Corps of Engineers investigates to determine if Refugee Tidal Freshwater wetlands have been lost in previous Savannah Harbor Deepening activities and if mitigation sites for those deepening actions are permanently protected tidal freshwater wetlands. Is the Corps of Engineers monitoring those locations and acreage of the previous mitigation sites to insure they are tidal freshwater wetlands that are permanently protected? Accountability of tidal freshwater wetlands lost from previous deepening activities must be written into the current deepening plan and a condition for moving forward with this Harbor Deepening. Until this happens, there must be no Federal or State funding approved for this project.

USFWS considers the current Tidal freshwater wetlands to be the most critical natural resource in the harbor. Tidal freshwater wetlands are far more ecologically diverse than saltwater wetlands and their acreage along the east coast and in the Savannah National Wildlife Refugee in particular has been in steady decline over recent decades. It is imperative that we preserve what we have and take measures to restore what has been lost. (see DEIS Section 5.1.2 as it addresses indirect impacts to wetlands which includes impacts to tidal freshwater wetlands).

Sam Booher
4387 Roswell
Dr **Augusta, GA**
30907

Sam Booher

710-MR-01-EV01

Comment: *For past River Deepening and this planned Deepening, I have not read where any of the proposed mitigation properties are tidal freshwater wetlands. I am asking that the Corps of Engineers investigates to determine if Refugee Tidal Freshwater wetlands have been lost in previous Savannah Harbor Deepening activities and if mitigation sites for those deepening actions are permanently protected tidal freshwater wetlands. Is the Corps of Engineers monitoring those locations and acreage of the previous mitigation sites to insure they are tidal freshwater wetlands that are permanently protected? Accountability of tidal freshwater wetlands lost from previous deepening activities must be written into the current deepening plan and a condition for moving forward with this Harbor Deepening. Until this happens, there must be no Federal or State funding approved for this project.*

Response: Appendix L (Cumulative Impacts) provides a thorough discussion of the impacts of past harbor improvements on the various marsh types (salt, brackish, tidal freshwater) in the Savannah Harbor estuary. While there are other factors involved such as sea level rise and landside development, deepening of the Savannah Harbor navigation channel over time has resulted in an increase in upstream salinity levels. This, in turn, has caused freshwater marsh to be replaced by more salt tolerant wetland species. Mitigation for this particular impact has been provided on a project-specific basis, depending on the expected impact of the individual project. A comprehensive study to determine the historic losses of freshwater marsh in the Savannah Harbor estuary and appropriate restoration or mitigation measures would require a separate study authorization from Congress.

The Corps conducted extensive studies during SHEP to determine its potential impacts to tidal freshwater marsh and measures to ameliorate those effects. It is unavoidable that SHEP's construction will increase upstream salinity levels. While this change will not result in any areal marsh loss, it would cause some tidal freshwater marsh to shift to a brackish marsh species assemblage. Consequently, measures have been developed and included to increase the flow of freshwater and decrease the flow of saltwater into Middle and Little Back Rivers to offset the anticipated increase in salinity levels. Even with implementation of these measures, some tidal freshwater marsh (mainly in Front River) would likely convert to more brackish species of emergent marsh.

A Wetland Interagency Coordination Team [technical expert representatives from the District and federal/state natural resource agencies] was assembled to identify acceptable mitigation for SHEP. At that time, the USFWS stated that mitigation actions must be performed within the basin for impacts to wetlands located within the SNWR. The Service suggested preservation of lands as a possible solution and recommended sites that are part of its long-term lands acquisition strategy to compliment the SNWR. The District then consulted with the Stakeholder Evaluation Group, including its non-governmental Organizations members, to see if they could identify any other suitable mitigation options. Over the 10-year study period, no agency/organization could identify another feasible alternative as mitigation for impacts that would occur as a result of the wetland species shifts.

The Wetland Interagency Team concluded that there were no opportunities either to restore or create substantial acreages of tidal freshwater marsh in the estuary. Consequently, acquisition and

preservation of lands that are ecologically valuable and add to the purposes of the Savannah National Wildlife Refuge was identified as appropriate mitigation for impacts to tidal freshwater marsh.

From: SBOOHER@aol.com
To: CESAS-PD, SAS
Subject: America cannot afford to Deepen every Ocean Port
Date: Monday, January 24, 2011 6:46:16 PM

Mr William Bailey 24 January 2011
Attn: CESAS- PD

Subject: America cannot afford to Deepen every Ocean Port

The ports in Savannah, Jacksonville and Charleston will continue to be key U.S. gateways to international trade. However all three do NOT need to be deepened in order to accommodate the new generation of containerships. The current containerships will continue to dominate ocean commerce when the expansion of the Panama Canal is completed in 2014.

The current terminals along the Savannah River support hundreds of thousands of jobs throughout Georgia and South Carolina. Current size container ships are not going to be sunk. They will continue to be utilized. Once a decision is made as to which Atlantic Coast Port is deepened, current container ships visiting that port will be shifted to use Savannah Port. Without deepening the Savannah River, Savannah Port will continue to grow and provide even more jobs as current containerships visiting Jacksonville, if deepened, will now use Savannah Port.

The Federal Government cannot afford to assist deepening every port along the Atlantic Coast. Nor are State Budgets deep enough to allow every state along the Atlantic Coast to spend tax payers money to deepen a port in every state.

The Federal Government needs to decide which one Port to will help fund. This would save funds currently planned for deepening Savannah River and yearly dredging funds needed to keep it deep. A much better solution would be a Trans-shipment port in the Bahamas like Hutchenson Port then no Atlantic Coast ports need deepening.

Sam Booher
4387 Roswell Dr
Augusta, GA 30907

Sam Booher

711-DC-02-EC17

Comment: *The ports in Savannah, Jacksonville and Charleston will continue to be key U.S. gateways to international trade. However all three do NOT need to be deepened in order to accommodate the new generation of containerships. The current containerships will continue to dominate ocean commerce when the expansion of the Panama Canal is completed in 2014.*

Response: The District is very sensitive to how taxpayers' funds are spent. As a result, the SHEP economic analysis was performed to the highest standards using empirical data and forecasts developed by reputable economic firms with specific expertise in the shipping industry. The economic model used in the prediction analysis for SHEP underwent several iterations of rigorous review, including one by an independent panel. From the federal perspective, the optimal project (defined as the project providing the greatest net benefits over costs, i.e., NED) was found to be the -47 feet deepening alternative.

As to evaluating multiple ports and selecting one "regional port" to deepen [upgrade], this concept surfaces frequently. For the Savannah study, cargo flows at competing ports [southeast US] were examined and it was discovered that many have unique hinterlands. Further, it was determined that because of trucking costs, there is relatively little rerouting of cargo between competing ports and their respective hinterland. Also, port rotation becomes an issue, i.e., a system of container ports are served by a particular shipping service. Determination of which port[s] of call will be included in a given service rotation is often dictated by the design draft of the largest vessel[s] used by that company.

It is correct that some shippers will continue to use the Port of Savannah, irrespective of SHEP. The C Corps believes that to be the general case, rather than the exception. Therefore, for the "without-project" baseline condition, cargo volumes are not expected to decline if the harbor is not deepened. However, it was shown that for a select *share* of the vessels [mainly the larger, Post-Panamax vessels] there would be significant inefficiencies accruing over time absent deepening. Due to port rotations, the distinct hinterland, etc., some shippers could not easily move from one port for another and would just incur the higher costs from those noted inefficiencies as a cost of doing business. A deepening project will allow these shippers to switch to larger vessels or load some of their vessels without the current constrains of draft [for a select number of trade routes]. Hence, transportation costs would be lowered and the savings ultimately will be passed onto US consumers and businesses. This can be difficult to conceptualize, since the subsequent savings are difficult to trace over a 50-year investment period. SHEP will require a significant investment, but the transportation cost model determined that SHEP's benefit/cost ratio is greater than 5. This value was verified via multiple sensitivity analyses using alternate growth forecasts and changing shipper behavior. In nearly all instances, a deepening project is cost effective.

Freeport, Bahamas and other trans-shipment centers in the Caribbean have certainly grown more competitive in recent years. Nonetheless, for the present, they will merely complement and not replace ports in the Southeast because of the costs to reposition containers, as well as the time-sensitive nature of cargo. The District continues to monitor worldwide shipping trends as well as the Panama Canal's expansion, the Arctic Passage, and a host of other seaborne transportation events. Moreover, the District will re-examine SHEP during and after its construction to ensure that the economic benefits continue to be realized.

The following information also bears on your interests:

The NED plan is the alternative that fulfills the federal objective and maximizes the net economic benefits to the [entire] nation while taking into account environmental, societal, and other considerations. After a thorough analysis and rigorous review, the NED Plan was found to be the -47 foot deepening alternative. In fact, benefits would increase beyond -47-feet; however, the *net* benefits (difference between benefits and costs) maximize at the -47-foot level. The NED plan serves as the basis for cost-sharing, which in turn sets the limit for Federal government financing. If other alternatives are economically viable, the non-federal sponsor has the option of choosing a plan other than the NED, i.e., the Locally-Preferred Plan.

Global Insight's commodity forecast is based on a large number of economic factors and was vetted several times by economists for its applicability [reasonable assumptions] to the Savannah Harbor study. The Corps of Engineers guidance on deep-draft navigation projects emphasizes using empirical data [whenever possible] and to make forecasts over a 50-year period of analysis. This is a prudent approach because data on past and present problems help shape the future without-project condition scenario. This, in turn, serves as a baseline for project formulation and evaluation [comparisons]. As expected, a 50-year forecast contains uncertainty. Therefore, several sensitivity analyses were performed using lower growth rates, no growth, and increased packaging densities. For the most part, the results show project improvements [deepening] are still economically justified.

Economic conditions can change markedly from year to year. For example, in 2009 there were dramatic declines in worldwide cargo volumes and shipbuilding [economic downturn], whereas more recently external events such as Middle East unrest and the tsunami in Japan have likewise affected the shipping industry. Therefore, the application of a longer [50-year] period of analysis helps to reduce short-term volatility and provides a more accurate economic picture [smoothing the curve] of a project's economic viability.

The *HarborSym* analysis considers all vessels by estimating their efficiency gains from reduced congestion. The Transportation Cost Savings Model estimates the efficiency gains from vessels being able to load/unload without the current constraints of draft. Conversion of the operating fleet to larger vessels will also result in a substantial reduction in transportation costs after implementation of SHEP. The larger vessels would benefit more from a harbor deepening. However, there will also be some incremental gains in efficiency to smaller vessels as a result of reduced harbor/channel congestion.

The largest capacity vessels calling on the US East Coast [including Garden City Terminal] are expected to be about 8,000 TEUs. Vessels much larger than 8,000 TEUs are more apt to be deployed on Asia to Europe and/or Transpacific trade routes. The Economic Appendix [page 51] explains why these larger vessels are unlikely to call at Savannah, irrespective of SHEP. For example, vessels in excess of 9,500 TEUs would have difficulties negotiating Savannah Harbor due to length and width limitations and air draft restrictions created by the Talmadge Bridge. Such *super* ships currently make up about 3 percent of the world fleet, but are expected to increase to approximately 11 percent by 2030.
There is no regional or national policy governing port development. However, a regional port analysis was conducted and its conclusions are found in GRR-Appendix D. Under present circumstances, a regional port would not be technically or institutionally feasible [or at least very difficult]. There is no existing or planned East Coast port that could process the total volume of TEUs handled by multiple regional ports. Further, there is no governing authority which would support development of such a notional regional port. GEC, Inc. conducted a regional port analysis and concluded that a true regional port would require more land than is currently available at any of the existing Southeast US ports. In

addition, institutional issues such as the lack of a non-federal sponsor [required by the Water Resources Development Act of 1986] and the unknowns associated with State coastal zone management plans raise serious questions about the viability of this concept. Even assuming the theoretical potential at the reconnaissance level of study, a full feasibility level analysis would be necessary to ascertain actual practicability. Experience has shown that a very large/complex project with so many interrelated and often competing issues would require many years and millions of dollars to complete. Deferring critical port improvements to address the concept of a regional facility would seriously constrain the US position in international trade [in the meanwhile].

From: palmetz
To: CESAS-PD, SAS
Subject: Comment on Savannah Harbor Expansion Project
Date: Tuesday, January 25, 2011 1:01:13 AM
Attachments: Comment to COE 1-24-11.doc

To: The Savannah District, U. S. Army Corps of Engineers

From: Patricia E. Metz
2003 Fair Hope Drive, NE
Townsend, Georgia 31331

Subject: Comment on the Savannah Harbor Expansion Project

Date: January 24, 2011

Deepening the Savannah River to even 45 feet will result in additional loss of freshwater marsh within Savannah National Wildlife Refuge. Considering that the refuge has already lost 73% of this irreplaceable wetland habitat as a result of earlier harbor deepening projects, the Corps' proposal for deepening the river to 48 feet is unconscionable. Thousands of taxpayer dollars have been spent on elaborate models which predict minimal impact on the environment from the 48-foot deepening. Similar models produced for the development of the Back River Tide Gate predicted that salt water would never reach the refuge's northern intake to its freshwater diversion canal: the model was wrong.

If the new model is incorrect, a death blow could be dealt to the Savannah River fishery resources. Again thousands of taxpayer dollars have been invested in programs to restore striped bass in the river; these successful efforts will have been wasted if dredging proceeds to 48 feet. Suggested mitigation for the anticipated impact on striped bass is to fund restocking. This plan is pure folly since the loss of at least 28% of the striped bass spawning habitat is predicted, though no accurate measure to forecast the loss exists. With continued loss of spawning habitat, restocking would be a never ending, cost-spiraling endeavor.

Georgia's state and local governments strongly support the deepening project for one reason: the money and jobs it is expected to generate. To this end, they are willing to gamble with the natural resources of the Savannah River. However, many coastal residents do not share their vision for a deeper harbor which can accommodate the biggest container carrier vessels in the world. At some point, they must accept the fact that the cost of digging the Savannah River deeper and deeper cannot justify the environmental losses.

Please record my disapproval of the Corps proposal to deepen the Savannah River to 48 feet.

Patricia E. Metz

719-MR-01-EV01

Comment: *If the new model is incorrect, a death blow could be dealt to the Savannah River fishery resources. Again thousands of taxpayer dollars have been invested in programs to restore striped bass in the river; these successful efforts will have been wasted if dredging proceeds to 48 feet. Suggested mitigation for the anticipated impact on striped bass is to fund restocking. This plan is pure folly since the loss of at least 28% of the striped bass spawning habitat is predicted, though no accurate measure to forecast the loss exists. With continued loss of spawning habitat, restocking would be a never ending, cost-spiraling endeavor.*

Response: The statements that previous deepening projects have reduced wetland habitats in SWNR by 73% and that the Tidegate model predicted salt water would not reach the freshwater diversion canal are not completely accurate. Changes to freshwater wetlands within the SNWR are the result of multiple factors, including among others sea level rise, harbor improvements, and actions taken by the USFWS in its management of the Refuge.

The District conducted extensive incremental analyses to determine the balance between the least-cost, environmentally acceptable deepening alternative and the option that maximizes economic benefits. The studies/analyses [contained in the EIS] are competent to forecast/address potential project impacts. The models used to estimate the impacts of the various harbor deepening alternatives on wetlands were developed with full participation of the Wetland Interagency Coordination Team, of which the USFWS was a major contributor. The Water Quality Interagency Coordination Team, of which the USFWS was also a member, was oversaw the development and use of the models that were used to predict changes expected from a harbor deepening. The USFWS concurred in the acceptability of the models to predict impacts from this harbor deepening project. Although no numerical model is completely accurate, the data generated from these models closely tracks actual field measurements.

With regard to the striped bass restocking program, the Fisheries Interagency Coordination Team, [comprised of federal/state regulators and subject matter experts] agreed that the re-stocking program is adequate to mitigate for project impacts to spawning areas. The stocking would introduce fingerlings into the population after the spawning and juvenile life stages, thereby compensating for adverse impacts to habitats used by those early life stages. GA DNR-WRD has stated that the proposed compensatory mitigation is acceptable.

The selected alternative includes a post-construction monitoring plan to identify and evaluate actual impacts that occur to wetlands, along with an adaptive management plan to make adjustments to the mitigation features if required. Numerous techniques to ensure that modeling results are accurate and represent the range of expected conditions have been employed. Moreover, there has been extensive interagency coordination, stakeholder input, application of advanced technologies, consultation with subject matter experts, agency reviews, and independent external peer reviews – all conducted with the objective of achieving the most accurate appraisal of SHEP's impacts.

From: patrick huerd
To: CESAS-PD, SAS
Subject: No Harbor Deepening
Date: Tuesday, January 25, 2011 8:05:54 AM

Harbor Deepening will have a negative affect on local habitat and wildlife. This Port will only get bigger if we take this step. We have a usable port as it is and our Coastal Habitat is suffering enough. The people who make their lives here in this region are the ones who will lose. Georgia beaches are nasty by Natures choice, lets just let Mother Nature carry on without destroying anything else.

Respectfully

Patrick Lin Huerd
Long County
912-271-8610

Patrick Lin Huerd

724-DC-02-EV01

Comment: *Harbor Deepening will have a negative affect on local habitat and wildlife. This Port will only get bigger if we take this step. We have a usable port as it is and our Coastal Habitat is suffering enough. The people who make their lives here in this region are the ones who will lose. Georgia beaches are nasty by Natures choice, lets just let Mother Nature carry on without destroying anything else.*

Response: The Corps believes the SHEP can be implemented without significant adverse environmental impacts. The project's mitigation plan provides adequate mitigation for all affected resources.

From: Harry Shelley
To: CESAS-PD, SAS
Subject: Comments on SHEP
Date: Tuesday, January 25, 2011 8:42:13 AM

January 1, 2011

US Army Corps of Engineers
Savannah District Mobile/Savannah Planning Center
ATTN: Mr. William Bailey
P.O. Box 889
Savannah, Georgia 31402-0889

RE: Proposal to deepen the Savannah Harbor

Dear Mr. Bailey:

The Friends of the Savannah River Basin (FSRB) appreciates the opportunity to respond to the Environmental Impact Statement (EIS) on a proposal to deepen the Savannah Harbor from its current depth of 42 feet up to a maximum depth of 48 feet. We recognize the considerable effort and expense that goes into developing a full EIS.

The Savannah Harbor Expansion Studies have been on-on going for many years but the FSRB is concerned that they haven't fully comprehended current critical on-going actions that will impact the dynamics of the SRB taken as a system. Specifically the expansion of Plant Vogtle, the current on-going TMDL reduction studies, the extreme low flow studies, Phase 2 of the SR Comprehensive Study and salt water intrusion on the NWR or the City of Savannah water intakes. These must be fully analyzed to determine if there are any restrictions to operational flexibility or unintended biological or water quality impacts due to the project.

We also have concern over the proposed fish ladder mitigation action at the New Savannah Bluffs Lock & Dam. From the research we have seen, it is not clear that the sturgeon will effectively use such a system. In addition it is our understanding that the City of Augusta is required to build a fish ladder at the Diversion Dam should one be built at the New Savannah Bluffs. Given this second fish ladder, it is a concern that the operational flow restrictions caused by previous agreement on flows to the shoals area due to the Augusta Canal will further impact the flexibility to operate in extreme low flow situations.

We are also concerned about the nature and accuracy of the funding estimates for the adaptive management of the mitigation actions. They are based on a fixed percentage of the cost of the mitigation estimates. With the deficit issues in Washington it is unclear whether future funding will be available to adequately evaluate and execute any required actions to modify or add to the mitigation actions. This could seriously deter correcting any unintended impacts that may occur on the SRB. Also we would expect there to be more specific "trigger criteria" based on observed field observations to evaluate the need for mitigation actions and to assess their impacts.

Corps estimates, project the harbor deepening will provide more than $100 million annually in net benefits to the nation. However the entire SRB is of extreme importance to the economic health and well-being of both states. The Lakes area and lower basin receive millions of visitors, support real estate, industry, recreation, biological diversity and most critical of all water supply. We feel that no major action should be taken without fully understanding the

potential effects on this complex system.

Harold and Barb Shelley
FSRB Facilitators

Friends of the Savannah River Basin

725-MR-03-EV01

Comment: *The Savannah Harbor Expansion Studies have been on-on going for many years but the FSRB is concerned that they haven't fully comprehended current critical on-going actions that will impact the dynamics of the SRB taken as a system. Specifically the expansion of Plant Vogtle, the current on-going TMDL reduction studies, the extreme low flow studies, Phase 2 of the SR Comprehensive Study and salt water intrusion on the NWR or the City of Savannah water intakes. These must be fully analyzed to determine if there are any restrictions to operational flexibility or unintended biological or water quality impacts due to the project.*

Response: The District used a systematic evaluation of SHEP's potential effects on the Savannah River Basin. A combination of extensive field studies and comprehensive modeling analyses were conducted to determine impacts of the deepening project on the estuary. The results [which were compiled in the EIS] are adequate for an engaged reader to understand all the ramifications of the proposal. EIS-Appendix L (Cumulative Impacts) and EIS-Section 5.0 provide ample information to address all of the noted concerns.

725-MR-03-EV02

Comment: *We also have concern over the proposed fish ladder mitigation action at the New Savannah Bluffs Lock & Dam. From the research we have seen, it is not clear that the sturgeon will effectively use such a system. In addition it is our understanding that the City of Augusta is required to build a fish ladder at the Diversion Dam should one be built at the New Savannah Bluffs. Given this second fish ladder, it is a concern that the operational flow restrictions caused by previous agreement on flows to the shoals area due to the Augusta Canal will further impact the flexibility to operate in extreme low flow situations.*

Response: The Fishery Interagency Coordination Team concluded that construction of a fishway at the New Savannah Bluff Lock and Dam was acceptable mitigation for the adverse impacts of the SHEP on the Shortnose sturgeon. NOAA Fisheries (who is responsible for SNS under the Endangered Species Act) concurred in their Biological Opinion. Fishways have had a long/successful history. Lake sturgeon have been observed negotiating both constructed/natural rapids [entire river width] in the upper mid-west [US]. Some of these observations were made at much more shallow water depths than will be the case [3.5 to 5.5 feet] for the fish passage at the Dam (Aadland 2010). Since the Lake sturgeon is a larger species than the Shortnose, the latter should have little difficulty negotiating the constructed rock ramp at NSBL&D. Savannah District held an interagency fish passage workshop in April 2011 to review the mitigation proposed for SNS and develop design guidelines for successful passage at NSBL&D. As a result of the workshop, the District revised its proposed design to an Off-Channel Rock Ramp that would be much larger than the previously-proposed Horseshoe ramp. The larger structure would carry the entire river flow for most of the spring spawning season, thereby improving the expected SNS passage effectiveness. The Monitoring Plan continues to include provisions to ascertain Shortnose sturgeon use of the structure, as well as their overall success in moving to upstream spawning grounds. The Adaptive Management Plan provides the means to modify the fishway if required.

There are no planned release changes from the upstream dams resulting from the proposed fish passage at New Savannah Bluff Lock and Dam or the Diversion Dam. However, the latter structure [at the Diversion Dam] is not a component of the Savannah Harbor Expansion Project.

725-MR-03-EV03

Comment: *We are also concerned about the nature and accuracy of the funding estimates for the adaptive management of the mitigation actions. They are based on a fixed percentage of the cost of the mitigation estimates. With the deficit issues in Washington it is unclear whether future funding will be available to adequately evaluate and execute any required actions to modify or add to the mitigation actions. This could seriously deter correcting any unintended impacts that may occur on the SRB. Also we would expect there to be more specific "trigger criteria" based on observed field observations to evaluate the need for mitigation actions and to assess their impacts.*

Response: As stated in Appendix D (Monitoring and Adaptive Management Plan), the costs presented for the adaptive management measures are [indeed] estimates. Whether any of these measures will need to be implemented will only become known after post-construction results are inspected and project performance is evaluated [to include effectiveness of mitigation features]. The District intends to request funding for Adaptive Management along with the other construction costs. Funds would then be available to implement an action if it determined by the Federal Cooperating Agencies to be needed. Costs which exceed the estimated total for Adaptive Management could be sought through the Corps' normal budget process. Monitoring and adaptive management are considered to be mitigation features, so they would be given the highest priority in the Corps budget process. The Corps considers the project in the "construction" phase until the end of the monitoring and adaptive management period.

The Monitoring and Adaptive Management Plans provide a discussion of post-construction monitoring and the decision-making process that would determine if additional monitoring and/or mitigation measures are warranted. Purposely, the plan does not identify specific acceptability criteria for water quality or biological parameters that would trigger the need for additional monitoring or modifications to mitigation measures. The District is willing to defer to the judgment of agency technical experts, rather than just use a specific parameter to determine when changes may be necessary. Based on their experience, some resource experts may see a need to modify the monitoring and/or a mitigation measure, even though a specific [parameter] threshold has not been reached. There is also a concern about the potential cumulative/synergistic impacts of multiple parameters, even though the threshold limits had not been exceeded for any one parameter. The FEIS Appendix D contains thresholds for some individual parameters that will be used to monitor the project's performance.

Decisions about changes in the monitoring plan or mitigation features can be made at any time during the post-construction monitoring effort. Monitoring data and reports would be made available to the resource agencies as soon as possible. Data from fixed water quality monitoring stations would be available on a real-time basis [on-line]. The plan provides for an annual meeting [end of monitoring year] between the District and the natural resource agencies to discuss the data and any necessary changes. However, the schedule is sufficiently flexible to convene a meeting any time concerns dictate. If the monitoring identifies impacts that are well outside of those predicted, consultation with the resource agencies will begin immediately. Corrective actions could range from a change in the monitoring plan to a cessation of construction activities until a problem is rectified.

INTERNATIONAL PAPER

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January 24, 2011

Mr. William Bailey
PD, US Army Corps of Engineers
Savannah District
100 West Oglethorpe Avenue,
Savannah, Georgia 31401-3640

Also Via Email: CESAS-PD@usace.army.mil

RE: Comments on Draft Tier II Environmental Impact Statement (DEIS), General Reevaluation Report (GRR) and Savannah Harbor Expansion Project Chloride Impact Evaluation (CIE)

Dear Mr. Bailey:

International Paper is in receipt of your letter dated November 15, 2010 regarding provision of comments on the Draft Tier II Environmental Impact Statement and General Reevaluation Report for the Savannah Harbor Expansion. Since receipt of the letter, we were also provided with the document titled "Savannah Harbor Expansion Project Chloride Impact Evaluation," dated December 15, 2010. We appreciate the opportunity to review these documents and have several comments and concerns.

International Paper is a large, integrated pulp and paper facility located in Savannah, Georgia with a rated production capacity of over one million tons of product per year. The paper making process is very water intensive – upwards of 20 million gallons per day of water is used to make the finished product. In addition to producing linerboard products, water is also supplied to the facility's power boiler and recovery furnace to generate steam and energy that is used throughout the process. While some of the water remains in the product, much of the water is treated in the facility's wastewater treatment plant, located on the banks of the Savannah River and on Hutchinson Island.

Because water is a key raw material used at this facility, the quality of the intake water is vital to its successful operation. Therefore, the documents referenced above were reviewed to determine what, if any, impacts the Harbor Expansion would have on the quality of the facility's feedwater. Our comments are given below.

Comments

1. While the Draft Tier II Environmental Impact Statement (DEIS) and General Reevaluation Report (GRR) include a significant amount of information regarding the chloride evaluations, as issued the reports are incomplete and based on modeling efforts that were known to be in error. Therefore, the majority of International Paper's review of the documents focused on the Chloride Impact Evaluation (CIE), dated December 15, 2010. International Paper concurs with comments supplied by the City of Savannah on the DEIS and GRR and incorporates them by reference.

2. The Savannah Mill currently uses 6-8 million gallons per day of water supplied by the City of Savannah Industrial and Domestic (I&D) facility. That amount is expected to increase significantly over time as use of groundwater from the Upper Floridan aquifer is further curtailed. Therefore, the chloride content of the water supplied by the City of Savannah will have greater and greater impacts on the mill. The area of greatest concern is the boiler water feed system. This system provides high quality water to the boilers, which is then converted to steam to supply the mill. The increases in chloride content to the intake of the City I&D facility that are referenced in the CIE document will adversely impact the boiler water system. International Paper anticipates that it will be forced to treat the incoming water from the City I&D facility to reduce chloride levels of the water being supplied to the boilers.

3. The facility was originally constructed in 1936, with numerous expansions taking place since that time. It includes a vast labyrinth of underground piping of various vintages that supply water to all areas of the mill. The potential of increased chloride concentrations in these pipelines is also of great concern, as much of this pipeline is carbon steel or carbon based. Similar to the City of Savannah in their comments on the report, International Paper is likewise concerned about advanced corrosion rates within the mill's water pipelines. Many of these pipes already show signs of wear, and it is believed that advanced corrosion rates could force these pipelines to be repaired or replaced sooner than currently planned. To prevent this from occurring, International Paper anticipates that all incoming water from the City I&D facility will need to be treated to remove chlorides in order to preserve the integrity of the mill's piping system.

In order to understand the financial impact associated with treating the facility's incoming water supply for chlorides, consultants were contacted to get rough estimates for new water treatment technology. Based on the information received, treating the City I&D water to reduce chlorides down to current levels would cost millions of dollars in capital investments for the water treatment units with annual operating costs also in the millions of dollars. Costs that we considered did not include the costs associated with treating the concentrated wastewater stream that discharges from the chloride treatment units. Treatment methodologies for handling the wastewater stream have not yet been identified to develop a cost estimate.

To this point, the Chloride Impact Evaluation Report (CEI) evaluated desalinization as a Mitigation Option. The report states

> *"A conceptual estimate of costs for desalinization treatment at the point of industrial users was developed using the methodology published by the U.S. Department of the Interior and was determined to be cost prohibitive."*

Based upon the very rough costs for treating chlorides at the International Paper facility that are outlined above, we agree that desalinization treatment for industrial users is indeed cost prohibitive. Therefore, International Paper supports the mitigation option of construction of a supplemental water intake pipeline that would mitigate chloride concerns for all industrial users, at a cost considerably lower than the sum total of all capital investments by each industrial user.

Once again, we appreciate the opportunity to provide the Army Corp of Engineers with our comments and concerns regarding the chloride impacts from the Harbor Expansion Project. If you have any questions regarding the information contained in this report, please contact me at (912) 238-7054.

Sincerely,

Donna Katula
Manager, Environmental Performance
International Paper - Savannah Mill

INTERNATIONAL PAPER

728-MR-01-EV01

Comment: *The Savannah Mill currently uses 6-8 million gallons per day of water supplied by the City of Savannah Industrial and Domestic (I&D) facility. That amount is expected to increase significantly over time as use of groundwater from the Upper Floridan aquifer is further curtailed. Therefore, the chloride content of the water supplied by the City of Savannah will have greater and greater impacts on the mill. The area of greatest concern is the boiler water feed system. This system provides high quality water to the boilers, which is then converted to steam to supply the mill. The increases in chloride content to the intake of the City I&D facility that are referenced in the CIE document will adversely impact the boiler water system. International Paper anticipates that it will be forced to treat the incoming water from the City I&D facility to reduce chloride levels of the water being supplied to the boilers.*

Response: The District appreciates this information and used it in its update of the expected project impacts to chloride levels at the City's water intake in Abercorn Creek. That analysis is included in the Engineering Appendix, Section 7.7. The proposed mitigation storage reservoir should result in more stability in the water quality parameters as compared to the existing condition. Although occasional increases in chloride levels may be experienced, chloride levels are expected to be maintained below that which can be handled by the IP existing demineralizer facilities.

From: Beverly Faircloth
To: CESAS-PD, SAS
Subject: Harbor Expansion Project
Date: Tuesday, January 25, 2011 10:58:05 AM

I have serious concerns regarding the deepening of the harbor. The port at Savannah can continue to grow and jobs will be maintained without the expense and danger to the environment that bigger ships calling here will cause, such as:

>cost to improve highway infrastructure to support increased port traffic;

>saltwater intrusion of the Floridian Aquifer;

>quality of dredged material to be dumped on the beach at Tybee;

>cost to build and maintain the huge aerators that deepening the harbor will necessitate.

There are many more reasons not to recommend this. Please consider this carefully.

Beverly Faircloth

732-MR-04-EV01, 732-MR-04-EN01, 732-MR-04-EV02, 732-MR-04-EV03
Comment: *>cost to improve highway infrastructure to support increased port traffic;*
>saltwater intrusion of the Floridian Aquifer;
>quality of dredged material to be dumped on the beach at Tybee;
>cost to build and maintain the huge aereators that deepening the harbor will necessitate.

Response: The Georgia Ports Authority (GPA) is working closely with the Georgia Department of Transportation (DOT) to secure priority construction the following roadway links: Jimmy Deloach Parkway Connector to I-95; Grange Road Upgrade to GA 21; Mason ICTF/Highway 307 Overpass; and Brampton Road Connector to I-516.

These are relatively direct connectors to/from the GCT and would be able to accommodate predicted increases in future truck traffic at an acceptable level of service rating [without placing an unacceptable burden on adjacent residential streets].

As discussed in the GRR-Appendix C: Engineering, Supplemental Studies, Potential Ground-Water Impacts to the Upper Floridan Aquifer [2007] impacts to groundwater in the Upper Floridan aquifer are expected to be minimal due to the proposed harbor deepening.

Placement of sediments on the dry portion of the Tybee Island beach was never part of SHEP's sediment placement plan. However, after coordination with GA DNR-CRD and the City of Tybee Island, the original dredged material placement plan has been revised. Currently, placement of all sediments excavated from the entrance channel would be deposited in previously-approved areas: the Offshore Dredged Material Disposal Site or an upland confined disposal site. The Final EIS details the revisions to the plan.

The construction and maintenance costs of the Speece cones (aerators) were considered in the project's economic analysis. The District would be responsible for the long-term operation of the DO systems. Importantly, the Corps gives its highest budget ranking for operation/maintenance of mitigation features.

Skidaway Institute of Oceanography
University System of Georgia
10 Ocean Science Circle
Savannah, Georgia 31411

January 25, 2011

UNEXAMINED EFFECTS OF THE PROPOSED SAVANNAH HARBOR DEEPENING ON THE MARSHES OF THE SAVANNAH NATIONAL WILDLIFE REFUGE

We have identified three issues that have not been addressed adequately in the current EIS and monitoring plan for the Savannah Harbor project. Their exclusion will limit the ability of local, state and federal agencies to identify and mitigate potential damages to the marsh ecosystem of the Savannah National Wildlife Refuge as a result of the proposed deepening. We strongly recommend that the current monitoring and mitigation plans be altered to include more appropriate and detailed study of SNWR marsh oxygen consumption, sediment dynamics, and carbon and nutrient cycling as outlined below.

Dr. William Savidge, Asst. Professor
Dr. Clark Alexander, Professor
Dr. Jay Brandes, Assoc. Professor
Aron Stubbins, Asst. Professor
Skidaway Institute of Oceanography*

*The Skidaway Institute is an autonomous research institution within the University System of Georgia. Faculty of the Institute educate students and conduct research on all aspects of the marine environment in Georgia and around the world.

The EFDC and WASP modeling approach appears to ignore the contribution of the flooded marsh surface to the total oxygen demand of the estuary. The model is designed to evaluate processes in flooded channels. Oxygen consumption estimates are derived from standard BOD samples taken from the river. Studies elsewhere in the State of Georgia (Cai et al. 1999) have shown that the flooded marsh surface -- not the water in the river channel -- is the dominant sink for dissolved O_2 in tidal estuaries. The effect is most pronounced in the summer months and during nighttime high tides (the flooded marsh can contribute a net addition of oxygen to the system during daytime high tides). The Satilla River system studied by Cai et al. (1999) has a number of significant differences with the Savannah in terms of flooded marsh area and riverine water chemistry; however, exclusion of reactive marsh surfaces from consideration is likely to lead to an overestimate of O_2 concentrations within the system. Marsh surface oxygen consumption rates at the monitoring sites should be quantified to address this issue, and rates followed over time to address the effects of channel deepening/mitigation efforts on this variable. Results of the field measurements will guide modeling efforts and inform adaptive oxygen mitigation decisions

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Cai, Wei-Jun, Lawrence R. Pomeroy, Mary Ann Moran, and Yongchen Wang. 1999. Oxygen and carbon dioxide mass balance for the estuarine-intertidal marsh complex of five rivers in the southeastern U.S. Limnol. Oceanogr. 44: 639-649.

Sediment supply to marshes along the Middle and Back Rivers as a result of diversion at McCoy Cut is not addressed. Sediment supply is important for maintaining marsh level during sea level rise (e.g., Friedrichs and Perry 2001, Morris et al. 2002). Supply to marshes is affected by changes in in the strength of different sources (river/ocean) and changes in the efficiency of suspended particle trapping (as a function of tidal range, vegetation type and density). If the sediments feeding the marshes are derived predominantly from upstream sources, then the proposed diversion at McCoy Cut may channel more sediment into the Back and Middle Rivers. The effects of increased loading on marshes within the Refuge may be positive or negative. If sediment sources are predominantly from downstream, then blocking upstream movement of sediment at New Cut and the sediment basin may restrict the supply of sediment available to the marshes, limiting their ability to respond to sea level rise and leading to drowning of marsh habitat. Sediment character and accumulation rates on daily, weekly and monthly scales in channels and marshes should be measured near the monitoring sites to address this issue. Evidence for increased sedimentation in marshes or siltation in creeks and channels, or, conversely, sediment starvation of marsh platforms, can be used to alter sediment management strategies to maintain a healthy sediment balance in the Refuge.

Friedrichs, Carl.T., and J.E. Perry. 2001. Tidal salt marsh morphodynamics. In: P. Goodwin and A.J. Mehta (eds.), Tidal Wetlands: Physical and Ecological Processes. Journal of Coastal Research, SI 27: 7-37.

Morris, James T., P.V. Sundareshwar, Chriostopher T. Nietch, Bjorn Kjerfve, and D.R. Cahoon. 2002. Responses of coastal wetlands to rising sea level. Ecology 83: 2869-2877.

In the EIS, biological impacts to Refuge marshes are evaluated entirely in terms of abundance and distribution of biological components (marsh vegetation and fauna). However, the biogeochemical functions of the marshes and the indirect ecosystem services they provide have not been considered, and the potential alterations in those services, whether positive or negative, as a result of altered salinity patterns inside and outside the refuge remain unquantified.

Marshes are efficient systems for capture and sequestration of carbon and associated nutrients. Given the distribution of fresh, brackish and salt marshes within the Refuge as well as regional estimates for carbon sequestration (Loomis et al. 2010), marsh soils within the Refuge sequester on the order of 3000 metric tons of carbon per year. The source of the carbon is both particulate carbon captured from suspended riverine matter and atmospheric CO_2 stored as living and dead plant biomass. As both particulate exchange and plant productivity are likely to be altered by the dredging and mitigation activities, the capacity of the Refuge to store carbon will be altered by harbor expansion.

Carbon balance within the estuary is likely to be altered in other ways as well. Increased porewater sulfate, which is derived from salt water, in portions of the Refuge may tip the metabolic balance of the sedimentary microbial community from a predominantly methanogenic community to a sulfate reducing community. Weston et al. (2006) have presented evidence that

increased salinity and sulfate reduction can lead to an enhanced "burn-down" of stored carbon and the release of previously sequestered nutrients and CO_2 back into porewaters. Declines in sedimentary methanogenesis will also alter the relative proportions of CO_2 and CH_4 emissions to the atmosphere. Overall, decreased methane emissions from refuge sediments can be regarded as a net "good," as methane is a particularly effective greenhouse gas. However, the mobilization of stored carbon and nutrients that may accompany a shift sulfate metabolism in marsh sediments could contribute to eutrophication of local water bodies.

Distribution and abundance of marsh vegetation is an inadequate measure of the effects of harbor deepening on the Refuge marshes. The biogeochemical cycling of nutrients, as well as dissolved and particulate organic and inorganic carbon, should be assessed and monitored at representative sites within the Refuge to address this issue. Carbon and nutrient budgets represent a more holistic assessment of the health of the marshes and their relationship with the larger estuarine system than does marsh plant distribution. Plant productivity as well as biomass and distribution should be determined along planned monitoring transects.

Loomis, Mark J. and Christopher B. Craft. 2010. Carbon sequestration and nutrient (nitrogen, phosphorus) accumulation in river-dominated tidal marshes, Georgia, USA. Soil Science of America Journal 74: 1028-1036.

Weston, Nathanial. B, Ray E. Dixon, and Samantha B. Joye. 2006. Ramifications of increased salinity in tidal freshwater sediments: Geochemistry and microbial pathways of organic matter mineralization. Journal of Geophysical Research 111 (G01009) doi: 10.1029/2005JG00071.

Skidaway Institute of Oceanography

Page 1

737-MR-03-EV01, 737-MR-03-EV02

Comment: *The EFDC and WASP modeling approach appears to ignore the contribution of the flooded marsh surface to the total oxygen demand of the estuary. The model is designed to evaluate processes in flooded channels. Oxygen consumption estimates are derived from standard BOD samples taken from the river. Studies elsewhere in the State of Georgia (Cai et al. 1999) have shown that the flooded marsh surface -- not the water in the river channel -- is the dominant sink for dissolved O2 in tidal estuaries. The effect is most pronounced in the summer months and during nighttime high tides (the flooded marsh can contribute a net addition of oxygen to the system during daytime high tides). The Satilla River system studied by Cai et al. (1999) has a number of significant differences with the Savannah in terms of flooded marsh area and riverine water chemistry; however, exclusion of reactive marsh surfaces from consideration is likely to lead to an overestimate of O2 concentrations within the system. Marsh surface oxygen consumption rates at the monitoring sites should be quantified to address this issue, and rates followed over time to address the effects of channel deepening/mitigation efforts on this variable. Results of the field measurements will guide modeling efforts and inform adaptive oxygen mitigation decisions Sediment supply to marshes along the Middle and Back Rivers as a result of diversion at McCoy Cut is not addressed. Sediment supply is important for maintaining marsh level during sea level rise (e.g., Friedrichs and Perry 2001, Morris et al. 2002). Supply to marshes is affected by changes in in the strength of different sources (river/ocean) and changes in the efficiency of suspended particle trapping (as a function of tidal range, vegetation type and density). If the sediments feeding the marshes are derived predominantly from upstream sources, then the proposed diversion at McCoy Cut may channel more sediment into the Back and Middle Rivers. The effects of increased loading on marshes within the Refuge may be positive or negative. If sediment sources are predominantly from downstream, then blocking upstream movement of sediment at New Cut and the sediment basin may restrict the supply of sediment available to the marshes, limiting their ability to respond to sea level rise and leading to drowning of marsh habitat. Sediment character and accumulation rates on daily, weekly and monthly scales in channels and marshes should be measured near the monitoring sites to address this issue. Evidence for increased sedimentation in marshes or siltation in creeks and channels, or, conversely, sediment starvation of marsh platforms, can be used to alter sediment management strategies to maintain a healthy sediment balance in the Refuge.*

Response: The Corps does not concur. The models considered the contribution of flooded marsh surface as discussed in Section 8.3.2 of the report titled "Development of the Hydrodynamic and Water Quality Models" completed January 2006, which is included in the Engineering Appendix Supplemental Materials.

The adjacent marsh areas in the Lower Savannah River and Estuary (Harbor) significantly affect the dissolved oxygen concentrations in the Front River. The marsh areas are important for the hydrodynamics in the way they affect the salinity transport on the Middle and Little Back Rivers. Therefore, it was determined that inclusion of the marsh areas into the model was necessary for capturing the salinity trends in the upper part of the estuary. The modeled marsh areas would also provide a mechanism to simulate CBODu loadings from the marsh areas into Savannah Harbor. As described in detail in Section 4.04, a simple, but comprehensive solution was developed to handle the marsh areas in the EFDC hydrodynamic and WASP water quality models. The enhanced EFDC model

includes 17 separate marsh areas to represent the 10 Q zones of the estuarine marshes from the Tidegate to I-95. Only 15 of the marshes were used as water quality loads. The Union Creek and Augustine Creek sites were used as storage only. The hydrodynamic and water quality models used for the SHEP analyses were developed from the same models that EPA used to simulate dissolved oxygen for their TMDL regulations.

To quantify the exchange of organic material between marshes and the open water of the Savannah Harbor, previous studies were reviewed to develop appropriate loading rates. The following studies were reviewed and used to quantify the marsh loadings.

• GPA field data during Summer of 1999 – marsh data (ATM, 2000).

• Maybank Project: A Study of the Intertidal Marshes and Streams. USEPA Environmental Services Division, Athens, Georgia, May 1984 (USEPA, 1984).

• Burke III, Roy 1984. Proposed Protocol for: Incorporating the Effects of a Spartine Salt Marsh into a Simplified Water Quality Model of Adjacent Tidal Waters in Georgia. US USEPA, Region 4 (Burke, 1984).

• Nutrient Dynamics and Water Quality Interactions in the Goose Creek Sub-Basin of the Charleston Harbor Estuary. Department of Environmental Health Science University of South Carolina, Columbia, SC, October 1996 (McKellar, 1996).

• Nixon, Scott W. and Virginia Lee. Wetlands and Water Quality. Technical Report Y-86-2, October 1986 (Nixon, 1986).

Sediment supplies to marshes are important. However, the District does not agree that the flow alteration plan [for SHEP] will result in changes to sediment loading that are of sufficient magnitude to significantly alter suspended particle trapping (a function of tidal range, vegetation type and density) in the tidal freshwater marsh and/or brackish marsh ecosystems. Within the Lower Savannah River Basin, the sediment supply to tidal marsh ecosystems is derived from both freshwater (upstream) and brackish water (downstream) inputs. The flow diversion plan will shunt greater freshwater volumes to the Little Back River (LBR) and Back River (BR) areas to preserve and/or expand freshwater marsh, thereby minimizing SHEP-derived impacts to those marshes. However, segments of the LBR and BR will still be subjected to brackish water input to the extent that salinity gradients will continue to exist. Ultimately, these minor changes [to the salinity regime in LBR and BR] will reach equilibrium. The tidal range [differential between MWH and MLW] in these areas will not be significantly altered. Consequently, the adjacent tidal freshwater and brackish marshes would still receive twice-daily flushing by surface waters carrying sediments. In turn, sediments, particulate matter, and detritus, which are all transported and/or influenced by both freshwater and brackish water inputs, will still be subject to the same physical and biogeochemical processes (including sediment trapping) that presently occur in these marsh environments.

Shifts in vegetation type and corresponding densities, which also influence sediment supply to marsh, will also be minor as a result of the flow diversion plan. The salinity range used in the SHEP model to differentiate between brackish marsh (0.6-4 ppt) and salt marsh (> 4ppt) was restrictive given that brackish marsh salinities have been reported with a range from 0.5-10 ppt (NOAA, 2010) and in other estuarine systems from 0.5-17 ppt (Judd and Lonard, 2004). Thus, the salinity range used to quantify salt marsh in the area of potential effect (i.e., > 4 ppt) likely over estimates the amount of saltmarsh in the system and under-estimates the amount of brackish marsh. As such, the described conversion of salt marsh to brackish marsh that may occur as a result of harbor deepening, would be negligible when

taking into account vegetative characteristics for wetland environments with associated salinities commonly associated with a brackish marsh (i.e., range between 5 and 10 ppt).

Given the wide range of salinity reported in literature for brackish marsh systems, the inherent variability in salinity that exists for all estuarine systems, and the modeling results that report post-deepening salinity concentrations consistent with the aforementioned range, it was concluded the 740-acre calculated conversion of saltmarsh to brackish marsh if the harbor is deepened to 47-feet is a conservative number, with actual vegetative shifts unlikely to be identifiable in situ in Savannah. That said, the District elected to be conservative in its assessment of project-related effects and included the saltmarsh/brackish marsh conversion in its calculation of minor impacts.

The conversion of 223 acres of freshwater wetland to brackish marsh represents the only significant wetland conversion that is likely to be noticeable if the harbor is deepened to 47-feet as proposed. It is important to stress that the impact [223 acres] to freshwater wetlands would only result in a nominal shift in vegetative species. The District's calculation of the freshwater wetland acreage experiencing conversion is based on a change [in the boundary] of 0.5 ppt salinity, a traditional rule-of-thumb for differentiating between freshwater marsh and brackish marsh. However, data reported in the literature for Savannah Harbor suggest that a shift in vegetation (from freshwater to brackish marsh) in this estuary does not occur until salinity concentrations approach 2.5 ppt (Latham et al., 1994). Even at oligohaline marsh sites with average salinity concentration of 2.1 ppt, a discriminant function (DF) analysis revealed that only 47% of cases resulted in the correct pairing of environmental variables with vegetative species composition and dominance. At those same oligohaline sites, 37% of the vegetative species composition and dominance were more closely aligned with a freshwater classification (Latham et al., 1994).

Given the previously-described information, the District has determined that the SHEP and flow diversion plan will have a negligible impact on sediment supply to tidal freshwater and brackish marshes within the project effect's area.

Page 2

737-MR-03-EV03

Comment: *In the EIS, biological impacts to Refuge marshes are evaluated entirely in terms of abundance and distribution of biological components (marsh vegetation and fauna). However, the biogeochemical functions of the marshes and the indirect ecosystem services they provide have not been considered, and the potential alterations in those services, whether positive or negative, as a result of altered salinity patterns inside and outside the refuge remain unquantified.*

Response: The District agrees that freshwater and brackish marsh systems contribute important biogeochemical functions and indirect ecosystem services. However, considering the total acreage of diverse marsh habitat in the Refuge, the various SHEP-derived conversions will not be of sufficient magnitude to produce a quantifiable positive or negative result with respect to carbon sequestration. It is important to note that several studies were conducted during the SHEP to establish baseline conditions in regards to the amount of tidal freshwater marsh remaining in the estuary. Applied Technology and Management (March 2003) and USFWS (Welch and Kitchens 2006) conducted studies to categorize the various wetland communities in the study area (I-95 Bridge to mouth of Back River). Using a marsh succession model, the USFWS identified the following marsh distribution (Welch and Kitchens 2006):

Marsh Distribution

Marsh Type	Acreage
Freshwater	3,269
Brackish	3,082
Saltmarsh	2,506

Even with complete conversion of 223 acres of tidal freshwater wetland to its brackish counterpart, there would still be approximately 3,044 acres of tidal freshwater marsh present in the estuary. All marsh habitats are important in carbon cycling; hence, the net change in the sequestration process would be negligible in the context of the Refuge and/or Savannah River Estuary. This would also translate into a negligible change in the regional estimates for carbon sequestration [3,000 metric tons/year] for marsh soils within the Refuge [Loomis et al., 2010]. Further, it is doubtful that a marginal species shift [on 223 acres] would materially affect its sulfate metabolism or that this would result in a measurable increase in eutrophication of local water bodies. It is important to note that the subject plant community is already influenced by brackish water, and therefore, subject to some degree of sulfate reduction within its pore waters.

These marsh areas are further influenced by increased salinity during low flow and/or drought conditions. Interestingly, river flows used in simulations to determine wetland impacts for the "Basic Evaluation" are average/typical flows for the evaluation period of 1 March to 1 November as specified by the Wetland Interagency Coordination Team. Average/typical river flows were determined using recorded gage data for Savannah River at Clyo, Georgia. The EFDC model has continuous input boundary conditions for a seven-year period (1997-2003) available for simulation. The year 1997 was found to have flow conditions representative for the long-term average flows for the river. Low or drought river flows were also considered for determining wetland impacts. This flow condition was called "Sensitivity Analysis #1". Low or drought river flows were determined using recorded gage data and 2001 was found to have flow conditions representative for the long-term low/drought flows for the river. *As illustrated in the results for drought flow conditions, deepening (47-foot depth) in conjunction with flow diversion plan 6A would actually convert 520 acres of brackish marsh to freshwater wetlands.* However, the District chose to be conservative [more inclusive of impacts] and used the results of average/typical river flows that resulted in 223 acres of freshwater wetland conversion.

Freshwater Tidal Marsh/Wetland Impacted Acreages Deepening WITH Flow Diversion Plan 6A					
Model Scenario	**44 ft depth**	**45 ft depth**	**46 ft depth**	**47 ft depth**	**48 ft depth**
Basic Evaluation Average/Typical Flow Conditions	**322**	-32	-201	-223	-337
Sensitivity Analysis #1 Low/Drought Flow Conditions	**920**	**903**	**678**	**520***	**362**

Acreages shown in red are freshwater tidal wetlands that are not mitigated for by flow altering plans (6a & 6b).
**Interpolated value.*

To reiterate, nutrient cycling within the impacted 223 acres of freshwater wetlands would just be incrementally changed [not lost] and still retain the ability to sequester carbon. Thus, the net change in these processes would be negligible when considering the quantity of marsh located in the Refuge or the Savannah River Estuary.

Finally, the Corps' calculation of the number of acres of freshwater wetland that have the potential to be converted to brackish marsh is based on a shift in the boundary [location] of 0.5 ppt salinity, a traditional rule-of-thumb for differentiating between freshwater marsh and brackish marsh. However, data reported in the literature for Savannah Harbor suggest that a shift in vegetation (from freshwater marsh to brackish marsh) in this estuary does not occur until salinity concentrations approach 2.5 ppt (Latham et al., 1994). Even at oligohaline marsh sites with average salinity concentration of 2.1 ppt, a discriminant function (DF) analysis revealed that only 47% of cases resulted in the correct pairing of environmental variables with vegetative species composition and dominance. At those same oligohaline sites, 37% of the vegetative species composition and dominance were more closely aligned with a freshwater classification (Latham et al., 1994).

Given the aforementioned information, the District evaluated and monitored biological components [i.e., marsh vegetation and fauna] since these factors represented logical and quantifiable endpoints that can be appropriately mitigated should impacts be observed.

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January 25, 2011

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US Army Engineer District, Savannah

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Submitted via e-mail to CESAS-PD@usace.army.mil

Subject: **DRAFT - TIER II ENVIRONMENTAL IMPACT STATEMENT (EIS) FOR SAVANNAH HARBOR EXPANSION PROJECT, CHATHAM COUNTY, GEORGIA AND JASPER COUNTY, SOUTH CAROLINA, RELEASED 15 NOVEMBER 2010**

Dear Mr. Bailey:

These comments (including the attached Appendices) are submitted concerning the Draft Tier II EIS for the Savannah Harbor Expansion Project (SHEP). Please consider both my comments and the attached Appendices as part of the comments and part of the record of this proceeding.

Feel free to contact me (ahricko@usc.edu) or 323-442-3077 if I can provide any further information.

Sincerely yours,

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January 25, 2011

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Dear Mr. Bailey:

These comments are submitted concerning the Draft Tier II EIS for the Savannah Harbor Expansion Project (SHEP). Please consider both my comments and the attached Appendices as part of the comments and part of the record of this proceeding.

I am a professor at the Keck School of Medicine of the University of Southern California (USC). I direct a community outreach and education program at the Southern California Environmental Health Sciences Center. Through that Center, funded by the National Institute of Environmental Health Sciences, and with additional funding from the Kresge Foundation, our Center has been studying the health and community impacts related to international trade and goods movement, through ports, rail yards, and other facilities. We have had several national conferences on this topic and have received requests for technical assistance on better understanding of these impacts from those living in communities where ports and rail yards are expanding. It is with this background that I submit these comments.

I submit these comments primarily to address perceived inadequacies in the DEIS for the SHEP pertaining to the evaluation of air quality, noise, environmental justice and cumulative impacts. In addition, the purpose and need for the project are not clearly defined. The DEIS does not include any discussion of growth inducement, cumulative impacts, noise, health impacts, EJ or air quality in its economic or environmental analyses. For these reasons, a new Draft EIS should be recirculated for additional public review. In addition, I note that the request for a public hearing on this DEIR was denied by the Army Corps of Engineers.

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I. ISSUES IGNORED OR DISMISSED IN THE SHEP DEIS: Growth Inducement, Community Impacts, Health Impacts, Noise, Cumulative Impacts and Environmental Justice

I am familiar with Army Corps of Engineers DEISs, EISs, and EAs. As is true with the Ports of Los Angeles and Long Beach, the Georgia Ports Authority must comply with the National Environmental Policy Act (NEPA) for projects with federal involvement, such as projects with federal funding or federally issued permits. NEPA requires consideration of potential environmental impacts from projects prior to federal action. From reading the SHEP DEIS, I discovered that many of the issues that Army Corps of Engineers personnel have addressed in other DEISs/EAs related to Ports and international trade/goods movement are dismissed with a few simple paragraphs – and no analysis – in the SHEP. See the following analyses in other projects and please compare to the lack of such analyses in the SHEP.

- The DEIR/EA for the Heim Bridge/SR 47 Expressway in Southern California includes a discussion of the following topics, not located in the SHEP DEIS, which should have been addressed:
  - Growth Inducement
  - Health Impacts
  - Community impacts (see Appendix A, letter from U.S. EPA Region 9 on the Heim Bridge, SR 47 Project)
  - Noise (12 page discussion, with noise measurements, predicted measurements, mitigation methods) http://www.polb.com/civica/filebank/blobdload.asp?BlobID=7535
  - Cumulative impacts – including other projects that will impact air quality and noise* (see U.S. EPA Region 9 letter in Appendix A). Also see case at http://nsglc.olemiss.edu/SandBar/SandBar8/8.3nepa.htm).

- The EIR/EA for the Middle Harbor Redevelopment Project (Port of Long Beach) was produced by the ACE and Port of Long Beach, at http://www.polb.com/environment/docs.asp. The EIR/EA for this project in Southern California includes a discussion of the following topics, which are either not located or summarily dismissed in the SHEP DEIS, which should have been addressed:
  - Growth Inducement
  - Health Impacts
  - Community Impacts
  - Noise
  - Cumulative Impacts
  - Environmental Justice Concerns

A. NOISE

Of significant concern, the the ACE/GPA dredging project does not have a lengthy construction noise section nor does the overall project have an operational noise section to analyze whether unloading larger number of containers from new larger post-Panamax ships (that have been at

the Port previously) is noisier for the community than previous operations. This type of environmental review/analysis is a requirement of NEPA. Here are the pages of the Middle Harbor Project that shows the type of noise analysis – not done for the SHEP DEIS – which much be conducted: http://www.polb.com/civica/filebank/blobdload.asp?BlobID=5136.

Other EISs by the Army Corps of Engineers have also included noise. See, e.g., http://www.porteis.com/project/documents_library/PortEISNewsletter4v38pages.pdf . See the following Scoping Presentation by the ACE: www.lca.gov/Library/FileDownload.aspx?ProdType=2&id=3043.

Appendix A of these comments includes citations to research on the impacts of noise on human health and are submitted for the record as health impacts that must be considered by the SHEP DEIS.

The SHEP analysis states that the noise levels from the dragarm sliding along the bottom ranged from 70-140dB. Most noise charts do not even go over 110 (see below a noise chart reprinted from the EIS/EA by the Port of Long Beach and Army Corps of Engineers for the Middle Harbor Project.) The impacts of such noise levels on animal life in the river and human health nearby must be analyzed.

Exhibit 2.2.6-1
Typical Sound Levels from Indoor and Outdoor Noise Sources

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Chart above from the Middle Harbor Development Project of the Port of Long Beach.
The following section of the SHEP in italics is copied from the .pdf of the SHEP. Note the last paragraph which states that there are minimal impacts from noise, based on no original noise analyses for this project and no published data. The NEPA-required SHEP analysis of noise is completely inadequate.

Noise Associated with Dredging (from page 5-113 of the SHEP DEIS)
"The noise generated from a hopper dredge is similar to a cutterhead suction dredge except there is no rotating cutterhead. The majority of the noise is generated from the dragarm sliding along the bottom, the pumps filling the hopper, and operation of the ship engine/propeller. Like the cutterhead suction dredge, the noise ranged from 70 to 1,000 Hz and peaked at 120 to 140 dB (Clarke et al 2002).

These results from Clarke et al are preliminary and have not been published. (Emphasis added).

The noise generated from a mechanical dredge entails lowering the open bucket through the water column, closing the bucket after impact on the bottom, lifting the closed bucket up through the water column, and emptying the bucket into an adjacent barge. Once the barge is full, it is towed by a tug offshore and empted either in the submerged berms adjacent to the ocean bar channel or the Savannah ODMDS. According to discussions with Doug Clarke and Charles Dickerson, US Army Engineer Research and Development Center the maximum noise spike with mechanical dredges is when the bucket hits the bottom. All other noises from this operation (i.e., winch motor, spuds, etc.) are insignificant. The sediment within Savannah Harbor is predominantly sand/silt/mud mixture. No rock, gravel, or cobbles are located within the portion of the navigation channel to be deepened. According to the Clarke et al (2002), the peak amplitude for the bucket hitting the rocky, gravel, cobble bottom at Cook Inlet, Alaska was about 120 dB. Both Doug Clarke and Charles Dickerson, US Army ERDC stated that this peak amplitude of the bucket hitting the existing sand/silt/mud substrate of Savannah Harbor would be significantly less than 120dB.

In light of these factors, the proposed harbor deepening is not expected to result in more than minimal adverse impacts as a result of noise."

Below please find noise analyses conducted by other Port projects that involved the Army Corps of Engineers.

B. HEALTH IMPACTS FROM EXPOSURE TO AIR POLLUTION

The SHEP DEIR basically concludes that there will be insignificant health impacts from air pollution resulting from dredging the Savannah River and expanding the capacity of the Garden City Terminal. Their analyses and assumptions are believed to be faulty and the DEIR for SHEP must be redone. The resulting air pollution from this project must be evaluated, including its potential health impacts. Air pollution resulting from the expansion of port projects in the U.S. is a serious concern in 2010, but is dismissed by the ACE and GPA in their documents. Please see a report by U.S. EPA which documents some of the health impacts from ports and "goods movement." http://www.epa.gov/compliance/ej/resources/publications/nejac/2009-goods-movement.pdf. Also please see Appendix B of these comments, which includes more

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information about the latest research findings on the health impacts of air pollution on human health.

C. ENVIRONMENTAL JUSTICE CONCERNS

Environmental Justice (EJ) concerns are required to be considered/evaluated in EISs. The SHEP DEIS fails to consider EJ concerns. We are concerned over the significant and unavoidable impacts to the already disproportionately affected EJ community, and recommend additional measures to fully offset these impacts. We suggest that the Corps and Georgia Ports Authority develop a Health Impact Assessment to better identify these impacts and work with the community to identify offset measures. In addition to health impacts from construction and operational emissions, we are also concerned with potential impacts from construction noise resulting from the Project. Please see the report about environmental justice concerns relating to ports and goods movement produced by U.S. EPA in 2009, entitled: *Reducing Air Emissions Associated With Goods Movement: Working Towards Environmental Justice* at http://www.epa.gov/compliance/ej/resources/publications/nejac/2009-goods-movement.pdf

Of great relevance, on the locomotive and marine engine rule of U.S. EPA, the agency contracted with a consulting firm to produce a report about EJ issues and demographics near Ports. Here is Appendix G of the report and following are pages showing the inequities and disproportionate impacts of air pollution for the African-American community living near the various terminals of the Port of Savannah:

Age, Income, and Racial/Ethnic Composition of Populations Exposed to DPM in the Vicinity of Harbor Areas

Below are pie charts showing the income distribution near the Port of Savannah from the above report. Please note that the residents living in close proximity to the terminals are those who are most like to be exposed to PM:

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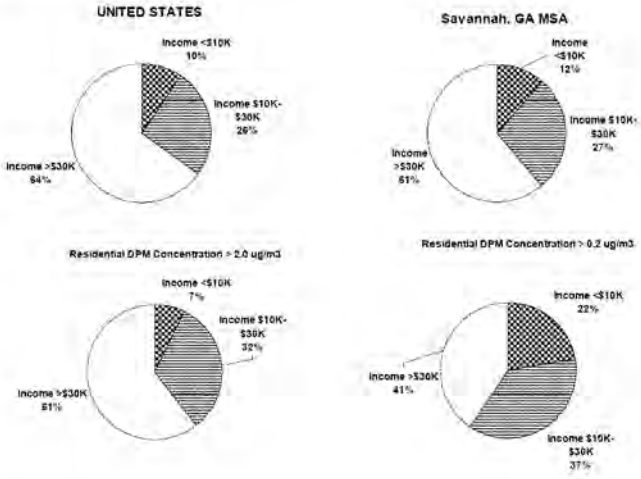
Figure G-113. Income composition of households exposed to DPM concentration thresholds due to emissions from Savannah Harbor.



Also please note that the racial demographics of those who live in close proximity to the marine terminals of the Savannah Harbor show that the African-American community is at greater risk of exposure to pollutants than other races in Savannah.

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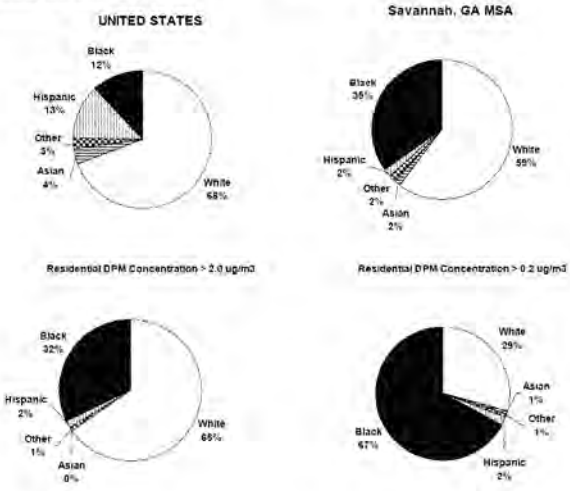
Age, Income, and Racial/Ethnic Composition of Populations Exposed to DPM in the Vicinity of Harbor Areas

Figure G-114. Racial/ethnic composition of population exposed to DPM concentration thresholds due to emissions from Savannah Harbor.



The comments attached in Appendix D, written by U.S. EPA Region 9 in response to a marine terminal expansion in Los Angeles are completely relevant to this DEIS, even citing the anticipated expansion for the Port of Savannah:

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II. PURPOSE AND NEED FOR THE PROJECT IS UNCLEAR AND INCONSISTENT

A. SHEP project and expansion of port capacity

- Is the project needed so that the Port of Savannah can expand its capacity?
- Or will, as claimed, the Garden City Terminal expand to capacity even without the SHEP river deepening?

If the latter is true, as claimed, why is the SHEP needed at all? If the SHEP is indeed needed for Garden City to reach capacity, then air quality and noise impacts are grossly understated in the emissions inventory and throughout the DEIS and the DEIS must be redone and resubmitted for public comment.

Although the DEIS is described as pertaining to the "Savannah Harbor Expansion Project," the EIS does not make a clear case about why the dredging/deepening of the Savannah River is actually required or proposed. In fact, the DEIS makes multiple claims that the Port of Savannah will not be expanded as a result of the river dredging – which actually is inconsistent with the name of the EIS, which calls the project an "expansion" project.

If the project is billed as an "expansion plan," which certainly implies enlarging the capacity to handle international trade, then both the air pollution and noise sections of the EIS are completely inadequate as written. They are based on an assumption that the Port will NOT expand in capacity, but will instead have the same number of containers as the Port would have in the future without dredging of the River.

At the outside, the Army Corps of Engineers DEIS must clarify:

- How many containers does the Garden City Terminal handle per year now?
- How many containers would it expect to have come into Garden City Terminal in future years if the River is not deepened?
- Why does it believe that smaller ships will keep coming to Savannah in large numbers and with a full complement of containers? What evidence does the GPA have that 6+ million containers/year will be handled at Garden Cit Terminal WITHOUT the SHEP project? This evidence must be in the DEIS.
- How many containers will GPA and the ACE anticipate coming into the Port of Savannah be in future years if the River is deepened?

If the answers to questions #2 and #3 are "an equal number," then how can the Georgia Ports Authority (GPA) justify spending millions of dollars to deepen the river? If the answer to the third question is YES, the ACE/GPA need to provide documentation that the Garden City Terminal can be competitive with all other East Coast Ports WITHOUT the SHEP, which is what the DEIS claims. The entire DEIR is based on answers to these questions and the assumptions that are based on them.

If, indeed, the GPA will "lose business" to other East Coast Ports if it does not deepen the river (as it claims in numerous newstories) then the answer for question #2 simply cannot be equal to the answer for #3 above.

Which is it? If the same number of containers will be handled with or without the deepening – then the Port will not be "growing," as stated below; nor will it "embark on an aggressive expansion," as stated below; nor will the deepening "create jobs and commerce." If, as is much more likely to be true based on other harbor expansion projects, the number of containers will indeed increase only with the SHEP Project and the deepening in place – then the EIS is completely inaccurate in its projections or air pollution and noise.

This is the current number of ships and types at the Garden City Terminal, from Appendix K of the SHEP DEIS at page 7:

TABLE 4-1 BASELINE EXISTING 42-FOOT DEPTH
GARDEN CITY TERMINAL
(ONE-WAY VESSEL CALLS)

	Post Panamax	Panamax	Sub-Panamax	Handy-size	Total
Total	32	1,261	213	15	1,521

How can the GPA, the Port of Savannah and the Army Corps of Engineers make the claims that this number will increase to 2226 Post Panamax ships WITH or WITHOUT deepening of the SHEP – by 2065? See Table 4-3 compared to above Table.

Where is an economic or environmental analysis that by 2065 more than 4,000 Post-Panamax ships will choose to go up a 42-foot Savannah River if it is not dredged to a deeper level, as indicated by Table 4-3 on page 8 of the SHEP DEIS?

2065	Post-Panamax	Panamax	Sub-Panamax	Handy-size	Total
-42 feet Baseline	2226	1289	616	17	4148
-44 feet	1869	1136	616	17	3637
-45 feet	1811	1075	616	17	3519
-46 feet	1794	1050	616	17	3477
-47 feet	1794	1040	616	17	3467
-48 feet	1794	1040	616	17	3467

Moreover, the Army Corps of Engineers must explain what the following paragraph from its Emissions Inventory (citing the Economic Analysis in the GRR) can possibly mean since the statement defies logic and also is in complete opposition to the statements made below in A and B about the expected results of expansion of the Garden City Terminal.

Paragraph quoted is from Appendix K, page 61, Air Emission Inventory for the Port of Savannah from the SHEP DEIS:

"Since the Corps' expectation is that a change in harbor depth in Savannah of up to 6 feet would not provide sufficient rationale for vessel lines to alter their trade routes or place larger (more efficient) vessels on those routes, the vessel fleets expected to occur With

and Without the proposed harbor deepening would remain the same. Therefore, no changes in air emissions at the port would be expected to occur as a result of any of the proposed deepening alternatives. A growth in cargo movements and accompanying air emissions are expected in the future over time in Savannah, but those increases would be the result of increasing demand for the goods which move through the port and not a result of a harbor deepening."

Another statement (page 84 of Appendix K): *The emissions from land-based terminal operations would not be affected by the proposed harbor deepening because the proposed deepening is not expected to result in more cargo moving through the port or Garden City Terminal (GCT)."*

And from page 94 of Appendix K: *"Emissions from Land-Based Equipment would not change with channel depth, because the same number of containers would move through the GCT With and Without harbor deepening on a given year."*

The above ACE conclusions are completely inconsistent, of course, with the following statements in the SHEP DEIS:

From Table 4-3, it is apparent that the number of vessels calling on the Port of Savannah decreases as the depth of the Federal channel increases. (Underlining is by the Army Corps of Engineers).

Furthermore, the ACE takes credit for a claimed reduction in air toxics (see concerns raised about the Air Toxics analysis by the U.S. EPA in its letter on this project) a few pages later in Appendix K:

"... the proposed harbor deepening – which would allow larger vessels to regularly use the harbor – would result in lower emissions of air toxics than would the fleet that can use the present 42-foot deep authorized channel."

In its overall conclusion about air quality, the Corps states, in Appendix K, page 100, that:

"Since the proposed harbor deepening is not expected to increase the number of vessels or total cargo moving through the port, no changes to air quality would occur as a result of the project. Increases in air emissions at the port are expected over time as a result of growth in demand for goods that move through the port. Those increases would occur independent of a harbor deepening project."

The Army Corps and the Port of Savannah cannot have it both ways. It cannot claim that the deepening will not increase the trade routes and size of the vessels coming to the Garden City Terminal AND simultaneously claim that the number of vessels will decrease (because they are carrying more containers) if the Federal channel increases in depth.

B. News story quotations – including from the Mayor of Savannah, postings on the Georgia Ports Authority website, and other documents – showing inconsistencies in what the SHEP claims versus what officials have claimed in public

The news story quotations below (from a variety of sources) are inconsistent with claims made in the SHEP DEIS. Only one conclusion can be drawn from the quotations below and from the

activities of the GPA at the Garden City Terminal (where it has already acquired 33 Post-Panamax cranes): *the SHEP will expand the capacity of the Port to handle more containers.*

Such a conclusion also makes it clear that the DEIR – because of its faulty claimed assumptions – does not assess the potential environmental impacts on growth inducement, air quality, noise and cumulative impacts from the SHEP project.

1. The quotations and highlights below are from a press release posted on the website of the Georgia Ports Authority concerning a conference of George Port Authority officials and 350 business people): http://www.gaports.com/corporate/tabid/379/xmmid/1097/xmid/5042/xmview/2/default.aspx

   "As the fastest growing and fourth largest container port in the nation, the Port of Savannah is responsible for moving 8.3 percent of the U.S. containerized cargo volume and more than 18 percent of all East Coast container trade in FY2010."

   "In preparation for the Panama Canal Expansion in 2014, the GPA has embarked on an aggressive expansion and modernization plan."

   "The SHEP is one of the most important and productive civil works projects in the country, and will maintain and create jobs and commerce throughout the region.

[Emphasis added.]

2. The SHEP GRR Section 4 states the following: (http://www.sas.usace.army.mil/shexpan/documents/SHEP_GRR_Section_4.pdf)

   "The Georgia Ports Authority has planned and funded improvements at Garden City Terminal to coincide with the Panama Canal Expansion Project. With these improvements in place, this terminal will be the largest single container handling facility in the Nation with more than 1,200 acres, 9,000 feet of berth, 33 post-Panamax size cranes, and two on-site intermodal transfer facilities serviced by two major rail lines. The facility, at full build out, will have a throughput capacity of 6.5 million TEUs."

   The paragraph from the SHEP GRR Section 4 (above) makes the following clear:

   - The GPA is funding improvements that rely on the Panama Canal Expansion to be successful.
   - Once expansion is in place, very large ships will be able come up the river IF IT IS DEEPENED.
   - The GPA has already bought 33 post-Panamax size cranes in anticipation of increased capacity from these larger ships.
   - At full buildout, the Garden City Terminal will have a throughput capacity of 6.5 million TEUs.

   Clearly, the Garden City Terminal would not be able to handle 6.5 million containers without the deepening of the river to handle post-Panamax ships. As required by NEPA, the SHEP DEIS must do adequate analyses of Growth Inducement, Noise, Lighting, Air Quality with this in mind, as an assumption throughout the document. Thus, the DEIS

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for SHEP must be redone and resubmitted for public review using correct assumptions for all analyses.

3. Comments by the Mayor of Savannah with President of the United States on need for river deepening to ensure economic growth

   Comments by the Mayor of Savannah, reprinted below, make it once again clear that the future economic growth of the Garden City Terminal relies on the deepening of the Savannah River. This growth inducment must be analyzed in multiple places throughout the DEIS.

   Savannah Morning News *March 3, 2010*
   by Lesley Conn

   Savannah Mayor Otis Johnson rode alone with President Barack Obama in the back of a limousine, and he tried to make the most of it Tuesday.

   "I'm sorry I did most of the talking," Johnson said, "but it was my one opportunity. I had a list in my head. I just unleashed it all."

   The mayor accompanied the president from Savannah Technical College, south of DeRenne Avenue near Hunter Army Airfield, to an unannounced stop downtown for lunch at Mrs. Wilkes' Dining Room on West Jones Street. .....

   The mayor stressed the need to deepen Savannah's harbor to 48 feet from 42 feet so the Georgia Ports Authority will be able to accept larger, deeper-draft vessels once the widening of the Panama Canal is completed. Without that deepening, the mayor explained, Savannah risks slipping as the fourth-busiest port in the nation, a standing that supports 286,000 jobs throughout the state.

4. Georgia Ports Authority admits on its website that the Savannah River deepening is a large part of what will increase its throughput capacity from 2.62 million TEUs to 6 million TEUs in 2018.

   This must be analyzed in a DEIS section on Growth Inducement (that currently does not exist), as well as in a Noise Section (which is currently only 3 paragraphs long), in the Air Quality section, and in Cumulative Impacts, since the GPA states (below) that there are numerous other expansion projects underway. See http://www.gaports.com/Default.aspx?tabid=269 reprinted below from the GPA website:

   The Future of Trade (From GPA website at
   http://www.gaports.com/Default.aspx?tabid=269

   Business continues to grow, and Garden City Terminal remains ahead of the curve. Anticipating the changing pace of trade not only in the Southeast and Midwest but in overseas markets, the Georgia Ports Authority will invest $1.2 billion in expansion

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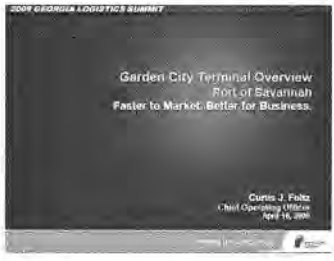
projects over the next decade to accommodate the projected growth in global trade.

Over the next 10 years, Garden City Terminal is scheduled to add on average two high-speed super post-Panamax container cranes every 18 months for a total of 25 cranes, as well as 86 Rubber-Tired Gantries (RTG) as part of long-term developments for a full RTG conversion at the facility, further improving terminal efficiencies. And to accommodate the larger traffic necessary to keep up with demand, the Georgia Ports Authority is in the process of increasing the depth of the Savannah River Navigation Channel from 42 to 48 feet MLW (12.8 to 14.6 meters).

These expansion projects, together with numerous others identified under the GPA's long-term strategic development plan, will increase throughput capacity from the current 2.62 million TEUs to 6 million TEUs in 2018. (Emphasis added)

5. The Georgia Port Authority Port Direct Curtis Foltz also makes it clear in a power point presentation that the Savannah River Deepening is part of the $1 billion + expansion that will allow the expansion described above on the GPA website. See http://s3.amazonaws.com/centers_of_innovation_documents/618/Curtis_Foltz.pdf



6. Another study discussing the various expansions related to the GPA and Garden City Terminal also makes it clear that the Savannah River Deepening is critical to reaching the capacity of 6 million containers at the Garden City Terminal. See

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http://www.aapaseaports.com/article.cgi?id=19008 reprinted Below:

Case Study: Georgia Ports Authority

Today's investments build for tomorrow

Even in tough economic times, Georgia's ports provide a vital economic lifeline for the Southeast, and the Georgia Ports Authority's ambitious and well-thought-out strategic development plan is positioning its facilities among the most accessible, efficient and best-equipped in the nation, according to authority officials.

While recent economic conditions present challenges, the GPA has not retreated from the planning and construction that have driven so much prosperity. In fact, the GPA has been working to secure additional capacity that will create new economic opportunity and sustainable growth for generations to come.

Already touted as the largest and most efficient single container facility in the United States, Garden City Terminal has yet to reach its full potential. Port officials say infrastructure improvements will ensure the port is ready when cargo levels increase.

The GPA's on-terminal strategic development plan bodes to nearly double annual capacity, from 3.5 million twenty-foot equivalent container units today to 6.5 million TEUs by 2018. In 2009, the GPA opened its second on-terminal intermodal container transfer facility, making it the only single-terminal facility on the U.S. East Coast with two on-terminal ICTFs.

The recent arrival of four super-post-Panamax ship-to-shore cranes at Garden City has brought the total to 23 post-Panamax class cranes on nearly 10,000 feet of continuous berthing. The Georgia authority has also completed terminal improvements such as additional refrigerated container racks and new containerhandling equipment. These expansion efforts, funded by the GPA, are ongoing in preparation for the Panama Canal expansion.

"The success of our business at the GPA is tied directly to the Panama Canal's ability to move our cargo throughout the world," said the authority's executive director, Curtis J. Foltz. "In an effort to complement the Panama Canal's expansion program, we are increasing capacity at the Port of Savannah and working diligently to gain approval of the Savannah Harbor Expansion Project."

Currently, Georgia Gov. Sonny Perdue, Georgia's elected Washington representatives and numerous other elected and appointed administrative officials are working in concert to achieve the goal of deepening the Savannah River from 42 feet to as many as 48 feet.

With the growth of the U.S. Southeast population in recent decades, retail and trade demands for this area have increased exponentially. The completion of the Savannah Harbor and Panama Canal expansion projects should enable the GPA to serve this important sector, expand its trade lanes and provide more opportunities for Georgia and the U.S. Southeast.

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"Our superior services, logistics and facilities have allowed the GPA to grow its market share and further establish Georgia's ports as a strategic gateway in the South Atlantic," Mr. Foltz said. "When the economic climate improves, we'll be ready with additional capacity and infrastructure in place to handle it efficiently."

While the world's economy may be struggling, the strategic advantages of the Port of Savannah remain the same, Mr. Foltz said. The successful formula of terminal capacity, velocity, efficient rail and gate operations and nearby distribution center space, with room to grow, provide a foundation for success.

"The GPA has continued to strengthen these advantages," Mr. Foltz said, "thereby positioning the Port of Savannah to be a world leader for many years to come."

III. Inconsistencies between the SHEP DEIS and the above news stories and website postings/presentations by the Georgia Ports Authority make it clear that the Savannah River Deepening will induce growth at the Garden City Terminal and that without the SHEP, the Garden City Terminal would not grow from 2.5+ to 6 million + containers. This induced growth must be accounted for in all analyses (air pollution, noise, and others)

A. Claimed reduction in air pollution

SHIP SIZE/NUMBER OF CONTAINERS

The DEIS makes the argument that larger ships will be frequenting the Port of Savannah, each carrying more containers – but that the total number of containers will not increase at the Port.

On this basis, the DEIS claims that air pollution will be reduced because (e.g., 10 ships carrying 4000 containers pollute more than 5 ships carrying 8000 containers).

The DEIS must be redone to reflect that the additional containers that will be accommodated at the Terminal only because of the SHEP will result in growth of air pollution at the Garden City Terminal as described below.

TRUCKS/YARD EQUIPMENT

Because the DEIS claims that the Garden City Terminal will be able to handle 6 million + containers in the future without the SHEP, then it claims that no additional trucks needed to move them (and no additional yard equipment, etc). This is false, based on all the above documentation that shows that the capacity of the Garden City Terminal is reached only with the deepening of the River.

Comment: the DEIS must be rewritten to account for the air pollution from the additional trucks, yard handling equipment, cranes, etc. that will be needed for the additional containers to be

handled in the future when the Harbor is deepened. A new emissions inventory is required along with new air dispersion modeling and analyses.

AIR EMISSIONS INVENTORY

As a starting point to determine if air pollution levels will go up or down or stay the same after the SHEP, an air emissions inventory was conducted.

OVERALL PORT EMISSIONS

On page 112, of Appendix K, page 112, it states: "The Port of Savannah is a substantial contributor of NOX (15 percent) emissions in Chatham County (Table 6-4). ... The Port contributes only minor amounts to emissions of SO2 (6.2 percent), PM10 (1.4 percent), HC (1.7 percent), VOC (1.7 percent), and CO (1.0 percent)." [Emphasis added.]

In light of the fact that most Ports that have done emissions inventories which concluded that the Ports are, in fact, significant contributors to PM, these calculations seem suspect. (See http://www.polb.com/environment/air/emissions.asp). Why is Savannah different than other ports that have conducted emissions inventories?

One important reason may be because GPA, the Port of Savannah and the Army Corps of Engineers have not followed the U.S. EPA Guidelines for conducting emissions inventories. The guidelines are different in significant aspects from the DEIS. E.g., the guidelines suggest that truck emissions be counted to the first drop-off, which is not how GPA/ACE did the calculations. Shipping emissions are calculated differently than the guidlelines, etc. In all cases, the GPA/ACE methods minimize the emissions from the SHEP expansion project over what would have resulted from using the U.S. EPA Guidelines. That is, if the guidelines were followed, the emissions would have been shown to be higher for the SHEP Project.

REDUCTION OF EMISSIONS

The Inspector General of U.S. EPA has noted a need for Ports to further reduce air emissions to protect public health. See http://www.epa.gov/oig/reports/2009/20090323-09-P-0125.pdf and excepts in this document, Appendix C. Please note that the Georgia Ports are relying solely on federal rules to reduce their pollution, whereas other ports around the country are replacing old trucks and dirty equipment. See for example the following statements in Appendix K, page 116:

"Emissions of NOX, SO2, and PM2.5 are likely to decrease as the terminal operators replace their equipment with newer engines that do not emit as much pollution and use the lower sulfur fuels mandated by EPA." ... "Again, the port's contributions of NOX and SO2 emissions in the County should substantially decrease as a result of these new requirements for cleaner fuels.

PORT CONTRIBUTION TO NOx and PM2.5

NOx and PM2.5 are two of the most important (measured) air pollutants from the Port in terms of links to health effects. The Emissions Inventory presents very confusing information about PM2.5. In one sentence (highlighted) the Inventory says that the port is a minor contributor of PM2.5 to County air pollution. In the next sentence (also highlighted below), the Inventory says that PM2.5 is a SUBSTANTIAL CONTRIBUTOR to air pollution in Chatham County. Which is it? See text surrounding Table 6-4 of the SHEP DEIS. The SHEP DEIS must contain accurate

analyses for the contribution of NOx and PM2.5 to port and regional air pollution. The air quality analysis must be redone so that it makes sense and so that readers and residents can understand it. The following is a quotation from the DEIR, Appendix K, page 90:

> The results calculated by the Corps for the entire port are in general agreement with those estimated by EPA in 2002 for Ocean-Going Vessels calling at Savannah. The numbers show that the port is a minor contributor of HC, VOC, CO, PM2.5, and PM10 in the County. However, it is a substantial contributor to emissions of NOX and PM2.5. The table below shows the percentage of air emissions in the County that are derived from the port (using the 2002 EPA National Emissions Inventory).

Table 6-4 2008 Port Emissions
Percentage of Chatham County 2002 Emissions

	HC	VOC	CO	NOX	PM10	PM2.5	SO2
Port of Savannah	2.4	2.4	1.5	24.5	4.2	11.9	7.2

Although the DEIS plays down any exceedances of air pollution regulations, the Emissions Inventory actually shows that 14% of the daily PM2.5 measurements exceeded 35ug/m3 – the U.S. EPA standard for PM25. See excerpt from the document below, Appendix K:

> EPA also reported a small increase in PM 2.5 concentration from 2000-2006. Figure 14 of that document showed that PM 2.5 had changed -1 to 4 ug/m3 over that period. The average annual PM 2.5 concentrations were in the range of 12.1-15 ug/m3, with 66 out of 895 measurements exceeding 15.1 ug/m3. The daily range of PM2.5 was in the range of 16-35 ug/m3, with 126 out of 895 measurements (14%) exceeding 35 ug/m3 (Figure 15 of EPA's document).

TRUCK EMISSIONS

Truck emissions are considered a large part of the air pollution emissions from virtually every port in the country... apparently with the exception of the Garden City Terminal. In Appendix K, the DEIS claims that the trucks are not a major source of pollution either at the port or at the Garden City Terminal.

These values indicate that emissions from these Trucks are a relatively small contribution to the total emissions from both the port and the Garden City Terminal. NOX represent the largest pollutant by weight from these trucks – 218 tons in 2008. That amount was 5 percent of the NOX emitted at the Garden City Terminal and 2.5 percent at the total emitted at the port. The largest contribution by percentage was in Carbon Monoxide (CO), where their emissions constituted 7.6 percent of the total at the Garden City Terminal. On a percentage basis, the Trucks (tractor trailers) which move containers over the roads do not comprise a major source of air pollution either at the port or at the Garden City Terminal.

We question whether the GPA/ACE are calculating truck emissions correctly. Appendix K, page 9, states. *"For container cargo, the landside area includes the time trucks wait to enter the GPA terminal to drop off or pick up its load, as well time for the outgoing trucks to clear the immediate vicinity of the port."*

The ACE included only a 15-minute period of time for when the trucks leave the port until they enter the interstate highway system, clearly an underestimation of time. At most ports, the trucks are not even out of the gate within 15 minutes after a container is loaded:

Appendix K, page 94. "The Corps added 15 minutes of travel time each way for each truck to account for the time trucks travel in the vicinity of the port, but outside the terminal. This additional 30 minutes of engine time accounts for time spent while traveling between the Interstate highway system and the Garden City Terminal."

Again, this part of the emissions inventory does not follow current guidelines from U.S. EPA for preparing emissions inventories, published in April 2009 and must be re-analyzed. http://www.epa.gov/cleandiesel/documents/ports-emission-inv-april09.pdf

U.S. Environmental Protection Agency

Current Methodologies in Preparing Mobile Source Port-Related Emission Inventories

Final Report

April 2009

We note that these guidelines state that truck emissions should be counted from the point of placing the container on the truck until the first destination/drop off point, not just while trucks are at the port. This emissions inventory method, used by the Ports of L.A. and Long Beach, would result in a much larger contribution of trucks to the port pollution. Thus, the emissions inventory must be redone for the SHEP DEIS.

REPLACEMENT OF TRUCK FLEET

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Replacement of truck fleets does not seem to be required, as is being done in LA/LB, Seattle, and even in Charleston SC. Georgia Ports appear to be relying on the marine operators replacing their fleets as equipment and trucks get older and as federal rules become stricter.

EMISSIONS WHILE HOTELLING AT GPA'S GARDEN CITY TERMINAL

Many Ports around the country – recognizing that there is significant air pollution from ships loading and unloading in the harbor with their engine on – have required electric plug-ins (also called "cold-ironing" or "shore power)," to reduce the emissions from ships that call upon their ports frequently.

However, just as the DEIS claims for truck emissions, the DEIS claims that "the hotelling of containerships is a minor part of the overall port emissions for HC, VOC, CO, NOX, PM, and SO2." As a result, the DEIS states that the Garden City Terminal not only does not require shore power – it actually claims that the use of shore power is experimental (even though other major ports are already using it.) The DEIS describes the process as "expensive," possibly requiring "international agreements" and "still in its development stage."

There is no credence to the ACE claim that "this method is still in the development stage" or that "international agreements" may be required to implement cold ironing. Shore power is being implemented at ports in L.A., Long Beach, Seattle, San Francisco, and Charleston.

Again, this part of the emissions inventory did not follow current guidelines from U.S. EPA preparing emissions inventories, published in April 2009: http://www.epa.gov/cleandiesel/documents/ports-emission-inv-april09.pdf. The emissions inventory must be redone.

EMISSIONS FROM TRIPS TRAVELING 36 MILES FROM THE SAVANNAH HARBOR TERMINAL TO THE ENTRANCE, ½ OF IT UP THE RIVER

The emissions inventory must calculate the emissions from the Post-Panamax ships that will be travelling up the Savannah River for the residents along the River.

COMPARISON OF EMISSIONS INVENTORIES FROM PORT OF LONG BEACH 2008 http://www.polb.com/environment/air/emissions.asp THOSE SHOWN IN THE SHEP DEIS EMISSIONS INVENTORY

The following charts are from the 2008 emission inventory showing the contribution of various pollutants to the Port emissions and to as a contribution to the South Coast Air Quality Management District – a huge area covering 5 counties. Note that many changes had already occurred at the POLB by 2008, including ULSD that is now used in trucks at Garden City, and electric cranes. Since the TEUs at POLA in 2008 were 6.7 million, this seems like a reasonable comparison for future emissions at the Garden City Terminal, EXCEPT that the Air District in southern California is a huge geographic area, so the emissions are much likely to be less as a contributor to those 5 counties than if the contribution were shown only for L.A. County.

Nonetheless, please note that the SOX emissions at the POLA are much higher than any levels of SOX emissions predicted for the Port of Savannah, including the Garden City Terminal.

This is further evidence that the SHEP DEIS must be redone and recirculated to the public, with the new DEIS correcting the Emissions Inventory for this project.

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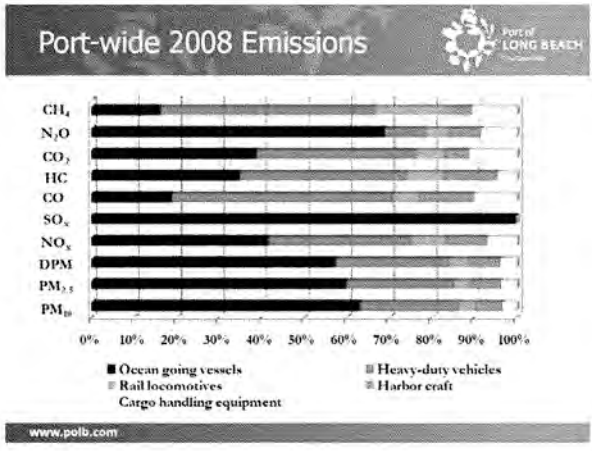
Port-wide 2008 Emissions
Port of LONG BEACH
CH_4
N_2O
CO_2
HC
CO
SO_x
NO_x
DPM
$PM_{2.5}$
PM_{10}
0%
10%
20%
30%
40%
50%
60%
70%
80%
90%
100%
Ocean going vessels
Heavy-duty vehicles
Rail locomotives
Harbor craft
Cargo handling equipment
www.polb.com

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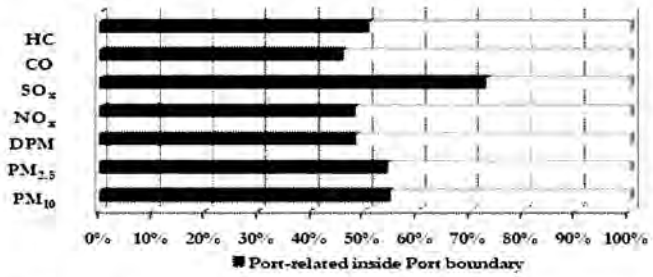
Figure ES.8 shows that roughly 50% of the port-related emissions occur within the Port boundary. SO_x port-related emissions are attributed with a higher percentage (70%) within the Port boundary due to hotelling and in-harbor maneuvering emissions within the breakwater.

Figure ES.8: 2008 Port-related Emissions by Port Boundary



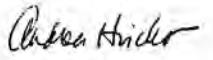
In order to put the Port-related emissions into context, the following figures compare the Port's contribution to other sources in the South Coast Air Basin[1]. The 2008 SoCAB emissions used for this comparison are from the 2008 emissions listed in the 2007 AQMP Appendix III. In the South Coast Air Basin, 8% of diesel particulate matter emissions, 4% of NO_x emissions, and 34% of SO_x emissions are attributed to port-related emissions from the Port of Long Beach. The Port's percent contribution of DPM and NO_x within the SoCAB decreased in 2008 as compared to 2007 and 2005, while the Port's percent contribution of SO_x increased in 2008 from 2007 and 2005.

This emissions inventory from Port of Los Angeles raises obvious questions about what the emissions inventory from the Garden City Terminal would be like when it will be handling 6 million + TEUs.

CONCLUSION:

Feel free to contact me (ahricko@usc.edu) or 323-442-3077 if I can provide any further information.

Sincerely yours,



Andrea Hricko
Professor of Preventive Medicine, Keck School of Medicine of USC

APPENDIX A. Health Impacts of Exposure to Air Pollution and Noise

(written by Andrea Hricko and submitted to the SHEP DEIS record)

The health impacts from air pollution and noise must be considered in the DEIS for the SHEP both for the construction of the SHEP and for operational noise (from ships, trucks, trains, handling of containers, yard equipment, cranes, etc) that will be increased by the expansion of the Garden City Terminal to handle more containers.

RESEARCH FINDINGS ON HEALTH IMPACTS FROM EXPOSURE TO AIR POLLUTION AND NOISE

A review of the scientific literature on the health impacts of mobile source noise and air pollution shows a growing body of scientific evidence indicating that:

Children who grow up in polluted communities suffer reduced lung function and other respiratory effects

USC studies in Southern California show that a package of mobile source pollutants (NOx, PM, acid vapor, and elemental carbon) correlate with reduced lung function. In one USC study, three times as many children in North Long Beach, where levels of elemental carbon (EC) are higher than in most of the communities in the study, had reduced lung function than children in less polluted communities. The study is important because medical experts believe that reduced lung function is a significant predictor of mortality from all causes in adults. The EIR/EIS must describe the USC and other research findings showing the respiratory health effects of mobile source air pollution. *(See references).*

Living or going to school in close proximity to busy roads and freeways (close to mobile source exhaust) is linked to asthma and respiratory effects in children, as well as other effects in adults.

A growing body of evidence shows increased risk of asthma and other respiratory effects from living or going to school in close proximity to busy roads and freeways. *(See References for citations to scientific articles on this topic).*

Elevated levels of particulate matter are linked to cardiovascular disease and increased mortality.

In response to this growing body of evidence, the American Heart Association issued a scientific statement in 2004 concluding: "Exposure to air pollution contributes to the development of cardiovascular diseases." A recent study shows an increase in stroke among those living close to busy roads. Studies on increased cardiovascular disease and mortality from particulate exposure should be reviewed in the EIR/EIS. *(See references for citations to scientific articles on this topic).*

Pregnant women who live near busy roads and freeways (and who are exposed to current levels of air pollution in Los Angeles air) are more likely to give birth to low birth weight and premature infants; infant mortality has also been linked to air pollution levels.

Thousands of women of child-bearing age live in the vicinity of the San Pedro Bay Ports or along goods movement corridors in Southern California. Studies on increased reproductive problems and adverse birth outcomes must be described in the EIR/EIS. *(See references for citations to scientific articles on this topic).*

Increased lung cancer risks among workers exposed to diesel exhaust, including a recent study on railroad workers.

Based on studies of workers exposed to diesel exhaust, diesel particulate matter was declared a Toxic Air Contaminant in the state of California in 1998. A recent study on diesel and cancer risks authored by Dr. Eric Garshick states:

> *In > 35 studies of workers with occupational exposure to diesel exhaust, excess risk of lung cancer is consistently elevated by 20–50%.... These results [elevated cancer risk in railroad workers] indicate that the association between diesel exhaust exposure and lung cancer is real. These results along with previous studies of lung cancer and diesel exhaust support current efforts to reduce emissions in both occupational and general environmental settings. (See references to scientific articles on this topic).*

Diesel exhaust particles can enhance allergies and allergic asthma.

The EIR/EIS should describe studies showing the potential for enhancement of allergies and asthma from diesel exhaust emissions from trucks and trains delivering containers to other locations throughout the region. *(See References)*

RESEARCH FINDINGS ON THE HEALTH IMPACTS OF EXPOSURE TO NOISE

Noise is a serious, and often dismissed, public health problem, which causes numerous health and social effects, ranging from hearing to cardiovascular problems, and from learning problems in school to sleep disturbances at home. A review of the noise exposure and health effects literature should be included in the EIR/EIS.

Community and occupational health studies show that noise levels from goods movement activities can impact health and quality of life. For example, excessive noise disturbs restorative sleep; elevated noise levels affect children's mental health and classroom behavior, especially if children have an "early biological risk" (such as having been born prematurely); and chronic noise exposure may contribute to the progression of cardiovascular disease. Portions of abstracts from several selected studies are reprinted below to illustrate the causes for concern. See complete list of references below.

"Disturbed Sleep Patterns and Limitation of Noise" by B. Griefahn et al.
Noise and Health, Volume 6, Number 22, Jan - Mar 2004, pp. 27-33(7).
ABSTRACT. "Due to the undisputable restorative function of sleep, noise-induced sleep disturbances are regarded as the most deleterious effects of noise. They comprise alterations during bedtimes such as awakenings, sleep stage changes, body movements and after-effects

such as subjectively felt decrease of sleep quality, impairment of mood and performance.... Intermittent noise that is produced by air traffic, rail traffic and by road traffic during the night is particularly disturbing and needs to be reduced. Suitable limits are suggested."

"Ambient neighbourhood noise and children's mental health" by P. Lercher et al. Occup Environ Med. 2002 Jun;59(6):380-6.
"OBJECTIVES: To investigate the relation between typical ambient noise levels (highway, rail, road) and multiple mental health indices of school children considering psychosocial and biological risk factors as potential moderators. CONCLUSIONS: Exposure to ambient noise was associated with small decrements in children's mental health and poorer classroom behaviour. The correlation between mental health and ambient noise is larger in children with early biological risk."

"Noise burden and the risk of myocardial infarction" by SN Willich et al. Eur Heart J. 2006 Feb;27(3):276-82. Epub 2005 Nov 24.
"METHODS AND RESULTS: In a case-control study, patients consecutively admitted to all 32 major hospitals in Berlin with confirmed diagnosis of acute myocardial infarction were enrolled from 1998 to 2001 in the Noise and Risk of Myocardial Infarction study. Information was obtained on environmental and work noise annoyance. The sound levels of environmental and work noise were assessed using traffic noise maps as proxy and international standards for workplaces, respectively. Environmental sound levels were associated with increased risk in men and women. CONCLUSION: Chronic noise burden is associated with the risk of myocardial infarction."

"Neighbourhood inequalities in physical inactivity: the role of neighbourhood attractiveness, proximity to local facilities and safety in the Netherlands" by FJ van Lenthe et al. Soc Sci Med. 2005 Feb;60(4):763-75. In a study in the Netherlands, residents who lived in neighborhoods with the most traffic-related noise pollution seldom walked or cycled to shops or work. This study is relevant to residents in noise and traffic-related goods movement communities, especially at a time when obesity is becoming such a serious problem.

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APPENDIX B: Selected References on the Health Impacts of Air Pollution and Noise

Respiratory Effects

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Pietropaoli, A. P., M. W. Frampton, et al. (2004). "Pulmonary function, diffusing capacity, and inflammation in healthy and asthmatic subjects exposed to ultrafine particles." Inhal Toxicol 16 Suppl 1: 59-72.

University of Southern California - Health Science News. (2005). "Air Pollution Found to Pose Greater Danger to Health than Earlier Thought."

University of Southern California - Health Science News. (2005). "Researchers Link Childhood Asthma to Exposure to Traffic-related Pollution."

Traffic proximity

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Brunekreef, B. and J. Sunyer (2003). "Asthma, rhinitis and air pollution: is traffic to blame?" Eur Respir J 21(6): 913-5.
Cyrys, J., J. Heinrich, et al. (2003). "Comparison between different traffic-related particle indicators: elemental carbon (EC), PM2.5 mass, and absorbance." J Expo Anal Environ Epidemiol 13(2): 134-43.
Environmental Protection Agency (2004). "Study of Health Effects of Toxic Air Pollutants on Asthmatic Children in Huntington Park."
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Particulate Matter

Chalupa, D. C., P. E. Morrow, et al. (2004). "Ultrafine particle deposition in subjects with asthma." Environ Health Perspect 112(8): 879-82.
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APPENDIX C. Excerpts from a Report by the Inspector General for US EPA on Need to Reduce Air Pollution at Ports.

Report found at: http://www.epa.gov/oig/reports/2009/20090323-09-P-0125.pdf

U.S. ENVIRONMENTAL PROTECTION AGENCY
OFFICE OF INSPECTOR GENERAL

Catalyst for Improving the Environment

Evaluation Report

EPA Needs to Improve Its Efforts to Reduce Air Emissions at U.S. Ports

Report No. 09-P-0125

March 23, 2009

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Chapter 1
Introduction

Purpose

This evaluation focuses on the efforts of the U.S. Environmental Protection Agency (EPA) to control air pollution from mobile sources operating in and approaching U.S. ports.[1] The evaluation, completed in accordance with the 2007 Annual Plan of the EPA Office of Inspector General (OIG), was initiated because a prior OIG report[2] found that EPA faced significant challenges in controlling air emissions from port sources.

The objectives of our evaluation were to determine whether EPA's:

- actions taken to address air emissions from oceangoing vessels at selected U.S. ports have been effective, and
- management plan (strategy) to address emissions from port sources is sufficient to protect human health and the environment at selected major U.S. ports.

Background

The United States has approximately 360 commercial sea and river ports. Air emissions from activities at these ports contribute to local air quality problems impacting communities surrounding port areas. These emissions have significant environmental and human health impacts, such as cancer and asthma. EPA's goal for clean air is to protect and improve the air so it is healthy to breathe, and reduce risks to human health and the environment. EPA employs a multipronged approach to address emissions from port sources. This approach includes implementing existing regulations, developing new standards for diesel engines, promoting voluntary emission reductions from existing diesel engines, and participating in international efforts to address air emissions from oceangoing vessels.

Sources of Emissions

Almost all port emissions come from five diesel-fueled source categories, including oceangoing vessels, heavy-duty trucks, cargo-handling equipment, locomotives, and harbor craft. The emissions of greatest

[1] According to the Agency, air quality modeling recently conducted to support its proposed Emission Control Area application shows that emissions from as far as 200 nautical miles from ports impact air quality, not only in the immediate port areas, but for 100 miles inland. When this report refers to oceangoing vessels "in U.S. ports," it is also referring to vessels approaching U.S. ports.

[2] *Progress Report on EPA's Nonroad Mobile Source Emissions Reduction Strategies*, Report No. 2006-P-00039, September 27, 2006.

concern from these sources are nitrogen oxides (NO_x), particulate matter (PM), sulfur oxides (SO_x), carbon monoxide (CO), and hydrocarbons (HC), as well as some toxic air pollutants. Figure 1-1 provides brief descriptions for each of these major categories of port pollution.

Figure 1-1: Descriptions of the Five Major Sources of Port Emissions

Source: The OIG compiled source categories based on review of existing literature on port air emissions.

Port sources also emit air toxics, most notably diesel exhaust. Other air toxics emitted from diesel engines include benzene, 1,3-butadiene, formaldehyde, acetaldehyde, acrolein, polycyclic organic matter, and naphthalene. All of these compounds, except acetaldehyde, were identified as national or regional risk drivers in EPA's 1999 National-Scale Air Toxics Assessment. These air toxics pose both cancer and non-cancer health effects. For example, EPA's December 2007 Advanced Notice of Proposed Rulemaking stated that:

> *...mobile sources, including Category 3 marine [oceangoing vessel] engines, were responsible for 44 percent of outdoor toxic emissions and almost 50 percent of the cancer risk among the 133 pollutants quantitatively assessed in the 1999 National-Scale Air Toxics Assessment.*

In January 2008, the South Coast Air Quality Management District (SCAQMD) released its draft final report, Multiple Air Toxic Exposure Study III (MATES III). MATES III studied the cancer risk from exposure to toxic air pollution in the Southern California air basin. The study measured air toxics at 15 locations throughout Southern California from 2004 to 2006. MATES III found the cancer risk rate from air toxics in the Southern California air basin is nearly 1,200 per million, with the highest cancer risks at about 3,700 per million. Most of the risks were from diesel particulates. The highest air toxics risks are found near the port area, an area near Central Los Angeles, and near transportation corridors. The results from this study demonstrate the need for continued efforts to reduce air toxic emissions, particularly from diesel engines. The Clean Air Act set a lifetime cancer risk of 1 in 1 million as a threshold above which regulation may be warranted for individual sources of air toxics.

A July 2008 National Oceanic and Atmospheric Administration study[5] found that emissions from shipping have a significant impact on air quality and health on both local and regional scales. Extensive measurements of the emissions of light absorbing carbon aerosol, or soot,[6] from commercial shipping showed increased concentrations of this aerosol at U.S. ports on the East Coast, West Coast, and Gulf Coast. The study also suggested that large oceangoing vessels may emit up to twice as much aerosol as previously estimated.

Impacts of Air Pollution from Port Activities

Diesel and other emissions from port activities have significant human health and environmental impacts in onshore communities. These impacts include increased cancer rates, asthma, other respiratory and cardiovascular diseases, and premature death. Port emissions also contribute to the formation of ground level ozone, acid rain, and crop damage. EPA has recognized that diesel engines at ports create emissions that affect the health of workers and people living in nearby communities, and contribute significantly to regional air pollution. EPA has determined that diesel exhaust is "likely to be carcinogenic to humans by inhalation" and that this hazard applies to environmental exposures.[7]

[5] Lack, D. B. Lerner, C. Granier, T. Baynard, E. Lovejoy, P. Massoli, A. R. Ravishankara, and E. Williams, *Light absorbing carbon emissions from commercial shipping*, Geophys. Res. Lett., 35, L13815, doi:10.1029/2008GL033906, 2008.

[6] Soot is diesel particulate matter, and results from burning fuel in diesel engines.

[7] U.S. EPA (2002). *Health Assessment Document for Diesel Engine Exhaust*, prepared by the National Center for Environmental Assessment, Washington, DC, for OTAQ, EPA/600/8-90/057F.

Recent studies show that populations living near large diesel emission sources such as major roadways,[7] rail yards, and ports[8] are likely to experience greater diesel exhaust exposure levels than the overall U.S. population, exposing them to greater health risk. For example, according to the California Air Resources Board, nearly 60 percent of the 2 million people living in the area around the Ports of Los Angeles and Long Beach have a potential cancer risk of greater than 100 in 1 million (due in part to port emissions), while over 410,000 people living closest to the same ports have a cancer risk greater than 200 in 1 million.[9] Recent studies have also shown an increased risk of cancer at other ports in the United States.[9]

EPA recently conducted an initial screening level analysis on the size of the U.S. population living near 47 marine ports and 37 rail yards selected. According to EPA, this was useful in beginning to understand the populations exposed to diesel particulate matter in these areas. The results indicate that at least 13 million people, including a disproportionate number of low-income households, African-Americans, and Hispanics, live in the vicinity of these facilities and are exposed to ambient diesel particulate matter. Figure 1-2 below shows U.S. port locations and areas exceeding air quality standards in 2007.

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Figure 1-2: U.S. Ports and Areas Exceeding Air Quality Standards as of March 2007.

Source: EPA Advanced Notice of Proposed Rulemaking, *Control of Emissions From New Marine Compression-Ignition Engines at or Above 30 Liters per Cylinder*. Federal Register, December 7, 2007, Volume 72, Number 235, pp. 69522-69552. The figure depicts counties which were designated nonattainment for either or both the 8-hour ozone National Ambient Air Quality Standards (NAAQS) and PM2.5 NAAQS as of March 2007. It also shows the location of mandatory class I Federal areas for visibility.

Areas of the country where air pollution levels persistently exceed the ambient air quality standards[11] may be designated as "nonattainment" areas. In 2007, 31 U.S. sea ports were located in nonattainment areas for ozone, fine particulate matter, or both. Further, in March 2008, EPA strengthened the air quality standards for ground-level ozone, revising the present 8-hour ozone standard from 0.084 to 0.075 parts per million (ppm). Many additional counties with ports are projected to be in nonattainment for the 0.075 ppm 8-hour ozone standard. According to EPA's Office of Air Quality Planning and Standards, EPA's goal is to improve the air quality in areas where it is unacceptable and prevent deterioration in areas where the air is relatively free of contamination.

In addition to public health impacts, serious public welfare and environmental impacts are associated with mobile source emissions at

[11] EPA has established National Ambient Air Quality Standards (NAAQS) for six pollutants commonly throughout the United States. These include ozone and particulate matter.

ports. Pollutants such as NO_x, SO_x, and fine particulate matter ($PM_{2.5}$) can impair visibility in many parts of the United States. These pollutants contribute to structural damage to bridges and other structures by corrosion or erosion, and damage the exteriors of buildings, monuments, and other culturally important articles. Finally, NO_x and SO_x emissions from diesel engines contribute to increased acidity and higher amounts of dissolved chemical nutrients (especially nitrogen and sulfur) in water bodies. For example, airborne NO_x from diesel and other sources contributes about 32 percent of the excess nitrogen load to the Chesapeake Bay, North America's largest and most biologically diverse estuary, home to more than 16 million people and 3,600 species of plants, fish, and animals.[11]

Projected Port Growth and Impacts

Generally, port emissions are expected to grow substantially over the next several decades, with oceangoing vessels showing the largest growth. According to EPA, excluding further regulatory controls,[12] NO_x emissions from oceangoing vessels are projected to more than double by 2030, growing to 2.1 million tons a year (or 34 percent of U.S. mobile source NO_x emissions).[13]

In 2007, Category 3 marine engines (large oceangoing vessel engines)[14] emitted more than half of the mobile source SO_x inventory for the entire United States (almost 530,000 tons). According to EPA, without further regulatory controls, these emissions are expected to increase to approximately 1.4 million tons by 2030, or 95 percent of mobile source emissions. Without additional regulations or controls, some source categories will represent an increasingly larger percentage of the Nation's mobile source emissions inventory. Figure 1-5 illustrates the projected emissions of NO_x, $PM_{2.5}$, and SO_2 for mobile sources categories as a percentage of the total U.S. mobile source inventory in 2001 and 2030.

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[11] *EPA Relying on Existing Clean Air Act Regulations to Reduce Atmospheric Deposition to the Chesapeake Bay and Its Watershed*, EPA Office of Inspector General, Report No. 2007-P-00009, Feb. 28, 2007.

[12] On October 9, 2008, the International Maritime Organization (IMO) adopted new international standards for NO_x from oceangoing vessel engines and sulfur in their fuels. Estimates in this report do not reflect potential reductions that may be achieved from recent revisions to IMO Annex VI standards. As discussed in Chapter 2, EPA will need to assess the impacts of these revisions on the Agency's ability to meet its responsibilities under the CAA.

[13] These projections are based on growth rates ranging from 1.7 to 5.0 percent per year, depending on the geographic region (2007 EPA Advanced Notice of Proposed Rulemaking).

[14] For the purpose of emission regulations, marine engines are divided into three categories based on displacement (swept volume) per cylinder. Each of the categories represents a different engine technology. Category 1 and Category 2 marine diesel engines are used to provide propulsion power on many kinds of vessels including tugboats, pushboats, supply vessels, fishing vessels, and other commercial vessels in and around ports. They are also used as stand-alone generators for auxiliary electrical power on many types of vessels. Category 3 marine diesel engines are very large and are used for propulsion power on oceangoing vessels such as container ships, oil tankers, bulk carriers, and cruise ships.

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Figure 1-3: Projected Emissions Contributions of Mobile Source Categories as a Percentage of the Total U.S. Mobile Source Inventory for 2001 and 2030, Based Upon Current Regulations.

Figure 1-3-a: Mobile Source Category NO_x Emissions as a Percentage of Total U.S. Mobile Source Emissions Inventory.

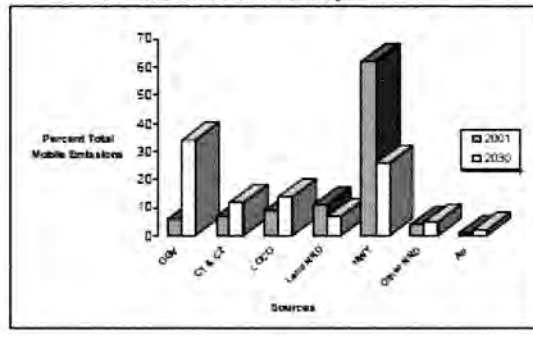


Figure 1-3-b: Mobile Source Category $PM_{2.5}$ Emissions as a Percentage of Total U.S. Mobile Source Emissions Inventory.

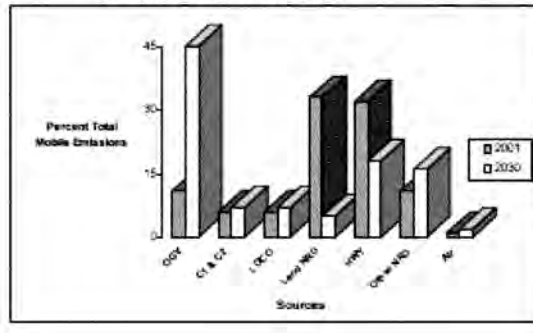
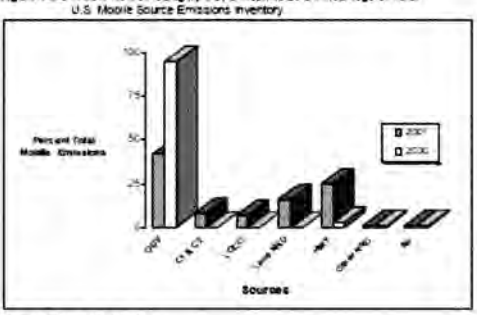


Figure 1-3-a Mobile Source Category SO2 Emissions as a Percentage of Total U.S. Mobile Source Emissions Inventory



Legend for Figure 1-3-a to 1-3-c:

OGV	Oceangoing Vessels
C1 & C2	Category 1 and Category 2 marine engines[1]
LOCO	Locomotives
Land NRD	Land-based nonroad diesel
HWY	Highway
Other NRD	Other nonroad diesel
Air	Aircraft

(Source: OIG analysis of EPA Advanced Notice of Proposed Rulemaking, *Control of Emissions of From New Marine Compression-Ignition Engines at or Above 30 Liters per Cylinder: Proposed Rule*. Federal Register pp. 69522-69552, December 07, 2007.

Increasing emissions at ports can be attributed to rising demands in international trade, as well as expanded port infrastructure. The Panama Canal is being expanded to accommodate larger oceangoing vessels and allow for more frequent use. According to the Panama Canal Authority, the expansion is scheduled to be completed in 2014. This expansion will include a new wider, deeper channel that will allow larger ships to pass through and the number of ships to increase. To accommodate the increased cargo volume attributable to the Panama Canal expansion, some Eastern U.S. and Gulf Coast ports are expected to significantly increase their capacity.

Figure 1-4 illustrates the expected growth in container trade projected at selected U.S. ports between 2004 and 2020.

[1] These engines are typically are used to provide propulsion power on many kinds of vessels including tugboats, pushboats, supply vessels, fishing vessels, and other commercial vessels in and around ports.

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Figure 1-4: Projected Growth in U.S. Maritime Container Trade at Selected U.S. Ports (2004-2020)

Source: American Society of Civil Engineers 2005 Report Card for America's Infrastructure; U.S. Department of Transportation.

For example, according to the U.S. Department of Transportation, by 2020 the Port of Savannah is projected to increase its container traffic by over 400 percent. Similarly, the Ports of Los Angeles and Long Beach (combined) and Houston are expected to increase their container traffic by over 300 percent. Increased cargo volume means more activity for cargo-handling equipment, heavy-duty trucks, harbor craft, and locomotives. This type of growth will add to air quality concerns in these areas. Appendix A provides details on projected growth at U.S. ports due to container shipping and port expansion plans.

NOTE: GEORGIA PORT AUTHORITY WANTS TO RAISE THE PORT'S POTENTIAL CAPACITY TO 6.5 MILLION TEU'S BY 2018

	and bulk head improvements.
Savannah	• Savannah Harbor Expansion Project will deepen the harbor to 48 feet (before the Panama Canal improvements are completed). • Georgia Port Authority wants to raise the port's potential capacity to 6.5 million TEUs by 2018.
Charleston	• The port expansion includes a $600 million terminal at the former Navy base.

In order to receive the growth in container traffic, by 2020 every major U.S. container port is expected to double the volume of cargo it must process with East Coast ports tripling in volume and some West Coast ports quadrupling in volume. Table A-2 shows the projected increases of specific ports by 2020, starting from 2004. This shows the anticipated impact of the Panama Canal expansion on port growth.

Table A-2: Growth of Container Traffic in Selected U.S. Ports

Port	2004 volume (1000 TEUs)	2020 Volume (1000 TEU)	Increase (Percent)
Seattle	1,776	2,557	44
Tacoma	1,798	4,396	144.5
Oakland	2,043	3,382	65.5
Los Angeles/Long Beach	13,101	59,420	353.6
Houston	1,437	6,165	329
Miami	1,010	2,152	113.1
Savannah	1,662	9,420	466.8
Charleston	1,860	6,639	256.9
Virginia	1,809	5,556	207.7
New York/New Jersey	4,478	15,835	253.6

Source: American Society of Civil Engineers – 2005 Report Card for America's Infrastructure; U.S. Department of Transportation.

Table 2-1: Contribution of Commercial Marine Vessels* to Mobile Source Inventories for Selected Ports in 2002

Port Area	NO_x Percent	$PM_{2.5}$ Percent	SO_2 Percent
Baltimore, MD	12	27	69
Beaumont, TX	6	20	55
Boston, MA	4	5	30
Charleston, SC	22	33	87
Galveston, TX	5	12	47
Houston, TX	3	10	41
Jacksonville, FL	5	11	52
Los Angeles/Long Beach, CA	5	10	71
Miami, FL	13	25	66
New Orleans, LA	14	24	59
New York/New Jersey, NY/NJ	4	9	39
Oakland, CA	8	14	80
Port Everglades, FL	9	20	56
San Francisco, CA	1	1	31
Savannah, GA	24	39	80
Seattle, WA	10	20	56
South Louisiana, LA	12	24	58
Tacoma, WA	20	38	74
Valdez, AK	4	10	43
Wilmington, NC	7	16	73

*This category includes emissions from Category 3 propulsion engines, as well as Category 2 and 3 auxiliary engines used on oceangoing vessels.

Source: *EPA Advanced Notice of Proposed Rulemaking, Control of Emissions From New Marine Compression-Ignition Engines at or Above 30 Liters per Cylinder.* Federal Register: December 7, 2007, Volume 72, Number 235, pp. 69522-69562. Table VII-4, p. 69547.

APPENDIX D. Letter from U.S. EPA Region 9 concerning the DEIR for the Heim Bridge, Port of Long Beach – to show the way that Region describes the need for information on cumulative impacts, health impacts, environmental justice, etc.

See next few pages of this .pdf

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105-3901

October 12, 2007

Mr. Ron Kosinski
California Department of Transportation
100 South Main Street
Los Angeles, California 90012-3606

Subject: Draft Environmental Impact Statement (FEIS) for the Schuyler Heim Bridge Replacement and State Route 47 Expressway Project (CEQ # 20070361)

Dear Mr. Kosinski:

The U.S. Environmental Protection Agency (EPA) has reviewed the Draft Environmental Impact Statement (DEIS) for the Schuyler Heim Bridge Replacement and State Route (SR) 47 Expressway Project (Project), Ports of Los Angeles and Long Beach, Los Angeles County, California. Our comments are provided under the National Environmental Policy Act (NEPA), the Council on Environmental Quality's NEPA Implementing Regulations (40 CFR 1500-1508), and Section 309 of the Clean Air Act. Based upon our review, we have rated the proposed action as *Environmental Concerns- Insufficient Information (EC-2)*. See attached "Summary of the EPA Rating System" for a description of the rating. The basis for the rating is summarized below and further detailed in our enclosed comments.

Cumulative Impacts

EPA is aware of a number of forthcoming EISs in the port area over the next few years, which, if implemented, will lead to substantial cumulative environmental impacts in an already highly impacted area. We note that the neighboring low income and minority communities have historically sustained extensive impacts to air quality and water quality from goods movement-related operations. For this reason, it is critical that the environmental documentation for this project, and all future projects in the Port of Los Angeles and Port of Long Beach area, reflect the level of historical, current, and future direct, indirect, and cumulative environmental impacts. In particular, this project's contributions to cumulative effects must be clearly defined along with proposed mitigation. EPA recommends that the FEIS include a more robust cumulative impact assessment that effectively discloses the health of the current environment, the trends that have contributed to impacts and/or losses to these resources, and the Project's cumulative effects.

Air Quality

EPA has concerns with the Project's impacts to air quality, including mobile source air toxics (MSATs). EPA recommends, given the likelihood of a shift in localized MSAT impacts in an area that is already highly impacted by air toxics, that Caltrans perform dispersion modeling for major MSATs to identify areas that may experience an increase in MSATs. Caltrans should provide additional mitigation for any adverse MSATs impacts and commit to these mitigation measures in the FEIS and Record of Decision (ROD). The mitigation plan developed for the

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Project should 1) further minimize impacts from construction; 2) be consistent with the Clean Air Action Plan (CAAP, approved on November 20, 2006); and 3) identify specifically how measures identified in the CAAP can be both expanded upon and implemented earlier. EPA also recommends that the FEIS include additional monitoring data and studies performed in the project area and identify exceedances of the new 24-hour national ambient air quality standard for particulate matter less than 2.5 microns in diameter (PM2.5).

Environmental Justice

EPA is concerned that the project may result in disproportionately high and adverse air quality impacts to low income and minority populations. EPA recommends that Caltrans re-assess these potential impacts as detailed in the enclosed comments. Mitigation should be proposed, as necessary, to reduce any identified environmental justice impacts.

Water Quality

EPA is concerned that proposed construction work in the Cerritos Channel and Consolidated Slip/Dominguez Channel will resuspend fine-grained bottom sediments and may exceed state water quality standards and the proposed silt/turbidity curtains may not be fully effective to reduce impacts from resuspended sediments, given tidal influences and the depth of the channel. Also, the DEIS does not accurately characterize the current conditions in the area surrounding the bridge. EPA recommends including recent testing results from complete Tier 1 and Tier 2 sediment sampling in the area surrounding the bridge in the Cerritos Channel and implementing additional best management practices (BMPs) and a construction monitoring program to ensure containment of resuspended sediments.

The enclosed Detailed Comments include additional recommendations to coordinate with EPA's Superfund Program for work proposed in Consolidated Slip and with the U.S. Fish and Wildlife Service and the California Department of Fish and Game to address impacts to the American peregrine falcon nesting pair on the Schuyler Heim Bridge.

We appreciate the opportunity to review this DEIS and are available to further discuss all recommendations provided. When the FEIS is released for public review, please send two hard copies and three electronic copies to the address above (Mail Code: CED-2). If you have any questions, please contact me at 415-972-3846 or Susan Sturges, the lead reviewer for this project. Susan can be reached at 415-947-4188 or sturges.susan@epa.gov.

Sincerely,

Connell Dunning

FOR Nova Blazej, Manager
Environmental Review Office

Enclosures:
EPA's Detailed Comments
Summary of EPA Rating Definitions

cc: Karl Price, California Department of Transportation
Steve Healow, Federal Highway Administration
Mark Cohen, U.S. Army Corps of Engineers

Cumulative Impacts

The cumulative impacts section of the Draft Environmental Impact Statement (DEIS) for the Schuyler Heim Bridge Replacement and State Route 47 Expressway Project (Project) in the Ports of Los Angeles and Long Beach identifies multiple current and future projects to be constructed in the ports area. A second document, the recently completed DEIS for the TRAPAC terminal also identifies multiple capacity increasing and infrastructure projects. Based on information contained in both documents, an estimated 14 combined Environmental Impact Report (EIR)/EISs, and almost twice as many EIRs, are to be developed in support of infrastructure projects over the next few years. This large volume of future proposed projects in the ports, if implemented, will lead to substantial cumulative construction- and operation-related environmental impacts in an already highly impacted area. We note that the neighboring low income and minority communities have historically sustained extensive impacts to air quality and water quality from goods movement-related operations.

The high volume of proposed projects combined with a highly urbanized setting, with low-income and minority communities in an already highly impacted area, demands a thorough cumulative impacts assessment with extensive proposed mitigation. Specifically, all feasible mitigation should be proposed and committed to along with timeframes for implementation.

The DEIS includes a brief qualitative discussion of cumulative impacts for each resource area, but does not provide an appropriate context for cumulative impacts. The DEIS does not include the historical extent of resource losses and impacts and instead, relies on baseline conditions described in the Affected Environment sections of the document for the analysis.

Given the historically sustained extensive cumulative impacts to air and water quality from goods movement-related operations, EPA strongly recommends a more comprehensive analysis of cumulative impacts to resources of concern. The Final EIS (FEIS) should include a more robust cumulative impact assessment that effectively discloses: 1) a defined study area for each resource; 2) the health or status of the resource and the historical extent of losses and/or impacts to the resource; 3) the trends associated with those losses and/or impacts; 4) how reasonably foreseeable actions may impact those resources; 5) the Project's contributions to these cumulative effects; and 6) a mitigation strategy and timeframe of implementation to reduce impacts.

Recommendation:

- Include a more robust cumulative impact analysis in the FEIS. EPA recommends Caltrans follow the June 2005 *Guidance for Preparers of Cumulative Impact Analysis* prepared jointly by Caltrans, Federal Highway Administration, and the EPA for this additional analysis. The guidance is a useful reference and is available on-line at http://www.dot.ca.gov/ser/cumulative_guidance/approach.htm
- Include a mitigation strategy to reduce impacts from the proposed project and include timeframes for implementation of all proposed mitigation.

Air Quality

Mobile Source Air Toxics

The project area includes the Wilmington District of the City of Los Angeles, which is already one of the most heavily impacted areas for air quality in the nation. In addition to being adjacent to the Ports of Los Angeles and Long Beach (where marine vessels, cargo handling equipment, diesel trucks, and locomotives all contribute mobile source air toxics (MSAT) emissions), Wilmington is also the location of several oil refineries and other major air toxics emitters.

A 2001-2003 California Air Resources Board monitoring study (http://www.arb.ca.gov/ch/reports/wilmington_sb25_report.pdf) adjacent to Wilmington Park Elementary School (1115 Mahar Avenue, Wilmington, CA), approximately 1000 feet from the proposed Project area where Henry Ford Avenue meets Alameda Street, found high levels for several air toxics. Predicted increased cancer risks due to air toxics at the site were 277 in a million, which is much higher than the level EPA generally considers unacceptable (EPA uses >100 in a million risk as unacceptable for stationary sources; see the Benzene NESHAP, 54 FR 38044, September 14, 1989). The majority of the increased cancer risk was due to 1,3-butadiene and benzene, both primarily emitted by mobile sources. The 277 in a million risk was from only nine air toxics. Including the impacts of diesel particular matter (PM) would make the actual risks much higher.

Given the significant concerns about adverse health effects from mobile source pollutants and the project's potential for emissions in close proximity to residential communities and sensitive receptors, EPA recommends performing an analysis of potential MSAT impacts that informs decision-making between project alternatives and informs avoidance, minimization, and mitigation options. When considering appropriate and useful levels of analysis, EPA recommends that the lead agency consider the following:

- The likelihood of impact and potential magnitude of the effect, including both the magnitude of emissions and the proximity of the project emissions to potential residential and sensitive receptors, such as schools, hospitals, day care facilities, and nursing homes;
- The severity of existing conditions;
- Whether the project is controversial and whether air toxics concerns have been raised by the public for this project or for other projects in the area in the past;
- Whether there is a precedent for analysis for projects of this type, either under NEPA or other environmental laws; and
- Whether the analysis could be useful for distinguishing between alternatives, informing design changes, and targeting mitigation.

For most transportation projects, EPA generally recommends that the following levels of analysis be considered (in order of increasing complexity):

1. Qualitative discussion,
2. Quantify emissions,
3. Toxicity-weight emissions,

4. Dispersion modeling, and
5. Risk assessment.

These analyses are further described in the March 2007 report entitled "Analyzing, Documenting, and Communicating the Impacts of Mobile Source Air Toxic Emissions in the NEPA Process" conducted for the American Association of State Highway and Transportation Officials (AASHTO) Standing Committee on the Environment and funded by the Transportation Research Board (http://www.trb.org/NotesDocs/25-25(18)_FR.pdf). Procedures for toxicity-weighting, which EPA has found to be especially useful for the targeting of mitigation, are described in EPA's Air Toxics Risk Assessment Reference Library (Volume 3, Appendix B, beginning on page B-4, http://epa.gov/ttn/fera/data/risk/vol_3/Appendix_B_April_2006.pdf).

The DEIS acknowledges the need for quantitative MSAT analysis, stating (page 3.13-20):

"(1) the project would serve diesel trucks with the potential to concentrate diesel particulate matter; and
(2) sensitive receptors are within the project area and near the project site."

EPA agrees that a quantitative MSAT analysis is appropriate in this situation. The Project may result in shifting or exacerbating MSAT impacts in an area that is already heavily impacted, causing a concern with both direct and cumulative impacts. While the DEIS acknowledges the need for quantitative MSAT analysis, the analysis presented is inadequate to fully understand how MSAT impacts may vary between project alternatives. The regional emissions analysis, presented in Table 3.13-9, does not have sufficient information to describe how MSAT impacts will change, given that MSAT impacts are usually very localized (i.e. "hotspot").

Monitoring studies and epidemiological research have found that the largest impacts from vehicle-related pollutants generally occur within the first 1000 feet of a major roadway (see Section 3 of EPA's "Regulatory Impact Analysis: Control of Hazardous Air Pollutants from Mobile Sources," February 2007, http://www.epa.gov/otaq/regs/toxics/fr-ria-sections.htm). The DEIS acknowledges that there are a number of sensitive receptors, including residences and schools, that are closer than 1000 feet, some even within 100 feet of the proposed Project location. Thus, any change in traffic density resulting from the proposed Project alternatives (for example, the shifting of truck traffic from State Route 103 (SR-103) or Interstate 710 (I-710) to State Route 47 (SR-47)/Alameda Street) is likely to lead to both an increase in MSAT impacts at one location and a decrease in MSAT impacts at another location. The net result of this change may be either unacceptable or beneficial, and is especially dependent on the relative locations of sensitive receptors, but is difficult to determine without further quantitative analysis of changes in ambient concentration as a result of each alternative.

Recommendations:

- Given the likelihood of a shift in localized MSAT impacts in an area that is already highly impacted by air toxics, EPA recommends that Caltrans perform dispersion modeling of each of the MSATs listed in Table 3.13-9 for inclusion in the FEIS. Maps o ambient concentration should be presented in the FEIS for both the base year (2003, no build) and fully-operational facility (all alternatives). If construction emissions are not fully mitigated, the predicted changes in ambient concentration that would result from construction activity should be presented as well.

- The FEIS should discuss areas where alternatives may lead to increased MSAT impacts or provide environmental benefits. For example:
  - Would changes to SR-47 lead to increased impacts near Henry Ford Avenue and Alameda Street? For alternatives that may lead to increased MSAT impacts, the MSAT analysis will be critical for distinguishing between build alternatives, identifying whether specific design changes or mitigation would be necessary or beneficial, and targeting mitigation efforts.
  - Would the proposed SR-103 Extension result in decreases in truck traffic along Willow Street to I-710, providing an environmental benefit for this heavily-residential area?

- If the project will result in increased MSAT impacts, then Caltrans should propose MSAT mitigation measures. In order to be most helpful for targeting mitigation, the emissions should be further reported by project segment and smaller geographic locations. The benefits of proposed MSAT mitigation measures should be quantified and discussed in terms of the ability of mitigation to minimize or eliminate any potentially adverse localized impacts.

National Ambient Air Quality Standards

The Project is located in the South Coast Air Basin (SCAB). The SCAB is classified by EPA as serious nonattainment of the National Ambient Air Quality Standards (NAAQS) for particulate matter less than ten microns in diameter (PM10), nonattainment for particulate matter less than 2.5 microns in diameter (PM2.5), severe nonattainment for 8-hour ozone, and maintenance for CO. The SCAB has the worst 8-hour ozone and $PM_{2.5}$ problems in the nation, and attainment of these National Ambient Air Quality Standards (NAAQS) will require massive reductions from mobile sources, given the rapid growth in this emissions category and the long lifespan of diesel engines. The DEIS accurately reflects the SCAB nonattainment designations made by EPA for the NAAQS.

San Pedro Bay Ports Clean Air Action Plan

The San Pedro Bay Ports Clean Air Action Plan (CAAP), approved on November 20, 2006, identifies the measures that the Port of Los Angeles and the Port of Long Beach will take to reduce the emissions from Port operations. The CAAP includes recommendations and measures to reduce emissions 45% by 2011 through control measures for ocean-going vessels, heavy duty vehicles, cargo-handling equipment, harbor craft, and locomotives. The measures included are anticipated to reduce diesel particulate matter by 80% over the next five years (p. 4-39). Construction equipment and heavy duty truck emissions are expected to be a substantial

portion of the emissions associated with the proposed project. EPA recommends that any mitigation for the project's emissions impacts be consistent and support the CAAP.

Traffic and Air Quality Technical Studies

The Air Quality section references the Traffic and Air Quality technical studies but does not include these studies in the DEIS. These studies contain considerable technical information that augments the conclusions of the DEIS.

Recommendation:

Include the Traffic and Air Quality technical studies as attachments to the FEIS.

Conformity

The description of the applicable conformity requirements in several different sections of the DEIS provide conflicting conclusions as to which conformity requirements apply to the various aspects of the proposed project. Federal Actions that require Federal Highway Administration (FHWA) funding or approval are subject to the Transportation Conformity requirements [40 CFR part 93, subpart A]; other Federal Actions are subject to the General Conformity requirements [40 CFR part 93, subpart B]. Further, if the proposed project involves bridge retrofit, modification, or replacement and requires a permit from any Federal Agency other than FHWA, General Conformity would apply to the construction (i.e., equipment, barge, tugboat, etc.) emissions and operational emissions associated with the modifications to the Schuyler Heim Bridge.

Recommendation:

Clarify in the FEIS which aspects of the project are subject to transportation conformity, and which to general conformity. For General Conformity, the FEIS should describe the specific Federal Action that triggers the General Conformity requirements and include an analysis of the direct and indirect emissions associated with that Federal Action that are subject to the General Conformity requirements. For the General Conformity applicability analysis shown in Table 3.13-4, in addition to the column labeled "10% of the Emission Inventory", EPA also recommends specifically listing the emissions of each pollutant for which General Conformity is applicable and for which year this analysis is performed.

The DEIS states that the originally proposed project was included in the SCAG 2004 Regional Transportation Plan (RTP) and the SCAG 2006 Regional Transportation Improvement Program (RTIP) (pp. 3.13-11 – 3.13-12) and that the changes to the project scope are expected to be approved into the 2008 RTP in March 2008.

Recommendation:

To demonstrate that the proposed project meets the transportation conformity requirements in 93.115(a) and 93.115(b)(1), clarify in the FEIS that the project's design and scope have not changed significantly from those which were included in the 2004 RTP and 2006 TIP.

PM Hot Spot Analysis

A PM2.5 hot spot analysis is only required for the portion of the project that will be funded or approved by FHWA. However, the PM2.5 hot spot analysis in the DEIS also includes marine vessel emissions (pp. 3.13-17) that are elsewhere described as covered under general conformity (pp. 3.13-5).

Recommendation:
Clarify in the FEIS the relevant requirements for the emissions associated with the various elements of the project, and specify which emissions should be included in the PM2.5 hot spot analysis.

The PM2.5 and PM10 hot spot analyses are based upon three years of monitoring data (2004-2006) at the North Long Beach monitoring site. However, short-term ambient air quality trends may be influenced by variations in meteorology and not accurately reflect the longer-term ambient air quality trends.

Recommendation:
Base the conclusions of the hot spot analyses for PM10 and PM2.5 on six years of ambient air quality data, rather than three years, so that conclusions about ambient air quality trends is not based upon potential impacts of short-term meteorological trends.

The monitoring data presented in the PM hot spot analysis is from the North Long Beach site, the closest monitoring site to the project location. However, the traffic at the North Long Beach monitoring site may not reflect the same traffic conditions as at the project location since the project's area is heavily impacted by heavy duty truck traffic.

Recommendation:
If possible, include a discussion in the PM hot spot analyses of PM trends at monitors in locations with the percentage of truck traffic similar to that of the project area. This analysis would determine if PM concentrations are higher at these locations, exhibit different trends, or whether those concentrations are significantly influenced by roadway emissions.

PM10

A 2001-2003 CARB monitoring study (http://www.arb.ca.gov/ch/reports/wilmington_sb25_report.pdf) adjacent to the Wilmington Park Elementary School, approximately 1000 feet from the proposed Project area, found that PM10 levels were higher at the CARB study's Wilmington monitoring site than at the North Long Beach monitoring site. These results suggest that the air quality near the Wilmington School may be influenced by local sources not captured at the North Long Beach site.

Recommendation:
In addition to the air quality analysis presented in the DEIS, include results of the CARB study in the FEIS. Revise the air quality section to take into account the CARB study's conclusions about the air quality in the vicinity of the proposed project. If necessary, re-evaluate the DEIS' conclusions regarding the proposed project's impact on the local air quality conditions.

PM2.5

In the discussion of the air quality at the North Long Beach monitoring site (page 3.13-7), the DEIS references the number of exceedances of the 65 micrograms per cubic meter (ug/m^3) 24-hour PM2.5 NAAQS in recent years, but does not describe exceedances of the new 24-hour PM2.5 NAAQS of 35 ug/m^3. The new standard should be used as the threshold for NEPA evaluation purposes, as described in the memorandum by Anne Norton Miller, Director, EPA Office of Federal Affairs ("Reflecting the Revised PM2.5 National Ambient Air Quality Standard in NEPA Evaluations", June 25, 2007). This new standard was exceeded numerous times at the North Long Beach and Long Beach stations, as shown in the chart below. As demonstrated in this chart, the two Long Beach monitoring locations do show overall progress, but the PM2.5 35 ug/m^3 24-hour standard has not been attained at either monitoring location.

Number of PM2.5 35 ug/m^3 24-hour exceedances per year:

	2000	2001	2002	2003	2004	2005	2006
North Long Beach:	35	47	36	25	21	13	5
Long Beach:				15	17	10	7

Recommendation:

To most accurately represent the air quality conditions in the Long Beach area, include in the FEIS an updated discussion of the PM2.5 air quality conditions at the nearby monitoring stations and compare the PM2.5 concentrations to the new PM2.5 24-hour NAAQS.

Monitoring Studies near the San Pedro Bay Ports

SCAQMD has an ongoing ambient monitoring project in the vicinity of the Ports of Los Angeles and Long Beach. The study will measure criteria pollutants, air toxics and PM with speciation. In addition, SCAQMD currently is analyzing data from the MATES-III monitoring program which will soon provide air toxics monitoring data, including PM2.5 speciation at monitoring locations closer to the Ports.

Recommendation:

Where relevant, include in the FEIS the results of these two micro-scale monitoring studies to determine whether any updates to the air quality discussion in the DEIS are necessary in order to provide the most accurate and current assessment of the air quality conditions in the proposed project area.

Construction Emissions and Mitigation:

The project construction is expected to result in significant emissions of CO, NOx, ROG, PM10, and PM2.5, such as demonstrated in Table 13.10 for Alternative 1. In addition, emissions from diesel-powered equipment are expected. The MATES-II study in South Coast found that 70% of all cancer risk is attributed to diesel particulate emissions. The DEIS should evaluate the specific potential for increased diesel emissions, separate from other mobile-source emissions. EPA recommends consideration of the following additional mitigation measures to reduce the impacts resulting from future construction associated with this project.

Recommendations:
Due to the serious nature of the PM_{10} and $PM_{2.5}$ conditions in the SCAB and the significant cancer risk attributed to diesel emissions in the South Coast, EPA recommends that the best available control measures (BACM) for these pollutants be implemented at all times and that the FEIS and ROD incorporate the Construction Mitigation Plan. We recommend that (1) all applicable requirements under SCAQMD Rules, (2) the Caltrans Standard Construction Specifications and recommended measures listed on pages 3.13-36 and 3.13-37 of the DEIS, and (3) the following additional and/or revised measures be incorporated into a Construction Mitigation Plan.

Fugitive Dust Source Controls:

- Stabilize open storage piles and disturbed areas by covering and/or applying water or chemical/organic dust palliative where appropriate. This applies to both inactive and active sites, during workdays, weekends, holidays, and windy conditions.
- Install wind fencing and phase grading operations where appropriate, and operate water trucks for stabilization of surfaces under windy conditions.
- When hauling material and operating non-earthmoving equipment, prevent spillage and limit speeds to 15 miles per hour (mph). Limit speed of earth-moving equipment to 10 mph.

Mobile and Stationary Source Controls:

- Maintain and tune engines per manufacturer's specifications to perform at EPA certification levels and to perform at verified standards applicable to retrofit technologies. Employ periodic, unscheduled inspections to limit unnecessary idling and to ensure that construction equipment is properly maintained, tuned, and modified consistent with established specifications.
- Prohibit any tampering with engines and require continuing adherence to manufacturers recommendations
- If practicable, lease newer and cleaner equipment meeting the most stringent of applicable Federal or State Standards (see table: http://arb.ca.gov/msprog/ordiesel/documents/Off-Road%20Diesel%20Stds.xls). In general, only Tier 2 or newer engines should be employed in the construction phase, given the scale of the construction project, the level of the exposed population, and the high background levels of pollutants in the area.
- Utilize EPA-registered particulate traps and other appropriate controls where suitable to reduce emissions of diesel particulate matter and other pollutants at the construction site.

Administrative controls:

- Identify all commitments to reduce construction emissions and update the air quality analysis to reflect additional air quality improvements that would result from adopting specific air quality measures.

- Identify where implementation of mitigation measures is rejected based on economic infeasibility.
- Prepare an inventory of all equipment prior to construction and identify the suitability of add-on emission controls for each piece of equipment before groundbreaking. (Suitability of control devices is based on: whether there is reduced normal availability of the construction equipment due to increased downtime and/or power output, whether there may be significant damage caused to the construction equipment engine, or whether there may be a significant risk to nearby workers or the public.)
- Utilize cleanest available fuel engines in construction equipment and identify opportunities for electrification. Use low sulfur fuel (diesel with 15 parts per million or less) in engines where alternative fuels such as biodiesel and natural gas are not possible.
- Develop a construction traffic and parking management plan that minimizes traffic interference and maintain traffic flow.
- Identify sensitive receptors in the project area, such as children, elderly, and infirm, and specify the means by which you will minimize impacts to these populations. For example, locate construction equipment and staging zones away from sensitive receptors away from fresh air intakes to buildings and air conditioners.
- Reflect the SCAQMD's BACMs for fugitive dust mitigation listed in Tables 3-13.11 – 3-13.13 in the Mitigation Reporting Plan (i.e., should be enumerated as mitigation measures in the monitoring report on p. 264 and 265). Moreover, given the severity of the PM problem in the area and the size of the construction activity associated with the proposed project, commit to implement during all construction phases more than the minimum of one BACM in each category in order to reduce PM emissions to the minimum.

Environmental Justice

EPA is concerned that the project may result in disproportionately high and adverse air quality impacts to low income and minority populations. Executive Order 12898 addresses environmental justice in minority and low income populations, and the CEQ has developed guidance concerning how to address Environmental Justice in the environmental review process (http://ceq.eh.doe.gov/nepa/regs/ej/justice.pdf). The project area is characterized by substantial proportions of both minority and low-income persons (82 percent minority and as many as 77 percent of persons below the poverty threshold in some areas), which is much greater that in either the City or County of Los Angeles.

As analyzed in the DEIS, the reference population is too narrowly defined and is not appropriated used for comparison to the affected population. The DEIS bases its determination of no disproportionately high and adverse air quality impacts to low income and minority populations, in part, because the DEIS indicates the effects of this project are not markedly different in severity or magnitude compared to other past or present highway improvements projects in the region (page 3.3-30). The DEIS further indicates that even though low-income

and minority groups would bear a large part of the burden associated with the project, it is due only to their proximity to short-term construction activities and is the same as for any community that would be similarly affected by proximity to construction (page 3.3-31). These arguments do not take into consideration the already existing ambient concentrations of air emissions and resulting increased cancer risk on minority and low-income populations in neighboring communities or other degraded environmental conditions associated with proximity to major port and industrial facilities. EPA recommends that Caltrans re-assess these potential impacts by more broadly defining the reference community (comparison group) to include the population that will benefit from the proposed project and comparing the benefits and impacts borne by both the affected community and the reference community.

Recommendations:

- Define the potential environmental justice concerns in the FEIS, which is the first step in an environmental justice analysis. Include a discussion of any environmental justice issues raised during the scoping meetings. If there are any additional environmental justice issues identified, then add them to Section 3.3.3.3.3.2 *Adverse Effects to Overall Population.* This section might be more appropriately named *Potential Environmental Justice Issues.*
- Define the reference community, which, combined with defining the affected community, is an important step in the environmental justice analysis. This is a critical step since the definitions are used to analyze whether there are disproportionately high and adverse human health or environmental impacts by comparing the impacts to the affected population with the impacts to the reference community. The affected community is defined in Section 3.3.3.2 *Affected Environment.* The reference community (or comparison group) is generally defined as the population that will benefit from the proposed project.
- Add a discussion of MSAT impacts, discuss the likelihood of a shift in localized MSAT impacts, and identify populations affected by MSATs, in Section 3.3.3.3.3.2 *Adverse Effects to Overall Population, Air Quality.*
- Revise Section 3.3.3.3.3.3 *Disproportionately High and Adverse Impacts to Minority and Low-income Populations* to include a discussion of the impacts to the affected community as compared to the reference community. The impacts that are significant after mitigation, such as the air quality impacts due to temporary construction and air quality impacts due to diversion of marine vessels around Terminal Island, are impacts that are predominately borne by minority and low-income populations and should be identified as environmental justice impacts in Section 3.3.3.4 *Environmental Justice Determination.*
- Identify additional mitigation to address these environmental justice impacts.

Water Quality

As noted in Table S-1: *Potential Project Effects and Avoidance, Minimization and/or Mitigation Measures*, Alternatives 1, 1A, 2, 3 and 4 would all involve the resuspension of fine-grained bottom sediments during 1) replacement and demolition of the Schuyler Heim Bridge in the Cerritos Channel, 2) placement of bridge footings in the Consolidated Slip/Dominguez Channel, and 3) other construction activities. The harbor sediments in the area of the bridges are

primarily silt and finer-sized fractions and, if resuspended, are expected to stay in suspension for days, resulting in exceedances of state water quality standards.

Dominguez Channel/Consolidated Slip

The DEIS incorporates sampling data from 2002 to characterize the sediments contained in the area around Consolidated Slip. The sediments in Consolidated Slip are highly contaminated with heavy metals including copper, lead, zinc, and mercury, total DDT compounds, total PCB compounds, and total PBC compounds. Consolidated Slip is part of Operable Unit 2 (OU2) of the Montrose Superfund Site. Montrose manufactured DDT at their plant upstream in Torrance from 1947 to 1982. DDT contaminated waste water flowed from the Montrose plant through subsurface storm drains and open channels, passing through the Dominguez Channel and Consolidated Slip on its way to the ocean. Consolidated Slip is currently listed on EPA's 303(d) list for 10 pollutants (including DDT) and has been designated by the Los Angeles Regional Water Quality Control Board (LARWQCB) as a Toxic Hot Spot under the Bay Protection and Toxic Cleanup Program.

Recommendation:

- Because OU2 is part of a Superfund Site, which is currently under remedial investigation, any activities that could potentially disturb sediments within the Site must be coordinated and approved through the EPA Superfund program process. DDT contaminated sediment in the Consolidated Slip would need to be managed as state and federal listed hazardous waste.

- EPA recommends that sediment sampling be conducted prior to any physical disturbance of sediment in Consolidated Slip to determine whether DDT is present in sediments in the work area. Please contact Richard Hiett, Remedial Project Manager, of our Superfund Program at 415-972-3170 for project coordination with the Superfund Site.

Cerritos Channel

The supplemental report, *Final State Route 47 Expressway and Schuyler Bridge Replacement Project Water Quality Impacts Technical Study* (July 2007) (Technical Study) relies on two sources of data to characterize the sediments in the Cerritos Channel underneath the Schuyler Heim Bridge. Surface sediment was characterized by looking at samples of the top 6 inches from a study performed in 2002 by CH2M Hill, and deeper strata were characterized from a 1994 Los Angeles Harbor Department Study. Because of the high rate of sedimentation in this area (the Ports of Los Angeles and Long Beach routinely conduct maintenance dredging in the area to maintain channel depth), the DEIS may not accurately characterize the current conditions in the area surrounding the bridge.

Recommendation:

The FEIS should include recent testing results from a complete Tier 1 and 2 sediment sampling, in accordance with the procedures set forth in EPA's Inland Testing Manual (http://www.epa.gov/waterscience/itm/ITM/) in the area surrounding the Schuyler Heim Bridge in the Cerritos Channel. Testing should fully characterize the chemical and physical properties of the sediment to the proposed project depth.

Construction Effects – Silt/Turbidity Curtains

As stated in the DEIS, sediment contaminants have the ability to impact aquatic life in both the Cerritos Channel and Dominguez Channel. The construction of new bridge footings and the removal of the old foundation will resuspend channel bottom sediments creating a turbidity plume that can be expected to stay in suspension for days and travel as far 1,250 meters upstream before the tide turns. As stated in the Technical Study, the sediment plume may contain constituents (copper, zinc, and PAHs) at potentially toxic concentrations. These concentrations will exceed State of California water quality criteria (WQC) and may cause acute toxicity to aquatic organisms. Additional contamination is possible from removal of lead-based paint from the existing structures. The DEIS proposes to utilize cofferdams and turbidity curtains to mitigate sediment resuspension (Section 3.16.4.1.1.1).

The loss of contaminants to the surrounding waters is of particular concern when dredging or relocating contaminated sediments. The sediment grain size distribution within the Consolidated Slip indicates that 80.12% of the material is composed of fines (silt and clays). Sediment samples taken from the Cerritos Channel also indicate a significant percentage (greater than 80 percent) of coarse silt and fines. This is of concern because sediment contaminants are generally bound to the fine particles, which are most easily resuspended during construction activities.

While the U.S. Army Corps of Engineers and other Federal Agencies have designated the use of silt or turbidity curtains a Best Management Practice to help protect environmental resources, there is little published literature that demonstrates how effective silt curtains have been in meeting project objectives.[1] The effectiveness of silt curtains depends on many factors such as 1) nature of operation, 2) quantity and type of material in suspension within or upstream of the curtain, and 3) characteristics, construction, and condition of the curtain as well as the area and configuration of the barrier enclosure (e.g. partial or full depth containment, either solid or permeable).

A 1978 study on silt curtains, performed by JBF Scientific Corporation for the U.S. Army Corps of Engineers Dredged Material Research Program, concluded that high currents and energy environments cause curtains to flare, thus reducing the curtain's effective depth. The study also noted that tidal currents that dominate the hydrodynamic regime may cause the fluid mud to be resuspended, especially if the curtain is not properly deployed and stated that "with respect to overall effectiveness and deployment considerations, a current velocity of approximately 1 knot appears to be a practical limiting condition for silt curtains."[2]

These conclusions are further supported by a 1994 EPA report which states that, "As a generalization, silt curtains and screens are most effective in relatively shallow, quiescent water. As the water depth increases and turbulence caused by currents and waves increases, it becomes increasingly difficult to effectively isolate the dredging operation from the ambient water. The

[1] Francingues, N. R., and Palermo, M. R. (2005). "Silt curtains as a dredging project management practice," *DOER Technical Notes Collection* (ERDC TN-DOER-E21). U.S. Army Engineer Research and Development Center, Vicksburg, MS. http://el.erdc.usace.army.mil/dots/doer/doer.html.

[2] JBF Scientific Corporation. (1978). "An analysis of the functional capabilities and performance of silt curtains," Technical Report D-78-39, US Army Engineer Waterways Experiment Station, Vicksburg, MS.

St. Lawrence Center (1993) advises against the use of silt curtains in water deeper than 6.5 meters or in currents greater than 50 centimeters/second."[3]

Recommendation:

- Provide more information in the FEIS about the measures (including silt/turbidity curtains) that will be implemented during construction to minimize sediment resuspension. This should include information regarding the length, depth, and placement of curtains that will be utilized in both the Cerritos Channel and near Consolidated Slip. Given the tidal influences, and depth of channel (>50 feet), there is a high likelihood for failure. Please clarify in the FEIS whether the curtains in the Cerritos Channel will cross the entire channel (blocking navigation) or if it will be placed just around the bridge pilings.

- The DEIS states that curtains would be used during "pile-driving operations in the channel." If curtains are chosen as the best method to contain suspended sediments, then they should be utilized during *all* construction activities, not just pile-driving operations, that have the potential to alter sediments. Additionally, it may be appropriate to utilize two separate barriers to contain sediments: a primary *and* a secondary barrier.

Sediment Resuspension Monitoring

In addition to silt curtains, another key consideration to minimize sediment resuspension involves the selection and operation of the dredge/construction equipment. The keys to an effective and environmentally safe dredging operation are (EPA 1994): 1) selection of compatible equipment with the conditions at the site and the constraints of the project, 2) use of highly skilled operators, and 3) close monitoring and management of the dredging operation.

Recommendation:

- Include a monitoring plan to measure the level of sediment resuspension caused by the project in the FEIS and the ROD. Include in the monitoring plan measurements of turbidity or suspended solids to help track contaminant transport and the efficacy of the barriers put into place. Specify that water samples be collected at one location upstream and several locations downstream from the construction activity.

Biological Resources – American Peregrine Falcons

As noted in Table 3.16-3 the Schuyler Heim Bridge is currently home to a year-round nesting pair of American peregrine falcons. It is also shown that Peregrine falcons have nested at the nearby Gerald Desmond Bridge. It appears that in some years, the two bridges were alternatively used as nesting territory.

In the evaluation of direct effects from construction (Section 3.16.3.3.1.1.1), the DEIS states that the removal and replacement of the Schuyler Heim Bridge would eliminate a known nest site for a breeding pair of peregrine falcons. The DEIS suggests that it is likely the disturbed

[3] US Environmental Protection Agency. 1994. ARCS Remediation Guidance Document. EPA 905-B94-003. Chicago, IL: Great Lakes National Program Office.

and displaced peregrines would utilize their alternative nesting location at the Gerald Desmond Bridge. To minimize impacts to the falcons from construction, Point B-7 (3.16.4.1.1.1) of the DEIS mentions that efforts will be made to coordinate construction schedules of the future Gerald Desmond Bridge Replacement Project to prevent overlap.

Recommendations:

- Prior to completing the FEIS, consult with the U.S. Fish and Wildlife Service and the California Department of Fish and Game regarding the displacement of the peregrine falcons within the Ports of Los Angeles and Long Beach.
- Include mitigation measures in the FEIS and ROD to ensure a long-term home for this species within the project area. The construction of the proposed project will result in the direct loss of habitat for a breeding pair of American peregrine falcons. It is unclear from the DEIS if replacement of this habitat has been considered other than to suggest that the pair might migrate over to their alternative nesting site at the Gerald Desmond Bridge. Potential migration to the Gerald Desmond Bridge may not address the long-term habitat requirements of the falcons since the Gerald Desmond Bridge is also undergoing replacement.

SUMMARY OF EPA RATING DEFINITIONS

This rating system was developed as a means to summarize EPA's level of concern with a proposed action. The ratings are a combination of alphabetical categories for evaluation of the environmental impacts of the proposal and numerical categories for evaluation of the adequacy of the EIS.

ENVIRONMENTAL IMPACT OF THE ACTION

"LO" (Lack of Objections)

The EPA review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

"EC" (Environmental Concerns)

The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impact. EPA would like to work with the lead agency to reduce these impacts.

"EO" (Environmental Objections)

The EPA review has identified significant environmental impacts that must be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

"EU" (Environmentally Unsatisfactory)

The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potentially unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the CEQ.

ADEQUACY OF THE IMPACT STATEMENT

Category 1" (Adequate)

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

"Category 2" (Insufficient Information)

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analysed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses, or discussion should be included in the final EIS.

"Category 3" (Inadequate)

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analysed in the draft EIS, which should be analysed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the NEPA and/or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

*From EPA Manual 1640, "Policy and Procedures for the Review of Federal Actions Impacting the Environment."

Keck School of Medicine University of Southern California

Page 2

755-MR-12-EV01

Comment: *Of significant concern, the the ACE/GPA dredging project does not have a lengthy construction noise section nor does the overall project have an operational noise section to analyze whether unloading larger number of containers from new larger post-Panamax ships (that have been at the Port previously) is noisier for the community than previous operations. This type of environmental review/analysis is a requirement of NEPA. Here are the pages of the Middle Harbor Project that shows the type of noise analysis – not done for the SHEP DEIS – which much be conducted: http://www.polb.com/civica/filebank/blobdload.asp?BlobID=5136.*

Response: The EIS discusses noise issues in the following locations: Section 50.7.1 Dredging Impacts, Section 5.19-Terminal Operations, Noise and Lighting section, Section 5.20.1 - Noise, and in Appendix B-Biological Assessment.

The GPA will expand the Garden City Terminal [GCT] irrespective of channel deepening. Under both without- and with- project conditions, the District expects the GCT to reach its build-out capacity near 2030 [at 6.5 million TEUs]. This is the maximum number of containers that can reasonably be processed based on factors such as the size of the terminal, the number of gates that provide access to the property, the number and size of the berths, the number and size of the container cranes, the number of jockey trucks that move the containers within the terminal, how the containers are stacked within the terminal, and the number of railroads that service the terminal and the return frequency of their trains. It is anticipated that without deepening, more vessels would be required to transport the cargo expected to move through the port. With deepening, the total number of vessels decreases as vessels would be able to load/unload closer to capacity without the present constraints of draft.

The District expects the number of containers moved through the port and through the Garden City Terminal to increase over time. However, harbor deepening would not alter the rate of increase. Since the number of containers moved through the Garden City Terminal would not be affected by harbor deepening, the proposed deepening, per se, would not affect noise levels attendant to landside cargo handling.

Page 3

755-MR-12-EV02

Comment: *The SHEP analysis states that the noise levels from the dragarm sliding along the bottom ranged from 70-140dB. Most noise charts do not even go over 110 (see below a noise chart reprinted from the EIS/EA by the Port of Long Beach and Army Corps of Engineers for the Middle Harbor Project.) The impacts of such noise levels on animal life in the river and human health nearby must be analyzed.*

Response: The following is the full text found in Appendix B on page 43:

"The noise generated from a hopper dredge is similar to a cutter head suction dredge except there is no rotating cutter head. The majority of the underwater noise is generated from the drag arm sliding along the bottom, the pumps filling the hopper, and operation of the ship engine/propeller. Like

the cutter head suction dredge, the noise ranged from 70 to 1,000 Hz and peaked at 120 to 140 dB (Clarke et al 2002). These results from Clarke et al are preliminary and have not been published."

As mentioned, the study quoted (Clarke et al 2002) has not been published [peer reviewed]. Further, it evaluated operations involving the excavation of rock rubble/cobbles from a channel in Alaska. Importantly, there is no rock in the Savannah Harbor sediments -- only sand, silt, and clay. Discussions with Dr. Clarke indicate that the noise levels generated from a hopper dredge would be considerably less with the type of sediments found in the Savannah Harbor.

The current data indicate that noise impacts on aquatic or terrestrial species would not be significant, so detailed studies are not warranted based on the information available at this time.

Page 4

755-MR-12-EV03

Comment: *The SHEP DEIR basically concludes that there will be insignificant health impacts from air pollution resulting from dredging the Savannah River and expanding the capacity of the Garden City Terminal. Their analyses and assumptions are believed to be faulty and the DEIR for SHEP must be redone. The resulting air pollution from this project must be evaluated, including its potential health impacts. Air pollution resulting from the expansion of port projects in the U.S. is a serious concern in 2010, but is dismissed by the ACE and GPA in their documents. Please see a report by U.S. EPA which documents some of the health impacts from ports and "goods movement." http://www.epa.gov/compliance/ej/resources/publications/nejac/2009-goodsmovement.pdf. Also please see Appendix B of these comments, which includes more information about the latest research findings on the health impacts of air pollution on human health.*

Response: In developing the air emission inventory for the Port of Savannah, the District used procedures established and recommended by US Environmental Protection Agency (EPA) to identify air emissions from ports. EPA's guidance document is titled, "Current Methodologies in Preparing Mobile Source Port-Related Emission Inventories, Final Report, dated April 2009". This document provides the framework that is used throughout the US to determine estimates for a port's air emission, i.e., for all ocean going vessels and land-based port equipment. [see responses to EPA's comments on air quality for more details]

The District expects the number of containers moved through the port and through the Garden City Terminal to increase over time. However, harbor deepening would not alter the rate of increase. Since the number of containers moved through the Garden City Terminal would not be affected by harbor deepening, the proposed deepening, per se, would not affect air emissions attendant to landside cargo handling.

As the number of containers moved through the port increases over time, the number of vessels required to transport the cargo is also expected to increase. With deepening, the total number of vessels is expected to decrease from what would otherwise be required to transport the cargo volume of a given year. If the number of vessels decreases, the air emissions from vessels would also decrease.

Page 5

755-MR-12-EV04

Comment: *Environmental Justice (EJ) concerns are required to be considered/evaluated in EISs. The SHEP DEIS fails to consider EJ concerns. We are concerned over the significant and unavoidable impacts to the already disproportionately affected EJ community, and recommend additional measures to fully offset these impacts. We suggest that the Corps and Georgia Ports Authority develop a Health Impact Assessment to better identify these impacts and work with the community to identify offset measures. In addition to health impacts from construction and operational emissions, we are also concerned with potential impacts from construction noise resulting from the Project. Please see the report about environmental justice concerns relating to ports and goods movement produced by U.S. EPA in 2009, entitled: Reducing Air Emissions*
Associated With Goods Movement: Working Towards Environmental Justice at
http://www.epa.gov/compliance/ej/resources/publications/nejac/2009-goods-movement.pdf

Response: Environmental justice concerns have been thoroughly considered in Section 5.19 of the EIS. This includes compliance of the proposed action with Executive Order 13045 (Protection of Children) and Executive Order 12898 (Environmental Justice). This section includes discussions on the following subjects: Overview of the project on EJ communities, Demographics of Chatham County and Garden City, Demographics of Jasper County, Landside Transportation of Cargo, Dredging Activities, Terminal Operations, Diesel Fuel Programs, Noise and Lighting, Employment, Considerations of other terminals, and Summary of Project Effects on EJ Populations and Children. Figures show the following: Poverty Levels in the Vicinity of the Upper End of Savannah Harbor; Locations of Schools, Hospitals and Child Care Facilities Along the Navigation Channel; and Proposed Road Improvements in the Vicinity of Garden City Terminal.[see response to EPA comments on this matter for more details]

Comparisons between the Ports of Los Angeles/Long Beach (LA/LB) and Savannah [while interesting] are not always valid. According to the US EPA website, the Ports of LA/LB are currently designated as "non-attainment" for both ozone (severe-17) and PM2.5. As indicated in Section 4.03 Air Quality, *"The Georgia Department of Natural Resources, Environmental Protection Division, Air Protection Branch (GADNR, EPD, APB) and the South Carolina Department of Health and Environmental Control, Bureau of Air Quality (SCDHEC, BAQ), have air quality jurisdiction for the project area for Chatham County, Georgia and Jasper County, South Carolina, respectively. The ambient air quality for Chatham County, Georgia and Jasper County, South Carolina has been determined to be in compliance with the National Ambient Air Quality Standards, and both counties have been designated as Attainment Areas (Personal Communication, 20 February 2007, Jim Kelly, GADNR, EPD, APB and Fatina Washburn, SCDHEC, BAQ)."*

Chatham County, GA is designated as in "attainment" for both ozone and PM2.5. Chatham and Jasper Counties are **not** designated as "non-attainment" for these pollutants.

A health impact assessment was not warranted because harbor deepening would result in reduced adverse air quality impacts to the surrounding communities rather than maintaining the status quo [no-action alternative]. The Ports of LA/LB probably may have conducted a detailed health impact assessment because their proposals were expected to have an adverse effect on parameters that affect human health [and this is not the case with SHEP].

Page 8

755-MR-12-EV05

Comment: *SHEP project and expansion of port capacity*

- *Is the project needed so that the Port of Savannah can expand its capacity?*
- *Or will, as claimed, the Garden City Terminal expand to capacity even without the SHEP river deepening?*

If the latter is true, as claimed, why is the SHEP needed at all? If the SHEP is indeed needed for Garden City to reach capacity, then air quality and noise impacts are grossly understated in the emissions inventory and throughout the DEIS and the DEIS must be redone and resubmitted for public comment.

Response: The Corps expects GPA to expand the GCT to 6.5 million TEUs regardless of whether or not the Savannah Harbor navigation channel is deepened. The objectives of the SHEP are to Identify and evaluate feasible, environmentally acceptable alternatives that will:

- Reduce congestion in the river channel;
- Accommodate recent and anticipated future growth in containerized cargo and ship traffic;
- Improve the efficiency of operations for container ships within the Savannah Harbor Navigation Project; and
- Allow larger and more efficient container ships to use the Port.

Harbor deepening would not expand the capacity of the Garden City Terminal to handle more cargo. The EIS adequately addresses the air quality and noise impacts of the proposed project.

Page 11

755-MR-12-EV06

Comment: *Clearly, the Garden City Terminal would not be able to handle 6.5 million containers without the deepening of the river to handle post-Panamax ships. As required by NEPA, the SHEP DEIS must do adequate analyses of Growth Inducement, Noise, Lighting, Air Quality with this in mind, as an assumption throughout the document. Thus, the DEIS for SHEP must be redone and resubmitted for public review using correct assumptions for all analyses.*

Response: No incremental increase in cargo is expected to occur as a result of the proposed harbor deepening. As a result, the number of containers that transit the areas that surround the port remains a zero sum. Further, overall landside impacts outside the Garden City Terminal, e.g., noise, air emissions [including air toxics], and traffic, would not increase as a result of the proposed deepening. The project's economic benefits accrue from the use of larger, more cost-effective container ships, not an increase in the number of containers.

Page 15

755-MR-12-EV07

Comment: *The DEIS must be redone to reflect that the additional containers that will be accommodated at the Terminal only because of the SHEP will result in growth of air pollution at the Garden City Terminal as described below.*

Response: The number of containers transiting the port and the Garden City Terminal will incrementally increase over time. However, harbor deepening would not affect the rate of this increase. It follows that the proposed deepening would have no material effect on the growth of air emissions at or in the environs of the Garden City Terminal. A deeper channel would allow fewer, larger vessels to carry the cargo moving through the port, resulting in a decrease in the number of vessel calls [when compared to the status quo]. The reduction in the number of vessels would decrease the pollutants emitted from vessels calling at the port.

Page 16

755-MR-12-EV08

Comment: *In light of the fact that most Ports that have done emissions inventories which concluded that the Ports are, in fact, significant contributors to PM, these calculations seem suspect. (See http://www.polb.com/environment/air/emissions.asp). Why is Savannah different than other ports that have conducted emissions inventories?*

Response: The emission inventory [Appendix K] for Savannah was developed using the procedures established and recommended by US Environmental Protection Agency (EPA) to evaluate a port's air emissions. EPA's guidance document is titled "Current Methodologies in Preparing Mobile Source Port-Related Emission Inventories, Final Report, dated April 2009". It provides the procedural outline used [throughout the US] to determine air emission estimates from all ocean-going vessels and land-based port equipment. The analysis was accomplished using the EPA protocols and site-specific data provided by GPA and the Savannah Harbor Pilots. While conducting the analysis, the District routinely consulted EPA to ensure its guidance was correctly interpreted and included the most up-to-date emission relationships.

755-MR-12-EV09

Comment: *NOx and PM2.5 are two of the most important (measured) air pollutants from the Port in terms of links to health effects. The Emissions Inventory presents very confusing information about PM2.5. In one sentence (highlighted) the Inventory says that the port is a minor contributor of PM2.5 to County air pollution. In the next sentence (also highlighted below), the Inventory says that PM2.5 is a SUBSTANTIAL CONTRIBUTOR to air pollution in Chatham County. Which is it? See text surrounding Table 6-4 of the SHEP DEIS. The SHEP DEIS must contain accurate analyses for the contribution of NOx and PM2.5 to port and regional air pollution. The air quality analysis must be redone so that it makes sense and so that readers and residents can understand it. The following is a quotation from the DEIR, Appendix K, page 90:*

Response: Appendix K has been revised to correct this inconsistency. A recalculation of emissions is not warranted. The District revised the text in Appendix K to reflect the following:

The results calculated by the Corps for the entire port are in general agreement with those estimated by EPA in 2002 and 2005 for Ocean-Going Vessels calling at Savannah. Table 6-4, below compares the Total Port Emissions for 2008 (in Table 5-78) to the EPA 2002 NEI and 2005 NEI data for Chatham County. For both the EPA 2002 and 2005 NEI data for Chatham County, the port is a minor contributor of HC, VOC, CO, PM10, PM2.5, and SO2. However, according to the EPA 2002 NEI data for the county, it is a substantial contributor to NOx emissions (about 18.3%). However, as also indicated in Table 6-4, according to the new EPA 2005 NEI data, the percent NOx emissions is further reduced from 18.3% to 13.5%.

Table 6-4 2008 Port Emissions Comparison (% Percent) to Chatham County EPA 2002 NEI and EPA 2005 NEI Emissions

	HC	VOC	CO	NOx	PM10	PM2.5	SO2
EPA 2002 NEI							
Port of Savannah (includes all 22 Terminals)	1.9	1.9	1.3	18.3	3.4	9.5	5.4
EPA 2005 NEI							
Port of Savannah (includes all 22 Terminals)	2.0	2.0	1.6	13.5	3.1	7.2	5.1

One needs to remember that the Corps is comparing its calculated emissions for the port in 2008 at the baseline -42 foot depth to the 2002 EPA NEI data for all of Chatham County. The port's contributions to SO2 emissions are expected to decrease as a result of EPA's requirements for use of cleaner fuels. These new standards should substantially reduce SO2 emissions, as the SO2 content in the fuels used by non-road diesel, locomotives, and marine diesel engines transitioned from 500 ppm sulfur in 2007 to ultra low sulfur diesel (ULSD) -- which is 15 ppm -- in 2010. For Ocean-Going Vessels, EPA issued new emission standards in late 2009 for Category 3 marine diesel engines which will require an 80 percent reduction in NOX emissions beginning in 2016. EPA also adopted standards for engines covered by MARPOL Annex VI that require OGV within 200 miles of the US to use fuel with a maximum of 1% Sulfur (10,000 ppm) beginning in 2012 and 0.10% (1,000 ppm) beginning in 2015. Again, the port's

contributions of NOX and SO2 emissions in the County should substantially decrease as a result of these new requirements for cleaner fuels.

As indicated in Section 5.20 of the EIS (on page 5-152 of the DEIS): *GPA continually evaluates methods to reduce diesel consumption and emissions. These actions protect the environment and the local population. Examples include the following:*

GPA has converted the older ship-to-shore cranes to electric and purchased new cranes that run off of electricity. Of the 23 ship to shore cranes, 21 are electric which avoids the use of 1.9 million gallons of diesel each year.

The Garden City Terminal is the largest shipper of refrigerated cargo on the east coast and has installed electric refrigerated container racks which eliminate the use of diesel generators for the refrigerated containers. The use of these racks in place of generators avoids the consumption of nearly 2.4 million gallons of diesel annually.

In 2010, EPA awarded GPA a Diesel Emissions Reduction Grant to repower 17 rubber tire gantry cranes (RTGs), which is one of the primary types of container handling equipment. By repowering these RTGs, GPA will avoid using 129,000 gallons annually throughout the life of the equipment.

GPA recently conducted a pilot project on use of a diesel additive in the container handling equipment. The study showed that the additive reduced fuel consumption and lowered emissions. GPA now uses the additive in all container handling equipment. This avoids use of 100,000 gallons of diesel fuel annually.

The Garden City Terminal has a total of 33 on-road truck container interchange lanes divided between two locations on the terminal, which have processed over 8,200 gate transactions on a single day. GPA's facility master plan includes construction of a third set of gates which would then provide access to the terminal from the east, west and south, thereby spreading out traffic and reducing waiting times at the gates. The dispersal of truck traffic reduces congestion and its accompanying air emissions. GPA expects to implement this improvement within the next 10 years.

Containers are shipped by rail using the two Intermodal Container Transfer Facilities (rail yards). At those facilities, trains are built for particular destinations as far west as Chicago. This effort reduces transit times of up to 3 days and avoids central train yard switching of cars, thereby reducing emissions. Moving freight by rail emits three times less NOx and PM than on-road trucks. With the only East Coast ICTFs located on the container terminal, GPA's on-dock rail volumes have increased 135% over the past five years (2008).

During periods of heavy cargo volumes, GPA coordinates extended gate hours (earlier morning and later evening hours and Saturdays) to decrease on-road and terminal congestion. This improves productivity, reduces truck idling, and decreases diesel emissions.

Forklifts of 15,500 pound capacity or smaller (86) are now fueled with LP gas, rather than diesel.

As a result of programs GPA implemented throughout the Garden City Terminal, approximately 4.5 million gallons of diesel and the associated emissions are avoided on an annual basis. While GPA has increased the total volume of containers moved, the gallons of diesel per container handled decreased 54% from FY01 to FY10.

Page 18

755-MR-12-EV10

Comment: *We question whether the GPA/ACE are calculating truck emissions correctly. Appendix K, page 9, states. "For container cargo, the landside area includes the time trucks wait to enter the GPA terminal to drop off or pick up its load, as well time for the outgoing trucks to clear the immediate vicinity of the port."*

Response: US EPA has designated both Jasper and Chatham Counties as attainment areas for both ozone and PM2.5. The following is an excerpt of where the 15-minute truck period is discussed in Appendix K:

The Corps included 15 minutes each way for each truck to account for the time it travels in the vicinity of the port, but not on the terminal. This additional 30 minutes of engine time accounts for time spent traveling between the Interstate highway system and the Garden City Terminal.

As noted, 15 minutes [each way] was allotted to travel time in reaching the Garden City Terminal and does not include any time spent within the terminal confines. This value [15 minutes] was selected based on input from GPA, which operates the GCT, and the truckers who haul the port's containers. Figure 5-57 shows planned road improvements near the Garden City Terminal (page 5-151 of the DEIS). This figure also depicts the proximity of Interstates 95 and 16 to the GCT. When the planned highway connector improvements are completed, the travel time from the gate at GCT to the interstates will be further reduced.

The air emission inventory in Appendix K also included truck emissions for the following trip increments once the truck is within the confines of GCT: (A) from the gate to trailer drop off, (B) move to new trailer pick up, and (C) loaded truck arrived back to the exit gate. These driving times or unloading/loading times (as well as relative speed of each one of these steps) were included in the overall calculation for emissions from the GCT and the port.

For defining the truck emission boundary, EPA's "Current Methodologies in Preparing Mobile Source Port-Related Emission Inventories, Final Report, dated April 2009" recommends the following:

Section 5.1. Definition of Land-side Boundaries (on page 5-1 of USEPA 2009)

"A region boundary must be determined to estimate the distance used in rail and long-haul truck trips. Boundaries for both modes should be consistent. In order to ensure consistency across different port emission inventories, the land-side boundary should be up to the first intermodal point, ***or the geographical boundary of the metropolitan area for trips that either originated or terminated outside the region*** *(emphasis added by the writer), whichever comes first. The geographical boundary of the metropolitan area is typically the air basin boundary, but it could be adapted depending on whether some regions are in non-attainment."*

For truck emissions, the District used the **geographical boundary of the metropolitan area for trips that either originated or terminated outside the region**. According to EPA 2009, the land side air emission boundary does not need to extend to the first intermodal point. Hence, a recalculation of the air emission analysis found in Appendix K is not warranted.

Page 19

755-MR-12-EV11

Comment: *However, just as the DEIS claims for truck emissions, the DEIS claims that "the hotelling of containerships is a minor part of the overall port emissions for HC, VOC, CO, NOX, PM, and SO2." As a result, the DEIS states that the Garden City Terminal not only does not require shore power – it actually claims that the use of shore power is experimental (even though other major ports are already using it.) The DEIS describes the process as "expensive," possibly requiring "international agreements" and "still in its development stage."*

Response: Appendix K discusses using shore power while berthing (cold ironing). Table 6-1 shows the percentage of container ship emissions while in a hotelling status at the Garden City Terminal compared to the port's total emissions. The values [based on an average dockside stay of 16 hours per container ship] reveal that hotelling is a minor part of the overall port emissions for HC, VOC, CO, NOX, PM, and SO2.

Table 6-1 Emissions while Hotelling at GCT

Percentage of Hotelling Emissions compared to Total Port Emissions [2008]

	HC	VOC	CO	NOX	PM10	PM2.5	SO2
Containerships	3.7%	3.7%	2.6%	9.0%	6.9%	6.8%	11.7%

Included in these calculated air emissions is 16 hours of auxiliary engine use while a vessel is berthed. Further, hotelling emissions will be reduced when ocean going vessel begin using Category 3 marine diesel engines as a result of EPA's new emission standards [2009]. This will mandate an 80 percent reduction in NOx beginning in 2016. EPA also adopted standards for engines covered by MARPOL Annex VI that require OGV within 200 miles of the U.S. to use fuel with a maximum of 1% Sulfur (10,000 ppm) beginning in 2012 and 0.10% (1,000 ppm) beginning in 2015. The District's hotelling calculations [2008] did not include the use of the noted new equipment/fuels which have resulted in even lower NOx and SO2 values. Given this conservative approach, a recalculation of emissions is not warranted.

755-MR-12-EV12

Comment: *The following charts are from the 2008 emission inventory showing the contribution of various pollutants to the Port emissions and to as a contribution to the South Coast Air Quality Management District – a huge area covering 5 counties. Note that many changes had already occurred at the POLB by 2008, including ULSD that is now used in trucks at Garden City, and electric cranes. Since the TEUs at POLA in 2008 were 6.7 million, this seems like a reasonable comparison for future emissions at the Garden City Terminal, EXCEPT that the Air District in southern California is a huge geographic area,*

so the emissions are much likely to be less as a contributor to those 5 counties than if the contribution were shown only for L.A. County.

Response: The air quality information from the Port of LA/LB has been reviewed by District technical staff for its applicability [comparison of port emissions to all other emitters in the air shed] to the proposed harbor deepening in Savannah. The District remains confident that the Garden City Terminal will reach maximum capacity of 6.5 million TEUs around 2030.

A direct air quality comparison between the Port of LA/LB [2008] and Savannah [2032] would overlook recently enacted regulations and new equipment/fuels – both of which will have a significant impact on emissions' levels. The District's calculations of Savannah's air emissions took into account the benefits these factors would introduce [over time]. Hence, the large difference in air emissions generated from these similar-sized ports [but at different points in time] is not the result of an error in the District's calculations, but rather a reflection of the benefits accruing from EPA's recent regulations.

The following paragraphs provide more detailed discussion of concepts that are important to this issue:

1. Ocean-going vessels [OGV] are the largest contributor of air emissions at any port. In 2008, OGVs at the Port of LA/LB were not required to use ultra low sulfur diesel [ULSD] (15 ppm Sulfur) fuels; rather they could use Marine Diesel Oil (MDO) [which is a 1% sulfur (10,000 ppm) fuel]. Their land based equipment used ULSD fuel, but the arriving OGVs did not have this requirement. The 2008 calculations for the Port of LA/LB included the use of fuels with the noted higher sulfur content. EPA issued new fuel standards that will substantially reduce SO2 emissions from non-road diesel, locomotives, and marine diesel engines. These fuels transitioned from 500 ppm sulfur[2007] to ULSD [15 ppm] in 2010. EPA also adopted standards for engines covered by MARPOL Annex VI that require OGV within 200 miles of the U.S. to use fuel with a maximum of 1% sulfur (10,000 ppm) beginning in 2012 and 0.10% (1,000 ppm) beginning in 2015. The SO2 emissions from both the Port of LA/LB and the Port of Savannah are expected to decrease with their use of these cleaner burning fuels.

2. Emissions of NOX, SO2, and PM2.5 will decrease as the terminal operators replace their equipment with newer engines that are less polluting. A port's percentage contributions of NOX and SO2 emissions to its surrounding air shed should further decrease with equipment replacement.

3. For OGVs, EPA issued new emission standards [2009] for Category 3 marine diesel engines which will require an 80 percent reduction in NOX emissions beginning in 2016. For its calculation of emissions from OGVs, the District used the values in the table below that shows the change in NOx emissions for OGVs at the Port of Savannah in 2008, 2016, 2020, 2025, 2030, and 2066.

Pollutant 2008	Main Engine Emission Factor (g/kW-hr)	Auxiliary Engine Emission Factor (g/kW-hr)
NOx	17.00	13.90

	NOx Main Engine (g/kW-hr)	NOx Aux Engine (g/kW-hr)
2016	13.634	11.20201
2020	10.1286	8.12038
2025	7.2726	5.71012
2030/2066	5.4128	4.15471

To summarize: OGVs are the largest contributor of air emissions at any port. The District assumed that these ships would comply with the recent EPA regulations mandating cleaner fuel and low emission engines. For 2030, the District assumed that OGVs arriving at the Port of Savannah will be using lower sulfur fuel (1,000 ppm) and NOX emissions will be 5.4 g/kW-hr for the main engine and 4.15 g/kW-hr for the auxiliary engines. This is a significant change from 2008 when fuel was MDO 1% sulfur (10,000 ppm) and NOx emissions were 17.0 g/kW-hr for the main engine and 13.90 g/kW-hr for the auxiliary engines. Hence, a recalculation of emissions is not warranted.

From: chamcl1@aol.com
To: CESAS-PD, SAS
Cc: ChamcL1@aol.com; judy.jennings@comcast.net; johickson@comcast.net
Subject: Concerns regarding the deepening of the Savannah River
Date: Tuesday, January 25, 2011 4:51:24 PM

As a concerned resident of Savannah. I am very concerned about the current plan for the deepening of our harbor, the environmental ramifications are not fully understood and the results could be ecologically disastrous. Dredging the harbor will adversely affect tourism, wildlife migration and the fishing industry. The encroachment of salt water will adversely effect drinking water, incurring additional expenses and major modification of water treatment plants to desalinate the water, in case of leakage into the aquifer. The environmental ramifications exceed the potential economic benefits at this time. I do not believe that a sufficient cost - benefit analysis has been conducted. Our economy is already in the red, the money could be better spent on more pressing issues. My contact information is

Carol Chambers
11 East 52nd st.
Savannah, GA 31405
912 236 3723

"Life is short,
and we do not have much time to gladden the hearts of those who travel the way with us.
So, be swift to love
and make haste to be kind."

Carol Chambers

757-MR-01-EV01

Comment: *As a concerned resident of Savannah. I am very concerned about the current plan for the deepening of our harbor, the environmental ramifications are not fully understood and the results could be ecologically disastrous. Dredging the harbor will adversely affect tourism, wildlife migration and the fishing industry. The encroachment of salt water will adversely effect drinking water, incurring additional expenses and major modification of water treatment plants to desalinate the water, in case of leakage into the aquifer. The environmental ramifications exceed the potential economic benefits at this time. I do not believe that a sufficient cost - benefit analysis has been conducted. Our economy is already in the red, the money could be better spent on more pressing issues. My contact information is*

Response: The environmental impact/mitigation planning process included multiple steps, viz., field/model assessment, development of avoidance feature, impact minimization, and mitigation of unavoidable losses. This iterative process included years of close coordination with both federal and state agencies. The effects of the proposed harbor deepening have been thoroughly addressed in the EIS. However, as stated in EIS-Appendix D, many of the evaluations involve predictions about future effects to biological resources; hence, there is some uncertainty about the impacts which the recommended alternative will actually produce. Those uncertainties include the accuracy of the predictive models [uncertainty risk] and the biological responses, per se, that will manifest as a result of changes in the environment. This is reason why the District plans to implement adaptive management measures [as described in Appendix D].

With respect to your specific comment regarding tourism, the District received a letter from the Savannah Area Chamber of Commerce [dated January 19, 2011] in which it stated: "On behalf of our 2,100 business members representing over 77,000 employees in our area, we strongly encourage the U.S. Army Corps of Engineers to proceed with the Savannah Harbor Expansion Project."

Regarding impacts to the Floridan aquifer, the Corps conducted extensive groundwater studies which are discussed in EIS-Sections 4.02.1 and 5.5. The overall conclusion is that the proposed harbor deepening would have minimal adverse impacts on groundwater. The full results of the field work, groundwater modeling, and GIS analyses are described in Section 5 of the Engineering Appendix of the GRR. They are described in further detail in a document titled "*Supplemental Studies to Determine Potential Groundwater Impacts to the Upper Floridan Aquifer, Savannah Harbor Expansion Project, Final Report, June 2007*".

Lastly, the cost analysis for the project was robustly accomplished. Very thorough cost and economic analyses were conducted by the District; the results of which were reviewed by the Corps Deep-Draft Navigation Center of Expertise in Mobile, AL, as well as expert economists from the private sector. Details are included in Section 10 and Appendix A of the GRR.

SOUTHERN ENVIRONMENTAL LAW CENTER

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January 25, 2011

VIA E-MAIL AND U.S. MAIL

Jeffrey M. Hall, Colonel
U.S. Army Corps of Engineers
100 West Oglethorpe Avenue
Savannah, Georgia 31401
CESAS-DE@usace.army.mil

Re: Notice of Availability of a Draft Tier II Environmental Impact Statement and Draft General Reevaluation Report for Savannah Harbor Federal Navigation Project, Chatham County, GA and Jasper County, SC; S.C. Coastal Conservation League et al. v. Westphal, C/A No. 9-00-0798-23 (D.S.C. 2001)

Dear Colonel Hall:

On November 15, 2010, the Savannah District of the U.S. Army Corps of Engineers (the "Corps" or "Savannah District") issued a Joint Public Notice (the "JPN") providing Notice of Availability of a Draft Tier II Environmental Impact Statement ("DEIS") and Draft General Reevaluation Report ("Draft GRR" or "GRR") pursuant to the authority provided by Section 102(b)(9) of the 1999 Water Resources Development Act for the Savannah Harbor Federal Navigation Project, Chatham County, Georgia and Jasper County, South Carolina (hereinafter referred to as the "Project," the "Proposal," or "SHEP").

On behalf of the South Carolina Coastal Conservation League, the South Carolina Wildlife Federation, the Center for a Sustainable Coast, the National Wildlife Federation, and the Savannah Riverkeeper (the "Conservation Groups"), the Southern Environmental Law Center ("SELC") submits this comment letter to express our substantial concerns about this proposed Project.[1] As described in more detail below, this proposal raises serious problems regarding compliance with the National Environmental Policy Act ("NEPA"), 42 U.S.C. §§ 4321 et seq. (2010); the federal Clean Water Act ("CWA"), 33 U.S.C. §§ 1251 et seq. (2010); the Coastal Zone Management Act ("CZMA"), 16 U.S.C. §§ 1531, et seq.; and the Endangered Species Act ("ESA"), 16 U.S.C. §§ 1531 et seq. (2010), among other applicable laws.

In particular, we are troubled by the central assumption underlying the DEIS and Draft GRR that the proposed deepening Project is unrelated to efforts by the Georgia Ports Authority ("GPA") to maintain or increase its business. Such an assumption not only strains credulity, but is also directly contradicted by the Corps' Tier I Environmental Impact Statement, statements by GPA officials, and GPA's willingness to pay a substantial sum of money for an extra foot's

[1] These comments are also submitted pursuant to South Carolina Coastal Conservation League et al. v. Westphal, C/A No. 9-00-0798-23 (D.S.C. 2001), in which United States District Judge Michael Patrick Duffy entered an order prescribing certain parameters of the Tier II studies being conducted by the Corps.

worth of depth. In making this dubious assumption, the Corps has undermined its economic analyses and skewed the environmental studies by failing to evaluate the indirect and cumulative effects associated with this proposal.

Even if one accepts for purposes of argument the assumption that this Proposal is not needed to increase Garden City Terminal ("GCT") throughput, the no-action alternative stands out as a clear winner since it would obviate the need to spend over $600 million in public money, protect natural resources of national significance, and yet have no effect on GCT's business.

In addition, substantial concerns have also been raised regarding the failure of the proposed channel as designed to safely accommodate fully-loaded Post-Panamax ships, further eroding the stated rationale for this Project, especially when weighed against the substantial economic cost and environmental impacts. And finally, the Corps has simply failed to consider, as NEPA and the CWA require, a sufficient range of alternatives for accommodating the anticipated larger class of containerships and instead has arbitrarily limited its review of alternatives to different depths in the Savannah River. Stated another way, the Corps has studiously avoided asking perhaps the most important question here in light of the limited availability of federal funds: whether the federal government could deepen a different port in the Southeast region for less money and with fewer impacts on the environment. For these and other reasons stated below, we respectfully request that the Corps remedy the significant flaws in the DEIS and Draft GRR before proceeding with a FEIS.[2]

The Proposed Project

As proposed in the JPN, the Corps has prepared the DEIS and GRR to incrementally evaluate deepening the Savannah Harbor Federal Navigation Project to a maximum authorized depth of -48 feet Mean Lower Low Water ("MLLW") as authorized by the Water Resources Development Act of 1999, Public Law 106-53, Section 102(b)(9). The current authorized depth is -42 feet MLLW. The studies purport to evaluate the engineering, environmental, and economic acceptability of various alternative Project depths (44, 45, 46, 47, and 48 feet) for the present and future harbor conditions over a 50-year analysis period. The maximum proposed Project length is approximately 38 miles, and the tentatively recommended plans include the 47-foot depth alternative (the National Economic Development Plan ("NED Plan")) and GPA's preferred 48-foot alternative (the Maximum Authorized depth alternative). JPN at 3. Recommended improvements also include channel deepening from the Atlantic Ocean through the Harbor Entrance Channel to the Garden City Terminal; channel widening to create meeting areas at Long Island and Oglethorpe Ranges; widening and deepening of the Kings Island Turning Basin; and channel widening at three bends. Id. The deepening proposal also includes a two foot allowable overdepth and up to six feet of advance maintenance. Id.

The SHEP proposal also involves the discharge of fill to construct and maintain submerged and nearshore berms, the continued discharge of effluent from confined disposal facilities, and the transportation of sediments dredged from the entrance channel to the Savannah Ocean Dredged Material Disposal Site. The proposal also contemplates the discharge of dredged

[2] This letter incorporates by reference our previous comment letters on this Project.

material for several aspects of the mitigation plan, including closing Rifle Cut; construction of a flow diversion structure and other modifications at McCoys Cut; deepening the upper portions of Middle and Back Rivers; removing the Tidegate and its abutments; and constructing additional features including a submerged sill and berm at the mouth of Back River, a submerged sill at the mouth of Middle River, three dissolved oxygen injection systems, a fish passage structure at the New Savannah Bluff Lock and Dam, a boat ramp on Hutchinson Island, and a restoration project at Disposal Area 1S. Id. at 2.

Environmental Impacts

This Proposal would involve substantial adverse impacts to resources of national significance and of great value to the states of South Carolina and Georgia. Over time, repeated deepenings and operation of the Tidegate have caused saltwater from the Atlantic Ocean to intrude up the Savannah River, seriously altering the area's natural intermixture of saltwater and freshwater. This saltwater intrusion has resulted in a number of significant problems, including severe losses of the tidal freshwater marshes, which the U.S. Fish and Wildlife Service ("FWS"), has identified as the single most critical natural resource in the harbor. DEIS at 5-8. After decades of saltwater encroachment, the area's once extensive tidal freshwater marsh is now largely contained within the Savannah National Wildlife Refuge (the "Refuge"). Tidal freshwater marsh within the Savannah River estuary have already been reduced from approximately 12,000 acres to about 3,300 acres due to previous deepenings, and the majority of remaining freshwater tidal marsh is found within the Refuge. This Proposal would cause direct impacts to as many as 14.08 acres of wetlands and indirect impacts to as many as 1,212 acres of freshwater tidal wetlands (the Corps estimates this number will be reduced to 337 acres as a result of proposed flow-altering modifications). DEIS at 5-10; JPN at 4.

Successive deepenings of the Savannah River have also contributed to the reduction of dissolved oxygen ("DO") levels to critically low levels on the River's bottom. Dissolved oxygen declines imperil aquatic species while channel maintenance and deepenings directly destroy and disrupt wildlife habitat through dredging and the emplacement of millions of cubic yards of dredged spoil. This proposal also threatens to contaminate groundwater supplies by increasing salinity and reducing the thickness of the confining layer separating the bottom of the Savannah River and the Upper Floridan aquifer thereby facilitating saltwater intrusion into the aquifer under the navigation channel. Similar concerns have been lodged regarding increased levels of chlorides at the City of Savannah's Municipal and Industrial intake on Abercorn Creek, a tributary of the River.

Other natural resources threatened by the Project include shortnose sturgeon (*Acipenser brevirostrum*), Atlantic sturgeon (*Acipenser oxyrincus oxyrincus*), and striped bass (*Morone saxatilis*). The shortnose sturgeon, which occurs in large coastal rivers of eastern North America, was recognized as federally endangered in 1967. Of particular concern here are the ways in which this proposed Project will impact Savannah River's population of federally-endangered shortnose sturgeon and Atlantic sturgeon (which has recently been proposed for listing as endangered by the National Marine Fisheries Service ("NMFS")) by decreasing dissolved oxygen levels and increasing salinities in their core habitat. The federal Final Recovery Plan for shortnose sturgeon states that because populations from different river

systems are reproductively isolated, the loss of a single river system's shortnose sturgeon population "risk[s] the permanent loss of unique genetic information critical to the survival and recovery of the species [as a whole]." Final Recovery Plan for the Shortnose Sturgeon at 7 (Dec. 1998). In addition, the Project threatens to harm other federally-listed species, such as North Atlantic right whales, sea turtles, and manatees.

History of the Project

GPA, acting under Section 203 of WRDA of 1986, 33 U.S.C. § 2231, prepared a draft feasibility study and environmental impact statement for this Project and submitted that study to the Corps, which published the DFS/EIS for public comment on May 10, 1998. Faced with overwhelmingly negative comments regarding the adequacy of the study, GPA announced it would prepare a "Supplemental Impact Statement" to address, among other things, "all the environmental concerns raised" by the DFS/EIS.

GPA, however, was racing to obtain congressional authorization for the Project as part of the Water Resources Development Act of 1998. Faced with a narrowing time window for the WRDA of 1998 bill, GPA decided to submit a "finalized" version of the DFS/EIS to the Corps for transmittal to Congress before supplemental studies had been completed. The repackaged draft, titled the Savannah Harbor Expansion Feasibility Study and Environmental Impact Statement (collectively, the "Tier I EIS"), stated that the channel expansion was economically feasible, cost effective, technically possible, and environmentally acceptable.

In 2000, the South Carolina Coastal Conservation League, the South Carolina Wildlife Federation, the Center for a Sustainable Coast, and the National Wildlife Federation filed suit in the United States District Court for the District of South Carolina against the Corps, challenging the Tier I EIS prepared for the Savannah Harbor Expansion Project.

That case was resolved by an order issued February 28, 2001.[3] In dismissing the plaintiffs' claims as unripe, the Court made it clear that it was doing so on the understanding that issues raised by the plaintiffs with regard to the Tier I EIS could be raised in the Tier II phase of the SHEP studies. The Court explained:

> Defendants' counsel stated during a hearing conducted by this court on February 15, 2001 that Plaintiffs will not be precluded from participating in the Tier II process and that even such broad concerns as site selection may be evaluated in that process. Therefore, the Defendants' [*i.e.*, the Corps of Engineers] are judicially estopped from later claiming that such issues cannot be raised during the Tier II process. . . .[4]

In WRDA 1999 (Section 101(b)(9)), Congress conditionally authorized deepening the channel to a maximum depth of 48 feet Mean Low Water (MLW). According to WRDA 1999, the Project may be carried out only after the Secretary of the Interior, the Secretary of

[3] South Carolina Coastal Conservation League et al. v. Westphal, C/A No. 9-00-0798-23 (D.S.C. 2001).

[4] Id., Feb. 28, 2001 Order, at 9.

Commerce, the Administrator of the Environmental Protection Agency, and the Secretary of the Army approve the selected plan and determine that the associated mitigation plan adequately addresses the potential environmental impacts of the Project. As a result, the Corps has now released its Tier II DEIS and Draft GRR.

Overview of Regulatory Requirements

Although the Corps does not process and issue permits for its own activities, it "authorizes" its own discharges, applying all applicable substantive requirements, including the Section 404(b)(1) Guidelines. 33 CFR § 336.1; 40 C.F.R. § 230.2(a)(2); see also Regulatory Guidance Letter ("RGL") 88-09 (July 21, 1998, expired Dec. 31, 1990) (describing Corps' duty to comply with same substantive legal requirements applicable to Section 404 permittees); RGL 05-06 (Dec. 7, 2005) (explaining that RGLs remain valid post-expiration unless superseded by regulation or subsequent RGL).

Given the scale of this Project and the environmental impacts that would result, the Corps has prepared and released the Tier II DEIS. Pursuant to NEPA, the EIS must explore a reasonable range of potential alternatives to meet the primary objective of the Project. In fact, the primary purpose of the DEIS is to carefully explore a reasonable range of locational and functional alternatives that meet some or all of the primary project purposes, including a "no-action" alternative, and compare their overall relative direct and indirect environmental impacts. 40 C.F.R. §§ 1502.14(d), 1508.25(b). The Project's harm to the environment and the relative degree to which each alternative would meet the Project purpose over time, including foreseeable induced development as a result of the Project, must be considered as part of this study. 40 C.F.R. §§ 1502.14(d), 1508.8.

An evaluation under Section 404(b)(1) Guidelines of the Clean Water Act is required for the proposed discharges of dredged or fill material and their effluent into waters of the United States. Corps projects, such as this, can only be authorized if they represent the least damaging "practicable alternative" that will meet the basic purpose and need for the project. 40 C.F.R. § 230.10(a). The Section 404(b)(1) Guidelines further prohibit discharges of dredged or fill material if it "[c]auses or contributes . . . to violations of any applicable State water quality standard." Id. § 230.10(b)(1). Additionally, the Corps' criteria for evaluating a permit application under Section 404 of the CWA are set forth at 33 C.F.R. § 320.4. Pursuant to these regulations, the "[d]ecision whether to issue a permit will be based on an evaluation of the probable impacts, including cumulative impacts, of the proposed activity and its intended use on the public interest." See 33 C.F.R. § 320.4(a) (listing relevant factors to be considered).

Closely related to the Section 404(b)(1) Guidelines is the CWA Section 401 certification process. Pursuant to this process, the South Carolina Department of Health and Environmental Control ("DHEC") and the Georgia Environmental Protection Division ("GAEPD") must certify that the Project will not harm water quality, taking into account feasible alternatives, wildlife habitat in the area, and other factors. See 33 U.S.C. § 1341. Section 401 water quality certification is a prerequisite to the issuance of a Section 404 permit, and may be denied when the project will have unacceptably high adverse impacts on aquatic resources. S.C. Code Regs. 61-101(F)(5); see also S.C. Code Regs. 61-101(F)(3)(c). The Corps has also requested coastal

zone consistency determinations from both South Carolina and Georgia.

Careful study and consultation with NMFS and FWS is required pursuant to Endangered Species Act (ESA) in connection with the Project given the presence of the endangered shortnose sturgeon, North Atlantic right whales, sea turtles, manatees, wood storks, and other imperiled wildlife. Section 7 of the ESA requires that each federal agency "shall insure that any action authorized, funded or carried out by such agency . . . is not likely to jeopardize the continued existence of any" listed species. 16 U.S.C. § 1536(a)(2). Further coordination with FWS is required by the Fish and Wildlife Coordination Act, 16 U.S.C. §§ 661 to 667e, which provides the basic authority for the FWS's involvement in evaluating impacts to fish and wildlife from proposed water resource development projects. The Magnuson-Stevens Fishery Conservation and Management Act, 16 U.S.C. §§ 1801 et seq., also requires the Corps to consult with NMFS on projects affecting Essential Fish Habitat. 16 U.S.C. § 1855(b)(2); 50 CFR § 600.920(a).

Legal Issues

Although NEPA dictates procedures, not outcomes, it is nevertheless an "action-forcing" statute that aims to improve the quality of agency decisions and protect the environment. See Robertson v. Methow Valley Citizens Council, 490 U.S. 332, 348 (1989). The NEPA process is designed to "bring pressure to bear on agencies" and is "almost certain to affect the agency's substantive decision." Id. at 349 (internal quotation marks omitted). Under NEPA, an agency must "make[] its decision to proceed with the action after taking a 'hard look at environmental consequences.'" Sabine River Authority v. Department of Interior, 951 F.2d 669, 676 (5th Cir. 1992) (citation omitted).

NEPA's environmental impact statement requirement has a dual purpose in achieving these goals. First, it requires federal agencies to thoroughly and objectively investigate, evaluate, and disclose environmental consequences associated with any major federal action. Requiring an EIS ensures that agencies "will have available, and will carefully consider, detailed information concerning significant environmental impacts," Robertson, 490 U.S. at 349, and thereby "fosters informed decision-making." Oregon Natural Desert Ass'n v. BLM, 625 F.3d 1092, 1122 (9th Cir. 2010). Second, it serves as an "environmental full disclosure law so that the public can weigh a project's benefits against its environmental costs." Nat'l Audubon Society v. Hoffman, 132 F.3d 7, 12 (2d Cir. 1997).

In an attempt to fulfill these purposes, the Corps has prepared a DEIS for the proposed SHEP. To satisfy NEPA, the DEIS must describe the purpose and need for the proposed action and must consider all reasonably foreseeable, significant, adverse impacts of the proposed action. 40 C.F.R. § 1502.13, 16. The DEIS must consider the cumulative and indirect impacts of the proposed action, including reasonably foreseeable expansions in the scope of the proposed action. Id. § 1502.16. The DEIS must also consider all reasonable alternatives to the proposed action. 42 U.S.C. § 4332(C)(iii), (E); 40 C.F.R. § 1502.1.

I. The DEIS and GRR Violate NEPA.

A. The Corps has Violated its Duty under NEPA by Failing to Provide Sufficient Information to Allow the Public a Meaningful Opportunity to Comment.

In order to attain its goals of encouraging a "productive and enjoyable harmony between man and his environment" and promoting "efforts which will prevent or eliminate damage to the environment," 42 U.S.C. § 4321, NEPA imposes procedural safeguards that must be carefully adhered to. See, e.g., Robertson, 490 U.S. at 351; Hodges v. Abraham, 300 F.3d 432, 445-46 (4th Cir. 2002); Nat'l Audubon Soc'y v. Dep't of the Navy, 422 F.3d 174, 184 (4th Cir. 2005). Although NEPA does not contain specific public comment and review procedures, federal courts have consistently found that public involvement lies at the center of NEPA's procedural requirements. See, e.g., California v. Block, 690 F.2d 753, 770-771 (9th Cir. 1982); Hodges, 300 F.3d at 438; Nat'l Audubon, 422 F.3d at 184; Sierra Nevada Forest Protection Campaign v. Weingart, 376 F. Supp. 2d 984, 990 (E.D. Cal. 2005) (saying NEPA's goal is "informed agency decision-making through informed public participation").

Federal regulations implementing NEPA recognize that "public participation [is] essential," 40 C.F.R. § 1500.1 (the "CEQ Guidelines"), and direct agencies to "involve . . . the public, to the extent practicable, in preparing [environmental] assessments." See 40 C.F.R. § 1501.4. The Corps' "NEPA procedures must insure that environmental information is available to public officials and citizens *before* decisions are made and *before* actions are taken." 40 C.F.R. § 1500.1(b) (emphasis added); see also Ohio Valley Envtl Coalition v. U.S. Army Corps of Eng'rs, 674 F. Supp. 2d 783, 808-09 (S.D. W.Va. 2009) (same); Sierra Nevada, 376 F. Supp. 2d at 990 (NEPA regulations "require that an agency give environmental information to the public and then provide an opportunity for informed comments to the agency"). According to the CEQ Guidelines, such procedures are necessary because "public scrutiny [is] essential to implementing NEPA." 40 C.F.R. § 1500.1(b).

Here, the Corps has failed to make available sufficient information to provide for meaningful public comment. Both the DEIS and GRR rely heavily on the use of various models by the Corps. For example, models utilized by the Corps include an Environmental Fluid Dynamics Computer Code ("EFDC") model, which is a three-dimensional surface water modeling system for hydrodynamic and reactive transport simulations of rivers and other water bodies; and the Water Quality Analysis Simulation Program ("WASP"), which is a dynamic compartment-modeling program for aquatic systems. The EFDC model provides ocean flow and tidal dynamics, upstream flow, and other data that is then incorporated into the WASP model through a hydrodynamic linkage file. GRR, App'x C at 102-03. The hydrodynamic and water quality models were modified and calibrated by the agencies and their consultants specifically for this project to evaluate a range of significant issues, including impacts to wetlands, fishery habitat, water quality, and dissolved oxygen. GRR, App'x C at 103, 105. Despite heavy reliance by the Corps on these models to evaluate critical aspects of the Project, neither the DEIS nor the draft GRR include sufficient information to allow the public to scrutinize the results derived from the modeling exercises.

Another example is the SHE groundwater model that was designed to simulate the intrusion of salt water from the Savannah Harbor. The Corps has not disclosed information

needed to assess the results of these modeling efforts. For example, the Corps' use of the DYNSYSTEM groundwater modeling codes, which are proprietary and unavailable to the public, render meaningless any effort by the public to intelligibly understand how the Corps has reached its conclusions. Furthermore, the Corps did not provide with the DEIS or GRR model file archives of the SHE model, which are needed to evaluate the legitimacy of the Corps' modeling efforts. Without access to these proprietary codes and model file archives, a third-party review of the groundwater modeling for the Project is not possible.

Simply put, without the requested information, a rigorous review of the modeling undertaken for major components of the DEIS and GRR, including fundamental issues related to wetland impacts, lowering of dissolved oxygen, salinity intrusion, groundwater contamination, and habitat analyses for fisheries, to name a few, is impossible. The failure to include this information with the DEIS and GRR and the decision to withhold such information until the comment period has nearly expired effectively takes away from the Conservation Organizations (and other interested members of the public) the opportunity to meaningfully review the DEIS and GRR. As such, the Corps' has frustrated NEPA's goal of informed agency decision-making through informed public participation.

On October 22, 2010, we submitted a FOIA request to the Corps requesting specific information related to the use of these models in order to allow for meaningful review. After initially saying that it would be unable to turn over the requested information until March (after the close of the comment period), the Corps sent a CD to counsel for the Conservation Organizations, which arrived on January 19, 2011 – three full business days prior to the close of the official comment period. The Conservation Organizations are in the process of determining whether the Corps has turned over all of the requested information. Once it is determined that the necessary information has been provided by the Corps, the Conservation Organizations intend to review the modeling analyses conducted in support of the DEIS and GRR and supplement this initial comment letter.

B. The DEIS and GRR Lack Needed Information.

The Corps' failure to include current data in the DEIS and GRR is unreasonable and arbitrary. Although an agency's obligation to perform research and experiments necessary to gather new data is governed by NEPA's "rule of reason," the agency must not disregard current data which is already in existence. Atchison, Topeka & Santa Fe Ry. v. Alexander, 480 F. Supp. 980, 992 (D.D.C. 1979), aff'd in part, rev'd in part on other grounds sub nom., Izaak Walton League of Am. v. Marsh, 655 F.2d 346 (D.C.Cir.1981). As the D.C. Circuit has explained, an agency may not "shut its eyes to the events of the recent past" and rely on outdated information. Id. (quoting Seatrain International, S.A. v. FMC, 598 F.2d 289, 293 (D.C. Cir. 1979)).

For purposes of its economic analyses, the Corps relies on baseline commodity forecasts completed in 2004. The trade forecast used by the Corps appears to seriously overstate the Project's benefits because more recent data from the Bureau of Census shows that imports fell 21 percent between 2008 and 2009, while exports fell by 13 percent.[5] These same statistics

[5] U.S. Census Trade Data is available at http://data.usatradeonline.gov/View/dispview.aspx. Percentage drops are based on containerized vessel tonnage only. The 2010 data is available only through November. While year to date

(available through November 2010) show that while there has been a rebound in 2010, this rebound is not likely to bring trade back to the 2008 level. Since lower traffic levels mean fewer project benefits, recent changes in the world economy could seriously alter the basic benefit-cost equation. The decision by the Corps to rely on pre-recession trade forecasts is arbitrary and capricious.

In addition to relying on old data, the Corps has also released its DEIS and GRR prior to completing its development of new information needed to evaluate the proposal. According to the GRR, the proposed harbor deepening would increase chloride levels at the City of Savannah's water intake during drought conditions. GRR at 168. The GRR states:

> In recognition of the concerns about the impact prediction tool, the Corps is presently obtaining additional data to enhance the capability and reliability of the predictive modeling tool. Those results should be available in the Final EIS.
>
> * * *
>
> If the proposed deepening project is found to produce sustained chloride concentrations that adversely affect [the] City of Savannah's Municipal and Industrial water intake on Abercorn Creek, then the USACE would construct this supplemental intake line at a cost of $35.9 million.

GRR at 169. By releasing its draft studies prior to evaluating additional data the Corps has determined it needs to refine its modeling, the Corps has taken away the public's opportunity to fully comment at this stage of the NEPA process. Moreover, if the Corps ultimately determines that a supplemental intake line is needed, such a determination will require revisions to the economic analyses, as well as additional federal and state permitting decisions. The decision to issue the DEIS without the data relating to the severity of impacts to the City's water supply violates NEPA.

C. The DEIS Violates NEPA because it Does not Properly Delineate the Purpose and Need of the Project.

The statement of purpose and need is a critical component of an Environmental Impact Statement. Pursuant to NEPA, an EIS shall "briefly specify the underlying *purpose and need* to which the agency is responding in proposing the alternatives including their proposed action." 40 C.F.R. § 1502.13; 33 C.F.R. § 325, App'x B(9)(b)(4) (emphasis added).

The Tier II DEIS is seriously flawed with respect to its purpose and need statement. At best, the Tier II DEIS violates NEPA by failing to set forth a clear statement of purpose and need. At worst, the DEIS presents a statement of purpose and need that is contrary to the previous articulation of project purpose found in the Tier I EIS. Such a conflicting statement

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exports through November are almost at 2008 levels, imports remain well below 2008. The estimated benefits for the project are primarily for imports.

would be arbitrary and capricious and would also violate NEPA.

1. The Purpose and Need Statement in the Tier II DEIS is, at Best, Impermissibly Vague and is, at Worst, in Conflict with the Tier I EIS.

The Tier I EIS prepared for this Project states that: "*[c]ontinued growth of the Port necessitates* that it remain efficient and cost competitive" and that "[b]ased on an evaluation of the study area and its needs, the objectives of the proposed project are as follows: (a) provide better passage for the existing fleet of larger vessels through the harbor at all tides, thus reducing shipping delays; and (b) provide for safe and efficient transit of larger vessels expected to call on Savannah Harbor in the future." Tier I EIS at 14 (emphasis added). In other words, the original statement of project purpose clearly acknowledges that GPA seeks to continue growing its business by deepening its channel for safe and efficient transit of larger ships.

The Tier I EIS' statement of project purpose is consistent with the many statements made GPA over the years, which leave no doubt as to GPA's overriding goal for this Project.

- "GPA considers increased channel depth to be vital to continued growth of port activities in Savannah." Georgia Ports Authority Press Release (July 13, 1998) (attached as Ex. A).

- "It is essential that we deepen the Savannah navigational channel in order that the port of Savannah remain competitive in the U.S. South Atlantic range" and "that Georgia's ports continue to act as a catalyst in helping to contribute to the economic growth and prosperity of the state." Ben Schmitt, Approval for River Deepening in Peril, Savannah Morning News (Oct. 8, 1998) (quoting Tom Swinson, spokesman for GPA) (attached as Ex. B).

- "Georgia's ports have long played an important role as a catalyst in the economic growth and prosperity of our state. Today, that role and the state's ability to aggressively attract cargo, create more jobs and promote industrial development stand to be greatly diminished if plans to deepen the Savannah Harbor fail." Doug J. Marchand, Deepening Harbor Will Keep Port Competitive, Savannah Morning News (July 6, 1998) (attached as Ex. C).

- "As the world market continues to grow, so must the size of container vessels and the ability of the modern port to handle critical vessel requirements if it is to retain its customers." Id.

The current Tier II DEIS is far less forthcoming regarding GPA's principal goal for this Project. Although it is difficult to tease out a statement of project purpose from the main body of the Tier II DEIS itself, the DEIS does offer that: "The primary problems identified—and the need for the project—relate to the inefficient operation of containerships in the Federal navigation channel at Savannah Harbor, which affect the Nation's international trade transportation costs." DEIS at 3-1.

At best, it is unclear if the DEIS even includes a statement of purpose and need and

whether the above-quoted statement was intended as such a statement. At worst, this language is intended to be a statement of project purpose, which indicates that the Corps is attempting to walk away from its earlier stated purpose in the Tier I DEIS. If the Corps in its Tier II DEIS has shifted the project purpose, then the Tier II DEIS is arbitrary and capricious and is in violation of NEPA. Under NEPA, tiering affords an agency the choice of supplementing an earlier EIS with a "subsequent statement or analysis at a later stage . . . ." 40 C.F.R. § 1508.28(b). Among other reasons, tiering may help an agency "to focus on issues which are ripe for decision and exclude from consideration issues already decided or not yet ripe." Id. Tiering does not, however, allow for changing the purpose of a project, as this could nullify or otherwise undermine analyses in a prior EIS on which the later tier is based. The Corps must at the very least explain its abandonment of the Tier I statement of purpose in the final Tier II EIS.

2. The Corps Must Devise a Statement of Purpose and Need that Reflects the Activity's Underlying Purpose and Need from a Public Interest Perspective.

Even if the Tier II DEIS's statement of project purpose could be made to be consistent with the Tier I EIS, such a statement would be unduly narrow. In order to comply with NEPA, the Corps must devise a new statement of project purpose that reflects the Project's underlying purpose and need from a public interest perspective.

Courts regularly have held that the statement of purpose and need should be defined to reflect the objective, general need for the proposed activity rather than the specific, narrow course of action preferred by the applicant. The rule as articulated by one federal appellate court is representative: "[T]he evaluation of 'alternatives' mandated by NEPA is to be an evaluation of the alternative means to accomplish the *general goal* of an action; it is not an evaluation of the alternative means by which a particular applicant can reach his goals." Van Abbema v. Fornell, 807 F.2d 633, 638 (7th Cir. 1986) (emphasis added). In addition, the Corps' regulations expressly warn against a restricted statement of purpose:

> Normally, the applicant should be encouraged to provide a statement of his proposed activity's purpose and need from his perspective (for example, "to construct an electric generating plant"). However, whenever the NEPA document's scope of analysis renders it appropriate, the Corps also should consider and express that activity's underlying purpose and need from a public interest perspective (to use that same example, "to meet the public's need for electric energy").

33 C.F.R. § 325, App'x B(9)(b)(4); see also Simmons v. U.S. Army Corps of Eng'rs, 120 F.3d 664, 666 (7th Cir. 1997) (saying "[o]ne obvious way for an agency to slip past the strictures of NEPA is to contrive a purpose so slender as to define competing 'reasonable alternatives' out of consideration (and even out of existence"); Envtl Defense Fund v. United States Corps of Eng'rs, 492 F.2d 1123, 1135 (5th Cir. 1974) (explaining NEPA requires a "thorough consideration of all appropriate methods of accomplishing the aim of the action"). Furthermore, it is imperative that "the Corps, will in all cases, exercise independent judgment in defining the purpose and need for the project from both the applicant's and the public's perspective." 33 C.F.R. § 325, App'x

B(9)(b)(4).

Here, the Corps must "consider and express th[e] activity's underlying purpose and need from a public interest perspective . . . ." Id. By concluding that this Project is needed for the "[c]ontinued growth of the Port," Tier I EIS at 14, the Corps would be artificially restricting its analysis to alternatives that benefit GPA to the exclusion of other reasonable alternatives beyond the Garden City Terminal for accommodating the larger class of container ships. Such an approach would violate NEPA and would frustrate a true alternatives analysis, which must include an evaluation of whether another port or ports in the Southeast could accommodate the larger class of container ships with a higher cost benefit ratio and fewer impacts on the environment. In other words, a general objective of the Project might be to accommodate the larger class of Post-Panamax vessels in the Southeast as opposed to simply evaluating alternative depths of deepening the Savannah Harbor. Without a clear purpose and need statement and a true "Multi-Port Analysis" that evaluates the relative costs and benefits of achieving the general objective of the Project from a public interest perspective, the Corps, as further discussed below, will be unable to comply with NEPA.

D. The National Economic Development Analysis ("NED") and the National Environmental Policy Act Analysis Are Defective Because They Are Based on the False Assumption That Container Traffic at the Port Is Unrelated to Whether the River Is Deepened.

Just as the Corps has attempted to increase its chances of obtaining approval for the Project by contorting the project purpose, the Corps attempts to do the same by relying on an economic assumption that deepening the port will not increase business at the port. As part of its civil works planning process, the Corps must evaluate all federal civil works projects to determine whether the projects have positive benefit-cost ratios. See U.S. Army Corps of Engineers, Planning Guidance Notebook, ER 1105-2-100 (April 2000). If a project has a negative benefit-cost ratio, it cannot be constructed. Id. This NED analysis is integrally related to the NEPA analysis that the Corps must perform because both analyses are based on assumptions of what would occur if a project were constructed versus what would occur if the project were not constructed. These "with-project" and "without-project" assumptions establish critical benchmarks for the entire NED process and are key components of the NEPA process.

The Corps' Planning Guidance Notebook, which sets forth the NED process, describes these assumptions as follows:

> (1) The without-project condition is the *most likely* condition expected to exist in the future in the absence of a proposed water resources project. Proper definition and forecast of the future without-project condition are critical to the success of the planning process. The future without-project condition constitutes the benchmark against which plans are evaluated.
>
> (2) The with-project condition is the most likely condition expected to exist in the future with the implementation of a particular water resources development project. Comparison of conditions with the project to conditions without the

> project will be performed to identify the beneficial and adverse effects of the proposed plans. These with and without-project comparisons *provide the framework for the evaluation of alternative plans.*

Corps Planning Guidance Notebook at 2-8 to 2-9 (emphasis added). In short, to conduct a proper NED analysis, the Corps must make an accurate assessment of what it thinks will be the *most likely* future with-project and without-project conditions.

Similarly, NEPA requires that the Corps consider actions or events that are "reasonably foreseeable." 40 C.F.R. § 1508.7 to 1508.8. Under either analysis, the Corps or any other federal agency cannot simply elect to adopt an assumption that is something other than the *most likely* future condition or a state of affairs that is reasonably foreseeable, but that is exactly what the Corps has done in this case.

In the recent Stakeholders Evaluation Group ("SEG") meeting on the Corps' economic analysis, Dr. Bernard Moseby, the Savannah District's economist, stated quite candidly that he did not even attempt to capture what is *most likely* going to happen to container traffic levels at the Port if the harbor is deepened. Instead, he simply assumed that they were going to grow at the same rate as they would without the deepening. Dr. Moseby stated in the meeting:

> In the evaluation, we're looking at Savannah port based on the projected growth for Savannah. And the *most conservative* thing to do is to use the same tonnage and growth rates in the without project condition as with with project [sic] condition.
>
> But the *most conservative*, defensible position was to assume that the same traffic would be used in the without project condition, 42 feet, and at each alternative depth.[6]

During this discussion, Dr. Moseby also admitted that he did not attempt any approach that could have yielded a more accurate assessment because he did not have a model that would allow him to make such an assessment. As he explained in the meeting:

> I didn't do a big picture analysis with all these ports and all the interactions between them. I don't think the Corps would – you've got to have a model that would to – that would do that. I don't.[7]

In an attempt to clarify this issue, Dr. Morgan Rees, GPA's consultant, offered the following:

> [I]f you do it the way the Corps has done it, you yield a pretty conservative estimate. And if you are thinking about maximizing the utility of spending a dollar of tax money, you're getting a good, solid, dependable, conservative answer because of the way the formulation process works. In other words, you're not going to be wasting the money. It may not – because of the complexity of the

[6] Transcript, SEG Meeting at 102-04 (Dec. 10, 2010).
[7] Id. at 103.

> system, it may not go precisely the way the Corps is predicting it will go in the report, but you can have a high level of assurance it's going to be well spent, whether you reach capacity in 2032, you reach capacity in 2038, whether the Panama Canal gets completed in 2014 [or] 2018.
>
> You're still going to get a good return on your dollar. *So given that you have a high level of confidence of getting a good return on the dollar, you've got to question pretty seriously how much detail and precision you ought to go to complete the report and make a recommendation.*[8]

Taken as a whole this discussion reveals that the Corps did not feel it had the time, resources, or desire to develop the *most likely* or *reasonably foreseeable* future with-project and without-project assumptions; instead, it decided to take a short cut and use the "conservative" assumption that container traffic levels would stay the same whether the harbor was deepened or not.

From the Corps' perspective, this approach may have had some benefits. By taking it, the Corps avoided devoting time and money to developing a multi-port model or include in NEPA's alternatives analysis other ports in the Southeast or making a robust inquiry into indirect impacts or cumulative affects under NEPA, or garnering broad political support if it had to admit that a deeper Savannah Harbor would take business away from neighboring ports.

1. The Corps' Position That Container Traffic Growth Is Unrelated to the Proposed Project Is at Odds with Virtually All Non-Corps Stakeholders.

By adopting an unacceptably conservative assumption, the Corps violated another tenet of its civil works planning process—the common sense requirement. The Planning Guidance Notebook clearly states that "the planning process must reflect reason and *common sense* . . . ." Corps Planning Guidance Notebook at 1-1. To conclude that a deeper, wider, and more efficient harbor is not going to attract more commerce is counterintuitive at the least. It is not surprising that, without exception, those in the Savannah Harbor community have been quick to point out that a deeper, wider, and more efficient harbor will in fact be good for business.

The GPA, which has already pledged $182 million towards the Project,[9] has made it very clear that it sees the Project as an essential component of the future growth of the Port. As described above, the GPA's position has been consistent from the outset of this Project—that the deepening is "vital to continued growth of port activities in Savannah." GPA Press Release (July 13, 1998) (attached as Ex. A). And that's why the Tier I EIS stated that the "*[c]ontinued growth of the Port necessitates* that it remain efficient and cost competitive." Tier I DEIS at 14 (emphasis added). More recently, Curtis Foltz, the new executive director of the GPA, stated in

[8] Id. at 128-29 (emphasis added).

[9] See Aaron G. Sheinin & James Salzer, Deal Warns of Cuts, Promises Progress in First State of the State, Atlanta Journal-Constitution, (Jan. 12, 2011) available at http://www.ajc.com/news/georgia-politics-elections/deal-warns-of-cuts-802278.html (last visited Jan. 24, 2011); Mary Carr Mayle, Kingston: Harbor Deepening Still Very Much Alive, Savannah Morning News (Oct. 2, 2010), available at http://savannahnow.com/news/2010-10-03/kingston-harbor-deepening-still-very-much-alive (last visited Jan. 24, 2011).

a speech to the House and Senate appropriations committees: "The ships and jobs will only come to Savannah if the harbor is deepened."[10] This statement is directly at odds with the Corps' assumption that the container traffic at the Port will follow the same trajectory regardless of whether the harbor is deepened or not. Mr. Foltz has also said that, "The Savannah harbor deepening project is critically important to continued economic growth in the southeastern United States."[11] But based on the Corps' assumption, container traffic is not going to diverge from its current trend line.

Expanding still further, Mr. Foltz commented recently that, "expanding the Port of Savannah is a linchpin to the continued competitiveness of Georgia, the Southeast — and indeed the United States in the global economy."[12] Again, the Corps' projection portends of no faster container growth with or without the Project.

In fact, the GPA is so convinced that deepening the harbor is going to have a dramatic impact on container traffic that it is opting to spend and extra $20.4 million to have the Corps dredge the harbor to 48 feet instead of the 47 feet that the Corps supports.[13]

GPA is not alone in its conviction that the harbor deepening is essential to the welfare of the Port. Mark Holifield, the Home Depot executive in charge of logistics, is quick to point out that, "It is critical to maintain the competitive advantage that Savannah provides to Georgia and the region," because "if trade (advantages) shift, we would have to re-evaluate our investments" by considering other ports.[14] As Mr. Holifield implies, Home Depot might start to ship through another port that can accommodate larger ships if the Savannah Port cannot.

Politicians have jumped on the faster-harbor-growth band wagon as well. U.S. Representative Lynn Westmoreland recently said the following:

> This expansion will increase the freight capacity of the port of Savannah by 20 percent, all the while creating 10,800 new jobs and $242 million in additional income for employees. Some federal investment in this project would provide a significant return for the American taxpayer while bringing one of our country's top ports into the next generation of ocean commerce.[15]

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[10] Walter C. Jones, Georgia Ports' New Boss Makes Case for Harbor Deepening, Savannah Morning News, (Jan. 20, 2010), available at http://savannahnow.com/latest-news/2010-01-20/georgia-ports-new-boss-makes-case-harbor-deepening (last visited Jan. 24, 2010).

[11] Mayle, supra note 10.

[12] Curtis J. Foltz & Mark Holifield, Expanded Port Means More Jobs, Atlanta Business Chronicle, (Nov. 19, 2010) available at http://bizjournals.com/atlanta/print-edition/2010/11/19/expanded-port-means-more-jobs.html (last visited Jan. 24, 2011).

[13] Mary Carr Mayle, Harbor Deepening Gets Big Boost, Savannah Morning News, (July 16, 2010), available at http://savannahnow.com/news/2010-07-17/harbor-deepening-gets-big-boost (last visited Jan. 24, 2011).

[14] Id.

[15] Lynn Westmoreland, Westmoreland: Obama—Support Harbor Deepening, Savannah Morning News, (Oct. 29,

Based on the Corps' "Multiport Analysis," however, even if the deepening were to create a 20 percent increase in freight capacity thus allowing larger ships to enter the Harbor, that extra capacity would go unused – at least in the short term – because, according to the Corps, associated land transportation costs would make it uneconomical for shipping lines to divert containers from other ports to Savannah Harbor.[16]

Agreeing with Rep. Westmoreland, rather than the Corps, Georgia's U.S. Senators have also made their position clear. U.S. Senators Johnny Isakson, R-Georgia, and Saxby Chambliss, R-Georgia, have requested $105 million in federal funds to continue the deepening Project. Both have submitted requests to the Senate Appropriations Committee to include the funding for SHEP in the fiscal year 2011 Energy and Water Appropriations bill. Chambliss justified the request by stating that, "The Savannah harbor must be deepened to keep up with the expansion of the Panama Canal. This project will provide tremendous benefit to Georgia, the Southeast and our nation as a whole."[17]

Both the outgoing and the incoming Governors of Georgia concur that the harbor deepening Project is worth the investment of state funds. Former Governor Perdue recently stated that "[Savannah Harbor's growth] won't last forever if we make no progress toward the deepening . . . So we don't want to inconvenience them or their customers and encourage them to go elsewhere."[18] In other words, Perdue appears to feel that if the harbor is not deepened, the big ships will not come. Governor Nathan Deal seems to agree, because he just announced Georgia's willingness to add another $32 million dollars to the $150 million that Georgia has already committed to the Project.[19]

Based on the stakeholders quoted above, it would seem that only the Corps believes that a 48-foot deep harbor would be no more of a draw for foreign and domestic shipping lines than a 42-foot deep harbor. This conclusion, of course, is contrary to the Tier I DEIS and the conventional wisdom of the stakeholders most likely to benefit from a deeper Savannah Harbor. To say that the Corps' assumption is the "most likely" or the "reasonably foreseeable" outcome of the harbor deepening is deepening is arbitrary and capricious.

2010), available at http://savannahnow.com/column/2010-10-30/westmoreland-obama-support-harbor-deepening (last visited Jan. 24, 2011).

[16] U.S. Army Corps of Engineers Savannah Harbor Expansion Project, Economics Appendix, at 173 (Nov. 5, 2010) (hereinafter Economics Appendix).

[17] Senators want $105M for Savannah Harbor, Atlanta Business Chronicle, (Apr. 5, 2010), available at http://www.bizjournals.com/atlanta/stories/2010/04/05/daily13.html (last visited Jan. 24, 2011).

[18] Larry Peterson, Kingston: It'll Be Tough to Deepen Savannah Harbor in Time to Float Big New Ships Due in 2014, Savannah Morning News, (Sept. 27, 2010), available at http://savannahnow.com/news/2010-09-28/kingston-itll-be-tough-deepen-savannah-harbor-time-float-big-new-ships-due-2014 (last visited Jan. 24, 2011).

[19] Sheinin & Salzer, supra note 10.

2. Even Corps Statements in the GRR and DEIS Belie the Corps' Assumption that the Proposed Harbor Deepening and the Container Traffic Are Unrelated.

In the Tier I EIS's statement of purpose the Corps expressed that "*[c]ontinued growth of the Port necessitates* that it remain efficient and cost competitive." Tier I DEIS at 14 (emphasis added). The Corps' "conservative assumption" taken in the Tier II DEIS and GRR is directly at odds with its position in the Tier I EIS; however, as evidence that it is not entirely comfortable with its "conservative assumption," there are several passages in the GRR and DEIS where the Corps returns to its prior position and expresses, albeit fleetingly, "common sense." In a telling passage in the GRR, the Corps admits that delays at the current 42 foot Savannah Harbor caused one shipping line to offload its containers at Charleston, which has a 45 foot harbor, instead of at Savannah. GRR at 56-57. This suggests that if Savannah Harbor is not deepened, other shipping lines may make a similar choice. This, of course, is directly at odds with the Corps' assumption that the same growth rate of container traffic at Savannah Harbor will occur with or without the proposed Project.

In other passages in the GRR, the Corps states that the harbor deepening will allow ships to reach their assigned berths on a more reliable schedule. This, in turn, is expected to encourage carriers to assign more of their large vessels to routes including the Savannah Harbor. GRR at 126. Similarly, the Corps predicts that the channel deepening will "encourage[] the deployment of larger vessels to Savannah." Id. at 127. All of these statements imply that a deeper Savannah Harbor will be more attractive to foreign shipping lines.

Like the GRR, the DEIS also includes passages that directly contradict the fundamental assumption that the Corps uses in its economic analysis. For example, in one of these passages, the Corps emphatically states that: "Harbor deepening would increase the amount of goods brought into the Savannah port." DEIS, App'x L at 34. A deeper port would mean bigger ships, fewer ships, shorter queues, and less waiting on the tide. Why wouldn't that translate into more business for Savannah Harbor? Savannah Harbor has grown so rapidly over the past decade because its landside operation has become a state-of-the-art facility. Why wouldn't a deeper more efficient portside operation yield similar benefits? Judging from the Corps' inconsistent analysis of this critical issue, the Corps does not appear to be entirely sure.

Until the Corps clears up the ambiguity of its position, it is difficult to judge the validity of the Corps' conclusions. Dr. Robert Stearns, whom SELC retained to review the economic components of the DEIS and GRR, concurs. As he provides in his attached report:

> In light of the divergent views between the Corps' economic models and the shipping community's assessment of the effect the project would have on container traffic, the Corps has not adequately explained why its assumption is valid and the shipping community's assessment is invalid. The answer to this question is paramount because:
>
> - if the Corps is correct, then there is no need to deepen the channel to keep Savannah Harbor functional and competitive; or

- if the shipping community is correct, then the Corps' economics analysis is fundamentally flawed because the Corps' NED analysis rests on its assumption that the with and without project scenarios would produce the same amount of container traffic.

Expert Report of Robert N. Stearns, Ph.D., at 6 (attached hereto as Ex. D) (hereinafter referred to as the "Stearns Report"). Furthermore, this ambiguity makes the Corps' GRR and DEIS legally deficient.

For instance, NEPA requires that the Corps consider all indirect effects of the harbor deepening. 40 C.F.R. §§ 1502.16(b), 1508.8(b). More container traffic would mean more distribution space would ultimately be required. The Corps highlights this issue in the DEIS where it states the following:

> Harbor development remains the most likely action to adversely affect the salt and brackish marshes remaining in the Savannah River estuary. *Harbor deepening would increase the amount of goods brought into the Savannah port. This could trigger the need for additional distribution centers and other support facilities or the expansion of exi[s]ting ones.* These new or expanded support facilities could impact wetlands. In-kind mitigation would be required where wetland impacts are unavoidable.

DEIS, App'x L at 34 (emphasis added).

As the above quote foretells, more distribution space in coastal Georgia may well mean the filling in of wetlands, as well as other environmental harm. Yet the Corps conveniently sidesteps such an analysis by relying on its assumption that container traffic at the port is going to grow at the same rate with or without the proposed deepening; therefore, there is no need for the Corps to examine any indirect impacts of the Project because, under the Corps' approach, there will be no additional indirect effects – that is, the same number of distribution centers will be required with or without the Project. While convenient for the Corps, this approach is divorced from reality. The question of indirect effects is discussed further in Section I.E. below.

3. <u>Since the Corps's Positive Benefit-Cost Ratio Is Based Solely on Greater Port Efficiencies, the Corps Should Discuss Who the Likely Beneficiaries of These Cost Savings Will Be.</u>

Another shortcoming of the Corps' economic analysis is that it does not address who is going to benefit from the harbor deepening. As the Corps explains at great length in the GRR and DEIS, a deeper Savannah Port will, according to the Corps, mean that bigger ships will be able to dock at the Garden City Terminal. As a result, the Corps contends, fewer ships will have to travel up and down the harbor channel. Also, ships will not be dependent on the tides to reach their berths. All in all, there will be cost savings, according to the Corps. But who will benefit from these alleged cost savings? Will these cost savings be passed on to the American consumer in the form of lower consumer prices or will they be pocketed by foreign manufacturers or

foreign shipping lines? The answer to this question is critical because, as Dr. Stearns points out in his analysis, if foreign interests are going to be the beneficiaries of the harbor deepening, all the United States will be doing by deepening the harbor is increasing our foreign trade deficit. More specifically, he asserts that:

> Foreign manufacturers and shipping lines may keep the savings of shipping through Savannah for themselves and pass none of these savings to U.S. consumers. Under such circumstances, the U.S. taxpayer would be asked to foot the bill to pay for a project that generates greater profits or lower prices for producers and consumers in other countries.

Stearns Report at 14. In short, by deepening our harbors, the United States could be making it less expensive for foreign countries to sell their goods in America. The Corps' economic analysis will not be complete until it addresses this fundamental question.

4. The Corps Must Explore More Thoroughly the Constraints Associated with Savannah Harbor.

As the Corps contends throughout the GRR and DEIS, shipping lines are building larger and larger ships, because these vessels can transport cargo more efficiently. Yet the design ship for the SHEP is a Post-Panamax Generation Two ship that was built in 1997. GRR at 121. Already ships that are significantly larger than the design ship are being built, yet the Corps does little to explain why it does not anticipate that these Post-Panamax Generation Three ships will call on Savannah Harbor.

While the GRR does contain information that states there are no air draft issues for the design ship, it acknowledges that it will be very difficult for Post-Panamax Generation Three ships to pass under the Talmadge Bridge. GRR, Econ. App'x at 51. Although the GRR does explain that two ships in the design-ship class will be able to pass at certain areas within the channel, it does not explain whether two Post-Panamax Generation Three ships would be able to pass in the channel. The Corps avoids these questions by simply stating that Generation Three ships will probably not call on Savannah Harbor, which is a counterintuitive position. If bigger ships mean greater efficiencies for Savannah Harbor, why does that principle not extend to Generation Three ships? As the GPA's Curtis Foltz has remarked, "Ships aren't getting any smaller. They're only getting bigger."[20]

The reason that this issue is so critical now, is that if it is in Savannah Harbor's long-term interests to have Generation Three ships call on it, then any additional work that would be necessary to allow their entry should be included in the current proposal. If, for instance, the Talmadge Bridge must be raised or the channel passing lanes must be further widened, then the economic and environmental costs associated with that work must be included in the current economic and environmental analysis. As Dr. Stearns explains in his attached report:

[20] Dan Chapman, Atlanta Leaders Push for Deeper Savannah Port, Atlanta Journal-Constitution, (Dec. 1, 2010), available at http://www.ajc.com/business/atlanta-leaders-push-for-762157.html (last visited Jan. 24, 2011).

> If a major bridge alteration were part of SHEP, there is a real possibility that the high cost of this related work would mean that SHEP would not generate any net economic benefits as traditionally defined by the Corps. The analytical assumption that Generation Three ships will not call at Savannah Harbor is a convenient way to dismiss this potential problem. If the Corps' baseline vessel forecast is right, there is a strong probability that the largest ships would be calling at some ports on the Southeast Atlantic Coast. Given the shipping lines' business practice of multiple ports of call, GPA may soon want to accommodate these larger ships at Savannah Harbor. The height of the Talmadge Bridge will become an increasingly contentious issue.

Stearns Report at 12 (citation omitted). The same would be true if the channel or passing lanes had to be enlarged to accommodate Generation Three ships. If the economic costs associated with such additional work are not factored into the current NED analysis, then the NED analysis will be skewed. And, as Dr. Stearns suggests above, if these costs were not factored in to the NED analysis, then a positive benefit/cost ratio would not result.

Irrespective of whether Post-Panamax Generation Three ships ever call on the Port, GPA may quickly decide that it needs a larger channel. On January 11, 2011, the Savannah River Maritime Commission ("SRMC") met to discuss the DEIS and GRR for the deepening Project. At this meeting, which was open to the public, consultants retained by the SRMC gave presentations regarding their preliminary evaluation of this Project. One of the consultants for the SRMC focused many of his comments on the navigational and safety aspects of the Project. In sum, the SRMC has cast a substantial level of doubt on whether the designed channel will be able to handle Post-Panamax shipping. Of particular concern are the following issues which we summarize here:

- According to the SRMC, the proposed channel is shallower than applicable design standards for fully loaded Post-Panamax ships, resulting in lower margins of safety. For example, the Navigation Study for Savannah Harbor Channel Improvements (Sept. 2004) determined that ships with a draft of 47.5 feet would hit the bottom in normal conditions in a channel with a depth of 52 feet. See Navigation Study at 34, Table 1. Since the currently proposed offshore channel is shallower, the SRMC predicts that a ship drawing 43 feet would be perilously close to running aground.

- Of further concern as it relates to draft is the SRMC's suggestion that the GRR misstates the applicable tide. Although it is true that there is a seven to eight foot tidal range at GCT, tidal range is closer to six feet at Fort Pulaski and four feet in the offshore channel. Overstating the extent of the tidal ranges raises additional concerns regarding the designed channel's capacity for handling fully loaded Post-Panamax ships, even on high tide.

- The offshore channel, as designed, would be about 570 feet wide. Post-Panamax ships have a beam of 160 feet (or, 28 percent of the offshore channel), and these ships can begin to veer off course due to wind and currents. If such a ship turns 10 degrees, the ship will take up to 56 percent of the channel width. In light of the proposed channel

design and the increasing size of ships expected, this presents a safety issue that needs to be studied more closely. Further, the designed proposed channel width will be even narrower than the current width, limiting further the size of ship that can utilize the post-project harbor.

- The GRR predicts that the GCT will ultimately have a demand of over 6,000 ships per year (or, 16 per day) however, SRMC's analysis suggests that the Port can only accommodate 12 ships per day due to the fact that as designed SHEP is essentially a one-way channel. The Corps or the local sponsor should conduct a traffic study to support its claim that GCT will be able to handle 6,000 ships per year.

- The Vertical Ship Motion Study for Savannah, GA, GRR, App'x 1.1.16, indicates that there will only be 120 days per year when wave conditions would be calm enough for a ship travelling at a speed of 6 knots and at a draft of 46 feet to transit the expanded channel without grounding. However, given the configuration of the proposed ocean channel, which is narrow and involves a sharp curve, consultants for SRMC have raised concerns that 6 knots is a dangerously slow speed for a container vessel to pass through the proposed ocean channel. In fact, consultants for SRMC have indicated that ships off the southeast coast often have to travel at 14 knots to stay in a narrow channel, such as the proposed SHEP channel; however a ship with a draft of 46 feet in the proposed channel will clearly hit the bottom at that speed. Further study is necessary to determine whether Post-Panamax ships can successfully navigate the ocean channel.

- Moreover, if the narrow design of the ocean channel requires ships to navigate at 14 knots, we are concerned that such a rate of speed would be in excess of NOAA's ship speed rule. See 73 Fed. Reg. 60,173 (Oct. 10, 2008) (requiring all vessels 65 feet or longer travel at *10 knots or less* in certain locations (SMAs), including off Savannah, along the east coast of the U.S. Atlantic seaboard at certain times of the year to reduce the threat of ship collisions with critically endangered North Atlantic right whales).

For these reasons, the concerns raised by the SRMC relating to the navigational capacity of the proposed expanded channel deserve serious consideration by the Corps. Accordingly, we recommend that the Corps require the additional studies recommended by the SRMC. If these studies find that additional dredging must be performed to make the channel larger, then it will be necessary for the Corps to incorporate these costs into the NED analysis and to incorporate any additional environmental impacts into the DEIS.

5. The Corps May Be Poised to Violate NEPA's Ban on Segmentation.

If the costs associated with raising the Talmadge Bridge and widening and deepening the shipping channel for Post-Panamax Generation Three ships—and possibly other Post-Panamax ships as described above—need to be included as components of the Project, then a DEIS that does not include consideration of their environmental impacts runs afoul of NEPA's bar against segmentation. It is well-settled that breaking a project "into small component parts" to avoid reviewing them together, "is to engage in illegal 'segmentation.'" New River Valley Greens v.

U.S. Dep't of Transp., No. 97-1978, 1998 U.S. App. LEXIS 22127, at *8 (4th Cir. Sep. 10, 1998) (quoting 40 C.F.R. § 1508.27(b)(7)).

A hallmark of segmentation is an initial proposed action involving "such a large and irretrievable commitment of resources that it may virtually force a larger or related project to go forward notwithstanding the environmental consequences." New River Valley Greens, 1998 U.S. App. LEXIS 22127, at *9. This conclusion is based in the regulations implementing NEPA, which provide that "proposals which are related to each other closely enough to be, in effect, a single course of action shall be evaluated in a single impact statement," including actions that "are interdependent parts of a larger action" and actions that "automatically trigger" other actions. 40 C.F.R. §§ 1502.4(a), 1508.25(a).

For our purposes, the question is whether the GPA is going to be content with a harbor that purportedly has an upper limit of Generation Two ships, or is going continue to seek to make the harbor larger and larger to capture the associated efficiencies of bigger ships. The Corps cannot wear blinders and ignore the latter situation and then pull them off five years from now when the GPA insists that to remain competitive it must raise the bridge and widen and deepen the channel.

E. The DEIS Relies on the Corps' Unreasonable Economic Assumptions to Dodge Analysis and Disclosure of Environmental Impacts.

As courts have recognized "[i]naccurate economic information may defeat the purpose of an EIS by 'impairing the agency's consideration of adverse environmental effects' and by 'skewing the public's evaluation' of the proposed agency action." NRDC v. U.S. Forest Serv., 421 F.3d 797, 811 (9th Cir. 2005) (quoting Hughes River Watershed Conservancy v. Glickman, 81 F.3d 437, 446 (4th Cir. 1996). The Corps' DEIS is a prime example. Despite NEPA's requirement that the Corps assess SHEP's indirect effects, the Corps in the GRR states: "It is important to note that the total cargo handled at Garden City Terminal is not projected to change due to implementation of the project. Therefore, secondary impacts associated with additional cargo traffic are not anticipated." GRR at 141. The Corps relied on this arbitrary and unreasonable assumption throughout the DEIS, thereby avoiding analysis and disclosure of many significant environmental impacts resulting from the Project.

1. Impacts to Air Quality.

The DEIS dismisses the Project's adverse impacts to air quality based on the unsubstantiated and implausible assumptions in its economic analysis, claiming, in sharp contrast to discussion in the Tier I EIS and numerous statements by GPA that the Project will not expand the Port's business. See DEIS at 5-108 (claiming that increased cargo movement through Savannah Harbor "would be the result of increasing demand for goods which move through the port and not a result of a harbor deepening").

Adding insult to injury, the DEIS's cursory discussion of air quality impacts makes inconsistent, competing claims regarding the manner in which the increased cargo would be transported. At times, the DEIS states that deepening the harbor from -42 to -48 feet will not

affect choices made by shippers or trade routes of ships calling on the Savannah Port, and will therefore have no impact on air quality. See, e.g., DEIS, App'x K at 66 (stating that because "a change in harbor depth in Savannah of up to 6 feet would not provide sufficient rationale for vessel lines to alter their trade routes or place larger (more efficient) vessels on those routes, the vessel fleets expected to occur With and Without the proposed harbor deepening would remain the same"); id., App'x K at 100 (stating that "no changes to air quality would occur as a result of the project").

In other instances the Corps is even more ambitious in its optimism, claiming that the Project will improve air quality by changing the behavior of shippers who, instead of making more trips with smaller ships, would upgrade to larger vessels and make fewer calls on Savannah. See, e.g., DEIS at 5-107 (stating that "[i]t is apparent from the Corps' Fleet Forecast . . . that the numbers of vessels calling on the Port of Savannah for years 2015, 2020, 2025, 2030, 2032 and 2065 will be significantly greater for the existing depth of -42 feet than the maximum proposed depth of -48 feet"); id. at 5-108 (asserting that reductions in air emissions would result "if larger container vessels were allowed to regularly call at the port"). The Corps does not include any supporting studies or analysis to even attempt to substantiate either of its conflicting conclusions. For the same reasons previously discussed in Sections I.C.2., I.D., supra, NEPA requires the Corps to complete a realistic analysis of the Project's impacts on the Port's growth and to incorporate the results into a full and complete analysis of the Project's impacts to air quality.

The DEIS further misleads the public concerning the Project's likely air pollution impacts by asserting that "maritime industries are not major air emitters" and "[t]he air quality in the harbor area is generally good." DEIS at 5-105. In fact, marine shipping operations constitute a major source of harmful air pollutants. Ocean-going vessels, land-side equipment, and secondary emissions from port development have significant impacts to air quality. For that reason, EPA recently produced an Evaluation Report, addressing these emissions. See EPA Needs to Improve Its Efforts to Reduce Air Emissions at U.S. Ports, Report No. 09-P-0125 (Mar. 23, 2009), available at http://www.epa.gov/oig/reports/2009/20090323-09-P-0125.pdf (last visited Jan. 25, 2011). The report explains that air pollution from port activities "impact[s] communities surrounding port areas" and has "significant environmental and human health impacts, such as cancer and asthma." Id. at 1-2. Emissions of greatest concern include nitrogen oxides (NOx), particulate matter (PM), sulfur oxide (SOx), carbon monoxide (CO), hydrocarbons (HC), and air toxics, especially diesel exhaust. Id. at 2.

The Report goes on to explain that "[d]iesel and other emissions from port activities" harm onshore communities through "increased cancer rates, asthma, other respiratory and cardiovascular diseases, and premature death." Id. at 3. EPA has recognized that impacts of diesel emissions from ports extend beyond local communities to "contribute significantly to regional air pollution." Id. at 2, 3. Similarly, a 2008 study by the National Oceanic and Atmospheric Administration found that commercial shipping results in "a significant impact on air quality and health on both local and regional scales." Id. at 3.

In addition, the DEIS acknowledges that the Air Emission Inventory prepared for the Project "does not include a detailed dispersion modeling assessment" of air toxics or a "risk-

based assessment of the health impacts" attributable to the Project. DEIS at 5-106. The DEIS must include detailed dispersion modeling to accurately assess and disclose impacts to local communities and to account for the fact that those nearest the source face the greatest threat from air toxics, as well as the potential for "hot spots" of aggravated effects to occur. Similarly, given the wide and growing recognition of the significant harm port-generated air pollution can do to human health, the Corps must include a risk-based health impact study. A legally sound EIS cannot ignore these impacts on the environment and surrounding communities, much less downplay their significance, as the DEIS has done here. Moreover, NEPA requires the Corps to consider environmental justice in its EIS. The Corps appears to have ignored this obligation in declining to consider which communities will be most impacted by air pollution.

Finally, the DEIS does not assess the Project's impacts to the affected areas' status under the Clean Air Act ("CAA"), 42 U.S.C. §§ 7401-7671q (2010). The DEIS states only that the affected areas are presently in attainment for the all National Ambient Air Quality Standards ("NAAQS") and claims the Project is therefore compliant with the CAA because this present status means the Corps need not prepare a conformity determination pursuant to CAA Section 176. The DEIS fails, however, to analyze and disclose whether the Project would push the impacted areas into non-attainment or maintenance status and what the Project's incremental impacts on compliance, or lack thereof, with applicable NAAQS will be. This omission is significant because the Project might have the potential to bring the affected area into non-attainment with the applicable standards for PM. The DEIS references an earlier EPA report indicating increases in PM 2.5 concentrations from 2000 to 2006, resulting in measurements exceeding the allowable daily range in 14% of the measurements taken for the study. DEIS, App'x K at 100. Similarly, EPA has proposed more stringent standards for ground-level ozone and has also predicted counties with ports might have difficulty meeting the standard. Report No. 09-P-0125, at 5. Failure to meet PM and ozone standards threatens not only regional public health, but could also lead to far-reaching planning requirements, emissions controls, and potential penalties under the CAA.

2. Sea Level Rise and Greenhouse Gas Emissions.

On February 18, 2010, Nancy H. Sutley, Chair of the Council on Environmental Quality, issued Draft NEPA Guidance on Consideration of the Effects of Climate Change and Greenhouse Gas Emissions to the heads of federal departments and agencies. One purpose of the guidance was to recommend ways in which Federal agencies could improve their consideration of the effects of greenhouse gas emissions and climate change in their evaluation of proposals for Federal actions under NEPA. See Draft Guidance at 1. In addition, the Corps has issued Engineering Circular 1165-2-211 Water Resource Policies and Authorities Incorporating Sea-Level Change Considerations in Civil Works Programs. The Corps' guidance states that "[p]otential relative sea-level change must be considered in every USACE coastal activity as far inland as the extent of estimated tidal influence." Engineering Circular 1165-2-211 at 1. We have the following comments relating to how the Corps has addressed sea level rise considerations in connection with SHEP.

- The DEIS and GRR should include a section explaining how Engineering Circular 1165-2-211 was applied to this Project and what were the results of its application.

- It is unclear from the DEIS and GRR to what extent the Corps has considered issues related to climate change in evaluating the dissolved oxygen injection system. In exchange for exacerbating already present, unnaturally low levels of dissolved oxygen in the water column, the Corps is proposing, as mitigation, to inject dissolved oxygen into the Savannah River. Pursuant to the proposal, this system would have to be run continuously during the summer months in perpetuity. As discussed previously, we question the soundness of a decision to place a river on a permanent respirator of sorts. We are further troubled by a decision to implement a mitigation strategy that requires such a significant source of energy in perpetuity in light of climate change considerations. Perhaps the Corps should evaluate ways in which to mitigate for the new energy consumption created by its mitigation proposal.

- The DEIS and GRR should address the extent to which the Corps factored different sea level rise scenarios into its analysis with respect to air draft issues. To the extent the Corps did consider this issue, how did sea level rise inform the Corps' air draft analysis?

- In the GRR, the Corps explains some of the ways in which the agency expects sea level rise to impact the Savannah River estuary. For example, the Corps suggests that sea level rise could reduce tidal freshwater marshes by approximately 370 acres in light of the historic rate of rise and also acknowledges that impacts could be far more extensive under other scenarios. GRR at 93. The Corps anticipates sea level rise would also affect other natural resources due to increased salinity levels. Anticipated impacts include those to fisheries and increased chlorides at the City of Savannah's water intake. GRR at 93. Under NEPA, the Corps cannot take the position that it need not provide full mitigation for impacts resulting from SHEP because some of these same resources will be affected as a result of climate change. The Corps must fully mitigate for the earlier impacts from SHEP now, especially since impacts from the SHEP will occur in the short-term whereas climate change related impacts will occur gradually over many years.

3. Additional Indirect Environmental Impacts

NEPA regulations define indirect effects as:

> Indirect effects, which are caused by the action and are later in time or farther removed in distance, but are still reasonably foreseeable. Indirect effects may include growth inducing effects and other effects related to induced changes in the pattern of land use, population density or growth rate, and related effects on air and water and other natural systems, including ecosystems.

40 C.F.R. § 1508.8(b). Among other effects, NEPA "requires agencies to consider the significance of growth induced by the federal action." Georgia River Network v. United States Army Corps of Eng'rs, 334 F. Supp. 2d 1329, 1344 (N.D. Ga. 2003). Here, the Corps declined to do so, even though the DEIS itself contains statements contradicting its claim that the Project has no bearing on the port's growth. In particular, the DEIS states that:

> Harbor development remains the most likely action to adversely affect the salt and brackish marshes remaining in the Savannah River estuary. *Harbor deepening would increase the amount of goods brought into the Savannah port. This could trigger the need for additional distribution centers and other support facilities or the expansion of exi[s]ting ones.* These new or expanded support facilities could impact wetlands. In-kind mitigation would be required where wetland impacts are unavoidable.

DEIS, App'x L at 34 (emphasis added). It adds that, as port development has increased on the Savannah River, "the Savannah District Corps of Engineers Regulatory Office has observed an increase in Section 404 permits for facilities (warehouses, distribution centers, etc.) which support port operations." DEIS, App'x L at 33. It follows that the largest port project in the history of the Savannah Harbor will undoubtedly induce and require further development — including port infrastructure expansion, road and freight rail construction, increased traffic, additional warehouse facilities, and other changes in land use patterns. This induced development would invariably have negative environmental effects.

The Corps' assumption that the Project is unrelated to GPA's business skews the DEIS in other ways too. For example, the DEIS, on the one hand, acknowledges that the introduction of non-native or invasive species can have "detrimental affects on an ecosystem." DEIS at 5-156. "Invasive species have been introduced into new areas through the discharge of ballast water from deep-draft vessels. Increasing the amount of ballast water exchange within the port is the primary avenue through which the proposed harbor deepening could have an adverse effect on this issue." DEIS at 5-156. However, the DEIS then concludes:

> The proposed harbor deepening is not expected to increase the number of vessels that call at the port of Savannah. The economic analysis forecasts a decrease in the number of vessels with a deeper channel over that which would have been necessary to move the same volume of cargo through the port using a smaller fleet of vessels. *Since there is no increase in the number of vessels expected to call as a result of the proposed deepening, there would be no additional risk from invasive species through ballast water.*

Id. (emphasis added). In these ways and others, the Corps assessment of indirect impacts is based on a flawed economic assumption that SHEP will result in no increase of cargo going through the Port.

F. Failure to Consider Cumulative Effects Associated with the Project.

Under NEPA, the Corps is required to thoroughly assess the cumulative effects of the proposed SHEP. 40 C.F.R. § 1508.7 & 1508.25. NEPA's implementing regulations define cumulative effects as "impacts on the environment which result from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (federal or non-federal) or person undertakes such other actions." 40 C.F.R. § 1508.7. The cumulative impact analysis "must be more than perfunctory; it must provide a useful analysis of the cumulative impacts of past, present, and future projects. . . . [A] cumulative impact

analysis must be timely. It is not appropriate to defer consideration of cumulative impacts to a future date when meaningful consideration can be given now." Kern v. U.S. BLM, 284 F.3d 1062, 1075 (9th Cir. 2002) (citation and internal quotation marks omitted). The Corps has failed to consider adequately SHEP's cumulative impacts.

1. The Cumulative Impacts of Garden City Terminal's Improvements and Other Future Port-Associated Projects.

The GRR states that the "Panama Canal Expansion Project will be fully operational by 2014, which will allow the passage for vessels with up to 50 feet of draft. The Georgia Ports Authority has planned and funded improvements at Garden City Terminal [("GCT")] to coincide with the Panama Canal Expansion Project." GRR at 14. GCT has planned to invest at least $130 million dollars of improvements in the next ten years "to coincide with the Panama Canal Expansion Project." GRR at 14; see also DEIS, App'x O at 21 (discussing GCT-related projects). Some of the proposed GCT improvements and GCT-associated projects are described below:

- "If the harbor is deepened, [GPA] plans to double the amount of cargo Savannah can handle by 2020. It also expects to spend another $1.1 billion on cranes and rail yards to accommodate twice as many containers."[21]

- In 2010, the State of Georgia approved $120 million in bond revenue to use toward completing the Jimmy DeLoach Highway from Interstate 95 to the Garden City Terminal. DEIS at 5-150.

- Long-term highway plans include "the Brampton Road Connector which will provide direct access from the Garden City Terminal to Interstate 516 and connections to Interstate 16." DEIS at 5-150.

- "Other actions to increase terminal capacity would entail incorporation of adjacent GPA properties into container operations." DEIS, App'x O at 22.

- Measures to augment the container capacity of GCT include "off-site storage of long-dwell empties." DEIS, App'x O at 23.

Importantly, the DEIS states that the "[h]arbor deepening would increase the amount of goods brought into the Savannah port. This could trigger the need for additional distribution centers and other support facilities or the expansion of exi[s]ting ones. These new or expanded support facilities could impact wetlands." DEIS, App'x L at 34. Given these significant planned improvements at GCT as well as related, planned highway projects, the Corps must consider and evaluate any potential environmental impacts of the GCT expansion projects with those of SHEP. Similarly, the DEIS should consider other reasonably foreseeable improvements at other facilities, both public and private, along the Savannah River, especially improvements associated with increased cargo from the SHEP.

[21] Chapman, supra note 21

2. The Cumulative Impacts of Future Savannah Harbor Projects.

A cumulative impact analysis must not examine a project in isolation, "without considering the 'net' impact that all projects in the area may have on the environment." LaFlamme v. FERC, 852 F.2d 389, 402 (9th Cir. 1988). The Corps' analysis of cumulative impacts is flawed — focusing narrowly on the "short-term" nature of the potential adverse environmental impacts and ignoring cumulative impacts that "can result from individually minor but collectively significant actions taking place over a period of time," 40 C.F.R. § 1508.07, as well as the potential for other individually significant actions. The DEIS fails to include in its cumulative impacts analysis reasonably foreseeable alterations to the Savannah River.

Since 1927, there have been four extensive harbor deepenings and numerous other projects, such as the Sediment Control Works Project and berth deepenings, with serious environmental impacts. DEIS, App'x L at 10. Given the history of deepening projects in the harbor, it is reasonably foreseeable that as technology advances and container ships become larger, there will be more deepening projects. The DEIS states that "due to ongoing ship-building trends, the size of the vessels calling at ports along the US east coast is expected to increase." DEIS at 3-4. The foreseeability of these projects is bolstered by GPA's strong desire to remain a competitive international port as evidence by GPA's willingness to pay millions for an additional foot more than the NED depth of 47 feet. Thus, the DEIS should consider and evaluate not just deepening to 48 feet, but future deepening to greater depths.

Similarly, as discussed in detail in Section I.D.4., supra, the widening of the harbor and the raising of the Talmadge Bridge are "reasonably foreseeable" projects that will allow the harbor to accommodate the Generation Three ships and other larger vessels. Pilots familiar with the harbor have expressed that SHEP would not support two-way traffic. In the interests of safety and in order to accommodate the world's largest ships in the future, it is likely that the GPA will widen the harbor. Also, the DEIS does not consider the potential elevation of the Talmadge Bridge so that the harbor may accommodate Generation Three ships. Given the continuing enlargement of container ships and GPA's strong desire to remain competitive, the raising of Talmadge Bridge is reasonably foreseeable under NEPA. The DEIS's failure to examine foreseeable future harbor projects does not satisfy NEPA's requirement that the Corps examine "past, present and reasonably foreseeable future actions." 40 C.F.R. § 1508.7.

3. The Cumulative Impacts of SHEP and the Jasper Terminal.

The cumulative impacts analysis requirement is based on the notion that "even a slight increase in adverse conditions that form the existing environmental context may threaten significant harm . . . ," Ga. River Network, 334 F. Supp. 2d at 1338. The DEIS' failure to examine a foreseeable Jasper Terminal, which would more than slightly alter the environmental context on the Savannah River does not satisfy NEPA's requirement that the Corps examine "past, present and reasonably foreseeable future actions." 40 C.F.R. § 1508.7. It is imperative that the proposed Jasper Terminal and its environmental impacts are analyzed in combination with SHEP, given that the construction of both projects would occur in close vicinity on the Savannah River and would impact the same coastal resources. Indeed, it is quite possible that certain environmental impacts on the Savannah River estuary caused by SHEP – such as the

destruction or alteration of wetlands and marshes – could be exacerbated by the construction of the Jasper Terminal. Similarly, construction of the SHEP could exacerbate the impacts of Jasper. For example, if the Jasper Terminal proceeds as planned, its location would be at least partially on one of SHEP's confined dredge material disposal facilities (CDFs), Site 14A/B. The DEIS states that "the lost dredged material disposal capacity would need to be replaced elsewhere . . . . Replacement of that capacity through the expansion of the CDFs to the north into existing salt marsh would result in extensive secondary wetlands impacts which would need to be mitigated." DEIS, App'x O at 75. This could result in additional environmental impacts given that construction of CDFs in area has resulted in the loss of over 6,000 acres of wetlands. DEIS, App'x L at 33. Indeed, it is possible that the severity of the cumulative impacts would preclude construction of the Jasper terminal if SHEP is allowed to proceed first, without consideration of Jasper.

The Corps virtually ignores the Jasper Terminal in its cumulative impacts analysis. The two major port projects, however, are closely connected, as evinced by the DEIS's numerous discussions of the Jasper Terminal in the DEIS and the Corps' own consideration of the Jasper Terminal in relation to Garden City Terminal's operations. See, e.g., GRR at 223-226; see also DEIS at 5-120 (stating that the deposition of dredged sediments from SHEP would "raise the elevation of the property, resulting in less fill being required in the future to raise the site to an elevation for [Jasper] terminal operations"). Where the DEIS does recognize the environmental impacts of the Jasper Terminal, its consideration of such impacts is woefully inadequate. Specifically, the DEIS states that "[d]eepening the existing navigation channel to River Mile 5 [i.e. the Jasper Terminal] would be expected to have only minimal impacts on the salinity and dissolved regimes in Savannah Harbor. Detailed impacts to fishery habitat cannot be predicted until detailed plans become available." DEIS, App'x at L at 46. First, NEPA prohibits conclusory findings of no adverse environmental impact without sufficient evidence to support these assertions. See Sierra Club v. Marsh, 769 F.2d 868, 881 (1st Cir. 1985). Second, the DEIS's assertion of a lack of information on the Jasper Terminal's impact on fisheries goes directly against NEPA's regulation concerning "incomplete or unavailable information." 40 C.F.R. § 1502.22. If, during an agency's evaluation of environmental effects, there is incomplete or unavailable information, the agency "shall always make clear that such information is lacking." Id. § 1502.22(b). Moreover, if the incomplete or unavailable information can be obtained and the "overall costs of obtaining it are not exorbitant," the agency must include the information in the EIS. Id.

Furthermore, the failure to consider the Jasper Terminal belies GPA's own statements on the subject. For example, as recently as December 2010, GPA Executive Director Curtis Foltz discussed the reasonably foreseeable Jasper Terminal:

> The Jasper port is a very solid project . . . . They are currently doing commercial viability studies to help support the long-term need for the project. Initial engineering designs have been completed. It's all moving forward, as it was expected to, on its current timeline. I think it is recognized, certainly by the Georgia [Congressional] delegation, that long term, a port in that region helps to

support that area of the country's demographic growth.[22]

Yet, when the GPA and the Corps had the opportunity to discuss the two projects in a coordinated fashion, they chose not to.

It is well established that NEPA "does not limit the inquiry to the cumulative impacts that can be expected from proposed projects; rather, the inquiry extends to the efforts that can be anticipated from 'reasonably foreseeable future actions.'" Fritiofson v. Alexander, 772 F.2d 1225, 1243 (5th Cir. 1985); see also City of Davis v. Coleman, 521 F.2d 661, 676 (9th Cir. 1975) ("Reasonable forecasting and speculation is thus implicit in NEPA . . . ."). The DEIS's inadequate cumulative impact analysis directly conflicts with the purpose of the cumulative impacts requirement, which "is to provide readers with a complete understanding of the environmental effects a proposed action will cause." N.C. Alliance for Transp. Reform v. U.S. Dep't of Transp., 151 F. Supp. 2d 661, 698 (M.D.N.C. 2001). The Corps' failure to examine cumulative impacts of SHEP and the Jasper Terminal renders the DEIS incomplete and in violation of NEPA.

4. In Assessing the Project's Impacts for Both NEPA and CWA Purposes, the Corps Cannot Ignore EPA's Proposed Revisions to the Total Maximum Daily Load ("TMDL") for DO in the Estuary.

The Savannah River estuary, which will be "directly affected" by the Project, DEIS at 5-37, suffers from critically low DO levels in the summer months. DO is "a critical resource in the harbor." Id. And, because the stretch of the Savannah River through the harbor and into the estuary fails to meet Georgia's water quality standards for DO, this river segment is currently listed on Georgia's CWA Section 303(d) list as impaired for DO. DEIS at 5-37; see 33 U.S.C. § 1313(d) (requiring states to implement total maximum daily loads ("TMDLs") to reduce pollution in impaired waterways). In 2006, EPA promulgated a TMDL for DO in the Savannah Harbor. See EPA, Final TMDL for DO in Savannah Harbor (Oct. 2006) (hereinafter "2006 TMDL"), available at http://www.georgiaepd.org/Files_PDF/techguide/wpb/TMDL/Savannah/EPA_SavannahHarbor_DO_TMDL_2006.pdf. The TMDL provides that "[t]he Savannah Harbor cannot accept any discharges of oxygen-demanding substances and still attain the applicable [DO] criterion." TMDL at 10.

In explaining this conclusion, EPA stated that Georgia and South Carolina would work cooperatively to "assess options for developing and adopting appropriate criteria for this waterbody" and that the existing Savannah Harbor Project would factor into this analysis. Id. at 11. Specifically, EPA recognized that "[s]ince the existing Harbor deepening and control structures have depressed the dissolved oxygen in the River, the biological impacts of this depressed dissolved oxygen regime and the ability to mitigate its impacts will be factors in the development of an appropriate dissolved oxygen criterion for the Savannah Harbor." Id.

[22] Ed Lightsey, All About Business: Georgia Ports: Georgia's Ports Have Accounted for 10,000 New Jobs Throughout the State in the Last Two Years, Georgia Trend(Dec. 2010), available at http://www.georgiatrend.com/features-business-industry/12_10_ports.shtml.

EPA has since proposed a revised TMDL. EPA, Draft Revised TMDL for DO in Savannah Harbor (Apr. 2010) (hereinafter "Draft Revised TMDL"), available at http://www.epa.gov/region4/water/tmdl/georgia/savannah_harbor_tmdl_draft_201056.pdf.pdf (last visited Jan. 24, 2011). The proposed revised TMDL, in contrast to the existing "no discharge" TMDL, would require an aggregate reduction in point source discharges of oxygen depleting substances of approximately 85 percent. See id. It does not, however, take into account impacts to DO from the proposed Project, nor does the Corps consider the impacts of its actions on dischargers affected by the TMDL. The Corps' failure to take into account cumulative impacts of the revised TMDL and the impacts of its Project on point source dischargers violates NEPA and impermissibly skews its review under the Section 404(b) Guidelines. Particularly given the substantial uncertainty surrounding its proposed DO mitigation, the Corps must consider the Project's potential impacts to dischargers and relationship to the TMDL.

The Project is a factor in implementation of the TMDL, as EPA previously acknowledged in explaining the relationship of previous deepenings to the 2006 TMDL, and the Corps must analyze it as such. The Corps must consider, for example, whether water quality trading in which SHEP proponents fund reductions in point source discharges affecting DO levels would better serve water quality and the objectives of both Section 303(d) and Section 404. The Corps' failure to do so also further skews its economic analysis. The available information suggests that foreign shippers, not domestic interests, would receive the lion's share of the s benefits from the SHEP, which would likely exacerbate the existing DO impairment in the harbor. In effect, the Project would subsidize these foreign interests not only at the taxpayer expense associated with the Project, but at the expense of local point-source dischargers, who would be required to achieve even greater discharge reductions to compensate for the added impacts of the SHEP.

G. To Comply with NEPA, the Corps Must Prepare a Programmatic EIS.

Under NEPA, where "several proposals for [projects] that will have cumulative or synergistic environmental impact upon a region are pending concurrently before an agency, their environmental consequences must be considered together." Kleppe, 427 U.S. at 410. Accordingly, a comprehensive or programmatic EIS "is appropriate . . . where the proposal itself is regional or systemic in scope, or where the proposal is one of a series of interrelated proposals that will produce cumulative systemwide [sic] effects that can be meaningfully evaluated together." Georgia River Network, 334 F. Supp. 2d at 1342 (quoting Izaak Walton League of America, 655 F.2d at 374).

In other words, NEPA requires that where "foreseeable similar projects in a geographical region have a cumulative impact, they should be evaluated in a single" programmatic EIS. City of Tenakee Springs v. Clough, 915 F.2d 1308, 1312 (9th Cir. 1990); see also 40 C.F.R. § 1508.7. Currently, there are multiple planned or proposed port deepening projects in the Southeast. GRR at 70. If constructed, these projects would have cumulative and synergistic environmental impacts that should be examined in a programmatic EIS. The Corps' failure to prepare a programmatic EIS for SHEP and related port projects is a violation of NEPA.

The Corps states that the "expected future growth of container cargo along the East Coast

[will] require expansion in the capacity of several deepwater container terminals" and "expansion of any existing container terminal or creation of a new terminal would cause environmental impacts." DEIS at 3-6. In the south Atlantic region, at least four port projects are planned or proposed—including Savannah, Jacksonville, Charleston, and Norfolk. GRR at 70. Each deepening project includes the expenditure of substantial federal funds, each project requires numerous federal permits, and each project presents significant environmental impacts on federally controlled coastal resources. Each project, when combined with others, could cause cumulative and synergistic impacts on the nation's environment, including its major rivers and estuarine and marine systems. The Corps "must give a realistic evaluation of the total impacts and cannot isolate a proposed project, viewing it in a vacuum." Grand Canyon Trust v. Federal Aviation Admin. 290 F.3d 339, 342 (D.C. Cir. 2002). . The Corps' review of these projects in isolation undermines two of NEPA's keystone objectives: informed public participation and informed agency decision-making. See Citizens for a Better Henderson v. Hodel, 768 F.2d 1051, 1056 (9th Cir. 1985).

The potential cumulative and synergistic environmental effects of the port expansion projects demand a programmatic analysis. The projects in the south Atlantic together present heightened risks to endangered species such as the right whale and shortnose sturgeon. Additionally, these projects are proposed in multiple rivers and marine systems on the East Coast and would cumulatively alter and destroy rare tidal areas including wetlands and marshes of national importance. The projects would also degrade estuarine wildlife values, fisheries, and disrupt coastal sediment flows. Considering the potential adverse impacts the projects would have on coastal resources and marine life, it is imperative that the Corps analyze the adverse impacts of SHEP in conjunction with the impacts of the other proposed port projects in the south Atlantic.

A programmatic analysis of environmental impacts is especially appropriate here where multiple ports are competing against others for the growing container business and the capability to accommodate Post-Panamax ships. To prepare for the Panama Canal port expansion, port authorities along the east coast are proposing deepening projects. Because each project is being pursued and examined separately, there is a possibility that the combined impact would result in more harm than good. For example, without a comprehensive analysis of the proposed projects, the country could end up with port expansions that provide marginal benefits while resulting in significant destructive impacts on the environment. Under NEPA, the regulations require that the Corps analyze proposed actions in the same EIS when it is the "best way to assess adequately the combined impacts of similar actions." 40 C.F.R. § 1508.25(a)(3). In examining the impacts of SHEP separately from other projects, the Corps has ignored that the crucial aspect of a programmatic EIS—the determination of "whether the various agency actions, when combined, have an effect on the environment that might be overlooked if examined separately . . . ." Sierra Club v. Watkins, 808 F. Supp. 852, 863 (D.D.C. 1991).

While the Corps' Multiport Analysis considers whether SHEP would have an economic affect on other ports in the Southeast, it has not considered the cumulative environmental impacts of the projects. A programmatic EIS is necessary in this case because it would (1) ensure that the Corps considers alternative means of meeting the demands of a new class of containerships, and (2) potentially reveal that the federally funded expansion of multiple port

facilities is not in the public interest. It is only through a "comprehensive consideration of pending proposals [that] the [Corps can] evaluate different courses of action." Kleppe, 427 U.S. at 410. Until the Corps prepares a programmatic EIS examining the ports that are now vying for the Post-Panamax ships, it will not be in compliance with NEPA.

H. The DEIS Violates NEPA Because it Does not Contain an Adequate Alternatives Analysis.

The alternatives analysis is "the heart of the environmental impact statement. 40 C.F. R. § 1502.14. It requires federal agencies to "study, develop, and describe appropriate alternatives to recommended courses of action in any proposal which involves unresolved conflicts concerning alternative uses of available resources." 42 U.S.C. § 4332(E). And in conducting this analysis, the agencies must "rigorously explore and objectively evaluate all reasonable alternatives." 40 CFR § 1502.14(a). The level of scrutiny required by NEPA in the alternatives analysis is proportional to the scope of the proposed project and the nature of the environmental impacts associated with it. See Brooks v. Volpe, 350 F. Supp. 269, 275-76 (W.D. Wash. 1972).

Here, the Project is enormous. To complete the Project, the Corps would have to dredge a 36 mile channel along the ocean floor and up the Savannah River; re-plumb the estuary; eliminate rare tidal freshwater wetlands and saltwater marsh; and displace endangered fish from their habitat. A project of this magnitude, in an ecosystem which is both exceptionally complex and suffering from the cumulative impacts of a long series of previous dredging and flow management projects, requires the most detailed scrutiny before a preferred alternative is selected. So far, the Corps has not taken the "hard look" that NEPA requires.

1. Because the DEIS Does not Consider Other Ports in the Region as Possible Alternatives, the DEIS does not Comply With NEPA.

Although the Corps does examine other ports in the Southeast to determine whether their container throughputs would be impacted if Savannah Harbor were deepened, the Corps does not examine whether the Corps should undertake harbor expansion projects at one or more of these other ports instead of at Savannah Harbor. The DEIS does not explain whether or not, for example, the Jacksonville or Charleston harbors could be deepened and improved to the same extent as Savannah Harbor for a lesser amount of money and fewer environmental impacts. This is critical in determining whether the DEIS is sufficient, because, as the Ninth Circuit Court of Appeals held in Citizens for a Better Henderson, a "viable but unexamined alternative renders [the] environmental impact statement inadequate." 768 F.2d at 1057.

2. The Failure to Adequately Evaluate Jasper as an Alternative Violates NEPA.

The DEIS's consideration of the Jasper Terminal falls far short of NEPA's requirement that the DEIS "rigorously explore and objectively evaluate" alternatives to the proposed action. 40 C.F.R. § 1502.14(a). Unlike all other alternatives considered by the Corps, the Jasper Terminal will likely be constructed. Even GPA's executive director, Curtis Foltz, recognizes the future Jasper Terminal, recently stating that the "Jasper port is a very solid project" and that the

project is "moving forward, as it was expected to, on its current timeline."[23] Thus, the Jasper Terminal is not simply a Corps-defined hypothetical alternative, but a viable alternative that could have dramatically less environmental impacts than deepening to the Garden City Terminal. The Corps' failure to conduct a fair and balanced consideration of the Jasper Terminal renders its alternatives analysis inadequate under NEPA.

The DEIS inconsistently treats the planned upgrades at GCT and the land-side construction costs of alternatives, especially those of the Jasper Terminal. This inconsistency offends NEPA's requirement that alternatives are treated consistently and fairly. On one hand, the DEIS excludes from the preferred alternative at least $130 million of improvements at GCT planned in anticipation of the expanded Panama Canal on the basis that these upgrades would occur with or without the expansion of the Canal. Yet the DEIS treats the construction of the Jasper Terminal as part of that alternative's costs even though the DEIS acknowledges that the Jasper Terminal would occur with or without the expansion of the Canal. See, e.g., DEIS, App'x O at 34 (The Jasper Terminal "would supplement container handling capacity [at Garden City] to help meet the growth in future demand."). This inconsistent treatment precludes any meaningful analysis of the Jasper Terminal as an alternative because the purported $357 million of construction costs for the Jasper Terminal alone present GCT as the least expensive alternative. DEIS, App'x O at 35, Table 6. The actual dredging and mitigation of the Jasper Terminal, however, are almost two-thirds less expensive than they are for the preferred deepening project to GCT. See id.

In addition, the Jasper Terminal would result in a reduction of demand for services provided by GPA at GCT and therefore some of GPA's proposed spending for improvements at the terminal and associated facilities may become unnecessary. In other words, Jasper Terminal would allow GPA to avoid significant expenditures at GCT and certain sunk costs could be recovered. For example, properties currently owned by GPA that are intended for future utilization could be sold, rather than developed for additional throughput. See DEIS, App'x O at 21. The DEIS improperly excludes these costs savings despite GPA's informing the Corps that it will implement GTC upgrades as needed. See DEIS, App'x O at 25. An adequate assessment of Jasper Terminal as an alternative to SHEP must include the cost savings for GPA that would result from the Jasper Terminal and these must be quantified and used to offset the construction cost of the Jasper Terminal (if they are to be included). At the same time, the SRMC has expressed concern that the design of the Project's channel may make it practically impossible to develop the Jasper Terminal given the fact that the proposed channel, as designed, will not be able to accommodate two-way traffic. Thus, the Jasper Terminal should be considered now as an alternative to ensure that the current Proposal will not unintentionally undermine the prospects for developing the Jasper Terminal.

3. The Alternatives Analysis is Flawed Because it Does not Consider all the Components of the Various Alternatives in a Consistent Manner.

As described above, in order for an alternatives analysis to be lawful, the agency conducting the analysis must include all aspects of each alternative and do so in a consistent

[23] Lightsey, supra note 23.

manner. The Corps did not accomplish this with its analysis of the Project. Specifically, the Corps' preferred alternative does not include the landside improvements to the Garden City Terminal that have been performed and will be performed to ready the terminal for Post-Panamax ships. See DEIS, App. O at 36. It goes on to explain that GPA has planned these improvements "to coincide with the Panama Canal Expansion Project." GRR at 14. In the DEIS, however, the costs of upgrades at the Garden City Terminal are entirely disconnected from the Project and therefore are not included in the project costs. In contrast, the Corps does include these costs in the "without project alternative," as well as all of the other alternatives to deepening to the Garden City Terminal. DEIS, App. O at 35-36. This, of course, skews the entire alternatives analysis. If the GPA landside improvements were undertaken with a deeper port in mind, they should be factored into the alternatives analysis in a consistent manner. The Corps should not be permitted to ignore these costs for some alternatives, while considering them for others.

II. The Proposed Project would Violate the Clean Water Act ("CWA")

Although the Corps, as a matter of policy, does not issue itself permits for its own activities, it "authorizes" its own discharges, applying all applicable substantive requirements, including the Section 404 Guidelines found at 40 C.F.R. § 230.10. 33 C.F.R. § 336.1(a) (2011); 33 C.F.R. § 337.6 (2011); 40 C.F.R. § 230.2(a)(2) (2011); see also Regulatory Guidance Letter ("RGL") 88-09 (July 21, 1998, expired Dec. 31, 1990); RGL 05-06 (Dec. 7, 2005). As explained below, this proposal violates the CWA in the following respects.

A. The Proposal Fails to Satisfy the CWA and the 404(b)(1) Guidelines and Must Therefore Be Denied.

1. The Corps failed to set forth a proper statement of purpose and need and has not adequately considered alternatives.

Section 404(b)(1) of the CWA, 33 U.S.C. § 1344(b)(1) (2010), directs the EPA to issue Guidelines that define the circumstances under which dredged or fill material may be discharged into wetlands or other waters. Importantly, the Guidelines provide that the Corps shall not grant a Section 404 permit "if there is a practicable alternative to the proposed discharge which would have less adverse impact on the aquatic ecosystem, so long as the alternative does not have other significant adverse environmental consequences." 40 C.F.R. § 230.10(a) (2011). An alternative to discharge to a wetland "is practicable if it is available and capable of being done after taking into consideration cost, existing technology, and logistics in light of overall project purposes." 40 C.F.R. § 230.10(a)(2). Where a discharge is proposed for a wetland or other special aquatic site, all practicable alternatives to the proposed discharge that do not involve a discharge to the wetland "are presumed to have less adverse impact on the aquatic ecosystem, unless clearly demonstrated otherwise." 40 C.F.R. § 230.10(a)(3). In addition, if the activity associated with a discharge to a wetland does not require access or proximity to or siting in a wetland (i.e., is not "water dependent"), practicable alternatives that do not involve wetland sites "are presumed to be available, unless clearly demonstrated otherwise." 40 C.F.R. § 230.10(a)(3).[24]

[24] The Guidelines "couple a general presumption against all discharges into aquatic ecosystems with a specific presumption that practicable alternatives to the fill of wetlands exist." Hough v. Marsh, 557 F. Supp. 74, 82 (D.

To implement the Guidelines (and NEPA, as discussed above), the Corps must first present a correct statement of a project's "basic purpose." See 40 C.F.R. § 230.10(a)(3). After the Corps defines the basic purpose of the project, it must then determine whether that basic purpose is "water dependent." See id. An activity is "water dependent" if it requires access or proximity within a wetland to fulfill its basic purpose. Id.

As discussed above in Section I.C.1., the Tier I EIS stated that: "*[c]ontinued growth of the Port necessitates* that it remain efficient and cost competitive" and that [b]ased on an evaluation of the study area and its needs, the objectives of the proposed project are as follows: (a) provide better passage for the existing fleet of larger vessels through the harbor at all tides, thus reducing shipping delays; and (b) provide for safe and efficient transit of larger vessels expected to call on Savannah Harbor in the future." Tier I EIS at 14 (emphasis added). In other words, the original statement of project purpose clearly acknowledged the connection between deepening and GPA's business goals.

The current DEIS is far less forthcoming regarding GPA's overriding goal for this Project. For example, the Corps devotes all of Appendix H of the DEIS to complying with the requirements of the Section 404(b)(1) Guidelines, yet nowhere does Appendix H provide the basic and overall purpose for the proposed Project. Although it is difficult to tease out a statement of project purpose from the main body of the Tier II DEIS itself, the DEIS does offer that: "The primary problems identified—and the need for the project—relate to the inefficient operation of containerships in the Federal navigation channel at Savannah Harbor, affect the Nation's international trade transportation costs." DEIS at 3-1. If this statement is intended to be a statement of project purpose, it shows that the Corps is attempting to walk away from its earlier statement in the Tier I DEIS, which makes clear that this Project is, in fact, directly related to GPA's intent to maintain or grow its business. And, despite the effort in the Tier II DEIS to ignore the plain relationship between deepening and GPA's business, many public statements from GPA over the years leave little doubt as to the overriding goal of GPA with this Project. See, e.g., Georgia Ports Authority Press Release (July 13, 1998) (attached hereto as Ex. A) ("GPA considers increased channel depth to be vital to continued growth of port activities in Savannah."); see generally Section I.C., supra.

In order to comply with the 404(b)(1) Guidelines and NEPA, the Corps must clarify its statement of project purpose and need. Without such a statement, compliance with the 404(b)(1) Guidelines is not possible.[25] In reformulating its statement of project purpose, the Corps should remain mindful that, as in the NEPA context, it must not "contrive a purpose so slender as to define competing 'reasonable alternatives' out of consideration (and even out of existence)."

Mass. 1982). "[A]n applicant . . . must rebut both of these presumptions in order to obtain a permit." Bersani v. Robichaud, 850 F.2d 36, 39 (2d Cir. 1988).

[25] Further, without a clearly delineated statement of project purpose and need, it is also not possible to conclude whether this is a water dependent project. Perhaps it is obvious to the Corps that this is a water dependent project because the Corps and GPA intend to deepen the harbor involves the deepening of a harbor. If, however, the project purpose is to create transportation efficiencies that are in the national interest, or even to maintain or increase GPA's bottom line, then it is not so clear that the overall project purpose is water related.

Simmons v. U.S. Army Corps of Eng'rs, 120 F. 3d 664, 666 (7th Cir. 1997).

2. Section 404(b)(1) Bars Approval of Projects that Cause or Contribute to Violation of Water Quality Standards.

The Section 404(b)(1) Guidelines prohibit authorization of a discharge of dredged or fill material that "[c]auses or contributes . . . to violations of any applicable State water quality standard." 40 C.F.R. § 230.10(b)(1). The DEIS shows that the Project would contribute to existing violations of numeric water-quality standards in the Savannah Harbor, which is already impaired by inadequate dissolved oxygen DO levels. The DEIS further shows that the Project would cause or contribute to violations of narrative water quality and antidegradation standards by damaging the aquatic ecosystem and eliminating or impairing existing uses. In addition, the DEIS fails to adequately analyze and disclose impacts to water quality and the level of uncertainty in the analysis conducted, suggesting that additional or greater violations may also result.

a). The Project will Contribute Violations of DO Standards in a Waterway Listed on Georgia's CWA Section 303(D) List as Impaired for DO.

As the DEIS explains, the greatest area of concern for DO is the Savannah River estuary, which will be "directly affected" by the Project. DEIS at 5-37. The stretch of the Savannah River through the harbor and in the estuary already suffers from critically low DO levels in the summer months. Due to the waters' failure to meet the applicable numeric standards, this river segment is currently listed on Georgia's CWA Section 303(d) (33 U.S.C. § 1313(d)) list as impaired for DO. DEIS at 5-37.

The DEIS admits that the Project will contribute to the existing violations of DO standards by exacerbating this impairment. Specifically, the DEIS admits that the proposed Project will have additional adverse impacts to DO levels. See, e.g., DEIS at 5-48 (stating that "[d]eepening the navigation channel would adversely impact dissolved oxygen levels in the harbor"); id. at App'x S p. 51 (same). And, in Table 5-19, it sets forth modeling results and a narrative that describes the Table as showing "a substantial decrease in dissolved oxygen levels" in "critical cells." DEIS at 5-43; see also App'x S p. 48 (same).[26] Moreover, the DEIS predicts 1-2 percent increases in the percentage of the harbor's waters violating DO standards. DEIS at 5-42. Because the Project will admittedly contribute to and cause further violations of DO standards in an already impaired waterway, approval of this Project is prohibited by Section 404(b)(1) of the CWA.

b). The Project would Violate the Applicable Narrative Water Quality Standards.

Water quality standards contain both numeric and narrative criteria for protecting existing and classified uses. See S.C. Code Ann. Regs. § 61-68(A)(1) (2009) (explaining that South

[26] Predictions of substantial adverse effects to DO levels are also supported by past experience. The DEIS acknowledges that creation and maintenance of the existing (42-foot) channel has adversely affected the DO regime in the harbor by lowering DO concentration by 1 mg/l. DEIS at 5-37.

Carolina's "water quality standards include the uses of the waters, the numeric and narrative criteria, and the antidegradation rules contained in [Regulation 61-68]"); 40 C.F.R. §§ 131.2 & 131.6 (describing purpose and required content of state water quality standards).

Consistent with the CWA, South Carolina has set a goal of "maintain[ing] and improv[ing] all surface waters to a level to provide for the survival and propagation of a balanced indigenous aquatic community of flora and fauna and to provide for recreation in and on the water." S.C. Code Ann Regs § 61-68(A)(4). To that end, the state's water quality standards require that "[u]ses in all waters shall be protected, wherever attainable, regardless of flow." Id. § 61-68(C)(3). And, the standards applicable to the waters affected by the Project specifically require that they be suitable for "fishing" (with exceptions concerning the commercial harvesting of clams, mussels, or oysters in two of the three affected river segments) and for "survival and propagation of a balanced indigenous aquatic community" of flora and fauna. Id. § 61-68(G)(10)-(12). Regulation 61-68 defines a "[b]alanced indigenous aquatic community" as "a natural, diverse biotic community characterized by the capacity to sustain itself through cyclic seasonal changes, presence of necessary food chain species and by a lack of domination by pollutant tolerant species." Id. § 61-68(B)(11).

The Project would violate these standards by impairing existing and classified uses and eliminating conditions necessary for the survival of a balanced indigenous aquatic community. In particular, the Project will cause deterioration of DO levels and saltwater intrusion. The decline in DO concentrations represents "a major concern for all fish and aquatic organisms." See Expert Report of Shawn P. Young, Ph.D. at 6 (attached hereto as Ex. E) (hereinafter referred to as the "Young Report"). Increased salinity impacts "the aquatic community as a whole, including freshwater marshes," and affects shortnose-sturgeon and striped-bass habitat. Id. at 9. It may also change the presence and abundance of benthic invertebrate and forage fish species. Id. at 4-5, 7, and 9. The Project's adverse impacts, especially with respect to DO and salinity, threaten to violate water quality standards by precluding the survival and propagation of the "natural, diverse biotic community" indigenous to these waters. S.C. Code Ann Regs § 61-68(B)(11), (G)(10)-(12). Most notably, the Project could "preclude" striped bass restoration in the Savannah River and possibly destroy the fishery, which has been described as a nationally important resource. Tier I FEIS at H-62 & H-205 (comments of U.S. Fish and Wildlife Service and Georgia Department of Natural Resources on Tier I DEIS); SELC, Comments on Tier I FEIS (Oct. 19, 1998). "[H]istorically, the Savannah River was Georgia's most important striped bass fishery." DEIS at 4-21, but it suffered a dramatic decline after the Corps grossly underestimated impacts of its previous activities. Young Report at 3, 15. And, while the Corps proposes a striped-bass stocking program as mitigation, even assuming the program were fully funded and implemented, under the CWA and applicable water quality standards, such a program could not adequately compensate for the adverse impacts and resulting violations. The CWA and state standards require preservation of the chemical, physical, and biological integrity necessary to support a "self sustaining" indigenous aquatic community; S.C. Code Ann Regs § 61-68(B)(11); 33 U.S.C. § 1313(d) (requiring states implement additional measures where existing discharge restrictions do not adequately protect the "protection *and propagation*" of a "balanced, *indigenous* population of shellfish, fish, and wildlife" (emphasis added)).

Additionally, NMFS has previously explained that the importance of the lower Savannah

fisheries "cannot be overemphasized." Tier 1 FEIS at H-188. In addition to the striped-bass fishery, the river presently supports American shad, "the most valuable commercial anadromous fish in the southeast," and other important game and/or commercial fish. DEIS at 4-20. It also contains endangered species, such as the shortnose sturgeon, and the Atlantic sturgeon, which NMFS has proposed for listing as endangered. As discussed in Section VI below, this proposal will directly reduce the likelihood of both the survival and recovery of shortnose and Atlantic sturgeon by reducing the reproductive fitness, numbers and distribution of each species. Young Report at 17. The changes in the character of the channel and quality of the water brought about by the Project would adversely impact these and other species, yet the analyses in the DEIS and GRR do not fully consider these impacts, Young Report at 16, and thus fail to provide reasonable assurance that other violations of narrative standards will not also occur.

Similarly, Georgia's water quality standards mandate that "existing instream water uses and the level of water quality necessary to protect the existing uses *shall be maintained and protected*." Ga. Comp. R. & Regs. r. 391-3-6-.03(2)(b)(i) (emphasis added). For the same reasons just described, the proposed Project violates Georgia's water quality standards as well.

c). The Project would Violate Antidegradation Standards and Section 404(b)(3).

Antidegradation standards stem from the CWA's goal of "restor[ing] and maintain[ing] the chemical, physical, and biological integrity of the Nation's waters," 33 U.S.C. § 1251(a), and are promulgated as part of the state water quality standards required under CWA Section 303(c). See PUD No. 1 of Jefferson County v. Washington Dept. of Ecology, 511 U.S. 700, 705 (1994).

EPA regulations require state water quality standards to incorporate an "antidegradation policy" sufficiently protective to ensure that, at a bare minimum, "[e]xisting instream water uses and the level of water quality necessary to protect the existing uses shall be maintained and protected" in all waters. 40 C.F.R. § 131.12(a)(1) (2011); see also 33 U.S.C. § 1313 (dictating required content of state water quality standards). "EPA has explained that under its antidegradation regulation, 'no activity is allowable . . . which could partially or completely eliminate any existing use.'" PUD No. 1 of Jefferson County, 511 U.S. at 718 (alteration in original) (citing EPA, Questions and Answers on Antidegradation 3 (Aug. 1985)). EPA has further explained that "[w]ater quality should be such that it results in no mortality and no significant growth or reproductive impairment of resident species," and "[a]ny lowering of water quality beyond this full level is not allowed." EPA, Questions and Answers on Antidegradation 7 (Aug. 1985), available at http://www.epa.gov/waterscience/standards/library/antidegqa.pdf (last visited Jan. 24, 2011).

Accordingly, South Carolina's and Georgia's water quality standards contain antidegradation rules intended to preserve the integrity of the state's waterways. As relevant here, South Carolina's antidegradation rules mandate that "[e]xisting water uses and the level of water quality necessary to protect these existing uses shall be maintained and protected regardless of the water classification," id. at § 61-68(D)(1), as well as that "[w]here surface water quality exceeds levels necessary to support propagation of fish, shellfish, and wildlife, . . . that quality shall be maintained and protected unless [DHEC] finds, after intergovernmental

coordination and public participation, that allowing lower water quality is necessary to important economic or social development in the areas where the waters are located," id. § 61-68(D)(2). Georgia's water quality standards contain analogous requirements. See, e.g., Ga. Comp. R. & Regs. r. 391-3-6-.03(2)(b)(ii) (providing that where "water quality exceed levels necessary to support propagation of fish, shellfish, and wildlife . . . that quality shall be maintained and protected . . . .").

As described above and in Sections II.A.2.(d), and VI, infra, the Project would significantly degrade water quality and threatens to eliminate the survival and propagation of self-sustaining populations of species present in and indigenous to the affected waters. It therefore violates the applicable South Carolina and Georgia antidegradation standards.

Moreover, the Corps' Section 404(b) Guidelines specifically prohibit authorization of discharges that would "cause or contribute to significant degradation of the waters of the United States." 40 C.F.R. 230.10(c). The Guidelines state that such effects include, among other things, significant adverse effects of the discharge on "life stages of aquatic life" and on "aquatic ecosystem diversity, productivity, and stability." Id. The same impacts giving rise to the violations of state water quality standards also violate the Section 404(b) Guidelines.

d). There is No Reasonable Assurance that the DO Injection System Will Remedy the Violations of Water Quality Standards.

Both the DEIS and GRR state that mitigation, through the use of Speece Cones to artificially inject oxygen into the water, will fully offset decreases in DO with incidental benefits. GRR at 192; DEIS at 5-51. More specifically, to mitigate the ways in which the deepening proposal will further exacerbate DO problems in the River, the Corps has "identified use of Speece cones as the specific technique to inject oxygen into the water . . . ." GRR, App'x B at 30. These systems would be land based, with water being withdrawn from the river through pipes, then treated and returned to the river. GRR, App'x B at 30. The water intake structure would include screens to reduce the intake of trash and other suspended solids. GRR, App'x B at 30. The intake and discharge would be located along the side of the river and not extend out into the navigation channel. GRR, App'x B at 30. For a number of reasons, the Corps cannot lawfully rely on this uncertain, unproven, and potentially unfunded mitigation plan in assessing the impact of the Project on DO levels.

According to the GRR, currently, the Savannah District annually receives approximately $13 million for operation and maintenance ("O&M") dredging and maintenance of the upland disposal areas. This does not include funds for dike raising, dike maintenance, and mosquito control. GRR at 220. The proposed sill to be constructed at the eastern edge of the sediment basin as part of the SHEP proposal will cause the basin to fill, resulting in an increase of O&M dredging and maintenance costs to over $24 million. GRR at 220. Against this backdrop, the "Dissolved Oxygen facilities will be constructed and maintained by the Corps." GRR, App'x B at 5. The costs for operating the dissolved oxygen injection systems are based on their continued operation for a period of 180 days per year. Included in the annual O&M costs are the replacement costs for the Speece cone and intake and discharge lines at 40 year intervals; and

replacement of the oxygen flow control, oxygen generator and side stream pump at 20 year intervals." GRR at 220. In sum, the annual operating costs for the Speece Cones are anticipated to be more than $1.3 million, and the Corps – and not GPA – will be responsible for this cost. It also does not appear that the Corps has provided any financial assurances that it will have the funding to operate and maintain the DO injection system for the length of the Project. Instead, it appears as if the Corps will have to rely on the annual appropriations process to fund this significant annual cost.

This feature of the mitigation plan conflicts with the new mitigation rules promulgated under the CWA.[27] Among other things, the Mitigation Rule was intended by the EPA and Corps to "improve[] the planning, implementation and management of compensatory mitigation projects by . . . requiring . . . *assurances of long-term protection of compensation sites, financial assurances*, and identification of the parties responsible for specific project tasks." 73 Fed. Reg. at 19,594. Under the Rule, mitigation plans must contain a long-term management plan, adaptive management plan, and financial assurances. Specifically, the Rule states that the "district engineer shall require sufficient financial assurances to ensure a high level of confidence that the compensatory mitigation project will be successfully completed, in accordance with applicable performance standards." Id. at 19,638 to 19,639; codified at 33 C.F.R. § 332.1(n)(1) (2011). Here, despite the importance of mitigating for further exacerbating the River's already severe dissolved oxygen problems and the exorbitant and ongoing cost of the technology selected to perform the mitigation, there is no reasonable assurance provided that the Corps will be able to successfully operate and maintain this element of the mitigation plan since it appears that it has been made subject to the annual appropriations process. As such, this mitigation measure fails to provide reasonable assurance (and similarly fails to comply with the Mitigation Rule).

In addition to the inadequacy of the purported mitigation, the Corps has not undertaken a sufficient analysis of the Project's impacts to DO. The Corps has not accounted for the full scope of the dredging required by the Project. In particular, it does not appear that the Corps considered the "[t]wo feet of allowable overdepth and up to 6 feet of advance maintenance in selected areas" that "would also be included for the proposed action." DEIS at 3-22. This added excavation and the potential for erosion in the loosened channel would further reduce DO. See DEIS at 5-37 (saying "as the channel depth increases, the ability of oxygen to reach the river bottom decreases, causing lower average levels of dissolved oxygen at the bottom . . . ."). It apparently means that the actual channel depth resulting from the proposed Project could be as much as 56 feet. But, the DEIS and DO modeling appear to ignore what this might mean in terms of further deterioration in DO levels. As a result, the modeling conducted could not actually predict impacts to DO and salinity, nor could the Corps accurately assess impacts to aquatic resources. Cite report. If the Corps ignored the full scope of the dredging and attendant impacts to DO, it necessarily underestimated the negative impacts and the amount of mitigation that would be necessary to compensate for the impacts. And, it is not entitled to rely on inaccurate models to support its conclusions. Cf. Native Ecosystems Council v. U.S. Forest

[27] On April 10, 2008 the EPA and the Corps issued a Final Rule on Compensatory Mitigation for Losses of Aquatic Resources under section 404 of the Clean Water Act. See 73 Fed. Reg. No. 70, 19,594-19,687 (Apr. 10, 2008) (codified at 40 C.F.R. pt. 230.91 and 33 C.F.R. pt. 325 and 332) (hereinafter referred to as the "Mitigation Rule").

Serv., 418 F.3d 953, 964 (9th Cir. 2005) ("An agency may not rely on incorrect assumptions or data in an EIS.").[28]

Moreover, it also appears that although the locations of the injection cones are now different than previously identified, the Corps has not studied mixing or dispersion of the injected oxygen at these locations. The DEIS neither analyzes nor frankly discloses this change of plans. The Corps must explain the basis for this deviation from its plans and assess impacts of the altered location. It likewise must account for the altered costs associated with the move. The DEIS recognizes that operational expense increases with distance from the areas needing increased DO. DEIS App'x C p. 43. In redoing its fundamentally flawed economic analysis, the Corps will need to factor in this cost.

More generally, the DEIS understates the uncertainty of and risks associated with both the projections of water quality impacts and the proposed mitigation. While the DEIS relies on a demonstration project in support of its conclusions, the results of that study were inconclusive. In fact, FWS has explained that, "There is a great deal of risk and uncertainty regarding impacts and the channel and flow modifications and dissolved oxygen mitigation plans. Based on the available information, there is a high degree of uncertainty as to how effective oxygen injection would be. See DEIS, App'x E (letter from Timothy N. Hall (FWS) to Colonel Edward J. Kertis, Jr. (Corps) dated Nov. 4, 2008). The Corps' failure to adequately analyze the Project's impacts to DO and the efficacy of the purported DO mitigation precludes reliance on the DO injection system as a mitigation technique.

Moreover, as with the mitigation proposed for striped bass, the mitigation proposed for DO, even if assumed to be fully funded and effective, could not replace what was lost. As the DEIS explains, the Project would adversely affect DO levels in three ways. First, the increased depth would decrease the ability of oxygen to reach the river bottom and thereby cause lower DO levels at the bottom of the river. DEIS at 5-37. Second, by enlarging the channel prism, the Project would move additional saltwater into the upper part of the harbor and into the estuary, which decreases those waters' capacity to accept oxygen from the air. Id. Third, as the channel prism enlarges, velocity decrease, reducing mixing through the water column. Id. Thus, the Project's effects reduce DO levels by reducing its "reaeration capacity." SEG DO/TMDL Issue Summary, at 2, available at http://sav-harbor.com/WP/DO_WP.pdf (last visited Jan. 24, 2011). Injecting air into the water from land-based Speece cones cannot restore the aeration capacity of the waterway. And, as discussed above, the CWA requires that the functions and values necessary to support a "self-sustaining," aquatic ecosystem, i.e. one not dependent on anthropogenic intervention.

Finally, the Corps must also take into account that the proposed mitigation would not be entirely benign. The DEIS recognizes that fish would become entrained in the oxygen injection system. And, although it states that approach velocities will be adjusted to "minimize" such impacts, it does not analyze or discuss what the impacts will be. DEIS at 5-48. The oxygen-injection system will also have noise impacts to the surrounding areas and greenhouse gas emissions, which the Corps must take into fully consider.

[28] Additionally, the DEIS fails to consider the potential of NOx emissions from the Project to add nitrogen to the waters, further depressing DO levels.

B. The Project Does Not Qualify for a Section 401 Water Quality Certification from South Carolina.

"The CWA requires the Corps to seek state water quality certification for discharges of dredged or fill material into waters of the U.S." 33 C.F.R. § 336.1(a)(1); see also 33 C.F.R. § 337.10 (2011); 33 C.F.R. § 338.2(c) (2011). To certify a project as consistent with its water quality standards, South Carolina must have "reasonable assurance" that the Project will not violate those standards. S.C. Code Ann. Regs. § 61-101(A)(4). "The water quality standards include the uses of the waters, the numeric and narrative criteria, and the antidegradation rules contained in [Regulation 61-68]." Id. § 61-68(A)(1). As explained above, the proposed Project would violate a number of these standards. See infra at Section II.A.2. And, more specific regulatory provisions addressing the state's review under Section 401 require that South Carolina deny the requested certification.

Consistent with the CWA's mandate, South Carolina's water quality standards emphasize a "preventative approach" that recognizes the difficulty of restoring water quality once degraded. S.C. Code Ann. Regs. § 61-68(A)(3). To that end, Section 401 certification must be denied if the "the proposed activity permanently alters the aquatic ecosystem in the vicinity of the project such that its functions and values are eliminated or impaired." S.C. Code Ann. Regs. § 61-101(F)(5)(a). As explained above, here, the proposed Project would result in severe and permanent adverse impacts to the affected waters. See infra at II.A.2.(d).

Similarly, if "there is a feasible alternative to the activity, which reduces adverse consequences on water quality and classified uses, "the proposed activity cannot receive certification. Id. 61-101(F)(5)(b). The availability of feasible alternatives to the proposed Project, discussed in detail in Section I.H. above, precludes issuance of a Section 401 water quality certification.

In addition, certification must be denied if "the proposed activity adversely impacts waters containing State or Federally recognized rare, threatened, or endangered species." S.C. Code Ann. Regs. § 61-101(F)(5)(c). Here, the DEIS and GRR acknowledge that the proposed Project will have significant adverse impacts on the federally endangered shortnose sturgeon. Indeed, the DEIS admits that "substantial adverse impacts" remain to shortnose sturgeon habitat even in the seemingly unlikely event that the proposed flow alterations and oxygen-injection system function as hoped and, in fact, benefit sturgeon. DEIS at 5-68; but see NRDC v. Kempthorne, 506 F. Supp. 2d 322, 355 (E.D. Cal. 2007) (stating, in ESA context, that "at a minimum, a mitigation strategy must have some form of measurable goals, action measures, and a certain implementation schedule"); Nat'l Wildlife Fed'n v. Nat'l Marine Fisheries Serv., 254 F. Supp. 2d 1196, 1211-12 (D. Or. 2003) (finding agency's reliance on mitigation measures that were not reasonably certain to occur to be arbitrary and capricious).

Finally, certification must be denied if: "the proposed activity adversely impacts special or unique habitats, such as National Wild and Scenic Rivers, National Estuarine Research Reserves, or National Ecological Preserves, or designated State Scenic Rivers." S.C. Code Ann Regs. § 61-101(F)(5)(d). Here, the DEIS acknowledges that the proposed Project will severely impact the Savannah National Wildlife Refuge, most significantly through the destruction of

tidal freshwater marshes. See infra Section VIII.C.; DEIS at 5-117. For that reason as well, certification must be denied.

C. The Project is not entitled to a Section 401 Water Quality Certification from Georgia.

The proposed Project would violate the Georgia Water Quality Control Act, O.C.G.A. §§ 12-5-20 et seq. ("GWQCA"), and therefore the Georgia Environmental Protection Division ("Georgia EPD" or "EPD") should not issue a CWA Section 401 Water Quality Certification ("WQC") in connection with this Proposal.

As a threshold matter, we are concerned with Georgia's approach to granting a WQC for the Project. Given the size and scope of the Project and the Project's significant environmental impacts, the South Carolina Health and Environmental Control Department has determined its review may require the statutorily-provided time period of one year to consider the Corps' request for a WQC. In contrast, Georgia EPD has already assured the Corps that it will receive certification in the coming months while, at the same time, acknowledging the agency has not had time to complete its review.[29] EPD is apparently operating under the mistaken assumption that the Corps is entitled to a WQC. To the contrary, the currently proposed Project would violate water quality standards under Georgia law. Considering the Project's degradation on water quality, it is imperative that EPD approach its obligations under the CWA in a cautious and critical manner. Consistent with this approach, and in compliance with 33 U.S.C. § 1341(a)(1), EPD should afford the citizens of Georgia an opportunity to review and comment on a draft WQC prior to reaching a final decision in this matter.

The GWQCA's primary objective is to "enhance water quality and prevent pollution." See Ga. Comp. R. & Regs. r. 391-3-6-.03(2)(a). SHEP's expected water quality degradation flies in the face of Georgia's Anti-Degradation Policy, which states that "[e]xisting instream water uses and the level of water quality necessary to protect the existing uses shall be maintained and protected." Id. at 391-3-6-.03(2)(b)(i) (emphasis added). The lower Savannah River that would be affected by the Project is already listed as impaired for dissolved oxygen under CWA Section 303(d). The Corps expressly recognizes that the Project "would adversely affect DO, a critical resource," DEIS at 5-37 and, thus, as discussed in detail in Section II.A.2(d), the Project would exacerbate DO problems.

Further reductions in DO will negatively impact existing uses in the river, such as the endangered population of shortnose sturgeon, Atlantic sturgeon, striped bass, and other fisheries. According to the GRR, the Project's reductions in DO levels could reduce the shortnose sturgeon's habitat by up to an additional 16 percent. GRR at 163. Moreover, as discussed in Section II.A.2(d), there is considerable uncertainty regarding the effectiveness of the primary measure, the oxygen injection system, intended to mitigate for the decreased DO levels in the river. There are no other "measures identified that could be implemented in the estuary that would restore sturgeon habitat or enhance existing habitats." Id. In its current form, the Project

[29] See Mary Carr Mayle, SC Opposes Savannah River Deepening Plan, Augusta Chronicle, (Jan. 5, 2011), available at http://chronicle.augusta.com/latest-news/2011-01-05/sc-opposes-savannah-river-deepening-plan (last visited Jan. 24, 2010)

would cause further degradation of DO, which, in turn, will inflict additional harm on existing uses in the river. Approval of this Project in its current form will prevent EPD from protecting and maintaining the water quality of the Savannah River, including its existing uses. For these reasons, a 401 WQC cannot be lawfully issued for this Project.

III. The Project Would Needlessly Thwart the Policies of South Carolina's Coastal Zone Management Program ("CMP"), in Violation of the Coastal Zone Management Act ("CZMA") and South Carolina Law.

Pursuant to the federal CZMA, 16 U.S.C. § 1451 et seq. (2010), the Corps must ensure that its activities in South Carolina's coastal zone are consistent to the maximum extent practicable with the state's CMP. See 16 U.S.C. § 1456(c)(1)(A) ("[e]ach Federal agency activity within or outside the coastal zone that affects any land or water use or natural resource of the coastal zone shall be carried out in a manner which is consistent to the maximum extent practicable with the enforceable policies of approved State management programs"). To that end, "e[]ach Federal agency carrying out an activity subject to [Section 1456(c)(1)(A)] shall provide a consistency determination to [the appropriate state agency] at the earliest practicable time, but in no case later than 90 days before final approval of the Federal activity unless both the Federal agency and the State agency agree to a different schedule." 16 U.S.C. § 1456(c)(1)(C).[30] This consistency determination should include "[c]omprehensive data and information" sufficient to support its conclusions. S.C. CMP at V-20. A federal agency may use its NEPA documents as a vehicle for consistency review under the CZMA, provided that those documents include the information and adhere to the timeframes required by the CZMA implementing regulations. 15 C.F.R. § 930.37.

DHEC "is responsible for commenting on and concurring with or objecting to Federal agency consistency determinations," and may do so through "the issuance or denial of relevant State permits" provided it "review[s] individual projects to ensure consistency with all applicable State management program policies and that applicable public participation requirements are met." 15 C.F.R § 930.6(b), (c). Where, as here, a project requires both a Section 401 water quality certification and a coastal zone consistency certification, "the coastal zone consistency certification determination shall be issued as a component of, and concurrently with, the water quality certification." S.C. Code Ann. Regs. § 61-101(A)(7). Because the Project will also require a critical area permit, however, DHEC ultimately might instead make its consistency certification decision through that permitting process. See id. § 61-101(A)(8).

Here, the DEIS and GRR set forth a fundamentally flawed and incomplete analysis of the Project's impacts and therefore fail to supply the "[c]omprehensive data and information," S.C. CMP at V-20, DHEC needs to properly review the Corps' consistency determination. See supra at I.E. For that reason alone, DHEC should object to the Corps' consistency determination. Moreover, even the limited analysis provided shows that the proposed Project would not be carried out in a manner consistent with South Carolina's CMP and will cause serious and unnecessary damage to critical areas of the State's coastal zone. Accordingly, DHEC should deny the Corps' certification request and insist that the Corps explore practicable and less

[30] In South Carolina, the relevant agency is the Office of Ocean and Coastal Resource Management ("OCRM"), an arm of DHEC.

damaging alternatives.

As an initial matter, DHEC must deny certification under the CZMA for the same reason it must do so under Section 401 of the CWA. CZMA Section 307(f) "requires States to incorporate all requirements established pursuant to the Federal Clean Water Act and Clean Air Act into their management programs." S.C. CMP at V-11; see also id. at III-20(7) (mandating that "[p]roposed port development or expansion and operation must meet existing air and water quality standards"). Because the Project would violate water quality standards and the Corps' 404 Guidelines, and thus the CWA, see supra at II.A.2., it is inconsistent with the CWA requirements incorporated into the CMP. And, the Corps' failure to properly analyze and disclose air pollution impacts, see supra at I.E.1., precludes it from certifying consistency, as DHEC lacks reasonable assurance that the Project will not violate any CAA requirements. South Carolina's CMP requires that all port expansion projects meet air and water quality standards. CMP at III-20(7). And, the Project fails to comport with that mandate.

The CMP requires further that projects affecting navigation, such as this one, be coordinated with the South Carolina State Ports Authority ("SCSPA"). CMP III-21; see also, S.C. Code Ann. Regs. § 30-11(B)(2) (requiring DHEC to obtain "a certificate from the South Carolina State Ports Authority declaring that the proposed project or activity would not unreasonably interfere with commercial navigation and shipping" before issuing a critical area permit for projects in waterways used for commercial navigation and shipping or in areas set aside for port development in an approved management plan); id. § 30-1(A)(3) (stating that DHEC's critical area permitting regulations "are to be read as part of, and to be construed with, the policies set forth in the South Carolina Coastal Management Program"). The SCPSA has expressed concern that the Project, as currently proposed, would adversely impact its interest in and the potential for the Jasper Ocean Terminal. Letter to Dean Moss (Savannah River Maritime Commission) from Colden R. Battey, Jr. (SCPSA) dated Dec. 17, 2010. In particular, the disposal cells slated for use by the SHEP proposal could preclude construction of the Jasper terminal. Id. The Corps and GPA must address these issues in the FEIS and must coordinate with the SCPSA to ensure that the Project does not adversely affect South Carolina's overall interests in port development and navigation, as well as to ensure that all reasonable alternatives to and reasonably foreseeable impacts of the Project receive the legally mandated consideration.

Finally, for the reasons discussed in Sections II.B. and V, infra, the proposed Project does not satisfy South Carolina's regulatory requirements pertaining to the "critical areas" of the coastal zone impacted by the Project. "The critical areas are of vital importance to the State." S.C. Code Ann. Regs. § 30-11(A). The CMP therefore prohibits dredging and excavation that would "contribute to water quality degradation" or result in "lethal fish entrapments." S.C. CMP at III-56. It likewise prohibits dredging for public projects in wetland areas unless the activity is water dependant and there are no feasible alternatives. Id. And, recognizing that the "creation and maintenance of navigational channels" is a "specialized form of dredging activity" with "a potential for severe environmental impacts," the CMP provides that such activity "should meet a demonstrated public need." Id. The Corps' proposal cannot be squared with these policies.

IV. The Project Is Inconsistent with Georgia's Coastal Management Program.

The Project is inconsistent with Georgia's Coastal Management Program ("GCMP") and therefore the Georgia Coastal Resources Division ("CRD") should not concur with the Corps' determination of consistency. Under the Georgia Coastal Management Act, to attain consistency with GCMP, Georgia must determine that a project is consistent with state law regulating the state's coastal resources. See O.C.G.A. § 12-5-322(3), (12). For the following reasons, the Project does not comply with various state laws governing coastal resources and is inconsistent with the objectives of the GCMP.

The GCMP's missions is to "balance economic development in Georgia's coastal area with preservation of natural, environmental, historic, archaeological, and recreational resources for the benefit of Georgia's present and future generations." GCMP at 25. One of the primary laws furthering this mission is Georgia's Coastal Marshlands Protection Act (CMPA), O.C.G.A. §§ 12-5-280 et seq. The CMPA regulates activities and structures in the state's marshlands, intertidal areas, mudflats, waters bottoms, and tidal wetlands. The DEIS states that the Project "would affect wetlands within the jurisdiction of the [CMPA]." DEIS, App'x I at 29. Specifically, the Project would convert at least 337 acres of tidal freshwater wetlands in the Savannah National Wildlife Refuge to brackish marsh and would destroy 15.68 acres of salt marsh on the Black River. Id. at 29. Despite the significant impacts to these unique resources, the DEIS concludes that with mitigation in the form of preservation and restoration the project is consistent with the GCMP and CMPA. See id. at 30. Notably, however, the CMPA does not include or contemplate mitigation as means of offsetting destruction of marsh or wetlands under CMPA's jurisdiction. Setting aside the proposed mitigation, the Corps should conclude that the destruction of 337 acres of freshwater wetlands included in the Refuge is not consistent with the GCMP's objective of providing a "coastal zone in which the area and functional integrity of wetlands that impact the coastal region of Georgia are maintained." GCMP at 29. The destruction of hundreds of acres of coastal wetlands and marshlands renders the Project inconsistent with the GCMP.

Among its coastal objectives, the GCMP aims to "[p]rovide a coastal zone in which wildlife species listed as special concern, threatened, or endangered are recovered to healthy, viable populations." GCMP at 28. To effectuate this goal, the Project must be in compliance with Georgia's Endangered Wildlife Act ("EWA"), O.C.G.A. §§ 27-3-130 et seq. Under the EWA, the "destruction of the habitat of any protected animal species on public lands is prohibited." Ga. Comp. R. & Regs. r. 391-4-10-.06(a)(3). Appendix I's discussion of consistency with the EWA recognizes that the Project's dredging of the Savannah River will result in loss of habitat for the endangered shortnose sturgeon. DEIS, App. I at 33. Yet, Appendix I states that "[w]ith the proposed mitigation in place for the Shortnose sturgeon, the proposed Project is fully consistent with this policy." DEIS, App. I at 33. To the contrary, the language of the Georgia EWA is unequivocal, stating "the destruction of the habitat of any protected animal species on public lands is prohibited." Ga. Comp. R. & Regs. r. 391-4-10-.06(a)(3). The DEIS's conclusion that the Project is consistent with the GCMP is flat wrong because the Project violates the Georgia EWA.

An additional program objective is to "[p]rovide a coastal zone in which the integrity and

functioning of the sand-sharing system is maintained." GCMP at 29. Georgia's Shoreline Protection Act (SPA), O.C.G.A. §§ 12-5-231 et seq. is the state's primary legal authority on the protection and management of Georgia's sand-sharing system—including sand dudes, beaches, sandbars and shoals. Also, Georgia law addresses erosion caused by dredging for navigation purposes in tidal inlets, rivers, and harbors. O.C.G.A. §§ 52-9-1 et seq. It is state policy that there should be no net loss of sand from the island beaches because of dredging. O.C.G.A. § 52-9-1. The Corps' recent study concluded that existing dredging Project at the port has contributed to nearly eighty percent of Tybee Island's beach erosion. DEIS, App. I at 17. Yet, the Corps concludes that because the Project would "result in only minor changes in nearshore wave patterns" the Project "would be expected to have very little impact on the Tybee Island shoreline." Id. However, the Corps erroneously examines the Project's potential impacts in isolation, and fails to consider the cumulative impact of the Project and existing beach erosion. For these reasons, the Project is not consistent with the GCMP.

The Project is inconsistent with the objectives of the GCMP and Georgia law protecting water quality on the coast. The GCMP seeks to ensure "that permits approved for coastal area activities are designed to minimize negative impacts on water quality . . . ." GCMP at 26. As described in Section II.C., the GWQCA states "[e]xisting instream water uses and the level of water quality necessary to protect the existing uses shall be maintained and protected." Id. 391-3-6-.03(2)(b)(i) (emphasis added). The DEIS recognizes that the Project will have significant impacts on the dissolved oxygen DO levels in the Savannah River, a water body already listed as impaired for DO. The lowering of DO would have deleterious effect on the fish populations in the Savannah River, especially the endangered shortnose sturgeon. However, Appendix I's discussion of water quality is devoid of any discussion of lowering DO levels. See DEIS, App'x I at 64-65.

The GCMP requires that the port expansion be consistent with the Georgia Air Quality Control Act, O.C.G.A. §§ 12-9-1 et seq. It is undetermined whether Project is consistent with the air quality policy of the GCMP because, as described in Section I.E.1., the DEIS fails to adequately assess the Project's air quality impacts. The DEIS states that the Project would "improve ambient air quality in Savannah Harbor" because the "total number of container ships would decrease . . . ." DEIS, App'x I at 26. However, this bold assertion is based on a flawed economic assumption, is contradicted by other DEIS statements, and lacks supporting data (described in Section I.D.). A determination of consistency cannot be attained without requiring the Corps to further assess the effects of the Project on air quality.

V. The Corps Has Failed to Apply for and Is Not Entitled to a Critical Area Permit from DHEC.

The South Carolina Coastal Zone Management Act ("South Carolina CZMA") "was passed by the 1977 General Assembly of South Carolina to provide for the protection and enhancement of the State's coastal resources." S.C. Code Ann. Regs. § 30-1(A)(1) (2009). Pursuant to the South Carolina CZMA, "[e]xcept for those exemptions as specified in the 1977 Coastal Zone Management Act, as amended, any person wishing to alter a critical area must receive a permit from [DHEC]." S.C. Code Ann. Regs. § 30-2(B) (2009). The statute's enumerated exemptions exclude "[d]redge and fill performed by the United States Corps of

Engineers for the maintenance of the harbor channels and the collection and disposal of the materials so dredged." S.C. Code Ann. § 48-39-130(D)(4) (2009); S.C. Code Ann. Reg. § 30-5(A)(4) (2009). But, they do not similarly exclude a Project such as this one, which consists of "improvements to" and "expansion of" an existing navigation project. Corps, GPA, & DHEC, Joint Public Notice, at 1, 2 (Nov. 15, 2010). And, under the CWA, the Project must comply with the state's permitting requirements. See 33 U.S.C. § 1344(t).

The Corps, however, has not applied for the required critical area permit. The JPN lists a Section 401 water quality certification and concurrence with the Corps' coastal zone consistency determination as the only authorizations requested and believed to be required from South Carolina. JPN at 8. The Corps' failure to recognize its obligation to obtain the necessary permit has the potential to frustrate or lead to inefficiencies in DHEC's review, as DHEC processes applications for Section 401 certifications according to different procedures when an applicant seeks a critical area permit for the same project. See S.C. Code Ann. Regs. § 61-101(A)(7) & (8). And, early coordination is particularly important here, as the concurrence of not only DHEC, but also SCSPA, will be required. See S.C. Code Ann. Regs. § 30-11(B)(2) (requiring DHEC to obtain "a certificate from the South Carolina State Ports Authority declaring that the proposed project or activity would not unreasonably interfere with commercial navigation and shipping" before issuing a critical area permit for projects in waterways used for commercial navigation and shipping or in areas set aside for port development in an approved management plan).

While the Corps must submit an application if it wishes to proceed with the Project, it is important to note that the Corps would not be entitled to a permit due to the inconsistencies with the CMP policies and critical area regulations previously discussed. See supra at III.

VI. The Biological Assessment Prepared Pursuant to the Endangered Species Act Is Deeply Flawed.

Section 7 of the ESA requires that each federal agency "shall, in consultation with and with the assistance of [the expert service agencies] insure that any action authorized, funded or carried out by such agency . . . is not likely to jeopardize the continued existence of any" listed species "or result in the destruction or adverse modification" of the species' critical habitat. 16 U.S.C. § 1536(a)(2) (2010). Under the regulations implementing this consultation process, each federal agency is required to determine whether its activities "may affect" a listed species. 50 C.F.R. § 402.14(a) (2011). If it is determined that the agency action may affect listed species, formal consultation is required unless FWS or NMFS determines, based on the best available scientific evidence, that the action is "not likely to adversely affect" the species at all. 50 C.F.R. § 402.14(a) & (b).

If formal consultation is sought, such consultation will culminate in the issuance of a biological opinion. The "[b]iological opinion is the document that states the opinion of the Service as to whether or not the Federal action is likely to jeopardize the continued existence of the listed species or result in the destruction or adverse modification of critical habitat." 50 C.F.R. § 402.02 (2011). NMFS' and FWS' joint regulations define [j]eopardize the continued existence of" as "to engage in an action that reasonably would be expected, directly or indirectly

to reduce appreciably the likelihood of both the survival and recovery of a listed species in the wild by reducing the reproduction, numbers, or distribution of that species." 50 C.F.R. § 402.02. Courts have explained that "even where baseline conditions already jeopardize a species, an agency may not take action that deepens the jeopardy by causing additional harm." Nat'l Wildlife Fed'n v. Nat'l Marine Fisheries Serv., 524 F.3d 917, 930 (9th Cir. 2008). Additionally, under the applicable regulations, an action is "jeopardizing" if it keeps recovery "far out of reach," even if the species is able to still cling to survival. Id. at 931. Jeopardy therefore can be found not only where an action plunges a species towards extinction, but where it suppresses the species below the path needed for recovery.

If the biological opinion concludes that the proposed action is not likely to jeopardize a protected species, the project can be completed. If, however, the biological opinion concludes that "jeopardy or adverse modification exists, NMFS [or FWS] must suggest reasonable and prudent alternatives . . . that it believes would not violate section 7(a)(2) and that can be implemented by the action agency." Aluminum Co. v. Administrator, 175 F.3d 1156, 1159 (9th Cir. 1999) (citing 16 U.S.C. § 1536(b)(3)(A)). If no reasonable and prudent alternatives exist, the action agency can seek an exemption, cancel the project, or continue with the project and risk violating the ESA. "The action agency is technically free to disregard the Biological Opinion and proceed with its proposed action, but it does so at its own peril," as it could face liability under the ESA and invite a challenge under the Administrative Procedures Act. Bennett v. Spear, 520 U.S. 154, 170 (1997); see generally National Wildlife Federation v. Coleman, 529 F.2d 359, 371-72 (5th Cir. 1976).

Further, pursuant to the ESA, conferences between representatives of the action agency and the expert agency are required for all federal actions that are likely to adversely affect the continued existence of a species proposed to be listed, such as the Atlantic sturgeon. 16 U.S.C. § 1536(a)(4). If the proposed species is subsequently listed prior to completion of the action, the action agency (in this case, the Corps) must review the action to determine whether formal consultation is required. 50 C.F.R. § 402.10.

The Corps has prepared a biological assessment ("BA") for this Project evaluating the potential impacts of the deepening proposal on endangered and threatened species and has included it at Appendix B to the DEIS. DEIS at 6-2. The assessment is being coordinated with the FWS (jurisdiction over the Florida manatee, piping plover, and nesting sea turtles) and NMFS (jurisdiction over other protected marine and aquatic species which may occur in the project vicinity) pursuant to Section 7 of the ESA. DEIS at 6-2.

A. Shortnose Sturgeon

The shortnose sturgeon ("SNS") was listed as an endangered species in 1967. Causes for decline were attributed largely to overfishing, bycatch in other fisheries, habitat fragmentation mainly due to dams blocking migration to spawning habitats, and water quality degradation Protecting and restoring spawning habitats and river flow conditions in those habitats is an essential part of the species recovery plan. Reestablishing access to historical spawning habitat and ensuring the presence of proper environmental conditions that were once found during the river's natural state are paramount.

The GRR explains that "expected reductions in habitat volume for shortnose sturgeon range from -11.0 to +10.6 percent, depending on channel depth, life stage, and season." GRR at 163. The GRR states further that the results of the hydrodynamic modeling indicate that the impacts to shortnose sturgeon would not be substantially reduced by the initial mitigation plan and that "no measures were identified that could be implemented in the estuary that would restore sturgeon habitat or enhance existing habitats." GRR at 163. The Corps states further that "[s]ince no means of increasing the volume of acceptable habitat within the estuary could be identified, a fishway around the New Savannah Bluff Lock & Dam . . . was recommended." GRR at 163. According to the Corps, the proposed fishway around the dam would allow migrating fish to move upstream past the facility, which would open up an additional 20 miles of habitat upstream of the dam to reaches shortnose sturgeon had used historically. GRR at 164. The Corps contends that the horseshoe rock ramp design would also allow fish to move downstream, thereby allowing young fish spawned upriver to access other habitats needed in later life stages. GRR at 164. Against this backdrop, the BA concludes that "the proposed project may affect, but is not likely to adversely affect Shortnose or Atlantic sturgeon or their critical habitat." BA at 182. We strongly disagree with this conclusion.

To begin with, the Savannah River Estuary provides essential habitat for the continued existence of shortnose sturgeon, and the DEIS does not accurately characterize the effects of such a large-scale disruption to sturgeon habitat. See Expert Report of Shawn P. Young, Ph.D. at 3. Researchers have concluded that the Savannah River shortnose sturgeon population has not been successfully reproducing, and, according to Dr. Young, the proposed harbor deepening Project will likely have significant negative effects on the remaining population in the a number of ways.

This Project will result in a reduction in available habitat and require SNS to seek and select new home ranges of lesser quality. Young Report at 4-6. Sturgeon are bottom-feeders, and the proposed deepening Project will eliminate the benthic community in dredged areas. Young Report at 5-6. It will take years for this community to reestablish itself, and if it does, the benthic community may not be comprised of the same quality and quantity of prey items. Young Report at 5-6. The loss of feeding opportunities will require shortnose sturgeon to find and move to other areas that may or may not provide suitable prey items, and the increased expenditure of energy resulting from this increased movement would be detrimental to the population, resulting in poor health and lower reproductive potential. Young Report at 6.

The deepening Project will also lower DO levels in the harbor, which is a major concern for all fish and aquatic organisms. Young Report at 6. Low dissolved oxygen will affect re-colonization of benthic organisms after substrate dredging and may alter species presence and abundance after re-establishment. Young Report at 7. This will in turn affect sturgeon and other benthic fish feeding and nutrition. In light of the importance of the estuary to juvenile and adult sturgeon; the current low levels of dissolved oxygen; and the questions involving the effectiveness of the oxygenation system, Dr. Young believes the Corps has underestimated the threat of this proposal to sturgeon. Young Report at 7.

Another concern for SNS is the turbidity caused by re-suspension of sediments and the

pollutants that may re-enter the water column after sediment exposure. Young Report at 7-8. Although the DEIS states that a sediment study was conducted to determine chemicals present in solid sediments, it does not appear as if the Corps conducted actual exposure toxicity tests to determine how the deepening Project would impact sensitive species, such as SNS. Young Report at 7-8. These studies should be undertaken and will likely reveal that the SHEP will have substantial negative effects on species such as SNS beyond the level described in the DEIS. Young Report at 8.

As the DEIS and the GRR acknowledge, the deepening Project will also exacerbate problems related to saltwater intrusion. Young Report at 9. Juveniles prefer low levels of salinity, and juveniles experience decreased energy and aerobic capacity, resulting in decreased growth and survival as salinity levels rise. Changes in prey species abundance due to increased salinity, on top of dredging and low dissolved oxygen, "will likely have profound impacts on the entire estuarine fish community, including shortnose sturgeon, Atlantic sturgeon, and striped bass." Young Report at 9.

As noted previously, the DEIS that: "Neither the Corps nor the [resource] agencies could identify any measures that could be implemented in the estuary that would restore sturgeon habitat or enhance existing habitats." DEIS at 5-91. Instead, the Corps suggested a method of allowing fish to move by the lowest dam on the river, the New Savannah Bluff Lock & Dam (NSBL&D) at Augusta, Georgia, which is operated by the Corps. DEIS at 5-91. The theory behind this proposal is that a "fishway around the structure would allow migrating fish to move past the dam" and "would open up an additional 20 miles of habitat upstream of the dam to Shortnose sturgeon, reaches that they had used in the past." DEIS at 5-91. Although the concept of fish passage offers some potential benefits to fisheries more generally, the Corps' proposal is deeply flawed because, as explained below, sturgeon species are unlikely to use the fish passage facility proposed in this case. Young Report at 11-16.

B. Atlantic Sturgeon

Atlantic sturgeon is a long-lived, late-maturing, estuarine-dependent, anadromous species that can live up to 60 years and reach lengths up to 14 feet. Proposed Listings for Two Distinct Population Segments of Atlantic Sturgeon in the Southeast as Endangered under the ESA, 75 Fed. Reg. 61904, 61905 (Oct. 6, 2010). Historically, Atlantic sturgeon were present in 38 rivers ranging from Labrador south to the St. Johns River in Florida, with spawning occurring in at least 18 rivers. Id. at 61906. In the past, there were large numbers of Atlantic sturgeon in many rivers along the Atlantic coastline, but the population suffered from severe declines due to overfishing in the late 1800s. Prior to the collapse of the fishery, Georgia's rivers were estimated to have 11,000 spawning females. Id.

Despite a fishing moratorium imposed by NMFS in 1998, Atlantic sturgeon have continued to suffer negative impacts from a range of factors throughout its habitat. Today, the South Atlantic DPS is estimated to number less than 6 percent of its historic population. Atlantic Sturgeon Status Review Team, Status Review of the Atlantic Sturgeon (*Acipenser oxyrinchus oxyrinchus*) (2007). In this DPS, spawning has been confirmed in the Savannah, and on October 6, 2010, NMFS published its Proposed Listings for two distinct population segments of the

Atlantic sturgeon in the Southeast, the Carolina DPS and the South Atlantic DPS. See 75 Fed. Reg. 61904 (2010). The formal status review found that unintended catch of Atlantic sturgeon in fisheries, vessel strikes, poor water quality, dams, lack of regulatory mechanisms for protecting the fish, and dredging were the most significant threats to the fish.

As pointed out by Dr. Young, the DEIS lacks baseline information and an impact assessment on the Savannah River Atlantic sturgeon. Young Report at 9. The omission of discussion and impact assessment of a species proposed for listing as Endangered needs to be rectified, especially where it has been determined that the proposed activity under review – in this case, dredging – is an obstacle to the species' recovery. Young Report at 9. In addition to lacking baseline information, the main focus of impact evaluation, mitigation, and funded research has been placed on the shortnose sturgeon; however, the Atlantic sturgeon has been neglected. Young Report at 10.

As with shortnose sturgeon, the proposed deepening will have significant negative effects on the health and survival of Atlantic sturgeon. The proposal will likely adversely affect the continued existence of the species by (1) causing a reduction in available habitat and causing changes in summer and winter habitat selection with negative consequences likely; (2) requiring these species to find new foraging habitats if they avoid the project altogether or leaving these species without a source of food due to the elimination of benthic prey from the large-scale dredging; and (3) causing these species to suffer physiologically from potential changes in water quality, including lower dissolved oxygen, increased turbidity and pollutants, caused by re-suspension of sediments, and increased salinity. Young Report at 4.

Although shortnose and Atlantic sturgeon share common traits, the DEIS assumes that the life history and behavior of Atlantic sturgeon and shortnose sturgeon is so similar that the SHEP impacts and the mitigation package will have the same outcome for both species. Young Report at 10. Such an assumption is erroneous. Young Report at 10. For example, a recent study of juvenile sturgeon abundance on in the Hudson River Estuary, has found that juvenile shortnose sturgeon prefer habitats upstream of the saltwedge (low salinity), while juvenile Atlantic sturgeon prefer habitats downstream of the saltwedge (higher salinity). Young Report at 10. Other scientists have documented differences in life history, including temperature selection and spawning habitat preferences. Young Report at 10. As previously noted, there will be some similar impacts, but there is a strong likelihood that the two species will also suffer differently in other ways. Young Report at 10. Greater analysis, therefore, is required to determine the impacts to Atlantic sturgeon and what mitigation is needed to address the harm from this Project. Young Report at 10-11.

C. Proposed Mitigation and Sturgeon

As part of the SHEP mitigation package, the Corps has proposed a fishway at the New Savannah Bluff Lock & Dam ("NSBLD") near Augusta, Georgia, 150 miles upriver of Savannah Harbor, as mitigation for damages to shortnose sturgeon habitat in the estuary. Young Report at 11. The Corps was unable to identify any forms of mitigation within the estuary to offset the loss of critical juvenile rearing habitat. Id. Accordingly, the fishway is a trade-off intended to alleviate impacts to important juvenile habitat by allowing passage to upstream habitat. The

problem is that although a fishway might provide some benefits to other species, this proposal is highly unlikely to benefit sturgeon. According to Dr. Young, the DEIS fails to demonstrate that the proposed fish passage design – the Horseshoe Rock Ramp – will have success at passing either species of sturgeon. Id. The proposal also lacks a detailed fish passage plan listing objectives and goals for the species that would purportedly benefit from the facility. Moreover, for a fish passage facility to be effective, a suitable environment must be present above the dam to support spawning and the development of eggs, larvae, and juveniles. Id. at 11. Should sturgeon select the Augusta Shoals for spawning habitat, it will be important to ensure that proper flows and water temperature are provided. At present time, the release schedules from J. Strom Thurmond Dam (JST) do not provide adequate flows during certain times of year. Young Report at 13. The City of Augusta also diverts a significant portion of flow into the Augusta Canal, substantially reducing flow for fish and aquatic organisms. Id.

Even if it could be demonstrated that the Horseshoe Rock Ramp could be constructed at the NSBLD, modifications would likely be necessary to specifically accommodate sturgeon. Id. at 11. It is likely these changes would substantially increase the cost of the fish passage facility, and additional funding would be needed up front to ensure proper maintenance of the structure in perpetuity. The fish passage proposal would certainly require far greater levels of committed funding than currently proposed, and even then, it is uncertain that the proposed design will work here to address impacts to sturgeon. The most effective mitigation action would be the complete removal of NSBLD along with all other dams/obstructions upstream to the JST and those in the Stevens Creek Basin, a major tributary of the Savannah River between JST and the City of Augusta, in combination with a flow schedule designed to promote biological integrity. Id. at 12.

In light of these concerns and the others expressed in Dr. Young's report, we believe the Corps' conclusion that the "the proposed project may affect, but is not likely to adversely affect Shortnose or Atlantic sturgeon or their critical habitat" completely misses the mark. DEIS, App'x B at 182. To the contrary, Dr. Young believes that this Proposal "will directly reduce the likelihood of both the survival and recovery of shortnose and Atlantic sturgeon by reducing the reproductive fitness, numbers and distribution of each species." Young Report at 16. For these reasons, this Proposal weighs heavily in favor of the preparation of a biological opinion by NMFS to determine if the proposal will jeopardize shortnose sturgeon. We also believe that conference consultation is required for Atlantic sturgeon pursuant to 16 U.S.C. § 1536(a)(4).

D. North Atlantic Right Whales

This Project also threatens one of the most endangered marine mammals in the world – the North Atlantic right whale – with perhaps less than 300 still alive. DEIS, App'x B at 96. As NMFS has acknowledged, the death of even one right whale due to non-natural causes could lead to the extinction of the species. Moreover, the expansion of port facilities is particularly relevant for this imperiled species as "[c]ollisions with ships are the single largest cause of right whale mortality in the western North Atlantic." 71 Fed. Reg. 77,704, 77,710 (Dec. 27, 2006). According to NMFS:

The available evidence strongly suggests that the western population of North

> Atlantic right whale cannot sustain the number of deaths that result from ship strikes and fishing gear interactions. If the impact of these activities continues at current rates, it is likely to result in the *extirpation of the western population of North Atlantic right whales*. Given the low population size of North Atlantic right whales in the eastern Atlantic Ocean, the extirpation of right whales in the western Atlantic Ocean would render the entire species effectively extinct.

71 Fed. Reg. at 77,714 (emphasis added).

In assessing the threat of vessel strikes to right whales resulting from this proposal, the BA states as follows:

> Vessel traffic has increased in the harbor since the last deepening in 1994. The Corps expects the number of vessels that call at the Port will increase in the future in response to population growth in the Southeast. That growth is expected to occur With or Without the proposed harbor deepening. The Corps' economics evaluations indicate that deepening the Federal navigation channel would not increase vessel traffic using Savannah Harbor, but would instead allow a decrease in the number of vessel calls. The Fleet Forecast found within the Economic Appendix in the GRR, states that over the 50-year project time (from 2015 to 2065) the projected number of vessels arriving at Savannah Harbor would be substantially higher for the existing -42 foot depth than for the proposed deepening to -48 feet. The reason for this decrease of vessels with a deeper navigation channel is the same volume of cargo could be carried by fewer, larger vessels as could be carried by a vessel fleet with a higher proportion of smaller vessels. In addition, in excess of 70 percent of the vessels presently do not call on Savannah Harbor at their maximum capacity or design draft. The "light loading" of vessels increase costs to the shipper, which are eventually passed onto the consumer. The proposed deeper channel would allow these "light loaded" vessels to increase their loads to their maximum capacity, thereby decreasing the number of vessels calling on the Port of Savannah.

DEIS, App'x B at 121. In other words, the Corps contends that fewer whales will be struck by vessels if the Project is completed because fewer ships will be calling on the harbor. As explained above, this position is based on an assumption that is not shared by the shipping community. The shipping community, including GPA, believes that the growth of the container traffic at the harbor will accelerate if the harbor is deepened. If GPA and the shipping community is correct, then there will be greater numbers of ships calling on the harbor. Reliance on this flawed assumption here undermines the evaluation of the Project's potential impact on right whales. Further, as discussed in Section I.D.4., the channel appears to be designed in such a manner as will require ships to travel at a speed in excess of the 10 knot speed restrictions.

E. Sea Turtles

Four federally listed, endangered sea turtle species, the Kemp's ridley (*Lepidochelys kempii*), leatherback (*Dermochelys coriacea*), loggerhead (*Caretta caretta*) and the hawksbill

(*Eretmochelys imbricata*), and one threatened species, the green (*Chelonia mydas*), feed in and migrate through the waters affected by the SHEP. GPA's proposal threatens harm to sea turtles due to the proposed dredging activities. Specifically, channelization of inshore and nearshore habitat and the disposal of dredged material in the marine environment can destroy or disrupt resting or foraging grounds and may affect nesting distribution through alteration of physical features in the marine environment. In addition, the associated lighting can negatively affect nesting activities. Moreover, the BA ignores the threat to turtles of ship strikes despite the fact that boat strikes have been identified as a significant and growing threat to sea turtles. Boat collisions can cause immediate death to turtles or severely debilitate them, leading to infection and decreased reproductive fitness. The frequency of injury from propellers and collisions is higher in areas where recreational boating and vessel traffic are intense. Recovery Plan for U.S. Population of Atlantic Green Turtle (1991) at 9 and Recovery Plan for U.S. Population of Loggerhead Turtle, Second Revision (2008) at I-56. Presumably, the BA ignores the threat of boat strikes, as it does with right whales, due to its conclusion that the Project will result in fewer, not more, ships over time.

F. Manatees

The West Indian manatee inhabits coastal, estuarine, and riverine systems in the southeastern United States, the Greater Antilles, eastern Mexico and Central America, and south to northeastern Brazil. About 3,000 West Indian manatees remain in the United States. The Florida subspecies (*T. manatus latirostris*) occupies the northern end of the species' range. These manatees occur primarily in Florida and southeastern Georgia. According to the Florida Manatee Recovery Plan, the most significant problem presently facing manatees is death or serious injury from boat strikes. U.S Fish and Wildlife Service, Florida Manatee Recovery Plan *(Trichechus manatus latirostris)*, Third Revision, at 23. The BA states that in 2008 the Georgia Department of Natural Resources indicated it had recovered three male carcasses in the Savannah River and that "[a]ll three were located at the downtown Savannah waterfront and apparently died from ship propeller lacerations (e.g. one was cut in half)." DEIS, App'x B at 83. Again, the BA does not even mention or assess potential impacts due to increased shipping activity as a result of the Project.

For these reasons and others, the DEIS and GRR fail to adequately assess or accurately disclose the effects of the Proposal on federally endangered and threatened species such as Shortnose sturgeon, North Atlantic right whales, sea turtles, manatees, and other wildlife. For these reasons, the Corps' determination that the Proposal may affect, but is not likely to adversely affect these species, is erroneous, and we believe formal consultation with NMFS and FWS is required.

VII. Consultation Pursuant to the Magnuson-Stevens Fishery Conservation and Management Act and the Fish and Wildlife Conservation Act.

A. Essential Fish Habitat Consultation.

Beyond the ESA, inter-agency consultation is also required under the Magnuson-Stevens Fishery Conservation and Management Act, 16 U.S.C. §§ 1801 et seq. (the "Magnuson-Stevens

Act"). That Act requires that a federal agency "shall consult with [NMFS] with respect to any action authorized . . . or proposed to be authorized . . . that may adversely affect any essential fish habitat ["EFH"] identified under this Act." 16 U.S.C. § 1855(b)(2); 50 C.F.R. § 600.920(a). For "any federal action that may adversely affect EFH, Federal agencies must provide NMFS with a written assessment of the effects of that action on EFH." 50 C.F.R. § 600.920(e)(1). The assessment must include, among other things, an analysis "of the potential adverse of the action on EFH and the managed species." 50 C.F.R. § 600.920(e)(3)(ii).

Although the DEIS includes an Essential Fish Habitat Evaluation, DEIS, App'x S, it is or understanding that EFH consultation has not yet commenced.

B. Fish and Wildlife Coordination Act.

Finally, coordination with the between the Corp and FWS is required pursuant to the Fish and Wildlife Coordination Act, 16 U.S.C. § 661 et seq. That law provides that "whenever the waters of any stream . . . are proposed or authorized to be . . . deepened . . . or modified for any purpose whatsoever, including navigation," the agency proposing, authorizing or permitting the action "shall first consult" with the FWS and with the "head of the agency exercising administration over the wildlife resources of the particular State wherein the . . . facility is to be constructed, with a view to the conservation of wildlife resources by preventing loss of and damage to such resources . . . ." 16 U.S.C. § 662 (emphasis added). The DEIS includes a draft Fish and Wildlife Coordination Report, in which FWS expresses substantial concerns about the Proposal, including the dissolved oxygen injection system and the impacts to fisheries. DEIS, App'x E. Coordination pursuant to the Fish and Wildlife Coordination Act must be completed before the Project can proceed.

VIII. The Mitigation Proposal Is Inadequate.

Although much of our letter already includes comments regarding specific elements of the mitigation package, we briefly summarize some of our chief concerns here:

A. Global Concerns.

- Overall, it does not appear as if the Corps has made much of an effort to comply with the new rules for compensatory mitigation under the CWA. On April 10, 2008, EPA and the Corps issued a Final Rule on Compensatory Mitigation for Losses of Aquatic Resources under section 404 of the Clean Water Act. See 73 Fed. Reg. 19,594-19,687 (Apr. 10, 2008) (codified at 40 C.F.R. § 230.91 and 33 C.F.R. §§ 325 and 332) (hereinafter referred to as the "Mitigation Rule" or the "Rule"). A central feature of the new Rule is the use of a watershed approach for purposes of all forms of mitigation. See 33 C.F.R. § 332.3(c)(1) ("The ultimate goal of a watershed approach is to maintain and improve the quality and quantity of aquatic resources within watersheds through strategic selection of compensatory mitigation sites."). The Rule states that:

> The district engineer must use a watershed approach to establish compensatory mitigation requirements in DA permits to the extent

> appropriate and practicable. Where a watershed plan is available, the district engineer will determine whether the plan is appropriate for use in the watershed approach for compensatory mitigation. In cases where the district engineer determines that an appropriate plan is available, the watershed approach should be based on that plan. Where no such plan is available, the watershed approach should be based on information provided by the project sponsor or available from other sources.

33 C.F.R. § 332.3(c). Although the DEIS includes statements indicating that the Corps "evaluated several sites within coastal Georgia," DEIS 5-6, for example, there is no indication that the Corps attempted to follow the Mitigation Rule's requirements relating to the utilization of a watershed approach or other key features of the Rule.

- Moreover, the mitigation package as a whole includes a great degree of uncertainty. As explained in greater detail in Section II.A.2.(d), the funding required for the elements of the proposed mitigation package is not assured by either the Corps or GPA. In fact, as explained above in Section II.A.2.(d), it is our understanding the funding needed to ensure that the dissolved oxygen injection system, for example, is maintained and operated in perpetuity will be subject to the precarious federal appropriations process. Without assurance that the proposed mitigation measures will be adequately funded, there can be no confidence in the success or effectiveness of the package as a whole. This approach again runs counter to the Mitigation Rule, which as explained above in Section II.A.2.(d), specifically provides that the "district engineer *shall require* sufficient financial assurances to ensure a high level of confidence that the compensatory mitigation project will be successfully completed, in accordance with applicable performance standards." 33 C.F.R. § 332.3(n)(1) (emphasis added).

B. Mitigation for Direct Wetland Impacts Is Flawed.

This Proposal would cause direct impacts to as many as 14.08 acres of wetlands. JPN at 4. To compensate for the direct impacts of 14.08 acres, the Corps has proposed grading down a former dredge spoil site to an elevation that would allow the growth of *Spartina alterniflora*. DEIS at 5-6. We have the following concerns:

- The proposed location for the mitigation for the 14.08 acres of direct impacts to wetlands is "a previously used sediment placement area (CDF 1S) within Savannah Harbor." DEIS at 5-6. According to the Corps, this area, which is located adjacent to the confluence of the Front River and the Middle River and is within the Refuge, was identified as having the "greatest opportunity to support the long term success of a restored salt and brackish marsh system." DEIS 5-6. The proposed restoration includes grading it down to an elevation that would allow the growth of *Spartina alterniflora*. DEIS at 5-6. If the site does not naturally revegetate as expected, the Corps would plant *Spartina* to provide the basis for subsequent growth across the site. DEIS at 5-7. It is not clear why the Corps does not simply re-plant *Spartina* from the outset. Moreover, it also unclear at what point the Corps will decide to re-plant the site and how extensive the re-planting will be. For example, Table 5-2 presents the "Revegetation Rate for Created

Marsh," but it does explain whether, for example, the Corps will initiate planting activities if 15 percent vegetative cover is not attained in year one. Finally, if the Corps does decide to re-plant, the DEIS does not specify how extensive such planting will be.

C. Mitigation for Indirect Wetland Impacts Is Lacking.

This Proposal would cause indirect impacts to as many as 1,212 acres of freshwater tidal wetlands (the Corps estimates this number will be reduced to 337 acres as a result of proposed flow-altering modifications). DEIS at 5-13; JPN at 4. After investigating and rejecting sites where indirect wetland impacts could be mitigated through restoration, enhancement, or creation, the DEIS indicates that the Corps began to focus on preservation opportunities. DEIS at 5-31 – 5-35. In exchange for impacting 337 acres of freshwater wetlands, the Corps has proposed preserving 2,683 acres of wetlands. DEIS at 5-35.We have the following concerns about the proposal to mitigate for indirect impacts.

- Part of the mitigation package relating to impacts to tidal freshwater marshes is to implement several flow-altering modifications of the river. As discussed above in Section I.A., it was not possible at this time to perform a rigorous review of the Corps' modeling completed in connection with the Project, and we remain concerned about the significant uncertainty regarding the ability of the flow-altering modifications to limit indirect impacts to 337 acres. Moreover, we are further concerned that proposed changes to the hydrology of the river may have unintended consequences. For example, while limiting damage to the tidal freshwater wetlands, the changes in hydrodynamics may have unintended effects to fisheries, including shortnose sturgeon, Atlantic sturgeon, and striped bass.

- We are concerned about the Corps' decision to rely on the Savannah District's Standard Operating Procedure for Compensatory Mitigation (March 2004) (the "SOP") since the SOP was designed to provide guidance for projects involving ten acres of impact or less. The SOP states that it "is applicable to regulatory actions requiring compensatory mitigation for adverse impacts to 10 acres or less of wetland or other open waters" and that the "SOP may be used as a guide in determining compensatory mitigation requirements for projects with impacts greater than the above wetland and stream limits, or for enforcement actions, *however, higher than calculated credit requirements would likely be applicable to larger impacts.*" SOP at 1 (emphasis added). In light of the extent of impacts from this Proposal to resources of national importance, we recommend that the Corps adopt a far greater ratio for preserving wetlands.

- The Mitigation Rule underscores the importance of providing in-kind mitigation for unavoidable impacts to "difficult-to-replace" aquatic features, such as freshwater tidal wetlands: "For difficult-to-replace resources (e.g., bogs, fens, springs, streams, Atlantic white cedar swamps) if further avoidance and minimization is not practicable, the required compensation should be provided, if practicable, through *in-kind* rehabilitation, enhancement, or preservation since there is greater certainty that these methods of compensation will successfully offset permitted impacts." 33 C.F.R. § 332.3(e)(3) (emphasis added). We understand the Corps' position that it was difficult to identify

preservation opportunities involving freshwater tidal wetlands; however, if in-kind mitigation cannot be undertaken here, we believe that strongly counsels in favor of far more preservation mitigation as provided for in EPA Region 4's Mitigation Policy.

D. Dissolved Oxygen Injection System Cannot Be Relied On.

- As discussed previously above in Section II.A.2.(d), we have serious doubts relating to the proposal to utilize the oxygenation system for purposes of mitigating the impacts associated with the lowering of already low levels of DO in the water column. In addition to not being able to verify the Corps' modeling results at this time, we are already skeptical of the proposal given the results of the demonstration project, which indicated that any reported benefits were within the natural ranges of variability. Moreover, it is highly dubious that such a system can be maintained and run effectively in perpetuity, especially in light of the fact that funding for its maintenance and operation is not even assured.

E. Fish Passage Is Unlikely to Benefit Shortnose Sturgeon.

- As explained above, in Section VI.C., the Corps has proposed a fishway at NSBLD as mitigation for damages to shortnose sturgeon habitat in the estuary. The DEIS fails to demonstrate that the proposed fish passage design – the Horseshoe Rock Ramp – will have success at passing SNS. The proposal also lacks a detailed fish passage plan listing objectives and goals for the species expected to benefit from the facility. Moreover, for a fish passage facility to be effective, a suitable environment must be present above the dam to support spawning and the development of eggs, larvae, and juveniles. Even if it could be demonstrated that the Horseshoe Rock Ramp could be constructed at the NSBLD, modifications would likely be necessary to specifically accommodate sturgeon. It is likely that these changes would substantially increase the cost of the fish passage facility, and additional funding would be needed up front to ensure proper maintenance of the structure in perpetuity. The fish passage proposal would certainly require far greater levels of committed funding than currently proposed, and even then, it is uncertain that the proposed design will work here to address impacts to sturgeon. The most effective mitigation action would involve the complete removal of NSBLD along with upstream modifications to promote a flow schedule designed to promote biological integrity.

F. Striped Bass Mitigation Proposal Is Weak.

- We are troubled about the proposal to provide a lump sum payment in exchange for significant impacts to the striped bass fishery. Such a proposal should only be considered as a measure of last resort. If no alternative measures can be identified to protect the existing fishery, this proposal must be significantly expanded as impacts to spawning habitat will likely be greater than predicted. Young Report at 3. The Corps has proposed to fund at a 20 percent spawning habitat loss level, but this amount falls well short of what would be needed. Young Report 15. In fact, the Corps has previously underestimated impacts from estuary modifications to the striped bass population in the 1970s and 1980s. Id. The Tide Gate and Diversion Canal installed in the late 1970s and

operated through the 1980s caused a 96 percent decline in striped bass reproduction, prompting a moratorium on striped bass fishing and harvest for an extended period of time. Id. The losses were a result of saltwater intrusion and hydrodynamic changes negatively impacting spawning and the survival of early life stages, and a major re-stocking effort was needed to rebuild the population. Id. To avoid repeating the mistakes of the past, the Corps should anticipate funding at a 100 percent loss level with funding made available prior to initiation of the Project.

- The stocking program, as Dr. Young recommends, should ensure striped bass broodstock are of Savannah River genetic origin, and genetic testing should be conducted before annual aquaculturing occurs. Id. at 16. The Savannah River striped bass are known to be genetically distinct from other river systems. Id. Striped bass in the many Atlantic and Gulf Coast rivers have some distinct physiology and behavior that increases success in the natal system, but may be a liability in restoring populations with genetics outside the natal system. Id.

IX. The Corps' Adaptive Management Plan is Deficient.

In Appendix D of the DEIS, the Corps explains that because the Project is so complex and because the environmental responses to the Project are so uncertain, the Corps will employ "adaptive management" to ensure that certain impacts to the environment caused by the Project will be fully mitigated. DEIS, App'x D at 3. As the Corps relates in Appendix D:

> The Savannah Harbor Expansion Project . . . has the potential to adversely affect nationally important resources. In addition, since predictions are made about future effects to biological resources, there is a degree of uncertainty about the impacts which the recommended action would actually produce. Those uncertainties include both the accuracy of the predictive impact tools and the biological responses that will occur as a result of changes in the environment.

DEIS, App'x D at 3. The Corps defines the adaptive management process as "evaluating the accuracy of the predicted environmental impacts, assessing the effectiveness of the mitigation features, and modifying the project as needed to ensure the levels of environmental effects predicted in the [EIS] are not exceeded." Id.

For the wetlands mitigation component of the Project, the Corps must adhere to the requirements of the Corps' Mitigation Rule, which defines adaptive management as follows:

> *Adaptive management* means the development of a management strategy that anticipates likely challenges associated with compensatory mitigation projects and provides for the implementation of actions to address those challenges, as well as unforeseen changes to those projects. It requires consideration of the risk, uncertainty, and dynamic nature of compensatory mitigation projects and guides modification of those projects to *optimize performance*. It includes the selection of appropriate measures that will ensure that the aquatic resource functions are provided and involves analysis of monitoring results to identify potential problems of a compensatory mitigation project and the identification

and implementation of measures to rectify those problems.

33 CFR §332.2 (emphasis added). The Corps has boiled this process down to the following elements: "Predict → Mitigate → Implement → Monitor → Adapt." DEIS, App'x D at 3. All five of these elements are central to effective adaptive management.

To ensure that the adaptive management works correctly, the Corps must develop an adaptive management plan, which the Corps' mitigation rule defines as follows:

> (12) *Adaptive management plan.* A management strategy to address unforeseen changes in site conditions or other components of the compensatory mitigation project, including the party or parties responsible for implementing adaptive management measures. The adaptive management plan will guide decisions for revising compensatory mitigation plans and implementing measures to address both foreseeable and unforeseen circumstances that adversely affect compensatory mitigation success.

33 CFR §332.4(c)(12) (emphasis added). The Corps' adaptive management plan for the Project as set forth in Appendix D of the DEIS is deficient in several respects.

A. There is no Guarantee that Adequate Money will be Available to Fund Mitigation Triggered by the Adaptive Management Plan.

As the Corps explains in its adaptive management plan, there are five components to a adaptive management – predicting impacts, developing appropriate mitigation for those impacts, implementing the mitigation, monitoring the mitigation, and adapting the mitigation as necessary. DEIS, App'x D at 3. The Corps has not made adequate provisions in its adaptive management plan to ensure that the fifth element – adapting the mitigation – will be completed. If, for instance, the chloride levels in the tidal freshwater wetlands reach levels higher than expected and many more of these rare wetlands are degraded as a result, then more wetlands mitigation would be required than is provided for under the adaptive management plan. And under the Corps' plan there is no guarantee that money will be available for such mitigation because the necessary funds will have to be approved by the Administration and appropriated by Congress on a yearly basis. In the current of climate of fiscal restraint, there is no assurance that Congress would appropriate money for additional mitigation for a civil works project that would, by that time, be completed.

The other federal agencies that have to sign off on the Project with the Corps – the EPA, the Department of Interior, and the Department of Commerce – have repeatedly sought assurances that the money for monitoring and adaptive management will be available when it is needed.[31] Likewise, the SHEP Stakeholders Evaluation Group has demanded as much.[32] According to an internal Corps memorandum, the Corps cannot make such assurances. Instead, it appears that the Corps is seeking to have the Georgia Department of Transportation, the local sponsor, place in an escrow account its share, as well as the federal share—approximately $48

[31] Savannah Harbor Expansion Project (SHEP) Monitoring and Adaptive Management Funding Customer Funded Escrow, Savannah District Fact Paper, p. 2, June 25, 2010 (Revised July 9, 2010).
[32] Id.

million total—of the monitoring and adaptive management costs.[33] By establishing this escrow account, at least this amount would not be subject to the whims of Congress. It does not appear, however, that the Corps has been successful in convincing the local sponsor to set aside this money, because the adaptive management plan in the DEIS only suggests that the local sponsor "may" establish an escrow account for *its share* of the monitoring and adaptive management monies. DEIS, App'x D at 32. The federal share would still need to be appropriated by Congress on a yearly basis. Id. Thus, the validity of the Corps' adaptive management plan is still very much in play.

On top of the uncertainty surrounding the funding of the monitoring and adaptive management components of the Project, there is a significant question as to whether the adaptive management sums incorporated in the plan are sufficient. For example, the adaptive management plan allows $1,341,500 for the purchase of additional wetlands if the wetlands mitigation incorporated in the project mitigation plan proves insufficient. Id. at 34. This figure represents only 5 percent of the mitigation costs the Corps included in the wetlands mitigation plan. The Corps does not explain why it chose this amount. Without more, this calculation is arbitrary and capricious.

Furthermore, the Corps does not explain what happens if the harbor deepening destroys far more wetlands than the Corps has predicted. If, for instance, the Project destroys 15 percent more wetlands than the Corps predicts, will the Corps mitigate for those wetlands destroyed that are above the Corps' 5 percent "cap"? This is especially important because there is such a disparity in the amount of wetlands that are at risk as a result of the Project. If the "replumbing" of the estuary works correctly, the Corps predicts that 337 acres of freshwater wetlands will be destroyed. DEIS, App'x C at 54. But if the re-plumbing does not work according to plan this number could be significantly higher.

In a similar vein, the Project calls for the use of three "Speece cones" to increase dissolved oxygen levels in the harbor. Id. at 95. If more Speece cones are needed to raise dissolved oxygen levels to acceptable levels, the adaptive management cost schedule only authorizes the Corps to spend an additional 10 percent for more Speece cones. DEIS, App'x D at 34. It would seem, based on the Corps' numbers, that this amount would not even cover one additional Speece cone. This is alarming when one takes into account that it was not that long ago that the Corps was suggesting that as many as twenty-nine Speece cones would be needed for the Project.[34] As the FWS has pointed out, it is inappropriate to use the performance goals for the Project as the thresholds for remedial action under the adaptive management plan.[35] Because of the uncertainty of the models, the actual impacts of the proposed Project could differ substantially from the predicted impacts.[36] Consequently, the amount of funding set aside for adaptive management should be increased to 10 or 15 percent of the initial cost of construction of the various mitigation components. And this additional amount should be included in the cost of the Project.

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[33] Id.
[34] See SEG Meeting Transcript at 101 (Feb. 14, 2006).
[35] See Letter from Cynthia K. Dohner, Regional Director, U.S. Fish & Wildlife Service, to Col. Jeffrey Hall, U.S. Army Corps of Engineers at 2 (Sept. 9, 2010).
[36] Id.

B. The Modeling Undertaken for the Project Does not Appear to Take into Account other Pollution Control Activities that are Occurring on the Savannah River.

The Federal Modeling Performance Goals do not seem to recognize that other pollution control efforts are ongoing on the Savannah River upstream of the harbor. For example, to come into compliance with the TMDL for dissolved oxygen, upstream dischargers will be undertaking projects to reduce their contributions of biological oxygen demand to the River. These efforts could have a significant impact on dissolved oxygen levels in the harbor. If the Corps fails to take this into account in its monitoring, then it will not get a true reading of whether or not certain components of the adaptive management plan should be triggered. In other words, the Project should not be able to escape its obligations to increase dissolved oxygen levels because upstream dischargers are acting responsibly.

C. The Monitoring Component of the Adaptive Management Plan Is Deficient.

The preconstruction monitoring for physical characteristics and biological resources should be extended to three lunar cycles to ensure an accurate baseline is established. In addition to wetlands and shortnose sturgeon, the Atlantic sturgeon and stripped bass should be monitored. Also, a monitoring plan should be developed to cover the planting of vegetation at the brackish marsh creation site. Furthermore, if additional mitigation is required under the adaptive management plan, the current plan only allows for one year of additional monitoring. This period should be increased to three years. Finally, the proposed long-term monitoring plan appears to be funded for only one year past the initial 5-year post-construction monitoring period. If this long-term monitoring is dependent on future Congressional appropriations, it is unlikely that this monitoring will ever take place. The Corps needs to find a way to better assure that this monitoring will be funded.

Conclusion

We appreciate the opportunity to submit these comments on the proposal to deepen the Savannah Harbor. For the reasons described herein, we believe the Proposal raises serious concerns under the National Environmental Policy Act, the Clean Water Act, the Endangered Species Act, and other state and federal laws and regulations. Our review of the DEIS and Draft GRR reveal that the Corps has failed to provide the public with a meaningful opportunity to review a major, publicly-funded infrastructure project by not providing timely access to the numerous models relied upon by the Corps in rendering its analysis. Until the public is afforded the ability to rigorously review the Corps' analysis, the Corps has frustrated the goals of NEPA by severely limiting public input.

Additionally, the Corps' underlying assumption that this Project is unrelated to the growth of the Georgia Ports Authority's underlying business defies reality, the consistent position of GPA, and the Tier I EIS. In making this suspect assumption, the Corps has undermined its economic analyses and undermined the environmental studies by failing to evaluate many of the negative effects associated with this Proposal. If the Corps is correct that

the Project is unrelated to the Port's underlying business, then there is no need to deepen the channel to keep Savannah Harbor competitive. Moreover, even if this Project could generate transportation efficiencies, the Corps has failed to determine that any savings would benefit the American public. Further, in light of questions raised regarding the ability of the proposed channel to safely accommodate fully-loaded Post-Panamax ships, the stated rationale for this Project is greatly diminished, especially when weighed against the substantial economic costs and environmental impacts.

And finally, the Corps has simply failed to consider a sufficient range of alternatives for accommodating the anticipated larger class of containerships. The refusal to consider whether the federal government could deepen a different port in the Southeast more cost effectively and with fewer impacts on the environment is deeply troubling, especially in these difficult economic times when federal dollars are in short supply. For these and other reasons stated above, we respectfully request that the Corps remedy the significant flaws in the DEIS and Draft GRR before proceeding with this Proposal.

Sincerely,

Christopher K. DeScherer

William W. Sapp

Enclosures

cc: William G. Bailey, Corps
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Heather Preston, DHEC
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Pace Wilber, NOAA Fisheries
Jane Greiss, FWS
Heinz Mueller, EPA
Jennifer Derby, EPA
Robert Lord, EPA
Allen Barnes, Georgia EPD
Keith Parsons, Georgia EPD
Spud Woodward, Georgia CRD

Exhibit A

Savannah pres

Georgia Ports Authority

DEEPWATER TERMINALS: Savannah • Brunswick
BARGE TERMINALS: Bainbridge • Columbus
TRADE DEVELOPMENT OFFICES: Savannah • Brunswick • Atlanta • New York • Oslo • Athens • Tokyo • Singapore • Hong Kong • Seoul • Sydney • Melbourne

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NEWS

For Immediate Release
July 13, 1998

SAVANNAH, GEORGIA U.S.A.-- The Georgia Ports Authority (GPA) has refined its plan to deepen the Savannah Harbor Navigation Channel by proposing to give state and federal government environmental agencies veto power over the project if their environmental concerns are not satisfied.

GPA Executive Director Doug J. Marchand said Monday, "We all recognize that the ports authority has the responsibility to provide for the economic development of Georgia and the entire multi-state geographic area which we serve. We also have the responsibility to be the best possible steward of the environment. For that reason, we are proposing what I believe to be an unprecedented plan to allow environmental resource agencies to help shape and to pass judgment on our plan to deepen the Savannah harbor."

The proposal comes as GPA is nearing completion of a study to determine the economic, engineering, and environmental feasibility of deepening the navigation channel. The next phase would be Congressional authorization to proceed with the design of detailed engineering plans that include advanced studies of the impact of the project on wildlife, fish and plant habitats, water quality, and properties adjacent to the navigation channel.

The final phase—construction of the project— can only proceed upon approval of a satisfactory Environmental Impact Statement and after Congress and the State of Georgia approve construction funding.

GPA has also identified the locally preferred plan for project depth. "After discussions with our present steamship line customers and our negotiations with potential new lines concerning the draft needs of the future, it was determined that the optimum draft for Savannah is -48'," Marchand said. "This would accommodate vessels currently planned, provide adequate under-keel clearance, and best suit carrier needs." The initial study used a depth of -50' to assess maximum impacts. The National Economic Development (NED) plan, which considers the highest net federal benefit and determines federal interest in cost-sharing a project, is also established at -48'.

The GPA plan provides the framework for environmental agencies to work with the GPA and the Corps of Engineers through a "stakeholders evaluation group" to identify the scope of the scientific studies which are required to measure any environmental impacts that might occur at various increased depths of the channel. The agencies could prevent further consideration of the project if agreement cannot be reached on the scope of the studies.

In the event studies proceed, the environmental agencies next would review the data the studies produce. When environmental impacts are predicted, the studies will include a proposal to avoid, minimize or mitigate those impacts. The agencies could prevent further consideration of the deepening project if it is determined that the mitigation plan is inadequate.

The GPA proposal is based on a draft initially proposed by the Georgia Department of Natural Resources. The proposal has been discussed with the agencies, and was transmitted to them in revised draft form on Friday. Ports authority representatives will begin meetings with the agencies on Tuesday to review details of the plan. GPA also will ask Members of the Georgia Congressional delegation to include the final version of the plan in the provision of the Water Resources Development Act of 1998 (WRDA 98) that would authorize the Savannah deepening project subject to satisfactory resolution of all environmental concerns.

Marchand said, "We recognize that the public and the state and federal environmental organizations all have legitimate concerns about the impact of any new activities in the sensitive Savannah River basin. We have been working for more than a year to identify and address those concerns and our proposal is insurance to all involved that we are prepared to fully address their concerns. However, we cannot even begin to study their concerns unless the deepening project is included in WRDA 98."

GPA considers increased channel depth to be vital to continued growth of port activities in Savannah. More than half of the container vessels currently calling at the port must either load to less than capacity or wait for high tides in order to safely transit the channel. Because of the trend of steamship companies to increase efficiency by increasing vessel size, it is anticipated that deep draft vessel calls will increase by over 445 percent over the next 50 years.

A 1997 economic impact study estimates that Georgia's public and private terminal operations directly or indirectly support 80,100 jobs, are responsible for $1.3 billion in wages, generate $23 billion in revenue and account for $565 million in state and local taxes each year.

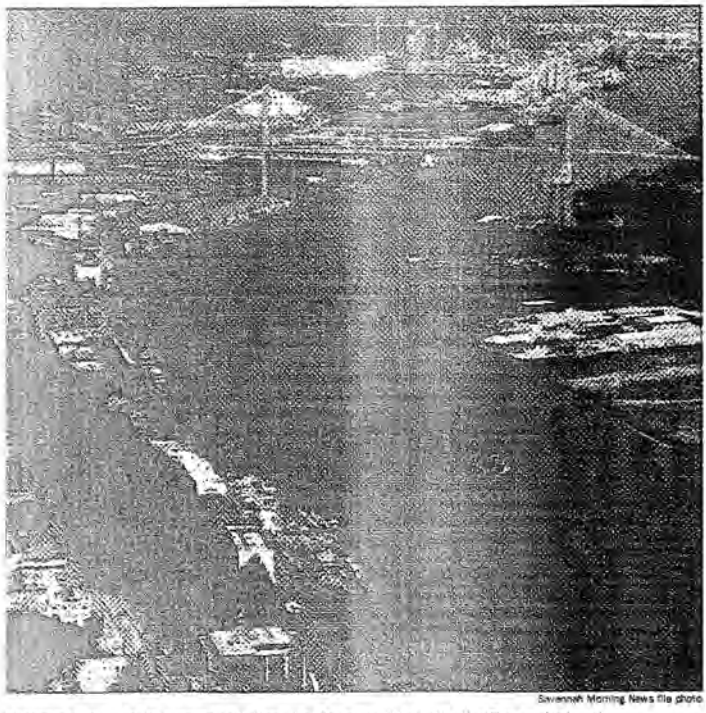
The Georgia Ports Authority operates modern and efficient deepwater port facilities in Savannah and Brunswick, Georgia and provides value added services to facilitate international trade. Inland barge terminals operated under the auspices of the Georgia Ports Authority are located in Bainbridge and Columbus, Georgia.

Visit the GPA website at http://www.gaports.com

For additional information, please contact James C. McCurry, Manager, Legislative Affairs at 912-964-3806 (800-342-8012) or via E-mail at jmccurry@gaports.com

Exhibit B

Approval for river deepening in peril



Savannah Morning News file photo

Deepening the harbor in Savannah will keep the city competitive with other Eastern Seaboard ports.

Savannah Morning News, Thursday, October 8, 1998

River

Continued from page 1A

one's going to be final minute if at all."

The Georgia Ports Authority has already spent $6 million to study the feasibility of deepening the harbor. The project is estimated to cost $200 million.

The Senate has approved a version of the bill, but the House must approve its version. Then a House/Senate conference committee must work out any differences.

The bill to fund the water act has the full support of the Senate, said Julie Robinson, spokeswoman for U.S. Sen Max Cleland, D-Ga.

But failure by Congress to act before it adjourns for the year could cost Savannah dearly in economic benefits from the ports, which provided 67,638 ports- and transportation-related jobs statewide in 1997.

Savannah ports officials previously have said that increased container cargo here could provide an additional 9,300 jobs (mostly in Georgia), $1.7 million in Georgia wages, $15 million in national sales and revenues, and $34,000 in state and local taxes.

Ports officials are locked in a battle with Charleston, S.C., to be named the third of what's expected to be only three megaport hubs on the Eastern Seaboard. Ports in New York and Virginia likely have a lock on the other two slots in the "hub-and-spoke" system — similar to how airlines operate — that is being devised for East Coast ports. The system, in which the hubs would funnel shipments to the smaller ports, is in reaction to a new breed of huge container ships plying international waters.

In Savannah, officials estimate port traffic could drop by nearly 50 percent long-term if the local port doesn't achieve "hub" status.

Charleston, S.C., already is lowering its harbor from 40 to 45 feet, with work to be completed in 2003.

"It is essential that we deepen the Savannah navigation channel in order that the port of Savannah remain competitive in the U.S. South Atlantic range," Swinson said. "And that Georgia's ports continue to act as a catalyst in helping to contribute to the economic growth and prosperity of the state."

Funding for the deepening project would take place over the next several years, Swinson said. But, he added, "everything is contingent on the results of the design phase."

Typically, the Water Resources Development Act is a biannual piece of legislation, Swinson said, meaning no action could push local plans back two years. However, Congress could come back and act on the bill in 1999.

A dispute over a California dam is the main reason the legislation has stalled, Kingston said. At issue is a disagreement between two California congressmen over how to control flooding in Sacramento from the American River.

"If they can get this done it will pass," Kingston said. "If they can't, the whole thing becomes a split."

Sam Drake, refuge manager for Savannah Coastal Refuges, said he's keeping a close watch on what Congress does.

Drake is concerned that deepening the channel would lead to salt-water intrusion into freshwater marshes.

Intrusion could threaten various plant species and wildlife, such as cypress trees, striped bass and short-nosed sturgeon, he said.

"I feel like it's a little premature to authorize the project," Drake said. "The best we can hope for is language in the bill that allows resource agencies to have input into the recommended depth to make it the least environmentally damaging."

But Kingston said if the act passes, people with concerns will still be able to give input to the dredging process.

"I'd hate to start all over again," he said. "It would be difficult to get back to where we are."

Legal issues reporter Ben Schmitt can be reached at 652-0366.

Exhibit C

7-6-98 SMN

Deepening harbor will keep ports competitive

By Doug I. Marchand

Georgia's ports have long played an important role as a catalyst in the economic growth and prosperity of our state. Today that role and the state's ability to aggressively attract cargo, create jobs and promote industrial development stand to be greatly diminished if plans to deepen the Savannah harbor fail.

Marchand

As ocean carriers force new alliances, everyone wants efficient strategies for vessel deployment and moves in the construction of larger vessels capable of carrying 5,000-7,000 TEUs. TEU is a unit of measurement for determining the number of containers in 20-foot equivalent units. Example: One 40-foot long container equals 2 TEUs. It is essential that Georgia's ports remain competitive and ready to meet the challenges of the international shipping community.

Over the past several years the size and capacity of container vessels, which at present account for more than 60 percent of the Port of Savannah's total tonnage, have far exceeded the levels previously predicted.

Specifically, container vessels currently calling the Port of Savannah, some are nearly more than 900 feet in length and carrying more than 4,000 TEUs, were previously not projected to call Savannah. (America's 100-largest container ports by another 25 years.)

As a result of the rapid growth in the size of today's container vessels, combined with the increase volume of cargo handling the port's facilities, the Savannah River navigation channel is not capable of adequately accommodating many of the vessels now calling the port.

The inadequate channel depth has forced over 20 percent of container ships calling Savannah in 1999 to either load to less than capacity or to wait for high tides to safely transit the channel. Such operational restrictions lead to dramatic increases in transportation costs, which are ultimately passed on to consumers.

Research indicates that for every two-foot deficiency in channel depth encountered by a vessel, ocean carriers experience additional operating costs exceeding $2 million per year. Ultimately, these operational constraints and resulting operational costs have port users to seek more reliable and cost-effective port facilities.

From Fiscal Year 1989 through the end of Fiscal Year 1997 [illegible] out of Georgia's Deepwater Port Application has [illegible] million tons of cargo. During that same period, cargo volume at the Port of Savannah has increased 52.6 million tons.

resent the Georgia Ports Authority's 11th consecutive year of growth with FY98 totals surpassing 11.4 million tons, an increase of 11 percent over FY97 figures. At the Port of Savannah, FY98 tonnage will surpass 8.7 million tons, a 4-percent increase over the previous 12-month period and a 39-percent increase over FY88.

This 10-year period encompasses two significant events in Savannah: the opening of the new Talmadge Bridge and the deepening/widening of the navigation channel. Without benefit of these projects, we would not have enjoyed the increase in tonnage nor the corresponding increases in economic productivity measured in terms of jobs, personal incomes, sales revenue and state/local taxes.

A recent study of growth projections in the U.S. South Atlantic port range for container movement forecasts averages greater than 5.5 percent annually over the 2000 to 2050 study period, while imports of containerized goods are forecast to increase at an average annual rate of 3.9 percent during the same time.

The Port of Savannah's estimated growth in TEUs is projected to average 4.2 percent per year over the study period. This translates into an estimated growth in TEUs, beginning in 2000, of 52 percent every 10 years for 50 years.

The projected growth will be carried on larger and larger vessels, compelling the need to deepen the navigation channel. If a deepening project is not undertaken, projected growth and larger vessels cannot be accommodated.

In addition to accommodating the movement of commercial traffic, the Port of Savannah is renowned for its reputation and role in supporting the rapid deployment of U.S. military equipment and personnel. The U.S. Army conducts regular deployment readiness exercises via the Garden City Terminal.

Results of a 1997 economic impact study indicate that Georgia's public and private terminal operations directly or indirectly support 80,100 jobs, are responsible for $1.8 billion in wages, generate $53 million in revenue and account for $60 million in state and local taxes annually.

The impact of the port industry on not only the Savannah area, but to the more than 7.5 million Georgians statewide, is tremendous. As the world market continues to grow, so must the size of container vessels and the ability of the modern port to handle critical vessel requirements if it is to retain its customers.

It is imperative that Georgia continue to grow as a center of international commerce and that this and future generations of Georgians reap the rewards of a port prepared to accommodate the ongoing and diverse needs of the international shipping community.

Doug Marchand is executive director of the Georgia Ports Authority.

Exhibit D

Expert Report of Robert N. Stearns, Ph.D.

I. Experience and Qualifications

I have had a 40-year career as both teacher and practitioner in public policy and economics. The Corps of Engineers Civil Works program has been a major focus of my work, starting in 1976 when I served as an economist for the U.S. Coast Guard (Department of Transportation) and continuing today in my capacity as a consultant. For nearly ten years (1986-1995), I worked for the Department of the Army, first as a senior policy advisor for the Corps' Civil Works program and later as Deputy Assistant Secretary for Project Management. In these capacities, I had extensive experience in developing new policies and presenting ideas to Congress, the Office of Management and Budget (OMB) and other high ranking government officials. More recently, I served as a senior analyst for the National Academy of Public Administration for its 2007 study, "Prioritizing America's Water Resources Investments: Budget Reform for Civil Works Projects at the U.S. Army Corps of Engineers."

These experiences have given me an extensive knowledge of Corps water resources projects and a wide range of planning and budgetary issues. While my primary focus has been on the economics of transportation projects, my responsibilities have required me to be fully informed on virtually every aspect of the Civil Works program.

My career includes 15 years teaching economics, quantitative methods, and statistics at the college level, most recently as an adjunct professor at the University of Maryland's School of Public Policy. I received a Ph.D. in economics from Yale University and a B.A. in mathematics from Swarthmore College.

II. Materials Reviewed

In performing this work, I have reviewed all of the following:

- Draft General Re-Evaluation Report for Savannah Harbor Expansion Project Chatham County, Georgia and Jasper County, South Carolina, 15 November 2010 (GRR).
- Economics Appendix to above referenced GRR, November 2010.
- Multiport Analysis, Savannah Harbor Expansion Project (attachment to Economics Appendix), July 2006.
- Savannah Harbor Expansion Project Deep-Draft Channel Improvements Economic Analysis: Commodity Projections (attachment to Economics Appendix), August 2004.
- Savannah Harbor Expansion Project Regional Port Analysis (Attachment to Economics Appendix), July 2007.
- Engineering Investigations, Savannah Harbor Expansion Project, Chatham County, Georgia and Jasper County, South Carolina Draft, November 10, 2010.

- Draft Tier II Environmental Impact Statement for Savannah Harbor Expansion Project Chatham County, Georgia and Jasper County, South Carolina. 15 November 2010.
- U.S. Army Corps of Engineers, Savannah Harbor Expansion Project web site.
- Relevant newspaper articles available on the internet.

III. Summary

I have been retained by the Southern Environmental Law Center (SELC), which is preparing comments on the Savannah Harbor Expansion Project (SHEP). SELC has requested that I review and evaluate the economic analyses that the Army Corps of Engineers (Corps) has performed for SHEP. Specifically, I have been asked to provide my expert opinions on the following subjects:

(i) whether the Corps performed an appropriate National Economic Development (NED) analysis on SHEP;

(ii) whether the Corps performed the "multi-port analysis" correctly;

(iii) whether the air draft issues involving the Talmadge Bridge were adequately considered in the economic analysis;

(iv) whether the purported benefits of the project will accrue to the United States or will be spread around the international community; and

(v) to what extent will this project help the United States meet other primary national economic goals.

Based on my background, education, training, experience, and the materials I have reviewed prior to formulating my opinion, I have concluded the following:

(i) statements by the Georgia Ports Authority (GPA) and other business and community leaders indicate their belief that this project is needed for the port's underlying business, thereby contradicting the Corps' contention that the port's growth rate will be the same with or without the project. The GRR and the DEIS fail to rectify these divergent views;

(ii) the Corps' so-called "multi-port analysis" and "regional port analysis" are based on inconsistent assumptions and fail to address the most important question of which port (or ports) in the southeast could be enlarged to accommodate the Post-Panamax ships with the least cost and fewest environment impacts;

(iii) the Corps' forecasts made in 2004 did not anticipate the 2008-09 international economic downturn and therefore are overly optimistic in predicting future

container traffic levels. Less container traffic reduces project benefits. The Corps' attempts to account for this downturn are inadequate;

(iv) the trend in larger ships calling at Savannah, induced in part by the deeper channel, may create new incentives to raise the Talmadge Bridge to accommodate even larger ships, leading to significant additional costs that taxpayers will have to bear;

(v) the Corps fails to acknowledge that many of the so-called "national" economic benefits from the cost savings associated with the proposed improvements to the port may actually accrue to foreign manufacturers and shipping lines rather than U.S. consumers and industries, and consequently the Corps fails to raise important national policy issues that should have been considered;

(vi) the benefits of deepening U.S. ports such as Savannah to reduce the cost of imports must be seriously weighed against the impact this has on the competitive position of U.S. manufacturers in international commerce; and

(vii) the Corps provides no evidence that any permanent jobs will result from the Port expansion, especially in light of the analytical assumption that the Port of Savannah's market share will not change because of the expansion.

IV. The Corps' Assumption that Deepening is Unrelated to Market Share is Contrary to Views Held by the GPA and Others in the Port Community.

The Corps' Planning Guidance Notebook states that in conducting a "National Economic Development" analysis, the Corps must base its analysis on the most likely with- and without-project scenarios.[1] In analyzing this project, the Corps assumed that the growth rate of the port as measured by tonnage received and shipped would be the same regardless of whether the port was deepened or not:

> Under with-project conditions, *the same volume of cargo is assumed to move through Savannah Harbor*, however, a deepening project will allow shippers to load their vessels more efficiently or take advantage of larger vessels. This is the main driver of the NED benefits.[2]

This "assumption" is repeated in the Corps' Multiport Analysis:

> [U]nder a 'least total cost analysis' with-project conditions [a deeper channel] should not be expected to shift any containerized cargo away from

[1] U.S. Army Corps of Engineers, Planning Guidance Notebook (Corps Planning Guidance Notebook), ER 1105-2-100, p. 2-6 (April 2000).
[2] U.S. Army Corps of Engineers Savannah Harbor Expansion Project, Draft Economics Appendix (Economics Appendix), p. 30 (November 5, 2010)(emphasis added).

competing ports for the major benefiting services and their current deployments.[3]

There is no doubt that the GPA believes that market share would be lost if the harbor is not deepened. GPA spokespersons have stated repeatedly that failure to deepen the harbor will put Savannah at a substantial competitive disadvantage and that without the harbor deepening, the container traffic through the port would remain at its current level or may even decrease as larger ships decide to call on other, deeper ports. Curtis Foltz, the new executive director of the GPA, recently stated in a speech to the House and Senate appropriations committees: "The ships and jobs will only come to Savannah if the harbor is deepened."[4] Mr. Foltz has also said that, "The Savannah harbor deepening project is critically important to continued economic growth in the southeastern United States."[5] Expanding still further, Mr. Foltz commented recently that, "expanding the Port of Savannah is a linchpin to the continued competitiveness of Georgia, the Southeast and indeed the United States in the global economy."[6]

In fact, the GPA is so convinced that deepening the harbor is going to have a dramatic impact on container traffic that it is reported to be ready to spend $20.4 million[7] to have the Corps dredge an extra foot so the harbor will reach a depth of 48 feet instead of the 47 feet that the Corps selected as the plan with greatest net benefits. In addition, GPA "expects to spend another $1.1 billion on cranes and rail yards to accommodate twice as many containers [by 2020]."[8]

The Corps acknowledged that shippers have similar views:

> Each of the carriers interviewed were very supportive of channel modifications at Savannah Harbor and stated that without a deeper channel, shipping inefficiencies would worsen given the growth in cargo and the increased vessel sizes.... The carriers emphasized repeatedly that East Coast ports would need to be able to receive loaded Post-Panamax vessels upon Panama Canal expansion or risk losing services to ports which can accommodate this traffic.[9]

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[3] U.S. Army Corps of Engineers, Multiport Analysis for the Savannah Harbor Expansion Project, p. 103 (July 2006)(Multiport Analysis).

[4] Walter C. Jones, *Georgia Ports' New Boss Makes Case for Harbor Deepening*, Savannah Morning News, January 20, 2010.

[5] Mary Carr Mayle, *Kingston: Harbor Deepening Still Very Much Alive*, October 3, 2010, http://savannahnow.com/news/2010-10-03/kingston-harbor-deepening-still-very-much-alive.

[6] Curtis J. Foltz and Mark Holifield, *Expanded Port Means More Jobs*, Atlanta Business Chronicle November 19, 2010, http://bizjournals.com/atlanta/print-edition/2010/11/19/expanded-port-means-more-jobs.html.

[7] Mary Carr Mayle, *Harbor Deepening Gets Big Boost*, Savannah Morning News, July 17, 2010. The Corps has estimated the incremental construction costs from 47 to 48 feet to be 33.4 million. GRR at 180. All of these incremental costs must be picked up by the local sponsor.

[8] Dan Chapman, *Atlanta Leaders Push for Deeper Savannah Port*, The Atlanta Journal-Constitution, December 1, 2010, http://www.ajc.com/business/atlanta-leaders-push-for-762157.html.

[9] Economics Appendix at 29.

Retailers also agree. For example, Mark Holifield, the Home Depot executive in charge of logistics, has remarked that, "It is critical to maintain the competitive advantage that Savannah provides to Georgia and the region," because "if trade advantages shift, we would have to re-evaluate our investments" by considering other ports.[10]

Politicians, too, have touted the expansion as a big boon to the economy. U.S. Representative Lynn Westmoreland recently said the following:

> This expansion will increase the freight capacity of the port of Savannah by 20 percent, all the while creating 10,800 new jobs and $242 million in additional income for employees. Some federal investment in this project would provide a significant return for the American taxpayer while bringing one of our country's top ports into the next generation of ocean commerce.[11]

Likewise, Georgia's new governor, Nathan Deal, just announced Georgia's willingness to add another $32 million dollars to the project.[12] This amount is on top of the $150 million that the state has already guaranteed.[13]

Even the Corps itself has cast some doubt on its own assumption that serves as the foundation of its NED analysis, as the following statement shows:

> Harbor development remains the most likely action to adversely affect the salt and brackish marshes remaining in the Savannah River estuary. *Harbor deepening would increase the amount of goods brought into the Savannah port.* This could trigger the need for additional distribution centers and other support facilities or the expansion of existing ones. These new or expanded support facilities could impact wetlands. In-kind mitigation would be required where wetland impacts are unavoidable.[14]

In light of the divergent views between the Corps' economic models and the shipping community's assessment of the effect the project would have on container traffic, the Corps has not adequately explained why its assumption is valid and the shipping community's assessment is invalid. The answer to this question is paramount because:

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[10] Dan Chapman, *Atlanta Leaders Push for Deeper Savannah Port*, The Atlanta Journal-Constitution, December 1, 2010, http://www.ajc.com/business/atlanta-leaders-push-for-762157.html.

[11] Lynn Westmoreland, *Westmoreland: Obama—Support Harbor Deepening*, Savannah Morning News, October 30, 2010, http://savannahnow.com/column/2010-10-30/westmoreland-obama-support-harbor-deepening.

[12] Aaron G. Sheinin and James Salzer, *Deal Warns of Cuts, Promises Progress in First State of the State*, The Atlanta Journal-Constitution, Jan. 12, 2011.

[13] Mary Carr Mayle, *Kingston: Harbor Deepening 'Still Very Much Alive,'* Savannah Morning News, Oct. 2, 2010.

[14] Draft Tier II Environmental Impact Statement for Savannah Harbor Expansion Project Chatham County, Georgia and Jasper County, South Carolina, p. 33, November 15, 2010 (emphasis added).

- if the Corps is correct, then there is no need to deepen the channel to keep Savannah Harbor functional and competitive; or

- if the shipping community is correct, then the Corps' economics analysis is fundamentally flawed because the Corps' NED analysis rests on its assumption that the with and without project scenarios would produce the same amount of container traffic.

The following example is not taken from any Corps document, but it will help to illustrate that if traffic levels are not the same for the with- and without-project conditions, then some of the Corps' assumptions and conclusions are flawed. In this hypothetical example, a year after the deeper Panama Canal is opened, a shipper has decided to import 1,000 twenty-foot containers from the Far East into the United States through Savannah. If the Channel depth at Savannah is 42 feet, he will hire a Generation One Post Panamax ship to carry this cargo.[15] If the Channel depth is 48 feet, he will hire a Generation Two Post Panamax ship,[16] which will allow the shipper to save $20 per container.[17] As a result, use of the bigger ship and deeper channel will result in a total cost savings of $20,000 for the shipper. In the Corps' economic analysis, this savings could be added to other similar savings to obtain the major component of the anticipated project benefits.

If GPA and other members of the shipping community are correct, the failure to deepen the harbor may lead the shipper to look for a deeper port that can accept the bigger ship. This will most likely be a cost-based decision. It may mean, for example, that instead of using Savannah at 42 feet, the shipper might choose Norfolk as the port of entry. The savings associated with switching ports could be as much as $19,999.[18] But for purposes of this example, if the savings associated with switching to Norfolk are only $9,000, then the benefits attributable to a deeper Savannah Harbor would only be $11,000 instead of the full $20,000 that results from the Corps' assumption of no-diversion. This hypothetical shows that project benefits could be smaller if the shipping community is right about Savannah Harbor losing traffic if the channel is not deepened. And, if the project benefits are smaller than calculated by the Corps, then net benefits (benefits minus costs), which drive the decision for a deeper channel, will also be less than reported in the NED analysis.

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[15] Assumption Two listed in the "Summary of Assumptions" is that "[Post Panamax] ships will call on the Savannah Harbor in both the without and with-project conditions on the larger trade routes which are currently constrained by the Canal." Economic Appendix at 74. In the without project case, this can be accomplished by such actions as "riding the tide" (Economics Appendix at 23-24), or not using Savannah as the first port of call into the South Atlantic Coast (Economic Appendix at 12).

[16] *See* Assumption Three in the Economics Appendix at 74.

[17] According to the Corps' Multiport Analysis, the cost savings per twenty foot container (TEU) for vessels moving from the Far East (FE) to the East Coast of the United States (ECUS) and thence to Europe (EU) will be $18.74. Multiport Analysis, Table 39 at 100.

[18] The savings associated with switching to Norfolk could not be more than $20,000 because if this were true, the shipper would be using Norfolk, *with or without* the deeper harbor at Savannah. Of course, land shipment costs to the final destination must also be factored into the analysis.

V. The "Multi-Port" Analysis Omits Material Factors and is based on Inconsistent Assumptions.

For purposes of the multiport analysis, the Corps has failed to adequately consider the interplay between different ports and competing port expansions. Economic principles dictate that to be complete, a comprehensive multiport analysis for SHEP should include each of the following study elements:

(i) the extent to which the port of Savannah would lose or gain container traffic depending on whether deepening occurs and to what depth;

(ii) the effect deepening of Savannah Harbor would have on container traffic at other neighboring ports;

(iii) whether instead of deepening multiple ports on the eastern seaboard, a single "super port" should be created with the other ports functioning as "feeder" ports; and

(iv) whether, in light of the limited availability of federal funds, the Federal government could deepen a different port in the southeast more cost effectively and with fewer impacts on the environment.

The Corps' NED approach to study elements (i) and (ii) is to assume that there would be no traffic gains or losses (see Section IV above). These questions are then revisited extensively in the Corps' Multiport Analysis that was completed in July 2006. The conclusion of this study, based on "least cost routing" models, is that deepening Savannah Harbor would not divert traffic from other ports. This finding is consistent with the Corps' NED assumption that market share is independent of channel depth, yet (as described above), conflicts with the position of the port community.

Study element (iii) is covered in the Corps' Regional Port Analysis that was completed in July 2006. This study element was motivated by stakeholder concerns:

> [S]ome project stakeholders expressed that there should be a study of allocating Federal improvement funds at one regional port in the South Atlantic range, rather than deepening several ports. They seemed to believe that this would make sense economically (since fewer funds would be expended) and environmentally (since the impact of dredging would only occur at one port rather than at several).[19]

The Corps methodology was (1) to assume that all growth traffic in the South Atlantic port area would flow through the designated "super port;" and (2) to evaluate whether or not any of the existing ports had the existing or planned terminal capacity to accommodate the traffic:

[19] U.S. Army Corps of Engineers, Savannah Harbor Expansion Project Regional Port Analysis (Regional Port Analysis, p. 1 (July 2007).

> A regional port concept that concentrates existing capacity and/or future growth in demand at a particular "port" in the region was examined by *shifts in port throughput* (Table 6) *and shifts in growth of container volumes among adjacent ports* (Table 7).[20]

The Corps' conclusion is that a "super port" concept would not work because no port has the (current and planned) land side capacity to handle the entire growth potential for the southeast Atlantic Coast.

As an initial matter, it is interesting to note that for purposes of this report, the Corps has concluded that deepening *can* affect market shares, an assumption clearly at odds with the NED analysis. In addition to this inconsistency, the Regional Port Analysis is flawed because the authors failed to at least consider the possibility that ports would still be able to compete successfully for at least some of the projected growth traffic even if they were in competition with a single "super port." If the authors had considered this possibility, they might have come to a significantly different conclusion. For example, with the construction of a so-called "super port," it is possible (consistent with the assumption of the Corps Regional Port Study) that as the overall level of traffic grows, most of the incremental containers shipped to the East Coast would arrive on Post Panamax ships and that those ships would almost always call on the super port.

It would seem more likely that even with a super port, smaller ships would still make direct calls on smaller ports and light-loaded larger ships would as well. Unless the Corps cannot rule out this more likely scenario, then it cannot assume that all incremental cargo shipped to the East Coast would head directly to the super port. The conclusions of the Regional Port Analysis, however, conveniently support the scenario of deepening multiple ports. By failing to consider the possibility that smaller ships would still make direct calls on smaller ports and larger ships would continue to light load, the stakeholders concerns have not been adequately addressed. At the same time, the inconsistency in the assumptions of the Regional Port Analysis that deepening *can* affect market shares are in stark contrast to the Corps' other study elements and are a major weakness in the Corps' overall analysis.

By focusing on terminal capacity constraints, the Corps' Regional Port Study missed a major opportunity to develop a strategic plan for federal spending on port improvements throughout the Southeast Atlantic Coast region. This question, clearly one of the stakeholder concerns as acknowledged by the Corps (see above) is equivalent to my Study Element (iv). It was apparently not considered even though it is a critical issue of national importance. With limited federal resources available for port development projects, it is essential to determine where incremental port development funding can be most efficiently spent.

By failing to determine where incremental port development funding can be most efficiently spent, the Corps has not completed a rational and complete assessment of the

[20] Id. at 7 (emphasis added).

benefits and costs of this project. If, for example, there is only sufficient funding to deepen one harbor in the southeast at this time and another already-existing port in the region could be deepened to 48 feet for $200 million and cause limited environmental impacts, whereas the Savannah Harbor project will cost over $500 million dollars and will cause greater environmental impacts, it would make little sense to move forward with SHEP. Without this type of comparison, the NED analysis is flawed.

VI. The Traffic and Fleet Forecasts Used by the Corps Likely Overstate Project Benefits in a Significant Way.

The projected benefits for this project depend crucially on two forecasts. The first is the baseline commerce measured in either tons or in the number of containers[21] that Savannah is predicted to import or export. The second is the world fleet of container ships available to use in the delivery of these products to or from Savannah. The trade forecasts are a statistical projection of past trends and are "optimistic" in the sense that future levels far exceed current levels.[22]

Historically, economies and trade between nations has grown in correlation. The recent downturn in world economies is a significant departure from the long-term trends and may be a more important indicator of possible changes in this trend. The trade data (from U.S. Census) shows that imports fell 21 percent between 2008 and 2009, while exports fell by 13 percent.[23] These same statistics (available through November 2010) show that while there has been a rebound in 2010, this rebound is not likely to bring trade back to the 2008 level.

By using baseline commodity forecasts completed in 2004, the Corps could not have anticipated these recent events. Since lower traffic levels mean fewer project benefits, changes in the world economy could seriously alter the basic benefit/cost equation. The Corps "considered" the dip in trade in one of its sensitivity scenarios and concluded that it would reduce project benefits by only one percent.[24] The recent economic downturn appears to have affected the Corps' forecasts, but only slightly.

This conclusion raises two important questions. First and most obviously: is it based on sound economic analysis? While the Corps "used" 2009 data in its sensitivity scenario, it did not simply use 2009 traffic as its new forecasting baseline. Instead, it calculated a baseline by taking the average for trade-route specific data from 2005 through 2009.[25] Thus, the downturn was given only a 20 percent weight in a revised baseline. This procedure is arbitrary and raises serious questions about the projected

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[21] While there is some non-container port traffic, the argument for deepening Savannah Harbor is based primarily on the effect it would have on container ship traffic.
[22] For example, the expected level of imports in 2020 is predicted to be almost twice the level in 2008.
[23] U.S. Census Trade Data is available at http://data.usatradeonline.gov/View/dispview.aspx . Percentage drops are based on containerized vessel tonnage only. 2010 data is available only through November. While year to date exports through November are almost at 2008 levels, imports remain well below 2008.
[24] GRR at 232.
[25] A fuller (although not complete) explanation of the methodology of this sensitivity analysis is given in the Economics Appendix at 119-120.

totals for future years, especially in the next decade. As a consequence of the procedure chosen, the Corps' forecast for 2010 is significantly higher than actual tonnage. The forecasts predicted that container traffic (combined exports and imports) would be 10.1 percent higher in 2010 in comparison to 2008.[26] Using Census data that is now available through November 2010, the actual tonnage (while rebounding from the extraordinary losses in 2009), is only 0.1 percent above the 2008 levels.[27]

The second question is: if commodity forecasts should be lowered, what difference would it make? If traffic is growing at a slower rate, the benefits may not even exceed project costs, a possibility that the Corps acknowledges:

> This is not to say that there are no future circumstances in which there is not a plan with benefits exceeding costs, but rather such circumstances are not likely. For example, a no-growth or very low-growth scenario with substantially less PPX vessels, such as Sensitivity 9, could result in plans wherein benefits do not exceed costs.[28]

Even if the Corps' conclusion that such scenarios are not likely, with actual traffic failing to meet the Corps' short term forecasts, consideration should be given to delaying the start of the project. Because net benefits are calculated by discounting future years, the project's net benefits and benefit-to-cost ratio may actually be higher with a later startup date. Postponing construction may not only be better from a benefit/cost (NED) perspective, but it would also support the broader federal objective of deficit reduction that has become a critical national priority. In light of these concerns, the Corps should include a sensitivity scenario that gives greater weight to recent trade data and show what happens to project economics if the trade developments are significantly below the baseline forecasts. A full evaluation of this scenario would include consideration of timing alternatives for the project and disclose the comparative benefits and costs of differing construction schedules. Failure to conduct this analysis would be unreasonable.

VII. The Corps Dismisses the Possibility that a Deeper Channel May Induce Even Larger Ships and thereby Ignores the Cost of Raising the Talmadge Bridge.

As larger and larger ships enter Savannah Harbor, new issues arise concerning the safety of the trip. One particular concern is the Talmadge Bridge that allows vehicular traffic to cross over the Savannah River between the harbor facilities and the open ocean. This issue was considered, and the Corps reached a conclusion that it would not be an issue for the ships expected to be used in Savannah. The problem was described as follows:

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[26] *See* Economics Appendix at 40-41.

[27] Census data is available at http://data.usatradeonline.gov/View/dispview.aspx. To estimate full 2010 figures (December amounts are not yet available), the 2009 share of traffic in December was assumed to be the same as the 2010 share of traffic in December.

[28] Economics Appendix at 129.

> The Talmadge (Savannah River) bridge has an air draft height of 185 ft. above MHHW, as per design drawings provided by Georgia DOT. See Figure 6.2.4.3-1. This height is based on the lower edges of the span above the navigation channel. Height above MHHW actually ranges from 192 ft. to 200 ft. in the middle of the span. The 185 ft. distance is used by the Savannah Harbor pilots as the official (conservative) air draft of the bridge.
>
> * * *
>
> The Savannah office for the USCG deferred to the Savannah River Harbor Pilots Association for restrictions on air draft. The Savannah River Harbor Pilots Association stated that there was no official policy regarding the air draft of vessels coming into the harbor. From information gained, a vessel's air draft is provided to the pilot and the Coast Guard before the vessel enters the channel. One carrier interviewed stated they use 3 ft as minimum allowance.[29]

The Corps concludes that the Talmadge Bridge presents no air draft problems for Generation Two Post-Panamax ships, the so-called "design vessels" that are expected to call at Savannah if the Harbor is deepened to 48 feet:

> USACE was provided with proprietary information listing vessels that were considered to make up the design fleet. The "workhorse" for the projected fleet is expected to be an 8200 (+/- 400) TEU [Generation Two] vessel. The upper height limit for these vessels was listed at 62 m (meters) or 157 ft for the design draft of 47.6 ft. Even if the superstructure was raised 10 ft to accommodate another tier of containers and the vessel was light loaded by an additional 10 ft (any more would not be economically considered according to IWR), the air draft would only increase to 177 ft which is still within an acceptable tolerance considered by the Savannah River Harbor pilots.[30]

So, the Corps' "worst case" scenario would involve the ship missing the bridge by 8 feet. Since the minimum "safe" distance appears to be 3 feet, the Talmadge Bridge does not present a height restriction problem for the ships the Corps expects to see entering the harbor. Simply stated: "Neither the design vessel nor the design fleet mix will violate the air draft restriction presented by the Talmadge (Savannah River) Bridge."[31] The key to this conclusion is the word "design." It is inevitable that larger ships will be built (Generation Three Post-Panamax ships). In fact, the Corps baseline forecast of Post-Panamax fleet composition shows Generation Three ships becoming 18 percent of the total fleet by 2015, up from the current share of two percent.[32] Not surprisingly, given the information provided above, the Corps expects that such ships would encounter problems going under the Talmadge Bridge:

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[29] Engineering Investigations, Savannah Harbor Expansion Project, Chatham County, Georgia, and Jasper County, South Carolina, Draft, November 10, 2010, pp. 65-67. MHHW stands for "Mean Higher High Water."

[30] Id. at 68-69. "IWR" refers to the Corps' Institute for Water Resources.

[31] Id. at 69 (November 10, 2010).

[32] Economics Appendix at 52 (see Table 28).

> Another major constraint at Savannah is the Talmadge Memorial Bridge, a 20-year old, cable-stayed bridge, which provides a vertical clearance of 185 feet. The keel-to-mast height of the Emma Maersk is reported to be 251 feet, so even after adjusting for tide and retractable masts, its air draft exceeds the allowable clearance of the bridge. If such vessels do indeed call at Savannah, they would need to be light loaded considerably.[33]

The Corps contends that the larger Generation Three ships will not call on Savannah Harbor, but will instead be used elsewhere in the world, where ports are bigger and deeper. Therefore, a Generation Three ship was not used as the "design" vessel for this project.

If a major bridge alteration were part of SHEP, there is a real possibility that the high cost of this related work would mean that SHEP would not generate any net economic benefits as traditionally defined by the Corps. The analytical assumption that Generation Three ships will not call at Savannah Harbor is a convenient way to dismiss this potential problem. If the Corps' baseline vessel forecast is right,[34] there is a strong probability that the largest ships would be calling at some ports on the Southeast Atlantic Coast. Given the shipping lines' business practice of multiple ports of call, GPA may soon want to accommodate these larger ships at Savannah Harbor. The height of the Talmadge Bridge will become an increasingly contentious issue.

There is a fundamental two-way relationship between channel depths and vessel sizes. Deeper channels induce larger ships and larger ships induce deeper channels. Recent comments by Curtis Foltz, the new executive director of the GPA illustrate this point: "Anything short of 48 feet is something that we would be disappointed with. Ships aren't getting any smaller. They're only getting bigger."[35] The Talmadge Bridge's height restriction may not actually be a long-term constraint on ship size despite the Corps NED assumptions for SHEP. A deeper channel for Savannah Harbor significantly increases the likelihood that raising the bridge will soon be requested.

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[33] Economics Appendix at 51.

[34] In this case the Corps says that the economic recession may have significantly altered the possibility of Generation Three Ships being built: "Despite a flurry of ship building following the introduction of the Emma Maersk and MSC Daniela to the world fleet, many ship builders have cancelled orders or scaled back the dimensions of their requested vessels in the orderbook. Part of this was due to the contraction in the global economy." Economics Appendix at 51. This is a fundamentally different view of the effect of the recession on commodity forecasts, where the Corps' sensitivity analysis is that the downturn would effect transportation cost savings (and therefore benefits) by only one percent. Economics Appendix at 120.

[35] Dan Chapman, *Atlanta Leaders Push for Deeper Savannah Port*, The Atlanta Journal-Constitution, December 1, 2010, http://www.ajc.com/business/atlanta-leaders-push-for-762157.html.

VIII. The Corps Does not Establish that the Benefits of the Harbor Deepening Would Benefit the United States' Economy.

As with all other navigation projects, the Corps bases its economic analysis on the United States Water Resources Council's "Economic and Environmental Principles and Guidelines for Water and Related Land Resources Implementation Studies," March 10, 1983. These principles were written to provide guidance to studies of water resource projects. They require that agencies calculate "*national economic benefits*:"

> Contributions to national economic development (NED) are increases in the net value of the *national output* of goods and services, expressed in monetary units. Contributions to NED are the *direct net benefits that accrue in the planning area and the rest of the Nation.*[36]

The Corps implementing guidelines for applying these Principles and Guidelines are contained in the Corps' Planning Guidance Notebook (ER 1105-2-100). For Savannah Harbor, the relevant portion of this document states:

> National Economic Development Benefits. The base economic benefit of a navigation project is the reduction in the value of resources required to transport commodities. Navigation benefits can be categorized as follows:
>
> > (a) Cost reduction benefits for commodities for the same origin and destination and the same mode of transit thus increasing the efficiency of current users. This reduction represents a NED gain because resources will be released for productive use elsewhere in the economy...
>
> Examples for deep draft navigation are reductions in costs associated with the use of larger vessels, with more efficient use of existing vessels, with more efficient use of larger vessels, with reductions in transit time, with lower cargo handling and tug assistance costs, and with reduced interest and storage costs.[37]

Under the guidance of the Planning Guidance Notebook, it is permissible to include in NED benefits the transportation cost savings for any commodity movement regardless of origin or destination. This would include imports from other countries or exports to other countries. To the contrary, the underlying Principles and Guidelines require a measurement of benefits accruing in the planning area and to the rest of the nation and should therefore exclude benefits accruing to foreign entities. There are clearly important differences between these two documents.

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[36] United States Water Resources Council, "Economic and Environmental Principles and Guidelines for Water and Related Land Resources Implementation Studies," p. iv (March 10, 1983)(emphasis added).
[37] Corps Planning Guidance Notebook at 3-5

A primary source of benefits attributed to this project by the Corps is derived from the fact that a deeper harbor leads to lower transportation costs of goods imported into this country, mostly from the Far East. Such savings, assuming that they occur, will be distributed among various entities. The savings may be absorbed by the exporting company or by shipping companies (thereby generating what economists define as "producer surplus"), or passed on to the consumer ("consumer surplus"). Determining how the savings would be distributed would depend on a number of factors, including the elasticities of supply and demand. The Principles and Guidelines clearly state that the Corps' analysis should be focusing on benefits to the planning area and the rest of the nation. The analysis for Savannah Harbor Expansion is therefore incomplete unless the Corps attempts to determine where SHEP benefits are likely to accrue.

From a U.S. policy perspective, in the "worst case" scenario, there would be virtually no injection of any money into the U.S. economy as a result of project deepening. Foreign manufacturers and shipping lines may keep the savings of shipping through Savannah for themselves and pass none of these savings to U.S. consumers.[38] Under such circumstances, the U.S. taxpayer would be asked to foot the bill to pay for a project that generates greater profits or lower prices for producers and consumers in other countries. In an era of huge federal deficits, the project might actually be financed by the very countries who obtain the greatest benefits from the project.

What might a "best case" scenario look like? In this section, I have focused on U.S. imports, because that is where most of the benefits appear to have been generated. Although the Corps does not provide the precise breakdown of benefits to exports and imports, it is possible to infer the relative shares, at least by order of magnitude. I begin by presenting the relevant data on the distribution of project benefits by benefit category, reproduced from the Economics Appendix:[39]

Benefit Category	Average Annual Benefits for 48' Project Depth (Thousands of dollars)	% Share of Total Benefits
Transportation Cost Saving	$139,151	92.54
Tide Delay Reduction	$10,400	6.92
Meeting Area (Long Island Oglethorpe)	$810	0.54
Total Average Annual Economic Benefits	$150.361	100.00

[38] Also in the worst case scenario, different supply and demand elasticities in the export market may cause the savings from exports to be passed on to foreign consumers.
[39] Economics Appendix, Table 165 at 185.

The Corps' Multiport Analysis shows how much could be saved per 20 foot equivalent container (TEU) at various channel depths over various trade routes.[40] This information is summarized here:

Vessel Cost Savings by Project Depth for Benefiting Services ($/TEU)

Depth and Direction of Traffic	FE ECUS MED	FE ECUS EU	FE SUEZ ECUS
48 in (imports)	$13.27	$18.74	$3.34
48 out (exports)	$5.92	$3.94	$4.32
48 out as % of 48 in	45%	22%	124%

FE ECUS MED- Far East to East Coast U.S. to Mediterranean via Panama Canal
FE ECUS EU- Far East to East Coast U.S. to Europe via Panama Canal
FE SUEZ ECUS- Far East to East Coast U.S. via Suez Canal[41]

Finally, U.S. Census data shows the breakdown between imports and exports. For 2009, imports, metric tons of containerized cargo = 6.0 million; export, metric tons of containerized cargo = 9.7 million. The import share of total trade = 38 percent.[42]

All of the data presented in this section show first that transportation costs saving is *the* major benefit category and while exports through Savannah outnumber imports, the project will have a much greater impact on imports for shipments coming through the Panama Canal. According to the Corps, in 2007, 69 percent of total calls were by services that transit the Panama Canal.[43] If, for purposes of illustration, two-thirds of the transportation cost-savings benefits are for imports and, in the best case scenario, all of the savings are passed on to the consumer, the citizens of Georgia (pop. = 9.8 million) and South Carolina (pop. = 4.6 million) may, in a best case scenario, enjoy a per capita reduction in their purchases of imported goods of roughly $6.50 per year.[44]

The Corps may argue that once NED benefits are calculated, any subsequent breakdowns of the data, such as those presented here, are "out of scope." But there is a critical difference between measuring "benefits to the nation" (as described in the Principles and Guidelines), and "measuring NED benefits" (as described in the Corps' own Planning Guidance Notebook). Projects of the SHEP's magnitude must be analyzed using both perspectives, something the Corps has not done.

[40] Multiport Analysis, Table 39, at 100.
[41] *See* Multiport Analysis at 7 for a description of trade routes.
[42] U.S. Census Foreign Trade Data is available at http://data.usatradeonline.gov/View/dispview.aspx
[43] Economics Appendix at 25.
[44] Population estimates are from U.S. Census Bureau (estimates are for 2009). 2/3 of transportation cost savings = $92.7 million per year. If instead of 2/3, total benefits were distributed to U.S. consumers of imports, the per capita figure would be $6.96. For the estimated savings given in my example, assume that the final destinations of imports through Savannah Harbor are either in Georgia or South Carolina.

IX. A Deeper Channel Would not Make the U.S. More Competitive in International Markets.

Should the United States government help U.S. manufacturers improve their competitive position in international markets? While policy makers' answers might range from a resounding yes to one that is scrupulously neutral (i.e., "let the markets decide"), it is doubtful that few if any would support policies or actions that would actually hurt the U.S. manufacturing base. How does the Savannah Harbor Expansion Project fare in an analysis of this important question?

Tables 15 and 18 in the Corps' Economics Analysis Appendix[45] give a descriptive picture of which containerized goods are being exported and imported through Savannah, where they are going to and coming from. Since the data in these tables mirrors the aggregate U.S. Census data, I will use the information provided by the Corps.

Table 15 lists the top five import commodity groups coming from each of the top five sending countries. Table 18 does the same thing for exports. One useful way of arraying this data is to rank, in order, the amounts from Tables 15 and 18 (separately). In each of my tables presented below, I present the top 15 commodity type/country combinations.[46]

Top 15 Commodity/Type Country Combinations for Containerized Imports through Savannah 2007

Rank	Commodity Description	Country	Tons
1	Furniture and Fixtures	China	541,146
2	Other Manufacturing nec	China	393,846
3	Metal Products	China	315,461
4	Non-Metallic Products nec	China	186,399
5	Plastic Products nec	China	184,569
6	Non-Metallic Products nec	Brazil	179,507
7	Synthetic Resins	South Korea	107,348
8	Iron & Steel	Japan	72,887
9	Natural Rubber	Thailand	63,111
10	Textiles	Brazil	56,575
11	Natural Rubber	Indonesia	49,570
12	Iron & Steel	Brazil	46,702
13	Metal Products	Taiwan	41,703
14	Textiles	India	39,023
15	Machinery & Equipment nec	Japan	38,689

[45] Economics Appendix at 35 & 37.
[46] The listings include containerized traffic only.

Top 15 Commodity/Type Country Combinations for Containerized Exports through Savannah 2007

Rank	Commodity Description	Country	Tons
1	Stone, Clay and Other Crude Materials	Japan	1,164,794
2	Meat/Dairy/Fish requiring Refrigeration	China	387,524
3	Stone, Clay and Other Crude Materials	China	316,983
4	Pulp	China	283,064
5	Stone, Clay and Other Crude Materials	Taiwan	249,205
6	Scrap	China	239,761
7	Cotton	Turkey	233,642
8	Synthetic Resins	China	207,418
9	Paper & Paperboard & Products	Turkey	176,460
10	Pulp	Japan	171,522
11	Stone, Clay and Other Crude Materials	South Korea	146,084
12	Pulp	Italy	114,276
13	Pulp	Turkey	102,753
14	Pulp	Brazil	86,740
15	Machinery & Equipment nec	South Korea	78,820

These tables tell many stories (such as the degree to which U.S. imports come from China). My purpose here is to point out perhaps the most important difference between the tables. The imports through Savannah are generally manufactured products and not "raw materials," while the exports are generally the opposite. So while deepening the harbor may make it less expensive to export stone, clay, and glass to Japan, it also makes it less expensive to import furniture and fixtures from China. From the perspective of the U.S. manufacturing base, this seems like a poor trade-off.

X. Under the Corps' Economic Assumptions, this Project would not Create a Significant Number of Sustainable New Jobs.

As I stated earlier in Section IV, the Corps assumes the Savannah Harbor Expansion Project will not induce any additional port traffic. This assumption severely limits the project's ability to create new jobs for Georgia and South Carolina beyond the work associated with the actual deepening itself. Clearly, there will be no induced jobs created by changing market share if the Corps is correct that this project is unrelated to increasing the port's business. Increased business (i.e., more imports and exports using the port) is no doubt the main source of job creation that might be anticipated by the local sponsor.

Possibly, by reducing the prices of imported goods, U.S. consumers will have more disposable income to spend on other goods and services which has the potential to create some new jobs. But as I have already shown (Section VIII), the disposable income effect under the best case scenario is likely to be miniscule and even this will not create U.S. jobs if consumers use their extra disposable income, whatever the amount, to buy additional foreign manufactured goods.

Despite its own analytical assumptions, in its General Reevaluation Report, the Corps claims that the job impact of deepening the channel will be 5,671 new jobs.[47] However, I am unable to connect this estimate to any other part of the analysis.

United States' ports often cite economic studies that measure the number of jobs that are either created by the port or sustained because of port activities. One such example is "The Economic Impact of Georgia's Deepwater Ports on South Carolina's Economy in FY 2009," April 2010, authored by Jeffrey M. Humphreys.[48] While it is true that ports are important economic engines for their communities and states, the "jobs issue" here is not how many jobs are supported by the port, but the extent to which the number of jobs may change if the harbor is deepened. Given the assumption that underlies the Corps' NED analysis, the answer is that this proposed deepening will not result in additional jobs since the port's underlying business will remain unchanged. In fact, as Table 42 shows in the Corps Economics Appendix,[49] if the channel is deepened there will be fewer, albeit larger, ships calling at Savannah. If jobs at the port are linked more closely to the number of ships calling than to the number of containers handled, a deeper channel might actually mean fewer jobs in the local economy.

XI. Conclusions

According to the Corps' recently released draft General Reevaluation Report,[50] the Corps is asking the American tax payer and the project's local sponsor to pay over $600 million to deepen the Savannah Harbor to 48 feet. If the Corps is correct that the project is unrelated to the port's underlying business, then there is no need to deepen the channel to keep Savannah Harbor functional and competitive. Even if the deepening would produce efficiencies that would in turn reduce shipping costs, the Corps has failed to determine that these efficiency savings will accrue to U.S. citizens. On the other hand, if the Georgia Port Authority is correct that the deepening is needed to maintain or increase its business, then the Corps' economics analysis is fundamentally flawed. Moreover, the Corps has failed to perform a true multiport analysis to determine, in light of the limited availability of federal funds, if the federal government could deepen a different port in the southeast more cost effectively and with fewer impacts on the environment. In evaluating port expansion projects, it is especially important that the Corps' analytical basis for its recommendation to proceed be objective, rigorous and comprehensive. For the Savannah Harbor Expansion Project, the Corps has not met these standards.

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[47] GRR at 195.
[48] Mr. Humphreys acknowledges that the study was supported by a grant from the Georgia Port Authority.
[49] Economics Appendix at 73.
[50] GRR at 180.

Dated: January 25, 2011

Respectfully submitted,

Robert N. Stearns, Ph. D.

Exhibit E

EXPERT REPORT OF SHAWN P. YOUNG, PH.D.

I, Shawn Paul Young, Ph.D., provide this expert report on behalf of the Southern Environmental Law Center (SELC) in the matter of the Savannah Harbor Expansion Project (SHEP). I submit this report as a private consultant in this matter. The opinions and conclusions that I express in this expert report are my own.

My current business address is Shawn Paul Young, LLC, P.O. Box 507, Bonners Ferry, Idaho, 83805. My professional and educational experience is summarized in the updated curriculum vitae attached to this report. I received a B.S. in Environmental Studies from Northland College; a M.S. in Aquaculture, Fisheries, and Wildlife Biology from Clemson University; and a Ph.D. in Fisheries and Wildlife Sciences from Clemson University. I have 13 years of experience researching the effects of human activities on fisheries and aquatic ecosystems. This includes 11 years of experience performing field research and environmental consultation on aquatic resources of southeastern rivers, including the Savannah River. I have previously held visiting faculty and/or research appointments in fisheries sciences and aquatic ecology at the University of Idaho, Purdue University, and Clemson University. In addition to my professional qualifications, I am an avid outdoorsman – fishing, hunting, and enjoying nature in every manner since my early childhood.

My main research interests focus on fisheries ecology and management in altered ecosystems. I have been consulted by public, state, federal, and academic sectors in the subject areas of fish and aquatic ecology. I have in publication, in press, and in review twenty-seven peer-reviewed articles relevant to fisheries and aquatic ecology. I have presented scientific

presentations at numerous professional meetings, academic seminars, and citizen fishing association functions.

In addition to my professional education, training, research, and publications, I have considered the findings of other scientists as listed in the Literature Cited section found at the end of this document, and the following information about the Savannah Harbor Expansion Project in forming my opinions. The information I considered has included facts that I would ordinarily consider and rely on in reaching opinions about the health, function, and viability of fisheries resources.

a. General Re-evaluation Report (GRR)

b. GRR Appendix C Attachment 3: Supplemental Studies

c. Draft Tier II Environmental Impact Statement (DEIS)

d. DEIS Appendices

My opinions and the rationale for these opinions regarding the impacts from the proposed dredging to deepen Savannah Harbor follow.

GENERAL EXPERT OPINION – SHEP IMPACTS TO FISH POPULATIONS

At the outset, it is important to note that the information provided by the Corps in the DEIS and GRR is incomplete. I have done my best to review this project in light of the fact that a rigorous, independent review by the public of some of the key modeling issues is not possible at this time. Once the Corps releases sufficient information regarding the modeling to allow for such a review of important conclusions made in the DEIS and GRR on issues such as water quality and dissolved oxygen, I may choose to supplement this initial report.

Even with this caveat, having reviewed the relevant materials that have been made available, it is my professional opinion that deepening Savannah Harbor to -45 or -48 feet will

have a significant impact on the shortnose sturgeon (*Acipenser brevirostrum*), Atlantic sturgeon (*Acipenser oxyrincus oxyrincus*), and striped bass (*Morone saxatilis*) populations in the Savannah Harbor and that the impacts will be substantially higher than the level of impacts predicted by the United States Army Corps of Engineers (USACE) in the GRR and DEIS. The DEIS does acknowledge that the project will have impacts, but underestimates the potential environmental degradation of such a project and the associated adverse impacts on aquatic organisms. Fisheries experts with knowledge of shortnose and Atlantic sturgeon ecology have identified dredging as a contributor to their declining numbers and distribution, and future dredging of their habitat as an obstacle to recovery (NMFS 1998, ASSRT 2007, Federal Register Volume 75 61904-61929 Oct 6, 2010).

Additionally, previous USACE projects in the Savannah River estuary have severely underestimated environmental impacts to fish populations, including an unforeseen 96% decline in striped bass spawning and a 97% decline in striped bass fishing (Reinert et al. 2005) during the 1970-80's directly attributed to estuary modifications.

The estuary in the vicinity of Savannah Harbor is an important habitat for the Savannah River shortnose sturgeon and Atlantic sturgeon populations and is essential to their continued existence. The DEIS acknowledges this importance; yet, does not accurately estimate the effects of such a large-scale disruption to the estuarine habitat with a projected duration of up to six years. Researchers have concluded that Savannah River shortnose and Atlantic sturgeon have not been successfully reproducing, and most of the current population originates from stockings intended to boost the population to offset this lack of reproduction. The harbor deepening project will have significant negative effects on the health and survival of already endangered shortnose sturgeon and Atlantic sturgeon populations and will reduce their potential recovery by

(1) causing a reduction in available habitat and causing changes in summer and winter habitat selection with negative consequences likely; (2) requiring these species to find new foraging habitats if they avoid the project altogether or leaving these species without a source of food due to the elimination of benthic prey from the large-scale dredging; (3) causing these species to suffer physiologically from potential changes in water quality, including lower dissolved oxygen, increased turbidity and pollutants, caused by re-suspension of sediments, and increased salinity.

In sum, the Biological Assessment, included as an appendix to the DEIS, concludes that "the proposed project may affect, but is not likely to adversely affect shortnose or Atlantic sturgeon or their critical habitat." Biological Assessment at 182. For the reasons described in my report, I strongly disagree with this conclusion. Accordingly, I recommend that the Corps and National Marine Fisheries Service (NMFS) engage in formal consultation and that the NMFS prepare a Biological Opinion.

Much of the rationale behind the conclusions regarding impacts to shortnose sturgeon and striped bass and the proposed mitigation listed in the DEIS is based upon modeling that parcels the estuary into sub-units instead of treating the estuary as an ecosystem in itself. The USACE appears to assume that the percent of a species' habitat affected by the project as determined from modeling will have the same level of effects on a given species. Fish are not randomly distributed; thus, a loss of critical habitat that is small in area may impact a large proportion of the population. Fish typically select specific areas within the general useable habitat that will maximize health and fitness, and may utilize several areas throughout the year for different purposes. This is the case with shortnose sturgeon, Atlantic sturgeon, and striped bass in the Savannah River estuary. Shortnose sturgeon juveniles and adults, Atlantic sturgeon juveniles, and striped bass eggs, larvae, and juveniles all use specific areas in the estuary depending on

flow, food availability, salinity and dissolved oxygen. A small percentage loss of total available habitat for these species in the Savannah estuary can (and in this case are likely to) have large impacts.

Dredging and Sturgeon

The proposed ruling to list the Atlantic sturgeon as federally endangered and the shortnose sturgeon recovery plan specifically discuss dredging as a cause for endangerment and an obstacle to recovery for both species. The project will cause long-term habitat modifications that will likely change sturgeon distribution with potentially negative consequences. Collins et al. (2000) found shortnose sturgeon juveniles exhibited a switch in home ranges during the 1990's and attributed the distribution and behavioral changes to harbor modifications.

> During 1988-1992, juveniles were concentrated in Kings Island Turning Basin. It appears that harbor modifications (deepening; tide gate removed from service; New Cut closed) since then have changed the hydrographic conditions and caused the fish to move from that area (Collins et al. 2002).

Dredging – Loss of benthic community

The effects of large-scale dredging over a 3-6 year period will likely have a profound negative effect on the foraging behavior of shortnose and Atlantic sturgeon. Sturgeon are known to be benthic (bottom) feeders. Thus, dredging has a major impact on sturgeon feeding behavior because dredging causes the elimination of the benthic organism community when the benthic substrate is removed. The DEIS acknowledges the immediate and complete loss of the benthic community in dredged areas. The benthic community will re-establish after some period of time, but the benthic community will not likely be comprised of the same quantity and quality of prey items as the pre-dredging community (Kenny and Rees 1996, Boyd et al. 2005). Re-colonization of dredged areas is dependent on several factors, intensity and extent of deepening and maintenance dredging, benthic species' life history and resiliency to disturbance, hydrodynamics

and water quality of affected area, and substrate type (Kenny and Rees 1996, Boyd et al. 2005, Szymelfenig et al. 2006). Re-colonization will likely take years considering 38 million cubic yards of material will be dredged across several years in order to deepen the harbor to -48 feet, and maintenance dredging will occur annually.

Shortnose sturgeon are not opportunists and only switch to other prey when preferred foods are unavailable, and research indicates that shortnose sturgeon are continuous feeders (NMFS 1998). Also, shortnose and Atlantic are reported to have different prey item preferences, but the adult shortnose and juvenile Atlantic sturgeon may compete for food (ASSRT 2007). Thus, the loss of preferred prey items or competition over limited resources will likely cause a habitat shift to alternative feeding grounds that may or may not provide adequate food or water quality. Increased energy expenditure in the form of increased movement to find other food sources and potentially poor nutrition from a change in prey items is likely to result in poor health, poor condition, and lower reproductive potential. If this occurs in a population already in low abundance with little to no recruitment, the effects would be severe to an individual, and detrimental to the population as a whole for both Savannah River shortnose and Atlantic sturgeon.

Dredging – Dissolved oxygen

The large-scale dredging is expected to cause a decline in dissolved oxygen concentrations. This is a major concern for all fish and aquatic organisms. The estuary is already impaired by low dissolved oxygen concentrations, as low as ~ 3 ppm during the summer. Most fish species require > 2.0 – 3.0 ppm dissolved oxygen levels for survival, and physiological impairment such as reduced growth and condition for many fish begins at < 5.0 ppm (Neill and Bryan 1991). This includes shortnose sturgeon (Jenkins et al. 1993, NMFS 1998, Campbell and

Goodman 2004), Atlantic sturgeon (Secor and Gunderson 1998, Federal Register 2010), and striped bass (Bain and Bain 1982, Coutant 1990). Dissolved oxygen needs are dependent on water temperature and life history stage of the organism. Increased temperature requires increased oxygen consumption by fish, and typically early life stages have higher oxygen requirements to support accelerated metabolism during these periods of rapid development.

Low dissolved oxygen, hypoxia, is also known to negatively impact aquatic invertebrates (Winn and Knott 1992). Hypoxia will in turn affect re-colonization of benthic organisms after substrate dredging. Re-colonization will take longer, and hypoxia may alter species presence and abundance after re-establishment (Szymelfenig et al. 2006). This will in turn affect sturgeon and other benthic fish feeding and nutrition. Further depletion of dissolved oxygen in the Savannah Harbor will likely have adverse impacts beyond those predicted in light of the importance of the estuary to juvenile and adult sturgeon and to all life stages of striped bass; the current impairment of dissolved oxygen concentrations in the harbor area; and the lack of confidence in the ability of the artificial oxygenation system expressed by federal agencies.

Dredging – Re-suspended sediments and pollutants

For fish and aquatic organism populations, a major concern for any dredging operation is the turbidity caused by re-suspension of sediments and the pollutants that may re-enter the water column after sediment exposure (Wilber and Clark 2001). The DEIS states that a sediment study was conducted to determine chemicals present in solid sediments. The study concluded that the only pollutant of concern is cadmium. The study measured levels of common organic, inorganic, and metals found in the Savannah Harbor sediments, but did not conduct actual exposure trials to pore-water where sensitive organisms such as shortnose sturgeon are exposed to waters

containing the re-suspended pollutants. Pore-water tests better reflect the toxicity levels organisms will encounter in the water than just solid sample surveys.

This should have been done considering the potential for the deposition of other un-tested uncommon pollutants from upstream and nearby facilities that may affect fish, and the general lack of knowledge on the sub-lethal and lethal effects of most common and uncommon pollutants that were found. Also, even if no single substance was identified at elevated concentrations, the many pollutants released from such a large amount of dredging materials being re-suspended may act in concert to create a harmful aquatic environment. In previous studies of Savannah River sediment toxicity, aquatic invertebrates experienced increased mortality (Winger and Lasier 1995, 2000). These studies indicate that SHEP will likely have substantial negative impacts beyond those stated in the DEIS.

In a recent study on the Roanoke River (Cope et al. 2010), researchers conducted exposure toxicity tests on shortnose sturgeon and fathead minnows. The results found that young shortnose sturgeon placed in the river suffered significantly higher mortality rates compared to sturgeon held in a controlled environment and also compared to fathead minnows exposed to the same riverine environment. Possible conclusions were that an identified toxicant with unknown effects on shortnose sturgeon was responsible; an untested or undetectable pollutant was present; or a synergistic effect of multiple pollutants makes the Roanoke River inhospitable for young shortnose sturgeon. Pollution in the form of toxicants is also listed as a reason for sturgeon decline and an obstacle to recovery (Federal Register Volume 75), and the effects of most pollutants on sturgeon species is not known. This may very well be the case with Savannah Harbor sediments, and proper testing is a reasonable expectation and should be conducted prior to the initiation of the project.

Dredging – Saltwater intrusion / increased salinity

Savannah Harbor deepening will allow the saltwedge to move upriver. Thus, saltwater intrusion will increase. This will increase the salinity of important habitats for juvenile and adult shortnose and Atlantic sturgeon, for striped bass spawning and early life stages, and the aquatic community as a whole, including freshwater marshes. Salinity affects ion/water balance in fish and aquatic organisms. Salinity preference and tolerance varies by species and between life history stages of a species, and determines habitat selection and ultimately organism community structure in an estuarine environment. Shortnose sturgeon juveniles prefer low salinity, and salinity tolerance increases with body size. Juvenile shortnose sturgeon salinity can tolerate up to 20 ppt, but suffer decreased energy and aerobic capacity, resulting in decreased growth and survival, as salinity increases (Jarvis et al. 2001, Jarvis and Ballantyne 2003, Zeigeweid et al 2008). Atlantic sturgeon preference and tolerance is not well defined. Juveniles select lower salinity habitat, and adults are known to inhabit marine environments. Savannah River striped bass eggs and larvae are negatively impacted and experience mortality as salinity increases toward 15-18 ppt (Winger and Lasier 1994).

Also, benthic invertebrate and forage fish species presence and abundance may change with increased salinity. A change in prey species presence and abundance due to increased salinity, direct removal by dredging, and low dissolved oxygen will likely have profound impacts on the entire estuarine fish community, including shortnose sturgeon, Atlantic sturgeon, and striped bass.

MITIGATION ISSUES – FISHERIES

The SHEP DEIS has no mitigation directly targeting Atlantic sturgeon. The DEIS also lacks baseline information and an impact assessment on the Savannah River Atlantic sturgeon.

The National Oceanic and Atmospheric Administration (NOAA) recently proposed to list the South Atlantic distinct population segment (DPS) of Atlantic sturgeon, under which the Savannah River population is included, as endangered under the Endangered Species Act (ESA) (Federal Register Volume 75 61904-61929 Oct 6, 2010). Within the proposed ruling, dredging is listed as a contributor to their declining populations and an obstacle to recovery. The omission of discussion and impact assessment of a species proposed for listing as Endangered needs to be rectified. Even if there is a general lack of knowledge concerning the Savannah River Atlantic sturgeon population, the DEIS should state so in order to prompt research efforts to fill in the information gaps concerning population size and structure, spawning habitat selection, habitat selection of early life stages, and estuary use in the SHEP vicinity. The main focus of impact evaluation, mitigation, and funded research has been placed on the shortnose sturgeon for good reason; however, the Atlantic sturgeon has been neglected.

The DEIS incorrectly assumes that the life history and behavior of Atlantic sturgeon and shortnose sturgeon is so similar that the SHEP impacts and the mitigation package will have the same outcome for both species. For example, a recent study of juvenile sturgeon abundance on in the Hudson River Estuary, has found that juvenile shortnose sturgeon prefer habitats upstream of the saltwedge (low salinity), while juvenile Atlantic sturgeon prefer habitats downstream of the saltwedge (higher salinity) (http://www.amnh.org). Other scientists have documented differences in life history (Kieffer and Kynard 1993, Bain 2002), including temperature selection (Niklitschek and Secor 2010) and spawning habitat preferences (NMFS 1998, ASSRT 2007). There will be some similar impacts, but there is a strong likelihood that the two species will also suffer differently in other ways. The mitigation package has placed all emphasis on shortnose

sturgeon. Atlantic sturgeon should be individually evaluated in terms of potential impacts and prioritized and targeted by mitigation actions.

As part of the SHEP mitigation package, the USACE has proposed a fishway at the New Savannah Bluff Lock & Dam (NSBLD) near Augusta, Georgia, 150 miles upriver of Savannah Harbor, as mitigation for damages to shortnose sturgeon habitat in the estuary. No mitigation could be identified within the estuary to offset the loss of critical juvenile rearing habitat. Thus, the fishway is a proposed trade-off intended to alleviate one major problem (impacts to important juvenile habitat) by allowing fish passage to upstream habitat. The problem is that although a fishway might provide some benefits to other species, this current proposal, without more, is highly unlikely to benefit sturgeon. In addition, the mere construction of a passage facility or the successful passage of fish upstream of an obstacle does not ensure spawning success or successful recruitment. A proper environment must be present above the obstacle to support spawning and the development of eggs, larvae, and juveniles. Also, the adults and the early life stages must be able to migrate downstream through the obstacle.

In this case, the DEIS does not demonstrate that the proposed fish passage design – the Horseshoe Rock Ramp – will have success at passing either species of sturgeon or that environmental conditions above NSBLD will support sturgeon spawning. Thus, it is uncertain if the fishway in itself will actually improve sturgeon spawning success. Even if it could be demonstrated that this design will work here, future modifications will likely be necessary to specifically accommodate sturgeon species. These changes would likely substantially increase the cost of the fish passage facility, and additional funding would be needed up front to ensure proper maintenance in perpetuity. The fish passage proposal would certainly require far greater levels of committed funding than currently proposed, and even then, it is uncertain that the

Horseshoe Rock Ramp design will work in this situation to address impacts to both species of sturgeon.

Further, the DEIS does not include a detailed fish passage plan as part of the proposed mitigation actions to offset impacts to shortnose sturgeon. There is no comprehensive fish passage plan listing objectives and goals for the species expected to benefit from the facility, including shortnose sturgeon. Whenever a new fish passage facility is proposed, there is a precedent for a fish passage plan to be completed. This has been a vital part of many recent FERC re-licensing cases across the United States. These fish passage plans typically list how many of each fish species will be passed and a list of recruitment goals with specific numbers. The SHEP DEIS only discusses the general objective of passing fish at NSBLD. A fish passage plan is a reasonable expectation given this is a standard practice for the construction and operation of new fish passage facilities nationwide.

The most effective mitigation action would be the complete removal of the NSBLD along with all other dams/obstructions upstream to J. Strom Thurmond Dam (JST) and those in the Stevens Creek Basin, a major tributary entering the Savannah River between JST and the City of North Augusta in combination with a flow schedule promoting biological integrity. This would eliminate any obstruction to migration of all life stages. Also, no long-term costs would be incurred for continued operation of the obsolete Lock and Dam nor a fishway. Moreover, the removal of this dam would have the benefit not only of providing access to habitat upstream, but it would allow more natural riverine processes that may provide suitable habitat for sturgeon.

The mere installation of a fishway at NSBLD falls well short of providing the necessary habitat conditions for successful reproduction and recruitment once a fish has bypassed NSBLD, the ultimate goal of the mitigation plan for shortnose sturgeon. Once fish successfully pass

NSBLD, they will likely select the "Augusta Shoals" for spawning habitat. The Augusta Shoals may provide adequate spawning substrate, but flow will be paramount. However, there will be periods when the necessary flows in terms of discharge amount and natural temporal availability will not be provided under flow-release schedules from JST. This is particularly true during periods of drought, which have been increasingly common in the Savannah River Basin. Drought conditions have prompted the USACE to take water management actions in the form of reduced flow from JST to conserve reservoir storage (USACE 2010a). These flow reductions impact the Savannah River's hydrology and biology from JST to the estuary. Conditions at the Augusta Shoals are further complicated by the fact that the City of Augusta diverts a significant portion of the flow into the Augusta Canal, substantially reducing flow for fish and aquatic organisms. Also, reduced freshwater flow will increase saltwater intrusion negatively impacting freshwater marshes and altering aquatic habitat conditions in the estuary. Reduced freshwater flows and increased depth of the estuary at Savannah Harbor will act in concert to worsen the saltwater intrusion.

If and when sturgeon and other fish species pass NSBLD, they are assumed to find better spawning habitats above Augusta, GA. However, proper flows are not ensured because the USACE has yet to finalize and adopt a strict comprehensive flow plan to promote diadromous and freshwater fish reproduction and recruitment below Thurmond Dam. Also, the City of Augusta has recently agreed to release a minimum of only 1,500 - 1,800 cfs during low flow periods (USACE 2010a, b). The USACE does not increase flow to offset the water diversion by the City of Augusta. So, even if USACE releases low flows of 4,000 or possibly 3,100 - 3,600 cfs during droughts to conserve reservoir storage, only 1,500-1,800 cfs will be present for fish spawning.

Several agencies, academic institutions, and organizations have addressed this issue of improving river flow and water quality in the middle and lower Savannah River including the estuary to benefit fish and aquatic organisms. Flow recommendations were developed during the 2003 Savannah River Flow Workshop (Duncan and EuDaly 2003). The 1,500 – 1,800 cfs minimum flow is much lower than the recommended flows stated in the 2003 workshop's river flow prescription.

Furthering the discussion of flows for fish populations, the USACE and state agencies have an agreement that pool elevation stability in the reservoirs themselves for largemouth spawning should be a priority in water management decisions (USACE 2010a). This appears to signify that freshwater sportfish populations in the reservoirs have priority over reproduction of threatened and endangered diadromous and freshwater species in the Savannah River below the USACE projects.

The mitigation proposal should include a mandated priority to provide adequate flows as suggested by the previously sponsored workshops to support fish populations and to improve the biological integrity of the Savannah River from JST Dam to the mouth. In my professional opinion and experience researching the fish populations in the Savannah River, along with conclusions from other scientists involved in studies of Savannah River ecology (Duncan et al. 2003, Marcy et al. 2005, Grabowski and Isely 2007), this is of paramount importance to ensure successful mitigation, and should be implemented as mitigation.

Flow releases from Thurmond Dam affect the Savannah estuary salinity and hydrodynamics (Duncan and EuDaly 2003). Thus, final adoption of the flow prescriptions from the Savannah River Basin Comprehensive Study (Duncan and EuDaly 2003) is a viable mitigation action. Re-establishing access to historical spawning habitat in combination with

ensuring the presence of proper environmental conditions, including flow, for all life history stages of fish and aquatic organisms should be part of the mitigation package.

As part of the SHEP, the USACE has proposed to fund the enhancement of Georgia DNR's striped bass aquaculture program as mitigation for damages to striped bass. However, the USACE will only fund at a 20% spawning habitat loss level. This proposal holds some merit as a last resort restoration strategy, but the program will likely need to be expanded as impacts to spawning habitat will likely be greater than predicted. Supporting evidence comes from the fact that the USACE underestimated impacts from estuary modifications to the striped bass population in 1970 - 80's. The Tide Gate and Diversion Canal installed in the late 1970's and operated through the 1980's caused a 96% decline in striped bass reproduction, prompting a moratorium on striped bass fishing and harvest for an extended period of time. This was due to increased saltwater intrusion and hydrodynamic changes negatively impacting spawning and the survival of early life stages (Reinhart et al. 2005). A major re-stocking effort was needed to rebuild the population. The USACE should anticipate funding at a 100% loss level given their gross underestimation of damages to the striped bass population due to previous activities/modifications.

The DEIS fails to acknowledge and discuss that there is evidence of two distinct subpopulations of striped bass in the Savannah River, an estuary-spawning and a non-estuary spawning subpopulation, and both may use the estuary as nursery habitat (Martin and Paller 2007). The USACE does not account for the potential impacts on the non-estuary spawning subpopulation. The mitigation proposed would only address the estuary spawning subpopulation. The stocking program will likely need to be revised to account for differential

impacts and restoration strategies for these two sub-populations that may utilize somewhat different life history strategies within the Savannah River.

The stocking program should ensure striped bass broodstock are of Savannah River genetic origin. Genetic testing should be conducted before annual aquaculturing occurs. The Savannah River striped bass are known to be genetically distinct from other river systems. Striped bass in the many Atlantic and Gulf Coast rivers have some distinct physiology and behavior that increases success in the natal system (Secor et al. 2000), but may be a liability in restoring populations with genetics outside the natal system.

The USACE plans to implement an artificial oxygenation system to remedy the low dissolved oxygen concentrations already found in the Savannah Harbor vicinity that are anticipated to worsen with SHEP. Although the DEIS discusses a trial run of the system with some purported success at raising dissolved oxygen concentrations ~0.5 ppm, some governmental agencies express significant reservations with respect to its effectiveness and cost over a 50-year period (DEIS Appendix E). Also, USACE underestimated dissolved oxygen losses from the last harbor deepening to -42 feet (EPA Informal Comments on Preliminary SHEP DEIS September 10, 2010). I share these concerns because such a system has not yet been proven reliable over such an area and time period.

Conclusions

- SHEP will result in adverse modification of critically important habitat for Savannah River shortnose and Atlantic sturgeon.
- The SHEP will directly reduce the likelihood of both the survival and recovery of shortnose and Atlantic sturgeon by reducing the reproductive fitness, numbers and distribution of each species.

- Baseline conditions in the Savannah River have already eliminated successful reproduction and caused a severe decline in shortnose and Atlantic sturgeon populations; thus, further habitat destruction or modification from SHEP will cause additional harm, jeopardizing the existence of shortnose and Atlantic sturgeon populations.
- The DEIS should be revised to include detailed discussion of impacts to Atlantic sturgeon.
- Pore-water toxicity tests should be conducted to determine effects of sediment re-suspension on organisms in the vicinity of Savannah Harbor.
- SHEP will likely have greater negative impact on striped bass than predicted in the DEIS
- Revisions to the SHEP mitigation plan are needed to include other beneficial actions, and funding for mitigation must be increased and pre-approved in its entirety.

In summary, my professional opinion is that the Savannah Harbor deepening project will have greater impacts to fish and aquatic organisms than the level anticipated by the USACE. I further disagree with the conclusion reached in the Biological Assessment that "the proposed project may affect, but is not likely to adversely affect Shortnose or Atlantic sturgeon or their critical habitat." Biological Assessment at 182. Accordingly, I recommend that the Corps and National Marine Fisheries Service engage in formal consultation and that NMFS prepare a Biological Opinion in connection with this action. Also, alternative mitigation actions need to be explored to further offset adverse impacts and to maximize the benefits of the proposed mitigation. The anticipated funding level should be raised to a level commensurate with the extent of anticipated impacts and it should be ensured that sufficient funds are available and not made subject to federal appropriations to provide mitigation for a worst case scenario. Finally,

as more information is made available to the public regarding this project, I reserve the right to supplement my opinions.

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Dated: January 21, 2011

Respectfully submitted,

Shawn P. Young

Shawn P. Young, Ph.D.

Southern Environmental Law Center

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765-DC-149-EV01, 765-DC-149-EC01

Comment: *In particular, we are troubled by the central assumption underlying the DEIS and Draft GRR that the proposed deepening Project is unrelated to efforts by the Georgia Ports Authority ("GPA") to maintain or increase its business. Such an assumption not only strains credulity, but is also directly contradicted by the Corps' Tier I Environmental Impact Statement, statements by GPA officials, and GPA's willingness to pay a substantial sum of money for an extra foot's worth of depth. In making this dubious assumption, the Corps has undermined its economic analyses and skewed the environmental studies by failing to evaluate the indirect and cumulative effects associated with this proposal.*

Response: The Corps believes the assumptions concerning the relationship between SHEP and the capital improvements at the Savannah Harbor are reasonable and appropriate. The Georgia Ports Authority (GPA) has embarked on a 10-year capital improvement program to increase container capacity at the Garden City Terminal (GCT) to a maximum capacity of 6.5 million TEUs annually by the year 2020. This program includes equipment purchases and upgrades, transportation infrastructure improvements, and container area expansion. The GPA capital improvement program is not tied to deepening the navigation channel.

In analyzing whether SHEP would divert container traffic from other South Atlantic ports, the Corps has properly assumed that GPA's Savannah Harbor improvements would continue, as is occurring, and that scheduled capital improvements at other regional ports would likewise occur. The Corps then evaluated expected demand and determined that over the next 20 years, growth in containerized cargo would require the planned capacity at Savannah Harbor and other South Atlantic ports, including Norfolk, Charleston, Wilmington, Jacksonville and Jasper County. Based on these analyses, the Corps concluded that SHEP would not divert containerized traffic from other ports. Then, the Corps analyzed whether a deeper navigation channel in the Savannah River would produce transportation cost savings. The Corps applied sound planning and economic forecasting, which showed annual net national economic benefits of $177 million.

765-DC-149-OC-01

Comment: *Even if one accepts for the purposes of argument the assumption that this Proposal is not needed to increase Garden City Terminal throughput, the no-action alternative stands out as a clear winner since it would obviate the need to spend of $600 million in public money, protect natural resources of national significance, and yet have no effect on GCT's business.*

Response: The no-action or "without project" alternative was thoroughly considered in the GRR/EIS, but was not selected because it would not fulfill the project purpose and need, which are to address navigation inefficiencies in Savannah Harbor. The no-action alternative would not allow larger and/or more fully loaded vessels to transit the harbor, and the nation would not realize benefits from lower transportation costs. By not enabling more efficient navigation in the harbor, the no-action alternative would not realize more than $177 million in net annual economic benefits that could be achieved with harbor deepening, even after taking the $647 million cost of SHEP into account. And while it is true that with the no-action alternative there would be no additional environmental impacts in the Savannah area, the $647 million cost of SHEP includes comprehensive avoidance and mitigation that would reduce any potential impacts to natural resources to acceptable levels.

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765-DC-149-EN01

Comment: *In addition, substantial concerns have also been raised regarding the failure of the proposed channel as designed to safely accommodate fully-loaded Post-Panamax ships, further eroding the stated rationale for this Project, especially when weighed against the substantial economic cost and environmental impacts.*

Response: Safety was a primary consideration in the channel design. Tidal restrictions were taken into consideration for the fleet forecast though the HarborSym analysis. The pilots use their professional judgment and training to take advantage of the tide and navigate ships in the channel while maintaining underkeel clearance. The Vertical Motion Study (June 2011) defines the adequacy of a channel in terms of days of accessibility. An inbound (more restrictive than outbound) 46-ft draft vessel traveling at 10 knots would have 360 days per year accessibility given a 50-ft depth in the entrance channel (+1 ft tide) for durations up to 8 hr each day of the 12.5-hr tidal cycle. Faster ship speeds, longer durations, and deeper depths are possible, but require "trade-offs" in speed, duration, depth, and days of accessibility.

765-DC-149-OC02

Comment: *And finally, the Corps has simply failed to consider, as NEPA and the CWA require, a sufficient range of alternatives for accommodating the anticipated larger class of containerships and instead has arbitrarily limited its review of alternatives to different depths in the Savannah River. Stated another way, the Corps has studiously avoided asking perhaps the most important question here in light of the limited availability of federal funds: whether the federal government could deepen a different port in the Southeast region for less money and with fewer impacts on the environment. For these and other reasons stated below, we respectfully request that the Corps remedy the significant flaws in the DEIS and Draft GRR before proceeding with a FEIS.*

Response: The Corps has satisfied its obligations under NEPA and the CWA to consider reasonable and practicable alternatives. The SHEP NEPA alternatives analysis ranged from considering other potential options or sites for the project, including other South Atlantic ports, to evaluating potential specific locations for disposal of dredged or fill material along Savannah Harbor and in the Atlantic Ocean along the entrance channel. The SHEP NEPA alternatives analysis is found in various places in the EIS and GRR including EIS Section 2.0, Purpose and Need for Action; EIS Section 3.0, Alternatives; EIS Appendix H, Section 404(b)(1) Evaluation (Practicable Alternatives); EIS Appendix O, Formulation of Alternatives; GRR Section 6, Formulation of Alternatives; various other sections in the GRR; GRR Appendix A, Economics; GRR Appendix A, Attachment 6 (Regional Port Analysis); GRR Appendix A, Attachment 4 (Multiport Analysis); and GRR Appendix D, Plan Formulation Appendix.

The SHEP NEPA alternatives analysis includes the following key elements: (1) the statement of project purpose and need (EIS Section 2.0); (2) a Regional Port Analysis (GRR, Appendix A, Attachment 6); (3) a Multiport Analysis (GRR, Appendix A, Attachment 4); (4) analysis of various structural and non-structural alternatives (EIS, Section 3.0; GRR, Appendix D); (5) analysis of deepening to eight alternative locations or sites for a port/terminal along the Savannah River (EIS, Section 3.0 and Appendix O; GRR Section 6 and Appendix D); (6) analysis of six different depths of harbor deepening along the Savannah River (EIS, Section 3.0 and Appendix O; GRR, various sections); (7) analysis of alternative disposal sites, methods, or beneficial use of dredged sediments (EIS, Section 3.01.1 and 3.07); (8) analysis of related maintenance dredging requirements (EIS, Section 3.08-3.10); and (9) analysis of the no-action alternative (EIS, Section 3.01.1 and Appendix O; GRR Section 6.12.1).

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765-DC-149-EV02, 765-DC-149-EV03

Comment: *The Corps has Violated its Duty under NEPA by Failing to Provide Sufficient Information to Allow the Public a Meaningful Opportunity to Comment.*

Here, the Corps has failed to make available sufficient information to provide for meaningful public comment. Both the DEIS and GRR rely heavily on the use of various models by the Corps. For example, models utilized by the Corps include an Environmental Fluid Dynamics Computer Code ("EFDC") model, which is a three-dimensional surface water modeling system for hydrodynamic and reactive transport simulations of rivers and other water bodies; and the Water Quality Analysis Simulation Program ("WASP"), which is a dynamic compartment-modeling program for aquatic systems. The EFDC model provides ocean flow and tidal dynamics, upstream flow, and other data that is then incorporated into the WASP model through a hydrodynamic linkage file. GRR, App'x C at 102-03. The hydrodynamic and water quality models were modified and calibrated by the agencies and their consultants specifically for this project to evaluate a range of significant issues, including impacts to wetlands, fishery habitat, water quality, and dissolved oxygen. GRR, App'x C at 103, 105. Despite heavy reliance by the Corps on these models to evaluate critical aspects of the Project, neither the DEIS nor the draft GRR include sufficient information to allow the public to scrutinize the results derived from the modeling exercises.

Response: The Corps has provided information concerning the two models used to analyze potential impacts from deepening the Savannah River navigation channel. Moreover, there has been extensive coordination with the public, partnering agencies, Cooperating Agencies, and stakeholders occurred throughout the study process as documented in EIS-Section 1.01 and GRRSection 1.5. Since its inception in 1999, the Stakeholders Evaluation Group (SEG) has provided a public forum and assisted in identifying scientific studies/analyses that should be performed to identify environmental impacts resulting from harbor deepening. The principal charge of the SEG was the development of consensus among the participants regarding the scope and content of the scientific investigations/analyses performed pursuant to developing the EIS, the appropriate increment of channel depth ultimately selected, together with suitable mitigation measures for unavoidable losses.

The SEG provided input to GPA, federal, and state agencies on all aspects of the scientific investigations, analyses, and mitigation options for the proposed action. In addition to incorporating the SEG's input, the District performed studies and investigations which were necessary to evaluate the proposed project alternatives properly. From 1999 through 2010, **over 70 public meetings**, including approximately 70 full SEG meetings, plus numerous additional interim and committee meetings were held. Two public workshops were conducted at the beginning of the project (NEPA scoping) to identify issues that the public believed would be important in evaluating the deepening proposal. These meetings provided opportunity for the affected public to comment "before decisions have been made and before any action has been taken".

The District does not concur that it presented insufficient information to allow meaningful public comment on the modeling efforts. The tools employed in the study were developed by subject matter experts from federal/state agencies and private industry over a number of years as summarized in Section 7.4 of the Engineering Appendix of the GRR. The models were used to assess future impacts predicted to occur with the various proposed depth alternatives. Their use employed state-of-the-art techniques that were independently reviewed and verified. These tools were just part of a comprehensive study approach which was refined over a 13-year study period to ensure all impacts

were adequately assessed. The analyses performed and data presented in various reports were coordinated with the principals [interagency teams, non-federal sponsor, and stakeholders] and adequately evaluate the impacts of the noted project alternatives. The detailed information summarized in the subject reports, combined with the technical reports included as appendices and supplemental data, provide the reader with sufficient information to make meaningful comment. The sheer volume of data [appendices and supplemental materials, independent verification, organizational certification, and the extensive record of public and interagency coordination] are evidence ofthe fact that the modeling tools employed and results presented are more than adequate for reasonable decision-making.

The commenter also stated that it submitted a Freedom of Information Act request for specific information relating to the use of the models identified, and indicated that the Corps provided the requested information on January 29, 2011. The commenter stated that it intended to review the modeling analyses and supplement the initial comment letter, however, no supplemental comments were received.

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765-DC-149-EC02

Comment: *For purposes of its economic analyses, the Corps relies on baseline commodity forecasts completed in 2004. The trade forecast used by the Corps appears to seriously overstate the Project's benefits because more recent data from the Bureau of Census shows that imports fell 21 percent between 2008 and 2009, while exports fell by 13 percent.5 These same statistics (available through November 2010) show that while there has been a rebound in 2010, this rebound is not likely to bring trade back to the 2008 level. Since lower traffic levels mean fewer project benefits, recent changes in the world economy could seriously alter the basic benefit-cost equation. The decision by the Corps to rely on pre-recession trade forecasts is arbitrary and capricious.*

Response: The commodity forecast for GCT has been updated to include historical data [2005-2010] for tonnage values, number of TEUs, and other pertinent container information. Additionally, a regression analysis [2005-2010] was performed for each world region route to establish a baseline forecast. However, circumstances precluded the universal use of regression analysis. For example, the ECUS Africa service has limited data [just 2005 and 2006] since trade on this route is so intermittent. Accordingly, a straight average was used. The FE ECUS, EU PEN, and FE ECUS PEN services were capped at 2010 tonnage levels versus using the regression results. This decision was reached because services recently shifted from routes using the Panama Canal to those transiting the Suez Canal.

Route-specific Savannah Harbor growth rates were developed from a 2010 Global Insight (GI) South Atlantic Trade forecast (as performed in the original analysis). These rates were applied to the new forecast baseline to establish the long-term trade forecast (measured in metric tons).

A discussion regarding why the original GI forecast was replaced with the methodology noted above for developing growth rates has been included in the GRR-Economic Appendix. GI forecast data are used to derive rates of growth/change and those rates are applied to actual Savannah cargo information.

GPA data were used because of the time lag necessary to obtain PIERS and WCSC statistics. GPA's data had a broad base, viz., historical information, pilot/harbor master accounts, and WCSC sources. The District evaluated these data and found them to be reasonable for this study. Moreover, PIERS and WCSC data were used to calibrate/adjust the LFA model.

Recent shipping research suggests that as the Northeast China market matures, the manufacturing axis may relocate to Southeast Asia then possibly to India. The future is less certain for Africa given its overall lack of infrastructure (compared to SE Asia/India). Other potential developments include the possibility of an Arctic passage, potential new trans-shipment centers, world events near the Suez Canal, and a host of other factors relating to the future without project condition. While even the near-term is difficult to predict [with accuracy], as trends develop, they will be acknowledged [and evaluated] in any subsequent economic analysis.

The Corps ' guidance on deep-draft navigation projects emphasizes using empirical data [whenever possible] and to make forecasts over a 50-year period of analysis. This is a prudent approach because data on past and present problems help shape the future without-project condition scenario. This, in turn, serves as a baseline for project formulation and evaluation [comparisons]. As expected, a 50-year forecast contains uncertainty; therefore, several sensitivity analyses were performed using lower growth rates, no growth, and increased packaging densities. The results show project improvements [deepening] are economically justified under most sensitivity analysis scenarios.

It is important to note that economic conditions can change markedly from year to year. For example, in 2009 there were dramatic declines in worldwide cargo volumes and shipbuilding [economic downturn] whereas more recently external events such as Middle East unrest and the tsunami in Japan have likewise affected the shipping industry. Therefore, application of a longer [50-year] period of analysis helps to reduce short-term volatility and provides a more accurate economic picture [smoothing the curve].

The Corps examined more recent post-recession container traffic data which confirmed that shipping growth had resumed its upward trend. The updated economic analysis uses actual TEU traffic volumes through 2010. Using those volumes, the analysis forecasts TEU volumes at the base year of 2015 until 2030. In 2008, just before the start of the national economic downturn, the Garden City Terminal handled 2.6M TEU. The volumes decreased to 2.4M TEU in 2009, but have recovered to 2.9M TEU in 2010, the latest full year reported by GPA. These data show that if anything, earlier forecasts of container traffic had been conservative.

Also, the District performed sensitivity analyses using alternate growth forecasts, some of which addresses the noted concern about import growth from China. These sensitivity analyses were carefully developed by the PDT/reviewers and addressed the main sources of uncertainty.

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765-DC-149-EV04

Comment: *In addition to relying on old data, the Corps has also released its DEIS and GRR prior to completing its development of new information needed to evaluate the proposal. According to the GRR, the proposed harbor deepening would increase chloride levels at the City of Savannah's water intake during drought conditions. GRR at 168.*

Response: The DEIS stated that the Corps was continuing to collect chloride data and would use that data to attempt to improve the capabilities of its impact predictive tools. Those studies have been completed and reviewed by the City of Savannah and Georgia DNR-EPD. As a result, the FEIS contain a revised approach to mitigate for potential impacts on chloride levels at the City of Savannah's water intake during drought conditions and high tides -- construction of a raw water impoundment. That mitigation technique was evaluated in the DEIS but the mitigation technique identified at that time was

construction of a supplemental water intake further upstream. A raw water impoundment is now identified as the most cost effective technique to address impacts to chloride levels at the City's water intake.

The GRR and EIS address deepening impacts, alternative channel depths, mitigation of unavoidable consequences, and the adaptive management measures which would be employed. The Corps' Engineering Research and Development Center provided expert advice and technical assistance over the course of the study. All of the documents/analyses included in the EIS have been subjected to extensive internal/external review by subject matter specialists. Close coordination has been maintained with the City of Savannah to gain information relative to potential site-specific impacts and possible solutions to local problems. The DEIS contained the results of studies and analyses available at publication [and any omissions were prominently noted in the document]. In recognition of concerns expressed by the City of Savannah during the noted coordination, the District agreed to obtain additional data to refine its chloride predictions regarding potential impacts at the City's water intake in Abercorn Creek.

The updated analysis in the Final EIS used enhanced impact prediction measures. The results of the refined evaluation indicate that during drought periods and certain tidal conditions, chloride concentrations could significantly increase in the vicinity of the water intake. This possibility, in combination with the City of Savannah's water treatment process, could result in concentrations of lead and disinfection by-products which exceed the regulatory threshold for drinking water. As mitigation, the District would construct a raw water impoundment system to address any potential violations of drinking water standards. During periods of low chloride levels, water would be pumped from the existing Abercorn Creek intake a storage reservoir for subsequent use as needed. When chloride levels become elevated in the creek, water in the impoundment would be pumped to the City's potable treatment plant for processing/distribution. When chloride concentrations within Abercorn Creek return to more usual [acceptable] levels, the raw water storage impoundment could be refilled and made ready for future use.

765-DC-149-EV05, 765-DC-149-EC03, 765-DC-149-EC04, 765-DC-149-EV06

Comment: *The Tier II DEIS is seriously flawed with respect to its purpose and need statement. At best, the Tier II DEIS violates NEPA by failing to set forth a clear statement of purpose and need. At worst, the DEIS presents a statement of purpose and need that is contrary to the previous articulation of project purpose found in the Tier I EIS. Such a conflicting statement would be arbitrary and capricious and would also violate NEPA.*

The current Tier II DEIS is far less forthcoming regarding GPA's principal goal for this Project. Although it is difficult to tease out a statement of project purpose from the main body of the Tier II DEIS itself, the DEIS does offer that: "The primary problems identified—and the need for the project—relate to the inefficient operation of containerships in the Federal navigation channel at Savannah Harbor, which affect the Nation's international trade transportation costs." DEIS at 3-1.

Response: The EIS clearly defines the project's purpose and need and does not materially differ from that stated in the Tier I EIS.

The statements of purpose and need in the Tier I EIS and the Final EIS are clear, consistent, and have not changed over time, viz., to improve the efficiency of deep-draft navigation transiting Savannah Harbor. Evaluation of alternatives to improve efficiency is appropriate because shipping demand continues to grow and fleets are shifting composition to include a larger class of vessels. The GRR and EIS documented [in detail] the process used to verify the purpose and need statement as part of plan formulation and analysis (GRR Section 6 and EIS-Appendix O).

The Tier I and Final EIS address the same issues, i.e., large vessels calling on Savannah Harbor are constrained by the current channel depth of 42-feet mlw. These vessels must light load and/or wait for high tide conditions to navigate the harbor safely. This situation will become more problematic as shipping fleets convert to larger post-Panamax ships [replacing the older, smaller vessels] to take advantage of the economies resulting for the Panama Canal's expansion. Where a navigation channel is insufficient to accommodate larger vessels in the shipping fleets, navigation improvements are evaluated as a potential means [alternative] to reducing shipping costs.

Projections of world trade and growth in demand for shipping containerized cargo through east coast ports support expansion of capacity at Savannah Harbor and elsewhere. In response to steady growth and traffic forecasts, the Georgia Ports Authority and the State will continue to invest in facilities to increase landside terminal capacity. The District remains convinced that the Garden City Terminal Savannah Harbor will achieve its maximum capacity of 6.5 million TEUs around 2030.

The GRR/EIS address whether navigation channel improvements are justified to service existing and future shipping fleets reliably. The Tier I EIS stated: "Container traffic at the Port of Savannah increased by 20% during 1991-1995, greatly exceeding expectations. Continued growth of the Port necessitates that it remains efficient and cost competitive." In order to meet that need, "the objectives of the proposed project are as follows: (a) provide better passage for the existing fleet of larger vessels through the harbor at all tides, thus reducing shipping delays; and (b) provide for the safe and efficient transit of larger vessels expected to call on Savannah in the future." (Tier I EIS, 1998, page 14)

The comments provide misplaced emphasis on the need to accommodate growth (Tier I EIS language quoted above in the fourth sentence of the preceding paragraph). The subject sentence simply recognizes the necessity of a successful port remaining efficient and cost competitive as traffic volume grows. Moreover, the comments misconstrue the language recognizing growth in traffic as a statement that a deeper harbor is intended to increase the volume of cargo moving through the port. The comments then – incorrectly -- conclude that all costs and environmental effects of growth should have been attributed to expansion of the federal channel and analyzed as consequences thereof.

The subject channel improvements are intended to improve the efficiency of moving containers through the harbor. The 1998 documents state that the project purpose was to improve navigation efficiency to achieve cost savings; not channel deepening to attract growth. For example, the problem identification analysis in the 1998 Feasibility Study states:

> The currently authorized channel depths in the Savannah Harbor continue to constrain traffic. Under present conditions, many ships calling the port incur costly tidal delays and light loading. As traffic continues to increase, and as vessels in the world fleet continue to grow in size due to the retirement of smaller ships, in the absence of a harbor expansion plan the problem will only become worse in the future. Some shippers modify vessel itineraries in order to accommodate the existing channel depths in Savannah. These companies have indicated it would be more economical to use a deeper port of call, which a deeper Savannah Harbor would allow them to do.

The foremost problems in Savannah Harbor were identified in the 1998 documents (much as they were in the DEIS and Draft GRR) to include existing shippers experiencing higher costs due to light loading, tidal delays, turning and overall maneuverability, all of which would grow with increases in annual tonnage and use of larger, more efficient ships.

To the extent that the earlier purpose and need statement was misunderstood, the Final EIS (Section 3.0) is precise. Although the goal of the GRR was to identify the best way to improve the efficiency of moving containers through the harbor, the initial investigations found that the primary problems relate to the inefficient operation of container ships in the Federal navigation channel at Savannah. Those inefficiencies affect the Nation's international trade and transportation costs. The following statements of existing "problems" describe these inefficiencies:

1. Existing shippers are experiencing increased/inflated operations costs due to light loading and tidal delays;
2. Light loading and tidal delays will increase as present harbor users increase their annual tonnage and as larger, more efficient ships replace older, smaller ones;
3. Existing ships are experiencing problems associated with turning and overall maneuverability in certain reaches of the inner harbor;
4. The severity of problems associated with turning capabilities and overall maneuverability will increase as vessel size increases.

In summary, the statements of purpose provided in previous/current NEPA documents are, in fact, consistent and it should not be construed otherwise. The project purpose remains addressing navigation efficiencies for existing vessel traffic and future fleets expected to call on Savannah Harbor once the Panama Canal expansion is completed. Conversely, attracting growth [market redistribution] is essentially a non-issue since forecasts confirm container traffic expected at South Atlantic ports will exceed the collective capacity of their current and planned facilities (GRR-Appendix A, Regional Port Analysis.

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765-DC-149-EC05, 765-DC-149-EV07

Comment: *Here, the Corps must "consider and express th[e] activity's underlying purpose and need from a public interest perspective . . . ." Id. By concluding that this Project is needed for the "[c]ontinued growth of the Port," Tier I EIS at 14, the Corps would be artificially restricting its analysis to alternatives that benefit GPA to the exclusion of other reasonable alternatives beyond the Garden City Terminal for accommodating the larger class of container ships. Such an approach would violate NEPA and would frustrate a true alternatives analysis, which must include an evaluation of whether another port or ports in the Southeast could accommodate the larger class of container ships with a higher cost benefit ratio and fewer impacts on the environment. In other words, a general objective of the Project might be to accommodate the larger class of Post-Panamax vessels in the Southeast as opposed to simply evaluating alternative depths of deepening the Savannah Harbor. Without a clear purpose and need statement and a true " Multiport Analysis" that evaluates the relative costs and benefits of achieving the general objective of the Project from a public interest perspective, the Corps, as further discussed below, will be unable to comply with NEPA.*

Response: This and other related comments advocate a broader purpose and need for the project than the Corps and stakeholders have identified. However, the proponent's purpose and need can and should be taken into account, as long as it does not unduly restrict consideration of a reasonable range of alternatives. The purpose and need of addressing inefficiencies in moving goods through Savannah Harbor is a valid one and did not restrict the alternatives analysis. As discussed previously, the SHEP NEPA analysis considered a wide range of alternatives based on this purpose and need, including alternative ports in the South Atlantic region, alternative terminal locations along the Savannah River,

alternative non-structural measures, and the no-action alternative. See EIS, Appendix H, 4040(b)(1) Evaluation (Practicable Alternatives) which provides a complete list of the different sections or parts of the EIS/GRR that address alternatives; see also responses to comments 765-DC-149-EV05-EV06 above.

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765-DC-149-EC06, 765-DC-149-EV08

Comment: *Taken as a whole this discussion reveals that the Corps did not feel it had the time, resources, or desire to develop the most likely or reasonably foreseeable future with-project and without-project assumptions; instead, it decided to take a short cut and use the "conservative" assumption that container traffic levels would stay the same whether the harbor was deepened or not.*

Response: The GRR/EIS without project condition is not based on assumption but rather recognizes that GPA is presently implementing a capital improvement plan that will expand the Garden City Terminal [GCT] to its maximum throughput capacity (6.5 million TEUs) and such expanded capacity is needed to meet projected container growth for the southeastern United States regardless of whether the Savannah Harbor navigation channel is deepened. Under both without and with project conditions, the District expects the GCT to reach its build-out capacity around 2030 [at 6.5 million TEUs]. That is the maximum number of containers that can reasonably be processed through the GCT. This determination of the maximum capacity at GCT is based on factors other than the depth of the navigation channel. These factors include the size of the terminal, the number of gates that provide access to the property, the number and size of the berths, the number and size of the container cranes, the number of jockey trucks that move the containers within the terminal, how the containers are stacked within the terminal, and the number of railroads that service the terminal and the return frequency of their trains. The Corps anticipates that without deepening, more vessels will be required to transport the cargo expected to move through the port. With deepening, the total number of vessels would decrease (when compared to the 42-foot channel depth), as vessels would be able to load/unload closer to capacity without the present draft constraints.

765-DC-149-OC03

Comment: *The Corps' Position That Container Traffic Growth is Unrelated to the Proposed Project is at Odds with Virtually all Non-Corps Stakeholders.*

Response: Although GPA provided its views on future growth at the Garden City Terminal, the Corps made its own determinations and conclusions and is not responsible for statements or positions made by other stakeholders concerning traffic growth with or without the deepening project. The Corps believes that its determination and conclusions relative to traffic growth are supported by the studies, projections and information in the administrative record.

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765-DC-149-EC07, 765-DC-149-EV09

Comment: *Even Corps Statements in the GRR and DEIS Belie the Corps' Assumption that the Proposed Harbor Deepening and the Container Traffic Are Unrelated.*

Response: The statements in the FEIS more accurately reflect economic conditions that those in the Tier I EIS. GPA is planning to expand the Garden City Terminal to 6.5 million TEUs regardless of whether the Savannah Harbor navigation channel is deepened. Under both without and with project conditions,

the GCT will reach this build-out capacity by 2020. The 6.5 million TEU value is the maximum number of containers that can reasonably be processed through the facility based on factors previously identified.

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765-DC-149-EC08

Comment: *Since the Corps's Positive Benefit-Cost Ratio Is Based Solely on Greater Port Efficiencies, the Corps Should Discuss Who the Likely Beneficiaries of These Cost Savings Will Be...Will these cost savings be passed on to the American consumer in the form of lower consumer prices or will they be pocketed by foreign manufacturers or foreign shipping lines?*

Response: The District followed the Corps' regulations and policies in evaluating the economic effects and justification for the proposed harbor deepening. A major source of that guidance is ER 1105-2-100, Planning Guidance Notebook. Chapter 3-2 discusses navigation projects. Appendix D [Economic and Social Considerations] provides more detail on certain aspects of these evaluations.

Section 3-2 states the following while discussing National Economic Benefits:

"The base economic benefit of a navigation project is the reduction in the value of resources required to transport commodities. Navigation benefits can be categorized as follows:

(a) Cost reduction benefits for commodities for the same origin and destination and the same mode of transit thus increasing the efficiency of current users. This reduction represents a NED gain because resources will be released for productive use elsewhere in the economy. Examples for inland navigation are reductions in costs incurred from trip delays (e.g. reduction in lock congestions), reduction in costs associated with the use of larger or longer tows, and reduction in costs due to more efficient use of barges. Examples for deep draft navigation are reductions in costs associated with the use of larger vessels, with more efficient use of existing vessels, with more efficient use of larger vessels, with reductions in transit time, with lower cargo handling and tug assistance costs, and with reduced interest and storage costs.

A key in that discussion is the statement of the underlying economic theory that "This reduction represents a NED gain because resources will be released for productive use elsewhere in the economy." The economic theory is that savings received by an entity would be used elsewhere for another purpose. The lower transportation costs may be passed on to the consumer, who would use those savings to purchase more goods. The lower transportation costs might be used by the producer to modernize their equipment or hire more staff so they could produce goods more cost effectively in the future.

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765-DC-149-EC09

Comment: *As the Corps contends throughout the GRR and DEIS, shipping lines are building larger and larger ships, because these vessels can transport cargo more efficiently. Yet the design ship for the SHEP is a Post-Panamax Generation Two ship that was built in 1997. GRR at 121. Already ships that are significantly larger than the design ship are being built, yet the Corps does little to explain why it does not anticipate that these Post-Panamax Generation Three ships will call on Savannah Harbor.*

Response: This comment and the next two comments criticize the Corps' use of a Post-Panamax Generation Two ship (the Susan Maersk, a Super Post-Panamax vessel with a beam of 140 feet) as the design ship for SHEP and the related determination that Post-Panamax Generation Three ships will not call at Savannah Harbor. The Corps contracted with a respected independent company, Maritime Strategies International, Ltd. (MSI), to forecast the future world fleet of container ship vessels. MSI's forecasted capacity for Gen 1, Gen 2, and Gen 3 Post-Panamax vessels calling at Savannah through 2030 was provided in GRR Table 28. Gen 3 ships were defined as capacity 12,000 TEU or higher. MSI determined that, even by 2030, Gen 3 ships would not call at Savannah while by then Gen 2 ships would constitute more than 50% of the ship traffic. Given the infrequency of Gen 3 ships [less than 1% of the container vessel capacity], their consideration in the channel design process was not warranted.

The MSI conclusions regarding Gen 3 ships are reasonable because the Trans Atlantic and Asia trade routes account for the majority of expected growth at Savannah and Gen 3 vessels are unlikely to be deployed there. Vessels of the Emma Maersk class or the new 18,000 TEU size vessels are too large to fit through the expanded Panama Canal. Their economies of scale are only realized on long service hauls; therefore, they would not be used on the shorter Trans Atlantic trade routes. For these reasons Gen 3 ships are not expected to call at South Atlantic ports in large numbers/regular frequency.

Gen 2 vessels are defined as 7,600 to 12,000 TEUs, and are further broken down into Super Post-Panamax and Ultra Post-Panamax based on vessel width and draft (GRR Table 29). Based on this data, the Corps further determined that Ultra Post-Panamax vessels would not be expected to call at Savannah due to size limitations (144-158 feet width when Savannah channel modification would be designed for 144 foot width maximum). The vessel class defined as Super Post-Panamax best fit the design limitations of the channel and the air draft limitations of the Talmadge Bridge. Therefore, this type of vessel was selected as the design vessel for the proposed harbor improvements.

Careful consideration was given to the height constraint imposed by the Talmadge Bridge. The fleet forecast used for economic justification in the SHEP included only vessels that could traverse under the bridge. Further, as stated there is no expectation that "Generation Three" [Gen 3/Emma Maersk] ships would call at Savannah on any regular basis even if the Talmadge Bridge were raised.

765-DC-149-EN02

Comment: *While the GRR does contain information that states there are no air draft issues for the design ship, it acknowledges that it will be very difficult for Post-Panamax Generation Three ships to pass under the Talmadge Bridge. GRR, Econ. App'x at 51. Although the GRR does explain that two ships in the design-ship class will be able to pass at certain areas within the channel, it does not explain whether two Post-Panamax Generation Three ships would be able to pass in the channel. The Corps avoids these questions by simply stating that Generation Three ships will probably not call on Savannah Harbor, which is a counterintuitive position. If bigger ships mean greater efficiencies for Savannah Harbor, why does that principle not extend to Generation Three ships? As the GPA's Curtis Foltz has remarked, "Ships aren't getting any smaller. They're only getting bigger."*

Response: The design vessel for SHEP is the Susan Maersk, which has a 140-foot beam and represents the largest class vessel expected to call regularly on the port. Vessels larger than 153-feet in width are not included in the forecast and in the unlikely event they did call at Savannah would require a 1-way traffic restriction for their transit. See also previous response at 765-DC-149-EC09.

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765-DC-149-EC10

Comment: *If a major bridge alteration were part of SHEP, there is a real possibility that the high cost of this related work would mean that SHEP would not generate any net economic benefits as traditionally defined by the Corps. The analytical assumption that Generation Three ships will not call at Savannah Harbor is a convenient way to dismiss this potential problem. If the Corps' baseline vessel forecast is right, there is a strong probability that the largest ships would be calling at some ports on the Southeast Atlantic Coast. Given the shipping lines' business practice of multiple ports of call, GPA may soon want to accommodate these larger ships at Savannah Harbor. The height of the Talmadge Bridge will become an increasingly contentious issue.*

Response: See previous response at 765-DC-149-EC09.

765-DC-149-EN03

Comment: *According to the SRMC, the proposed channel is shallower than applicable design standards for fully loaded Post-Panamax ships, resulting in lower margins of safety. For example, the Navigation Study for Savannah Harbor Channel Improvements (Sept. 2004) determined that ships with a draft of 47.5 feet would hit the bottom in normal conditions in a channel with a depth of 52 feet. See Navigation Study at 34, Table 1. Since the currently proposed offshore channel is shallower, the SRMC predicts that a ship drawing 43 feet would be perilously close to running aground.*

Response: Savannah Harbor pilots move vessels through the harbor with a 4-foot underkeel clearance throughout the length of the transit [a common requirement for US ports]. Depending on the draft of the vessel, use of tides may be required to maintain a 4-foot underkeel clearance throughout the channel passage. Corps guidance recommends conducting laboratory models, field measurements, numerical model simulations, and/or probabilistic models to refine the required channel depths. The Corps used the CADET program (a numerical model simulation) as part of the vertical ship motion study to evaluate the factors listed above. This 2011 Vertical Motion Study determined the number of days of accessibility, the vertical motion allowances, and net underkeel clearance based on vertical ship motion components (wave-induced heave, pitch, and roll) to provide a risk-based method of evaluating different channel depths. For the selected alternative, the depth for the Entrance Channel will be 49 feet. Based on the CADET tidal analysis, to accommodate the fully-loaded design vessel (47.5 foot draft) on any given day of the year, an additional 3 feet of water below the 49 foot proposed project depth (i.e., h=52 feet). That depth is expected to occur for six hours in a 24-hour period. The Corps does not expect fully-loaded design vessels to commonly transit the harbor. The economic analysis (upon which the benefits are estimated) expects a design vessel calling fully-loaded to move through the port 3 percent of the time. Since the Harbor Pilots typically ride the tide when moving larger vessels, this occurrence would not constitute a change from present practice and is expected to be very manageable. That occurrence would also represent a greatly improved situation over what would occur in the Without Project condition.

765-DC-149-EN04

Comment: *Of further concern as it relates to draft is the SRMC's suggestion that the GRR misstates the applicable tide. Although it is true that there is a seven to eight foot tidal range at GCT, tidal range is closer to six feet at Fort Pulaski and four feet in the offshore channel. Overstating the extent of the tidal ranges raises additional concerns regarding the designed channel's capacity for handling fully loaded Post-Panamax ships, even on high tide.*

Response: According to NOAA, the tide range at Ft. Pulaski averages 6.92 feet whereas the tidal range at the ocean entrance of the channel extension is from 6.30 to 6.51 feet.

765-DC-149-EN05

Comment: *The offshore channel, as designed, would be about 570 feet wide. Post-Panamax ships have a beam of 160 feet (or, 28 percent of the offshore channel), and these ships can begin to veer off course due to wind and currents. If such a ship turns 10 degrees, the ship will take up to 56 percent of the channel width. In light of the proposed channel design and the increasing size of ships expected, this presents a safety issue that needs to be studied more closely. Further, the designed proposed channel width will be even narrower than the current width, limiting further the size of ship that can utilize the post-project harbor.*

Response: All Post-Panamax vessels do not have widths of 160 feet. For example, Post-Panamax Generation 2 vessels have widths ranging from 139 to 144 feet. Ship simulation was conducted for the SHEP entrance channel and results are documented in a report titled *Savannah Harbor Entrance Channel Simulations 2010 Report*, which is included in Attachment 3 of GRR Appendix C. That work included input from the harbor pilots. Based on the simulation results, crabbing is not a significant issue and was not encountered during the simulations. As stated previously, the economic analysis indicates that Post-Panamax Generation 3 ships (with a beam of 160 feet) are not expected to call at Savannah Harbor. Therefore, a channel design to accommodate that class of vessel is not warranted. Since that class of vessels is not expected to call at the port, it does not contribute to the economic benefits expected from the proposed harbor deepening.

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765-DC-149-EC11

Comment: *The GRR predicts that the GCT will ultimately have a demand of over 6,000 ships per year (or, 16 per day) however, SRMC's analysis suggests that the Port can only accommodate 12 ships per day due to the fact that as designed SHEP is essentially a one-way channel. The Corps or the local sponsor should conduct a traffic study to support its claim that GCT will be able to handle 6,000 ships per year.*

Response: Harbor deepening will not result in a [de facto] one-way channel. The Corps design studies (including ship simulation that used actual pilots who operate in the harbor on a daily basis) confirm that the entrance channel would allow two-way traffic by two meeting vessels [design]. Those analyses also confirm that the inner harbor channel would allow two-way traffic for a design vessel (PPX2) and a PPX1 containership. Two-way traffic within the inner harbor channel for two design vessels is also possible, but would have to be limited to the meeting lane reaches [2] that would be constructed as part of the project.

The port will not be capacity limited by its navigation channel; rather, the District's studies reveal it will be constrained by its landside capacity which, as noted is 6.5 million TEUs. The deepened channel is designed to accommodate all vessel sizes expected to call regularly at the port over the project's economic life. The HarborSym model evaluates the delays that the fleet would experience on a daily basis. The total waiting time for the fleet is projected to grow over time as more vessels call at the port. i.e., many would be depth- and therefore tidally-constrained. The HarborSym model identifies a reduction in total waiting time for the fleet with each of the channel deepening alternatives.

765-DC-149-EN06

Comment: *The Vertical Ship Motion Study for Savannah, GA, GRR, App'x 1.1.16, indicates that there will only be 120 days per year when wave conditions would be calm enough for a ship travelling at a speed of 6 knots and at a draft of 46 feet to transit the expanded channel without grounding. However, given the configuration of the proposed ocean channel, which is narrow and involves a sharp curve, consultants for SRMC have raised concerns that 6 knots is a dangerously slow speed for a container vessel to pass through the proposed ocean channel. In fact, consultants for SRMC have indicated that ships off the southeast coast often have to travel at 14 knots to stay in a narrow channel, such as the proposed SHEP channel; however a ship with a draft of 46 feet in the proposed channel will clearly hit the bottom at that speed. Further study is necessary to determine whether Post-Panamax ships can successfully navigate the ocean channel.*

Response: The Vertical Ship Motion Study report was revised after receipt of additional proprietary data from Maersk on ship parameters/lines. Errors were also corrected regarding how codes for the CADET program were compiled. The final report, dated June 28, 2011, contains the updated/corrected information. A vertical motion study defines the adequacy of a channel in terms of days of accessibility. For the recommended entrance channel extension, the revised report indicates that an inbound (more restrictive than outbound) 46-foot draft vessel traveling at 10 knots would have 360 days per year accessibility given 50-feet of water with no tidal restriction. It would have 364 days of accessibility a year given 52-feet of water [available for 6 hours of the 12.5 hour tidal cycle]. A 47.5-foot draft vessel traveling at 10 knots would have 360 days of accessibility at 52-feet of water [available for durations of up to 6 hours of the tidal cycle]. Faster speeds and increased days of accessibility are possible if the transit is coordinated with the tide cycle to use the higher water level. These durations are sufficient to allow safe transit through the entrance channel.

765-DC-149-EN07

Comment: *Moreover, if the narrow design of the ocean channel requires ships to navigate at 14 knots, we are concerned that such a rate of speed would be in excess of NOAA's ship speed rule. See 73 Fed. Reg. 60,173 (Oct. 10, 2008) (requiring all vessels 65 feet or longer travel at 10 knots or less in certain locations (SMAs), including off Savannah, along the east coast of the U.S. Atlantic seaboard at certain times of the year to reduce the threat of ship collisions with critically endangered North Atlantic right whales).*

Response: There is no safety-related requirement for vessels to transit the ocean channel at 14 knots. Savannah Harbor pilots routinely travel at speeds of ten knots [or less] -- in adherence of NOAA's speed restriction -- during seasons when the North Atlantic Right Whales may be present. Ship simulations verified that the current restriction on speed would not pose a significant problem after the deepened channel extension is in place.

765-DC-149-EV10

Comment: *For these reasons, the concerns raised by the SRMC relating to the navigational capacity of the proposed expanded channel deserve serious consideration by the Corps. Accordingly, we recommend that the Corps require the additional studies recommended by the SRMC. If these studies find that additional dredging must be performed to make the channel larger, then it will be necessary for the Corps to incorporate these costs into the NED analysis and to incorporate any additional environmental impacts into the DEIS.*

Response: See responses to previous comments. TheCorps reviewed the studies contained in the Draft GRR and revised some analyses. The updated analyses confirm the previous findings and are included in the Final GRR.

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765-DC-149-EV11

Comment: *As courts have recognized "[i]naccurate economic information may defeat the purpose of an EIS by 'impairing the agency's consideration of adverse environmental effects' and by 'skewing the public's evaluation' of the proposed agency action." NRDC v. U.S. Forest Serv., 421 F.3d 797, 811 (9th Cir. 2005) (quoting Hughes River Watershed Conservancy v. Glickman, 81 F.3d 437, 446 (4th Cir. 1996). The Corps' DEIS is a prime example. Despite NEPA's requirement that the Corps assess SHEP's indirect effects, the Corps in the GRR states: "It is important to note that the total cargo handled at Garden City Terminal is not projected to change due to implementation of the project. Therefore, secondary impacts associated with additional cargo traffic are not anticipated." GRR at 141. The Corps relied on this arbitrary and unreasonable assumption throughout the DEIS, thereby avoiding analysis and disclosure of many significant environmental impacts resulting from the Project.*

Response: The economic information is the best information available and is the type of information the Corps routinely uses when analyzing water resource development projects, including proposals to deepen navigation channels. The economic models are based on sound science and are of the type the Corps routinely uses for these types of projects. In considering the best available economic information and using sound forecasting models, the District considered future cargo traffic and has concluded that harbor deepening will not affect the current rate of increase [without project]. Further, the GPA would expand the GCT to its 6.5 million TEU throughput capacity regardless of whether the Savannah Harbor navigation channel is deepened. Under both without and with project conditions, the GCT will reach its build-out capacity by 2020 [at 6.5 million TEUs]. This is the maximum number of containers that could reasonably be processed through the Garden City Terminal. This determination is based on factors such as the size of the terminal, the number of gates that provide access to the property, the number and size of the berths, the number and size of the container cranes, the number of jockey trucks that move the containers within the terminal, how the containers are stacked within the terminal, and the number of railroads that service the terminal and the frequency of their trains. It is anticipated that without deepening, more vessels will be required to transport the cargo expected to move through the port. With deepening, the total number of vessels decreases as vessels will be able to load/unload without the present constraint of draft. See also other responses addressing this issue.

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765-DC-149-EV12

Comment: *In other instances the Corps is even more ambitious in its optimism, claiming that the Project will improve air quality by changing the behavior of shippers who, instead of making more trips with smaller ships, would upgrade to larger vessels and make fewer calls on Savannah. See, e.g., DEIS at 5-107 (stating that "[i]t is apparent from the Corps' Fleet Forecast . . . that the numbers of vessels calling on the Port of Savannah for years 2015, 2020, 2025, 2030, 2032 and 2065 will be significantly greater for the existing depth of -42 feet than the maximum proposed depth of -48 feet"); id. at 5-108 (asserting that reductions in air emissions would result "if larger container vessels were allowed to regularly call at the port"). The Corps does not include any supporting studies or analysis to even attempt to substantiate either of its conflicting conclusions. For the same reasons previously discussed in Sections I.C.2., I.D.,*

supra, NEPA requires the Corps to complete a realistic analysis of the Project's impacts on the Port's growth and to incorporate the results into a full and complete analysis of the Project's impacts to air quality.

Response: The District did not avoid analysis and/or disclosure of environmental impacts, including air quality. As explained previously, the economic analysis predicts both without project and with project fleets of container vessels. The air analysis (EIS, Section 5.06 and Appendix K) is based on the forecasted fleet mix and its methodology uses the procedures [data collection and computational protocols] recommended by EPA. As reflected in the EIS, the total air emissions from the fleet would decrease if the number of vessels decreases as forecasted (comparing without project and with project fleets). The District has confidence in these findings and that the conclusions drawn there from are appropriate. The EIS reflects a realistic and reasonable analysis of the Port's air quality impacts on the environment and contains a complete air emission inventory/analysis.

765-DC-149-EV13

Comment: *The DEIS further misleads the public concerning the Project's likely air pollution impacts by asserting that "maritime industries are not major air emitters" and "[t]he air quality in the harbor area is generally good." DEIS at 5-105. In fact, marine shipping operations constitute a major source of harmful air pollutants. Ocean-going vessels, land-side equipment, and secondary emissions from port development have significant impacts to air quality. For that reason, EPA recently produced an Evaluation Report, addressing these emissions. See EPA Needs to Improve Its Efforts to Reduce Air Emissions at U.S. Ports, Report No. 09-P-0125 (Mar. 23, 2009), available at http://www.epa.gov/oig/reports/2009/20090323-09-P-0125.pdf (last visited Jan. 25, 2011). The report explains that air pollution from port activities "impact[s] communities surrounding port areas" and has "significant environmental and human health impacts, such as cancer and asthma." Id. at 1-2. Emissions of greatest concern include nitrogen oxides (NOx), particulate matter (PM), sulfur oxide (SOx), carbon monoxide (CO), hydrocarbons (HC), and air toxics, especially diesel exhaust. Id. at 2.*

Response: The air quality in the harbor area is generally good (see EIS-Sections 4.03 and 5.6 and EIS-Appendix K). According to US EPA Region 4, both Chatham County, GA and Jasper County, SC are considered attainment areas for the 8-hour ozone standard. The Savannah area is under no federal or state restrictions for the purpose of improving air quality or to meet any air quality standard.

According to the 2002 and 2005 EPA National Emission Inventory (NEI) data for Chatham County Georgia, the Port of Savannah is a small subset of the County's total air emissions. The 2002 and 2005 NEI data for Chatham County was provided by the Emissions Inventory & Analysis Group, AQAD/OAQPS, US EPA Research Triangle Park, NC. When EPA prepared those evaluations, it included both landside and water-side (ocean-going vessels) components of the port in the values reported as being for the "Port of Savannah". EPA data demonstrate that Savannah's marine shipping operations are not a major contributor of harmful air quality pollutants.

765-DC-149-EV14, 765-DC-149-EV15

Comment: *In addition, the DEIS acknowledges that the Air Emission Inventory prepared for the Project "does not include a detailed dispersion modeling assessment" of air toxics or a "risk based assessment of the health impacts" attributable to the Project. DEIS at 5-106. The DEIS must include detailed dispersion modeling to accurately assess and disclose impacts to local communities and to account for the fact that those nearest the source face the greatest threat from air toxics, as well as the potential for "hot spots" of aggravated effects to occur. Similarly, given the wide and growing recognition of the significant harm port-generated air pollution can do to human health, the Corps must include a risk-based health impact*

study. A legally sound EIS cannot ignore these impacts on the environment and surrounding communities, much less downplay their significance, as the DEIS has done here. Moreover, NEPA requires the Corps to consider environmental justice in its EIS. The Corps appears to have ignored this obligation in declining to consider which communities will be most impacted by air pollution.

Response: Harbor deepening is not the causal factor that would lead to growth in container volume through the port on any given time line. The District's analysis forecasts emissions over time, with or without a harbor deepening. Since the air emissions would not increase as a result of the project, detailed modeling of those emissions is not needed to conclude the project would not produce significant adverse impacts on air quality.

With harbor deepening, total air emissions generated by port operations would decrease when compared to the without project condition. Since the air emissions would not increase as a result of the project, a risk-based health impact study of the effects of those (ongoing) emissions is not warranted.

The District did not ignore any substantial source of air emissions associated with the port. An examination of the Air Emission Inventory [EIS, Appendix K] reveals all of the major emitters at Garden City, as well as those at the other 21 terminals in the harbor, were included. Section 5.20 [Protection of Children and Environmental Justice] describes impacts of the proposed action in the context of both Executive Order 12898 and Executive Order 13045.

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765-DC-149-EV16

Comment: *Finally, the DEIS does not assess the Project's impacts to the affected areas' status under the Clean Air Act ("CAA"), 42 U.S.C. §§ 7401-7671q (2010). The DEIS states only that the affected areas are presently in attainment for the all National Ambient Air Quality Standards ("NAAQS") and claims the Project is therefore compliant with the CAA because this present status means the Corps need not prepare a conformity determination pursuant to CAA Section 176. The DEIS fails, however, to analyze and disclose whether the Project would push the impacted areas into non-attainment or maintenance status and what the Project's incremental impacts on compliance, or lack thereof, with applicable NAAQS will be. This omission is significant because the Project might have the potential to bring the affected area into nonattainment with the applicable standards for PM. The DEIS references an earlier EPA report indicating increases in PM 2.5 concentrations from 2000 to 2006, resulting in measurements exceeding the allowable daily range in 14% of the measurements taken for the study. DEIS, App'x K at 100. Similarly, EPA has proposed more stringent standards for ground-level ozone and has also predicted counties with ports might have difficulty meeting the standard. Report No. 09-P-0125, at 5. Failure to meet PM and ozone standards threatens not only regional public health, but could also lead to far-reaching planning requirements, emissions controls, and potential penalties under the CAA.*

Response: The EIS determined that over the life of the project (from 2016 to 2066) the proposed deepening of the harbor will not interfere with the area remaining in attainment of the NAAQS under Section 110 of the Clean Air Act. The EIS explains that because the proposed harbor deepening is not expected to increase the number of vessels or total cargo moving through the port, no changes to air quality or incremental impacts on compliance with the NAAQS would occur as a result of the project. Increases in air emissions at the port are expected over time as a result of growth in demand for goods that move through the port. Those increases would occur independent of a harbor deepening. Since the deepened port's total emissions would be less than those of the status quo, the proposed action

would not cause air quality degradation in Chatham or Jasper County or be the cause of either of those areas being considered as a non-attainment or maintenance area.

765-DC-149-EV17

Comment: *The DEIS and GRR should include a section explaining how Engineering Circular 1165-2-211 was applied to this Project and what were the results of its application.*

Response: The proposed action is in full compliance with Engineering Circular 1165-2-211. The GRR-Engineering Appendix explains how Engineering Circular 1165- 2-211 was applied to this project and the results of its application. The District also used a state-of-the-art hydrodynamic model to identify impacts to wetlands and floodplains from the proposed project alternatives. The sensitivity analyses for this model included low river flows [2001 conditions] and sea level rise of 25 and 50 cm [see EIS-Section 5.1.2 Indirect Impacts to Wetlands].

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765-DC-149-EV18

Comment: *It is unclear from the DEIS and GRR to what extent the Corps has considered issues related to climate change in evaluating the dissolved oxygen injection system. In exchange for exacerbating already present, unnaturally low levels of dissolved oxygen in the water column, the Corps is proposing, as mitigation, to inject dissolved oxygen into the Savannah River. Pursuant to the proposal, this system would have to be run continuously during the summer months in perpetuity. As discussed previously, we question the soundness of a decision to place a river on a permanent respirator of sorts. We are further troubled by a decision to implement a mitigation strategy that requires such a significant source of energy in perpetuity in light of climate change considerations. Perhaps the Corps should evaluate ways in which to mitigate for the new energy consumption created by its mitigation proposal.*

Response: Section 5.20 (C) of the FEIS clarified how climate change was considered in evaluating the mitigation plan, and Section 5.25.6 addresses the energy requirement for the oxygen injection system.

765-DC-149-EN08

Comment: *The DEIS and GRR should address the extent to which the Corps factored different sea level rise scenarios into its analysis with respect to air draft issues. To the extent the Corps did consider this issue, how did sea level rise inform the Corps' air draft analysis?*

Response: Section 7.5.2.2 of the Engineering Appendix references evaluated sea level rise over the life of the project. If the current historic rate of sea level rise continues, sea level will rise approximately 0.5 feet over the 50-year life of the project. At the highest predicted rate, sea level would rise 2.3 feet over the life of the project. The air draft of the design vessel with minimum water draft is 170 feet, with the antenna up. With an additional 2.3 feet of water elevation, the air draft would be 172.3 feet. The vertical clearance of the bridge is a minimum of 185 feet above mean higher high water. The air draft of the vessel fleet is not a concern for SHEP, even at the highest rate of sea level rise.

765-DC-149-EV19

Comment: *In the GRR, the Corps explains some of the ways in which the agency expects sea level rise to impact the Savannah River estuary. For example, the Corps suggests that sea level rise could reduce tidal freshwater marshes by approximately 370 acres in light of the historic rate of rise and also acknowledges that impacts could be far more extensive under other scenarios. GRR at 93. The Corps anticipates sea level rise would also affect other natural resources due to increased salinity levels. Anticipated impacts*

include those to fisheries and increased chlorides at the City of Savannah's water intake. GRR at 93. Under NEPA, the Corps cannot take the position that it need not provide full mitigation for impacts resulting from SHEP because some of these same resources will be affected as a result of climate change. The Corps must fully mitigate for the earlier impacts from SHEP now, especially since impacts from the SHEP will occur in the short-term whereas climate change related impacts will occur gradually over many years.

Response: The Corps did not take the position alleged that full mitigation of impacts from SHEP would not be required because those impacts are predicted to occur naturally over the life of the project. The mitigation for SHEP's impacts is based on those occurring when the project is implemented. The District obtained approval of a policy waiver request to mitigate for the impacts at the Base Year, rather than an average annual approach over the 50-year period analysis as is normal Corps practice. This provides a substantial benefit by ensuring the mitigation plan will be implemented before or concurrently with construction, as required by SHEP's authorizing legislation.

765-DC-149-OC04

Comment: *The Corps did not consider the significance of growth induced development that would be caused by the project even though the Corps stated in Appendix L that harbor deepening would increase the amount of goods brought into the Savannah port, which could trigger the need for additional distribution centers and other support facilities or expansion of existing ones.*

Response: The referenced statement in Appendix L was in error and has been removed. As explained in other responses, the project would not increase the amount of cargo transiting the port nor cause secondary growth; those effects would occur in the without project condition because of demand and GPA's capital improvement plan to expand the Garden City Terminal to accommodate 6.5 million TEUs annually regardless of harbor deepening.

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765-DC-149-EV20

Comment: *The Corps' assumption that the Project is unrelated to GPA's business skews the DEIS in other ways too. For example, the DEIS, on the one hand, acknowledges that the introduction of non-native or invasive species can have "detrimental affects on an ecosystem." DEIS at 5-156. "Invasive species have been introduced into new areas through the discharge of ballast water from deep-draft vessels. Increasing the amount of ballast water exchange within the port is the primary avenue through which the proposed harbor deepening could have an adverse effect on this issue." DEIS at 5-156.*

Response: As explained in the previous response, cargo growth through the harbor would not be affected by the proposed harbor deepening. As a result, the project does not need to evaluate (or mitigate) for the environmental impacts that may occur as a result of growth independent of the proposed action.

765-DC-149-EV21, 765-DC-149-EV22

Comment: *Under NEPA, the Corps is required to thoroughly assess the cumulative effects of the proposed SHEP. 40 C.F.R. § 1508.7 & 1508.25. NEPA's implementing regulations define cumulative effects as "impacts on the environment which result from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (federal or non-federal) or person undertakes such other actions." 40 C.F.R. § 1508.7. The cumulative*

impact analysis "must be more than perfunctory; it must provide a useful analysis of the cumulative impacts of past, present, and future projects. . . . [A] cumulative impact analysis must be timely. It is not appropriate to defer consideration of cumulative impacts to a future date when meaningful consideration can be given now." Kern v. U.S. BLM, 284 F.3d 1062, 1075 (9th Cir. 2002) (citation and internal quotation marks omitted). The Corps has failed to consider adequately SHEP's cumulative impacts.

Response: In this and the next two comments, the commenter criticizes the SHEP EIS cumulative impacts analysis, alleging that it does not consider the cumulative impacts of past, present, and reasonably foreseeable future actions. One of the arguments is that the cumulative impacts analysis does not consider future projects to deepen the Savannah River to accommodate Generation 3 ships (larger vessels). The commenter contends that future deepening would, among other things, require raising the Talmadge Bridge and additional widening.

The District's analysis of cumulative impacts is described in EIS Section 5.15 and Appendix L – Cumulative Impact Analysis. Following CEQ regulations and guidance, the District has adequately considered the relevant cumulative impacts of past, present, and reasonably foreseeable future actions. As recommended by CEQ, the cumulative impact analysis is focused on the most meaningful issues, including potential cumulative impacts to wetlands, fisheries, dissolved oxygen, groundwater, and endangered species. For each key resource, the analysis addresses geographic scope, historical basis (baseline condition), past actions / stresses, present condition, present actions / stresses, capacity to withstand stress, future actions / stresses, incremental impact, and alternatives to avoid, minimize, or mitigate cumulative effects.

The cumulative impact analysis fully recognizes and assesses the impact of past actions, such as previous deepenings of the Savannah Harbor and dam and reservoir construction upstream. The cumulative impact analysis also thoroughly evaluates the present condition, discussing recent and continuing work or programs such as maintenance of the existing Savannah Harbor Navigation Project, repairs to the SNWR freshwater control system, and stocking of Striped bass. For each key issue or resource, the cumulative impact analysis then considers reasonably foreseeable future actions, including the completion of GPA's capital improvement plan, the proposed project (SHEP), drought, sea level rise, and a proposed Jasper County container terminal.

The cumulative impact analysis does not consider additional deepening after SHEP to be a reasonably foreseeable future action. The period of analysis of the SHEP is 50 years, which is a long time horizon. During those 50 years, there will be annual maintenance dredging, which is fully considered in the cumulative impact analysis. However, additional deepening post-SHEP is not reasonably foreseeable, and in fact would be speculative, especially considering SHEP's 50-year period of analysis. As previously discussed, Generation 3 ships are not expected to call at Savannah Harbor between now and the year 2030 at any frequency requiring additional deepening, and there are constraints such as the Talmadge Bridge and the Floridan Aquifer that would limit any potential future deepening. Thus, the SHEP cumulative impact analysis considers the appropriate reasonably foreseeable future actions.

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765-DC-149-EV23

Comment: *A cumulative impact analysis must not examine a project in isolation, "without considering the 'net' impact that all projects in the area may have on the environment." LaFlamme v. FERC, 852 F.2d 389, 402 (9th Cir. 1988). The Corps' analysis of cumulative impacts is flawed — focusing narrowly on the "short-term" nature of the potential adverse environmental impacts and ignoring cumulative impacts that "can result from individually minor but collectively significant actions taking place over a period of time," 40 C.F.R. § 1508.07, as well as the potential for other individually significant actions. The DEIS fails to include in its cumulative impacts analysis reasonably foreseeable alterations to the Savannah River.*

Response: See response to previous comment [765-DC-149-EV21-22].

765-DC-149-EV24

Comment: *Similarly, as discussed in detail in Section I.D.4., supra, the widening of the harbor and the raising of the Talmadge Bridge are "reasonably foreseeable" projects that will allow the harbor to accommodate the Generation Three ships and other larger vessels. Pilots familiar with the harbor have expressed that SHEP would not support two-way traffic. In the interests of safety and in order to accommodate the world's largest ships in the future, it is likely that the GPA will widen the harbor. Also, the DEIS does not consider the potential elevation of the Talmadge Bridge so that the harbor may accommodate Generation Three ships. Given the continuing enlargement of container ships and GPA's strong desire to remain competitive, the raising of Talmadge Bridge is reasonably foreseeable under NEPA. The DEIS's failure to examine foreseeable future harbor projects does not satisfy NEPA's requirement that the Corps examine "past, present and reasonably foreseeable future actions." 40 C.F.R. § 1508.7.*

Response: See response to previous comment [765-DC-149-EV21-22].

765-DC-149-OC05

Comment: *The cumulative impacts analysis in the DEIS fails to examine the proposed Jasper Terminal in combination with SHEP. The construction of both projects would occur in close vicinity on the Savannah River and would impact the same coastal resources.*

Response: The cumulative impact analysis in the Final EIS evaluates a proposed Jasper County terminal as a potential future action with regard to each key issue/resource, to the extent practical at this time using available information. A proposed Jasper County terminal has not reached the feasibility level design stage yet, so information/data about its siting, design, and infrastructure is conceptual at this point.

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765-DC-149-EV25

Comment: *In Assessing the Project's Impacts for Both NEPA and CWA Purposes, the Corps Cannot Ignore EPA's Proposed Revisions to the Total Maximum Daily Load ("TMDL") for DO in the Estuary.*

Response: The NEPA documents do not ignore EPA's 2010 Draft TMDL. The FEIS discusses EPA's TMDL and its relationship to the SHEP in Section 4.02 and dissolved oxygen mitigation measures in Section 5.02. The dissolved oxygen injection system is designed to offset adverse project impacts [at all alternative depths] thereby addressing the primary concern in regards to the Savannah Harbor Draft

TMDL. In addition, because of their spacing, the Speece Cones are expected to increase oxygen concentrations in the Savannah Harbor environs. Specifically, the harbor's dissolved oxygen regime should be incidentally improved in over 90 percent of the project effects' area compared to existing conditions.

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765-DC-149-EV26

Comment: *To Comply with NEPA, the Corps Must Prepare a Programmatic EIS. The Corps states that the "expected future growth of container cargo along the East Coast [will] require expansion in the capacity of several deepwater container terminals" and "expansion of any existing container terminal or creation of a new terminal would cause environmental impacts." DEIS at 3-6. In the south Atlantic region, at least four port projects are planned or proposed—including Savannah, Jacksonville, Charleston, and Norfolk. GRR at 70. Each deepening project includes the expenditure of substantial federal funds, each project requires numerous federal permits, and each project presents significant environmental impacts on federally controlled coastal resources. Each project, when combined with others, could cause cumulative and synergistic impacts on the nation's environment, including its major rivers and estuarine and marine systems. The Corps "must give a realistic evaluation of the total impacts and cannot isolate a proposed project, viewing it in a vacuum." Grand Canyon Trust v. Federal Aviation Admin, 290 F.3d 339, 342 (D.C. Cir. 2002). . The Corps' review of these projects in isolation undermines two of NEPA's keystone objectives: informed public participation and informed agency decision-making. See Citizens for a Better Henderson v. Hodel, 768 F.2d 1051, 1056 (9th Cir. 1985).*

Response: The DEIS and Final EIS fully meet the District's responsibilities under NEPA. The District has evaluated alternatives outside the Savannah River estuary, as well as alternatives within the estuary. The District disagrees that a programmatic EIS is required. A programmatic EIS is not required or appropriate with regard to the SHEP for a variety of reasons including but not limited to the following. First, port expansion projects that are only conceptual or proposed are speculative. The cited projects are at varying stages of concept or development. Second, the cited projects are not all pending concurrently before the Corps. For example, a proposed deepening of the Norfolk harbor is not under study by the Corps at this time. Third, to date no one has seriously contended that the potential environmental impacts of SHEP and its mitigation would have any effect on the environment at Jacksonville, Charleston, or Norfolk harbors. Fourth, and perhaps most importantly from a legal standpoint, Congress authorized the SHEP in 1999 as a specific stand-alone project, mandated it be studied in a particular way, and required that it be approved by four federal agencies. Such Congressional action preempts any arguable NEPA programmatic EIS requirement.

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765-DC-149-EV27, 765-DC-149-EC12

Comment: *Although the Corps does examine other ports in the Southeast to determine whether their container throughputs would be impacted if Savannah Harbor were deepened, the Corps does not examine whether the Corps should undertake harbor expansion projects at one or more of these other ports instead of at Savannah Harbor. The DEIS does not explain whether or not, for example, the Jacksonville or Charleston harbors could be deepened and improved to the same extent as Savannah Harbor for a lesser amount of money and fewer environmental impacts.*

This is critical in determining whether the DEIS is sufficient, because, as the Ninth Circuit Court of Appeals held in Citizens for a Better Henderson, a "viable but unexamined alternative renders [the] environmental impact statement inadequate." 768 F.2d at 1057.

Response: This is another comment regarding the SHEP alternatives analysis. As explained in a previous response (765-DC-149-EN01), the SHEP NEPA alternatives analysis ranged from considering other potential options or sites for the project, including other South Atlantic ports, to evaluating potential specific locations for disposal of dredged or fill material along Savannah Harbor and in the Atlantic Ocean along the entrance channel. The SHEP NEPA alternatives analysis is found in various places in the EIS/GRR, including EIS Section 2.0, Purpose and Need for Action; EIS Section 3.0, Alternatives; EIS Appendix H, Section 404(b)(1) Evaluation (Practicable Alternatives); EIS Appendix O, Formulation of Alternatives; GRR Section 6, Formulation of Alternatives; various other sections in the GRR; GRR Appendix A, Economics; GRR Appendix A, Attachment 6 (Regional Port Analysis); GRR Appendix A, Attachment 4 (Multiport Analysis); and GRR Appendix D, Plan Formulation Appendix.

As explained above and in several places in the GRR/EIS, including EIS Appendix H, Section 404(b)(1) Evaluation (Practicable Alternatives), among the conclusions reached as a result of the Regional Port Analysis, the Multiport Analysis, and the analysis of eight alternative sites for the project along the Savannah River were the following: (1) there is no feasible alternative to improving Savannah Harbor because the major South Atlantic ports will experience so much cargo growth from 2005 to 2050 they will all need deepening or improvement currently planned, (2) no one South Atlantic port has the ability to expand to accommodate all the growth in container volume expected in the region, and (3) the proposed deepening of Savannah Harbor would not divert container traffic from other ports because the shipping cost efficiencies would not outweigh the additional landside transportation costs.

765-DC-149-EV28

Comment: *The DEIS's consideration of the Jasper Terminal falls far short of NEPA's requirement that the DEIS "rigorously explore and objectively evaluate" alternatives to the proposed action. 40 C.F.R. § 1502.14(a). Unlike all other alternatives considered by the Corps, the Jasper Terminal will likely be constructed. Even GPA's executive director, Curtis Foltz, recognizes the future Jasper Terminal, recently stating that the "Jasper port is a very solid project" and that the project is "moving forward, as it was expected to, on its current timeline."23 Thus, the Jasper Terminal is not simply a Corps-defined hypothetical alternative, but a viable alternative that could have dramatically less environmental impacts than deepening to the Garden City Terminal. The Corps' failure to conduct a fair and balanced consideration of the Jasper Terminal renders its alternatives analysis inadequate under NEPA.*

Response: The SHEP NEPA alternatives analysis fully considered a proposed Jasper County terminal. Among other things, the Regional Port Analysis specifically evaluated current and projected port capacity, demand, and growth, and environmental impacts and constraints for other South Atlantic ports (Norfolk, VA; Wilmington, NC; Charleston, SC; Savannah, GA; and Jacksonville, FL) and a proposed Jasper County Marine Terminal (GRR, Appendix A, Attachment 6). In addition, the information regarding a Jasper County terminal was analyzed in a study of the potential costs and environmental impacts of locating the project at one of eight different sites along the Savannah River (four on the South Carolina side, four on the Georgia side) As discussed in the EIS Section 3.0 and Appendix O. Among the conclusions reached as a result of the Regional Port Analysis, the Multiport Analysis, and the

analysis of eight alternative sites for the project along the Savannah River were the following: a Jasper County terminal would not be cost effective when compared to improving Savannah Harbor based on the high cost involved (now estimated at $4 billion including the cost of constructing the new transportation infrastructure that would have to be built), and the timing (a Jasper County terminal does not exist at present and cannot be constructed in time to meet the growth in demand occurring through Savannah Harbor).

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765-DC-149-EV29

Comment: *As described above, in order for an alternatives analysis to be lawful, the agency conducting the analysis must include all aspects of each alternative and do so in a consistent manner. The Corps did not accomplish this with its analysis of the Project. Specifically, the Corps' preferred alternative does not include the landside improvements to the Garden City Terminal that have been performed and will be performed to ready the terminal for Post-Panamax ships. See DEIS, App. O at 36. It goes on to explain that GPA has planned these improvements "to coincide with the Panama Canal Expansion Project." GRR at 14. In the DEIS, however, the costs of upgrades at the Garden City Terminal are entirely disconnected from the Project and therefore are not included in the project costs. In contrast, the Corps does include these costs in the "without project alternative," as well as all of the other alternatives to deepening to the Garden City Terminal. DEIS, App. O at 35-36. This, of course, skews the entire alternatives analysis. If the GPA landside improvements were undertaken with a deeper port in mind, they should be factored into the alternatives analysis in a consistent manner. The Corps should not be permitted to ignore these costs for some alternatives, while considering them for others.*

Response: The alternatives analysis was properly conducted. The alternatives analysis considers all components of the various options in a consistent manner. The landside improvement costs at the GCT are not included in Table 6 of Appendix O because the GCT does not require modification to accommodate Post-Panamax vessels. This is not the case for any other terminal alternative. Table 7 shows the costs of modifying the GCT to achieve **additional** throughput capacity and accompanying text clearly explains that the GPA plans to expand the GCT regardless of whether or not the Savannah Harbor navigation channel is deepened (Without Project Condition). See also other responses on alternatives issues.

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765-DC-149-EV30

Comment: *Although the Corps, as a matter of policy, does not issue itself permits for its own activities, it "authorizes" its own discharges, applying all applicable substantive requirements, including the Section 404 Guidelines found at 40 C.F.R. § 230.10. 33 C.F.R. § 336.1(a) (2011);33 C.F.R. § 337.6 (2011); 40 C.F.R. § 230.2(a)(2) (2011); see also Regulatory Guidance Letter ("RGL") 88-09 (July 21, 1998, expired Dec. 31, 1990); RGL 05-06 (Dec. 7, 2005). As explained below, this proposal violates the CWA in the following respects.*

Response: The SHEP, including the mitigation plan, would not violate the Clean Water Act or the Section 404(b)(1) Guidelines. The EIS describes how the project will avoid, minimize, and compensate (mitigate) for potentially significant adverse environmental impacts to ensure compliance with the Clean Water Act. The States of Georgia and South Carolina have issued Section 401 water quality certifications with conditions to ensure the project will comply with state water quality standards established under

the Clean Water Act. EIS Appendix H, Section 404(b)(1) Evaluation, analyzes and demonstrates compliance with the Section 404(b)(1) Guidelines.

765-DC-149-EV31

Comment: *Section 404(b)(1) of the CWA, 33 U.S.C. § 1344(b)(1) (2010), directs the EPA to issue Guidelines that define the circumstances under which dredged or fill material may be discharged into wetlands or other waters. Importantly, the Guidelines provide that the Corps shall not grant a Section 404 permit "if there is a practicable alternative to the proposed discharge which would have less adverse impact on the aquatic ecosystem, so long as the alternative does not have other significant adverse environmental consequences." 40 C.F.R. § 230.10(a) (2011). An alternative to discharge to a wetland "is practicable if it is available and capable of being done after taking into consideration cost, existing technology, and logistics in light of overall project purposes." 40 C.F.R. § 230.10(a)(2). Where a discharge is proposed for a wetland or other special aquatic site, all practicable alternatives to the proposed discharge that do not involve a discharge to the wetland "are presumed to have less adverse impact on the aquatic ecosystem, unless clearly demonstrated otherwise." 40 C.F.R. § 230.10(a)(3). In addition, if the activity associated with a discharge to a wetland does not require access or proximity to or siting in a wetland (i.e., is not "water dependent"), practicable alternatives that do not involve wetland sites "are presumed to be available, unless clearly demonstrated otherwise." 40 C.F.R. § 230.10(a)(3).*

Response: DEIS Section 2.0 clearly defines the project's purpose and need. As Appendix O and other parts of the EIS/GRR describe in detail, numerous potential methods [structural/nonstructural] were considered. All measures that had the potential to reach the project's objective were evaluated based on their technical, economic, and environmental effects. EIS Appendix H, 404(b)(1) Evaluation, contains a full discussion of practicable alternatives, demonstrating there is no practicable alternative to the SHEP, taking into account cost, existing technology, and logistics in light of overall project purposes.

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765-DC-149-EV32

Comment: *The Section 404(b)(1) Guidelines prohibit authorization of a discharge of dredged or fill material that "[c]auses or contributes . . . to violations of any applicable State water quality standard." 40 C.F.R. § 230.10(b)(1). The DEIS shows that the Project would contribute to existing violations of numeric water-quality standards in the Savannah Harbor, which is already impaired by inadequate dissolved oxygen DO levels. The DEIS further shows that the Project would cause or contribute to violations of narrative water quality and antidegradation standards by damaging the aquatic ecosystem and eliminating or impairing existing uses. In addition, the DEIS fails to adequately analyze and disclose impacts to water quality and the level of uncertainty in the analysis conducted, suggesting that additional or greater violations may also result.*

Response: With its mitigation plan, the SHEP would not violate the Clean Water Act or the Section 404(b)(1) Guidelines. The EIS describes how the project will avoid, minimize, and compensate (mitigate) for potentially significant adverse environmental impacts to ensure compliance with the Clean Water Act. The States of Georgia and South Carolina have issued Section 401 water quality certifications with conditions to ensure the project will comply with state water quality standards established under the Clean Water Act. EIS Appendix H, Section 404(b)(1) Evaluation, analyzes and demonstrates compliance with the Section 404(b)(1) Guidelines.

As to the level of uncertainty, in EIS-Section 5.1.2.1 Procedures, the following is stated: *The Water Quality Interagency Coordination Team assisted in the application of EPA's model on this project. EPA, USFWS, NMFS, USGS, SC DHEC, GA DNR-EPD and the Corps agreed in 2006 that the enhanced model was suitable for use in evaluating potential impacts from this proposed harbor deepening project. The Corps had an Independent Technical Review performed of the model by ERDC. Their review focused on the model grid representation, input parameters, and existing conditions calibration. The reviewer stated that the model was acceptable for impact evaluation purposes on this project. The ERDC ITR did not include analysis of the model programming, but rather the application of the model to Savannah Harbor. The EFDC and WASP models are on a Corps' "allowed for use" list of approved engineering models.*

The District's use of these state-of-the-art hydrodynamic models does not discount the risk and uncertainty associated with water quality and mitigation. In fact, few organizations have more experience/expertise in addressing the complexities of landscape water resource projects.

Throughout the EIS, the District detailed how model uncertainties were realized and considered. Section 8 and Appendix Q of the EIS are examples of risk/uncertainty being discussed in detail. Section 12 in the GRR considered the following uncertainties: Economic Analysis Uncertainty, Jasper County Terminal Sensitivity Analysis, Alternative Sensitivity Analyses Cost Risk Analysis, Chloride Mitigation Costs, Environmental Impact and Mitigation Uncertainty, Uncertainty in Salinity Predictions, Risk with Salinity Predictions, Uncertainty in Dissolved Oxygen Predictions, Risk with Dissolved Oxygen Predictions, Uncertainty in Biological Responses, Risk in Biological Responses, Risk in Sea Level Change Assumptions. Section 15 in the Engineering Appendix of the GRR also speaks to the risk and uncertainties associated with a project of this magnitude.

765-DC-149-EV33

Comment: *The DEIS admits that the Project will contribute to the existing violations of DO standards by exacerbating this impairment. Specifically, the DEIS admits that the proposed Project will have additional adverse impacts to DO levels. See, e.g., DEIS at 5-48 (stating that "[d]eepening the navigation channel would adversely impact dissolved oxygen levels in the harbor"); id. at App'x S p. 51 (same). And, in Table 5-19, it sets forth modeling results and a narrative that describes the Table as showing "a substantial decrease in dissolved oxygen levels" in "critical cells." DEIS at 5-43; see also App'x S p. 48 (same).26 Moreover, the DEIS predicts 1-2 percent increases in the percentage of the harbor's waters violating DO standards. DEIS at 5-42. Because the Project will admittedly contribute to and cause further violations of DO standards in an already impaired waterway, approval of this Project is prohibited by Section 404(b)(1) of the CWA.*

Response: The referenced sections of the DEIS [in this comment] describe adverse conditions resulting from reduced dissolved oxygen occurring in the absence of mitigation. The District recognizes that SHEP would impact dissolved oxygen levels unless mitigation is provided. The comment, however, overlooks the fact that a vital component of the proposed project is its mitigation plan, which includes oxygen injection system to address those specific adverse consequences. In fact, although the system is designed to remove the project's impacts on the harbor's dissolved oxygen regime, it would also provide some incremental improvements to the status quo.

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765-DC-149-EV34

Comment: *The Project would violate these standards by impairing existing and classified uses and eliminating conditions necessary for the survival of a balanced indigenous aquatic community. In particular, the Project will cause deterioration of DO levels and saltwater intrusion. The decline in DO concentrations represents "a major concern for all fish and aquatic organisms." See Expert Report of Shawn P. Young, Ph.D. at 6 (attached hereto as Ex. E) (hereinafter referred to as the "Young Report"). Increased salinity impacts "the aquatic community as a whole, including freshwater marshes," and affects shortnose-sturgeon and striped-bass habitat. Id. at 9. It may also change the presence and abundance of benthic invertebrate and forage fish species. Id. at 4-5, 7, and 9. The Project's adverse impacts, especially with respect to DO and salinity, threaten to violate water quality standards by precluding the survival and propagation of the "natural, diverse biotic community" indigenous to these waters. S.C. Code Ann Regs § 61-68(B)(11), (G)(10)-(12). Most notably, the Project could "preclude" striped bass restoration in the Savannah River and possibly destroy the fishery, which has been described as a nationally important resource. Tier I FEIS at H-62 & H-205 (comments of U.S. Fish and Wildlife Service and Georgia Department of Natural Resources on Tier I DEIS); SELC, Comments on Tier I FEIS (Oct. 19, 1998). "[H]istorically, the Savannah River was Georgia's most important striped bass fishery," DEIS at 4-21, but it suffered a dramatic decline after the Corps grossly underestimated impacts of its previous activities, Young Report at 3, 15. And, while the Corps proposes a striped-bass stocking program as mitigation, even assuming the program were fully funded and implemented, under the CWA and applicable water quality standards, such a program could not adequately compensate for the adverse impacts and resulting violations. The CWA and state standards require preservation of the chemical, physical, and biological integrity necessary to support a "self sustaining" indigenous aquatic community; S.C. Code Ann Regs § 61-68(B)(11); 33 U.S.C. § 1313(d) (requiring states implement additional measures where existing discharge restrictions do not adequately protect the "protection and propagation" of a "balanced, indigenous population of shellfish, fish, and wildlife" (emphasis added)).*

Response: The quoted sections of the EIS discuss potential project impacts if **no** mitigation occurs. In fact, a vital component of the proposed project is its mitigation plan, which includes an oxygen injection system to address those specific adverse consequences. Studies by independent engineering firms identified the use of an injection system [Speece Cones] as the most cost-effective method to address decreased dissolved oxygen levels in the post-project harbor. Another consultant [Tetra Tech] used the various hydrodynamic and water quality models to design the specifics of the noted dissolved oxygen system. The systems that the District has proposed would result in a minor net improvement to the estuary's DO levels. EIS Table 5-28 titled, *Percent of Cells with Improvement in D.O. Levels Over Existing Conditions* demonstrates the extent of improvement to the harbor's DO levels.

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765-DC-149-EV35

Comment: *EPA regulations require state water quality standards to incorporate an "antidegradation policy" sufficiently protective to ensure that, at a bare minimum, "[e]xisting instream water uses and the level of water quality necessary to protect the existing uses shall be maintained and protected" in all waters. 40 C.F.R. § 131.12(a)(1) (2011); see also 33 U.S.C. § 1313 (dictating required content of state water quality standards). "EPA has explained that under its antidegradation regulation, 'no activity is allowable . . . which could partially or completely eliminate any existing use.'" PUD No. 1 of Jefferson County, 511 U.S. at 718 (alteration in original) (citing EPA, Questions and Answers on Antidegradation 3*

(Aug. 1985)). EPA has further explained that "[w]ater quality should be such that it results in no mortality and no significant growth or reproductive impairment of resident species," and "[a]ny lowering of water quality beyond this full level is not allowed." EPA, Questions and Answers on Antidegradation 7 (Aug. 1985), available at http://www.epa.gov/waterscience/standards/library/antidegqa.pdf (last visited Jan. 24, 2011).

Response: With the proposed mitigation in operation (see EIS Section 5.0 andAppendix C Mitigation Planning), SHEP will not degrade the water quality in either Georgia or South Carolina. The States of Georgia and South Carolina have issued Section 401 water quality certifications for the SHEP with conditions to ensure the project will comply with state water quality standards established under the Clean Water Act.

Section 5 in Appendix C Mitigation Planning discusses water quality issues and states: *The Corps used the hydrodynamic and water quality models to identify many of the impacts to natural resources from the proposed project alternatives. These included impacts to salinity, water quality, wetlands, and fisheries. Impacts to other resources were evaluated using separate analyses. Those evaluations included potential impacts to the drinking water aquifer, adjacent ocean beaches, river shorelines, and air quality. After the expected impacts to the aforementioned resources were identified, the Corps used the hydrodynamic and water quality models to evaluate ways to reduce impacts.*

Section 6 in Appendix C also discusses the various mitigation plans that would avoid, reduce, and compensate for water quality impacts.

Table 5-28 in the EIS shows the incidental improvements to DO that would result if the proposed DO systems are implemented along with harbor deepening.

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765-DC-149-EV36

Comment: *Both the DEIS and GRR state that mitigation, through the use of Speece Cones to artificially inject oxygen into the water, will fully offset decreases in DO with incidental benefits. GRR at 192; DEIS at 5-51. More specifically, to mitigate the ways in which the deepening proposal will further exacerbate DO problems in the River, the Corps has "identified use of Speece cones as the specific technique to inject oxygen into the water . . . ." GRR, App'x B at 30. These systems would be land based, with water being withdrawn from the river through pipes, then treated and returned to the river. GRR, App'x B at 30. The water intake structure would include screens to reduce the intake of trash and other suspended solids. GRR, App'x B at 30. The intake and discharge would be located along the side of the river and not extend out into the navigation channel. GRR, App'x B at 30. For a number of reasons, the Corps cannot lawfully rely on this uncertain, unproven, and potentially unfunded mitigation plan in assessing the impact of the Project on DO levels.*

Response: The District, in partnership with Georgia Ports Authority, conducted extensive analyses regarding water quality issues. The studies concluded that SHEP, without mitigation, would impact dissolved oxygen levels. The District and Georgia Ports Authority then analyzed potential strategies for mitigating impacts to dissolved oxygen levels. The District concluded that dissolved oxygen impacts can be mitigated through dissolved oxygen systems. Dissolved oxygen injection systems have been used successfully at Corps reservoir projects in the Savannah District and elsewhere around the world. The District analyzed different oxygen injection systems. Most germane in this regard would be the demonstration project that established the capability of the Speece Cones to add oxygen to the estuary

without causing other adverse effects. The results of that effort are described in the MACTECH Engineering report titled "Savannah Harbor Reoxygenation Demonstration Project", dated January 2008 [and subsequent reports].

Tetra Tech developed the design of the oxygen injection systems. The report titled, *Oxygen Injection Design Report Savannah Harbor Expansion Project*, dated October 2010, describes this effort. The report is included as part of the Engineering Appendix supplemental materials in the GRR. Both the design analyses and the demonstration project indicate that Speece Cones are an effective means to restore [and improve] DO post-deepening.

Moreover, the Georgia and South Carolina water quality certifications ensure Savannah Harbor dredging operations are conducted in a manner to maintain specified water quality standards. No dredging may occur if the dissolved oxygen levels fall below the specified dissolved oxygen levels. These conditions add protection to the Savannah River estuary so that dredging will not result in unacceptable dissolved oxygen levels.

765-DC-149-EV37

Comment: *According to the GRR, currently, the Savannah District annually receives approximately $13 million for operation and maintenance ("O&M") dredging and maintenance of the upland disposal areas. This does not include funds for dike raising, dike maintenance, and mosquito control. GRR at 220. The proposed sill to be constructed at the eastern edge of the sediment basin as part of the SHEP proposal will cause the basin to fill, resulting in an increase of O&M dredging and maintenance costs to over $24 million. GRR at 220. Against this backdrop, the "Dissolved Oxygen facilities will be constructed and maintained by the Corps." GRR, App'x B at 5. The costs for operating the dissolved oxygen injection systems are based on their continued operation for a period of 180 days per year. Included in the annual O&M costs are the replacement costs for the Speece cone and intake and discharge lines at 40 year intervals; and replacement of the oxygen flow control, oxygen generator and side stream pump at 20 year intervals." GRR at 220. In sum, the annual operating costs for the Speece Cones are anticipated to be more than $1.3 million, and the Corps – and not GPA – will be responsible for this cost. It also does not appear that the Corps has provided any financial assurances that it will have the funding to operate and maintain the DO injection system for the length of the Project. Instead, it appears as if the Corps will have to rely on the annual appropriations process to fund this significant annual cost.*

Response: The Corps will document in the project Record of Decision its binding commitment to install, operate, and maintain the dissolved oxygen injection system in accordance with the project mitigation plan subject to Congressional appropriation of funds for the project, and will make the dissolved oxygen injection system a top priority for annual operation and maintenance (O&M) funds appropriated and received for the project, above normal maintenance requirements. See also response to next comment.

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765-DC-149-EV38

Comment: *This feature of the mitigation plan conflicts with the new mitigation rules promulgated under the CWA.27 Among other things, the Mitigation Rule was intended by the EPA and Corps to "improve[] the planning, implementation and management of compensatory mitigation projects by . . . requiring . . . assurances of long-term protection of compensation sites, financial assurances, and identification of the parties responsible for specific project tasks." 73 Fed. Reg. at 19,594. Under the Rule, mitigation plans must contain a long-term management plan, adaptive management plan, and financial assurances. Specifically, the Rule states that the "district engineer shall require sufficient financial assurances to*

ensure a high level of confidence that the compensatory mitigation project will be successfully completed, in accordance with applicable performance standards." Id. at 19,638 to 19,639; codified at 33 C.F.R. § 332.1(n)(1) (2011). Here, despite the importance of mitigating for further exacerbating the River's already severe dissolved oxygen problems and the exorbitant and ongoing cost of the technology selected to perform the mitigation, there is no reasonable assurance provided that the Corps will be able to successfully operate and maintain this element of the mitigation plan since it appears that it has been made subject to the annual appropriations process. As such, this mitigation measure fails to provide reasonable assurance (and similarly fails to comply with the Mitigation Rule).

Response: The District prepared a long-term management plan with an adaptive management element specific to the mitigation of impacts on dissolved oxygen. Appendix D (Monitoring and Adaptive Management Plan) describes the cost estimates for adaptive management to modify the project's mitigation features [as necessary]. To date, these estimates are supported by the facts. It should be noted that the costs for mitigation and adaptive management requirements exceed (on a percentage basis) the normal allocation for a more routine Corps of Engineers water resource development project. SHEP would remain in a construction status (Construction Funding) until all construction is complete, the post-construction monitoring is complete, and any required adaptive management measures are implemented and confirmed to be effective. If more funds are required to conduct additional monitoring or modify any of the mitigation features associated with the project, these funds would be requested through the annual construction budget process. Funding requests for mitigation measures receive high priority because they must be secured before project construction can be completed. Following completion of these activities, the project would enter the operation and maintenance phase, which becomes responsible for costs associated with maintaining the mitigation features of the project, e. g., an oxygen injection system. Funding requests for mitigation features for projects (either in the construction or operation/maintenance) phases receive the Corps' highest priority.

Adaptive management funds would be requested as part of the construction funds for the project. These funds could be supplemented during annual budget requests for construction general funds. The project is cost-shared and the local sponsor (Georgia Department of Transportation) would also be responsible for providing its annual share of funding.

The concerns about financial assurances, as defined in the 2008 Final Mitigation Rule, and its application toward civil works projects like the SHEP are unjustified. Regulation 33 CFR 332.3 (n)(1) states, *"The district engineer shall require sufficient financial assurances to ensure a high level of confidence that the compensatory mitigation project will be successfully completed, in accordance with applicable performance standards. In cases where an alternate mechanism is available to ensure a high level of confidence that the compensatory mitigation will be provided and maintained (e.g., a formal, documented commitment from a government agency or public authority) the district engineer may determine that financial assurances are not necessary for that compensatory mitigation project."* The SHEP is a civil works project that will receive funding from the federal government. Authorization of this project by the Assistant Secretary of the Army in conjunction with annual Congressional appropriations for its operation/maintenance provides sufficient documentation that the compensatory mitigation will be maintained. Similarly, the Georgia Department of Transportation (another government agency within the State of Georgia) would be committed to providing its share of project costs. Thus, there is little risk that mitigation features like the D.O. injection system will be eliminated during the project's life.

Of note, the 2008 Final Mitigation Rule has significant application within the USACE's Regulatory Program. The Rule was used as the principal document for updating the USACE's mitigation banking program in the State of Georgia. Both commercial and county-managed mitigation banks exist within the state. Financial assurances are required for commercial, private-based mitigation banks where the responsible party (i.e., banker) could abandon a mitigation bank before it achieves success. However, county-owned mitigation banks use credits exclusively for the purpose of mitigating public projects (i.e., road improvement, utility lines, etc.) and are not required to provide financial assurances. Likewise, the Georgia Department of Transportation (state agency) is not required to provide financial assurances for its mitigation banks. The reason for this difference in policy is based on 33 CFR 332 (n)(1) of the Final Mitigation Rule, i.e., government entities are neither transient nor fleeting. Similarly, the federal government and the Georgia Department of Transportation are not required to provide financial assurances for the same reasons.

The Corps will document in the project Record of Decision its binding commitment to install, operate, and maintain the dissolved oxygen injection system in accordance with the project mitigation plan subject to Congressional appropriation of funds for the project, and will make the dissolved oxygen injection system a top priority for annual operation and maintenance (O&M) funds appropriated and received for the project, above normal maintenance requirements.

There would be 12 Speece Cones total at three different locations. The proposed Speece Cone technology has been used in other applications worldwide for 30 years and underwent on-site testing in Savannah Harbor during 2007. The DO system design for Savannah Harbor already includes reserve capacity and an operational back-up unit at each of two installation locations. The estimated life of the cones and lines is 40 years and the estimated life of the controls, oxygen generator, and pumps is 20 years. During construction, there would be a Transfer Efficiency Study to optimize the DO system operation. During the project's 10-year post-construction monitoring period, needed adjustments and modifications to the DO system would be funded through the project's $18 million Adaptive Management plan. Successful installation, operation, and maintenance of the DO system is a requirement of several approvals for the project, including Georgia and South Carolina's water quality certifications.

765-DC-149-EV39

Comment: *In addition to the inadequacy of the purported mitigation, the Corps has not undertaken a sufficient analysis of the Project's impacts to DO. The Corps has not accounted for the full scope of the dredging required by the Project. In particular, it does not appear that the Corps considered the "[t]wo feet of allowable overdepth and up to 6 feet of advance maintenance in selected areas" that "would also be included for the proposed action." DEIS at 3-22. This added excavation and the potential for erosion in the loosened channel would further reduce DO. See DEIS at 5-37 (saying "as the channel depth increases, the ability of oxygen to reach the river bottom decreases, causing lower average levels of dissolved oxygen at the bottom . . . ."). It apparently means that the actual channel depth resulting from the proposed Project could be as much as 56 feet. But, the DEIS and DO modeling appear to ignore what this might mean in terms of further deterioration in DO levels. As a result, the modeling conducted could not actually predict impacts to DO and salinity, nor could the Corps accurately assess impacts to aquatic resources. Cite report. If the Corps ignored the full scope of the dredging and attendant impacts to DO, it necessarily underestimated the negative impacts and the amount of mitigation that would be necessary to compensate for the impacts. And, it is not entitled to rely on inaccurate models to support its conclusions. Cf. Native Ecosystems Council v. U.S. Forest Serv., 418 F.3d 953, 964 (9th Cir. 2005) ("An agency may not rely on incorrect assumptions or data in an EIS.").*

Response: The District's hydrodynamic/water quality studies and resultant models included each alternative's authorized channel depth, including over-depth and advance maintenance. To evaluate each of the depth alternatives, the model grid within the channel was lowered by the appropriate amount, i. e., the 48' project depth (deepen by 6') model grid bathymetry depths were increased by 6'. The original model grid was based on actual annual surveys which included advance maintenance and over-depth. Therefore, the alternative project depths also accounted for any currently authorized advance maintenance and over-depth.

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765-DC-149-EV40

Comment: *Moreover, it also appears that although the locations of the injection cones are now different than previously identified, the Corps has not studied mixing or dispersion of the injected oxygen at these locations. The DEIS neither analyzes nor frankly discloses this change of plans. The Corps must explain the basis for this deviation from its plans and assess impacts of the altered location. It likewise must account for the altered costs associated with the move. The DEIS recognizes that operational expense increases with distance from the areas needing increased DO. DEIS App'x C p. 43. In redoing its fundamentally flawed economic analysis, the Corps will need to factor in this cost.*

Response: The details of the oxygen system locations and costs are presented in the *Oxygen Injection Design Report Savannah Harbor Expansion Project*, dated October 2010. This report, prepared by Tetra Tech, is included as part of the Engineering Appendix supplemental materials in the GRR. That report describes the mixing and dispersion analyses that were performed. Section IV (D) of EIS Appendix C describes the changes that occurred in the DO system designs through time.

765-DC-149-EV41

Comment: *More generally, the DEIS understates the uncertainty of and risks associated with both the projections of water quality impacts and the proposed mitigation. While the DEIS relies on a demonstration project in support of its conclusions, the results of that study were inconclusive. In fact, FWS has explained that, "There is a great deal of risk and uncertainty regarding impacts and the channel and flow modifications and dissolved oxygen mitigation plans. Based on the available information, there is a high degree of uncertainty as to how effective oxygen injection would be. See DEIS, App'x E (letter from Timothy N. Hall (FWS) to Colonel Edward J. Kertis, Jr. (Corps) dated Nov. 4, 2008). The Corps' failure to adequately analyze the Project's impacts to DO and the efficacy of the purported DO mitigation precludes reliance on the DO injection system as a mitigation technique.*

Response: The risks and uncertainties of the proposed dissolved oxygen system for Savannah Harbor are fully discussed in the Risk and Uncertainty Analysis EIS Appendix Q]. In summary, it was concluded that the model's errors in predicting dissolved oxygen levels present little risk for decision-makers. Moreover, the results of the oxygen demonstration project together with intensive post-construction monitoring further reduce the risks associated with project implementation. The adaptive management plan provides the means to modify the oxygen injection systems or their operation. These alterations could range from adjusting the amount of injected oxygen, modifying the oxygen injection equipment, or adding to the number of sites where oxygen is injected. See also responses to other comments, including explanations that dissolved oxygen injection systems have been used successfully at Corps reservoir projects in the Savannah District and elsewhere around the world, and that Georgia and South Carolina water quality certifications require Savannah Harbor dredging operations are conducted in a manner to maintain specified water quality standards.

765-DC-149-EV42

Comment: *Moreover, as with the mitigation proposed for striped bass, the mitigation proposed for DO, even if assumed to be fully funded and effective, could not replace what was lost. As the DEIS explains, the Project would adversely affect DO levels in three ways. First, the increased depth would decrease the ability of oxygen to reach the river bottom and thereby cause lower DO levels at the bottom of the river. DEIS at 5-37. Second, by enlarging the channel prism, the Project would move additional saltwater into the upper part of the harbor and into the estuary, which decreases those waters' capacity to accept oxygen from the air. Id. Third, as the channel prism enlarges, velocity decrease, reducing mixing through the water column. Id. Thus, the Project's effects reduce DO levels by reducing its "reaeration capacity." SEG DO/TMDL Issue Summary, at 2, available at http://sav-harbor.com/WP/DO_WP.pdf (last visited Jan. 24, 2011). Injecting air into the water from land-based Speece cones cannot restore the aeration capacity of the waterway. And, as discussed above, the CWA requires that the functions and values necessary to support a "self-sustaining," aquatic ecosystem, i.e. one not dependent on anthropogenic intervention.*

Response: The oxygen injection systems have been designed to remove the incremental impacts of the SHEP on the dissolved oxygen regime in the harbor and will effectively mitigate for its construction. The design and feasibility of the systems are detailed in the report titled *Oxygen Injection Design Report Savannah Harbor Expansion Project*, dated October 2010. This report was prepared by Tetra Tech and is included as part of the Engineering Appendix supplemental materials in the GRR. Both the design analyses and the demonstration project indicate that the Speece Cones would be an effective measure to elevate D.O. in the deepened harbor. Due to the spacing of the systems, the dissolved oxygen regime would be improved in over 90 percent of the estuary, compared to existing conditions. See also responses to other comments regarding dissolved oxygen.

765-DC-149-EV43

Comment: *Finally, the Corps must also take into account that the proposed mitigation would not be entirely benign. The DEIS recognizes that fish would become entrained in the oxygen injection system. And, although it states that approach velocities will be adjusted to "minimize" such impacts, it does not analyze or discuss what the impacts will be. DEIS at 5-48. The oxygeninjection system will also have noise impacts to the surrounding areas and greenhouse gas emissions, which the Corps must take into fully consider.*

Response: The District considered potential adverse impacts of the design during the development process. The potential for fish entrainment would be minimized by keeping intake flow velocities at less than 0.5 feet per second, a rate that natural resource agencies identified as being adequate to protect fishery resources. The intake velocity and intake screens would minimize significant entrainment of adult/juvenile fish and many other aquatics. Project designers are also aware of other potential issues related to operating the Speece cones, e.g., noise abatement measures will be included in the final project design, if necessary. However, the District conducted a noise evaluation and found that noise from operating the D.O. systems would be indistinguishable from background noise levels.

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765-DC-149-EV44

Comment: *The CWA requires the Corps to seek state water quality certification for discharges of dredged or fill material into waters of the U.S." 33 C.F.R. § 336.1(a)(1); see also 33 C.F.R. § 337.10 (2011); 33 C.F.R. § 338.2(c) (2011). To certify a project as consistent with its water quality standards, South Carolina must have "reasonable assurance" that the Project will not violate those standards. S.C. Code*

Ann. Regs. § 61-101(A)(4). "The water quality standards include the uses of the waters, the numeric and narrative criteria, and the antidegradation rules contained in [Regulation 61-68]." Id. § 61-68(A)(1). As explained above, the proposed Project would violate a number of these standards. See infra at Section II.A.2. And, more specific regulatory provisions addressing the state's review under Section 401 require that South Carolina deny the requested certification.

Response: In this and other comments, it is contended that the project does not qualify for a Section 401 water quality certification from South Carolina or Georgia. However, with its mitigation plan (see EIS Section 5.0 and Appendix C, Mitigation Planning), the SHEP will not degrade water quality in either Georgia or South Carolina. The States of Georgia and South Carolina have issued Section 401 water quality certifications for the SHEP with conditions to ensure the project will comply with state water quality standards established under the Clean Water Act. See also response to comment 765-DC-149-EV35.

765-DC-149-EV45

Comment: *Consistent with the CWA's mandate, South Carolina's water quality standards emphasize a "preventative approach" that recognizes the difficulty of restoring water quality once degraded. S.C. Code Ann. Regs. § 61-68(A)(3). To that end, Section 401 certification must be denied if the "the proposed activity permanently alters the aquatic ecosystem in the vicinity of the project such that its functions and values are eliminated or impaired." S.C. Code Ann. Regs. § 61- 101(F)(5)(a). As explained above, here, the proposed Project would result in severe and permanent adverse impacts to the affected waters. See infra at II.A.2.(d).*

Response: With the proposed mitigation in operation (see EIS Section 5.0 and Appendix C, Mitigation Planning), the SHEP will not degrade water quality in either Georgia or South Carolina. The States of Georgia and South Carolina have issued Section 401 water quality certifications for the SHEP with conditions to ensure the project will comply with state water quality standards established under the Clean Water Act. See also response to previous comment 765-DC-149-EV35.

765-DC-149-EV46

Comment: *Similarly, if "there is a feasible alternative to the activity, which reduces adverse consequences on water quality and classified uses," the proposed activity cannot receive certification. Id. 61-101(F)(5)(b). The availability of feasible alternatives to the proposed Project, discussed in detail in Section I.H. above, precludes issuance of a Section 401 water quality certification.*

Response: The SHEP NEPA alternatives analysis, discussed and explained above in response to comment 765-DC-149-EN01, demonstrates there is no feasible alternative to SHEP. In South Carolina, a feasible alternative must be reasonable, taking into account the likelihood that it will achieve the project purpose, the cost of the alternative, and other factors – and it must reduce adverse consequences on water quality. A proper feasible alternatives analysis includes analysis of alternative locations and sites, analysis of methods of design or construction, and analysis of the no-action alternative. The Corps' alternatives analysis for SHEP fully complied with these principles.

Originally, the local sponsor proposed the project with the purpose of improving navigation in Savannah Harbor. The Corps had a duty to take that project purpose into account. In addition, the US Congress then authorized the specific project (subject to further study and approval by other federal agencies). 1999 Water Resources Development Act, Pub. L. No. 106-53, sec. 101(b)(9). As part of the studies authorized by Congress, the Corps conducted a wide-ranging, multi-level alternatives analysis that included (1) the Regional Port Analysis (GRR, Appendix A, Attachment 6), (2) a Multiport Analysis (GRR,

Appendix A, Attachment 4), (3) an analysis of a reasonable range of alternative locations or sites along the Savannah River (EIS, sec 3.0 and Appendix O; GRR Section 6 and Appendix D), (4) an analysis of six different depths of harbor deepening along the Savannah River (DEIS, sec. 3.0 and Appendix O; GRR, various sections)(methods of design or construction), and (5) the no-action alternative (EIS, at 3.01.1 and Appendix O; GRR Section 6.12).

The pertinent conclusions relative to the wide range of alternatives studied for SHEP are: (1) there is no feasible alternative to improving Savannah Harbor because the major South Atlantic ports will experience so much cargo growth from 2005 to 2050 they will all need deepening or improvement, (2) no one South Atlantic port has the ability to expand to could accommodate all the growth in container volume expected in the region, (3) the proposed deepening of Savannah Harbor would not divert container traffic from other ports because the shipping cost efficiencies would not outweigh the additional landside transportation costs, and (4) at this time a proposed Jasper County terminal is not an alternative in lieu of improving Savannah Harbor for various reasons including the tremendous cost involved (at least $4 billion), the environmental impacts, and the timing (a Jasper terminal does not exist at present and cannot be constructed in time to meet the growth in demand Savannah and other South Atlantic ports are currently facing).

Moreover, South Carolina's Coastal Management Plan (SCCMP) specifically establishes a strong preference for developing ports in industrialized areas that have existing infrastructure. See SCCMP, Part III, Transportation Facilities, at III-19 – III-20. This preference plus the high cost associated with developing a Jasper terminal and the approximately twenty years required to study, permit, and construct that project, weigh heavily against finding a Jasper terminal alternative to be a feasible alternative to improving Savannah Harbor.

The SHEP and a Jasper terminal are not viewed by the Jasper Ocean Terminal project office as alternatives. Rather, the project office believes both ports are needed. A March 11, 2011 "Update" from the Jasper Ocean Terminal project office contains numerous statements that SHEP is necessary and beneficial for the Jasper Ocean Terminal project ("The development of the Jasper site is predicated on the success of ports in Savannah and Charleston. A completed SHEP and the planned expansion of Charleston are the first steps . . . ."). The Update states that the Jasper Ocean Terminal will handle container volumes in excess of what an improved (deepened) Savannah Harbor or Charleston Harbor could handle. The Update also confirms that a Jasper terminal will cost $4 billion (a more recent estimate by the SCSPA is $5 billion).

In light of the information provided in the Update, combined with the fact that a Jasper terminal would have its own environmental impacts requiring mitigation (Regional Port Analysis, DGRR, Appendix C, Attachment 6, Final Report, at 14-20, and associated Interim Reports), a Jasper terminal is not presently a feasible alternative to SHEP. After extensive study, no other specific feasible alternative was identified or found.

765-DC-149-EV47

Comment: *In addition, certification must be denied if "the proposed activity adversely impacts waters containing State or Federally recognized rare, threatened, or endangered species." S.C. Code Ann. Regs. § 61-101(F)(5)(c). Here, the DEIS and GRR acknowledge that the proposed Project will have significant adverse impacts on the federally endangered shortnose sturgeon. Indeed, the DEIS admits that "substantial adverse impacts" remain to shortnose sturgeon habitat even in the seemingly unlikely event that the proposed flow alterations and oxygen-injection system function as hoped and, in fact, benefit*

sturgeon. DEIS at 5-68; but see NRDC v. Kempthorne, 506 F. Supp. 2d 322, 355 (E.D. Cal. 2007) (stating, in ESA context, that "at a minimum, a mitigation strategy must have some form of measurable goals, action measures, and a certain implementation schedule"); Nat'l Wildlife Fed'n v. Nat'l Marine Fisheries Serv., 254 F. Supp. 2d 1196, 1211-12 (D. Or. 2003) (finding agency's reliance on mitigation measures that were not reasonably certain to occur to be arbitrary and capricious).

Response: The project includes mitigation to compensate for the loss of Shortnose sturgeon habitat in the estuary by providing access to historic and additional upriver spawning areas. The National Marine Fisheries Service – which administers the Endangered Species Act for this species – has stated that the proposed mitigation effectively balances the impacts to the Savannah River population of SNS. NMFS has issued a Biological Opinion for the project which includes terms and conditions protecting the Shortnose sturgeon, including construction of a fish passage structure at New Savannah Bluff Lock and Dam. The project's compliance with the ESA regarding Shortnose sturgeon, Atlantic sturgeon, and other threatened and endangered species is fully documented in Sections 4.09, 5.11 EIS-Appendix B (BATES), and EIS Appendix Z (BO). Also, the Georgia and South Carolina water quality certifications require implementation of fish passage approved by NMFS as a condition, which provides additional assurance adequate mitigation will be implemented.

765-DC-149-EV48

Comment: *Finally, certification must be denied if: "the proposed activity adversely impacts special or unique habitats, such as National Wild and Scenic Rivers, National Estuarine Research Reserves, or National Ecological Preserves, or designated State Scenic Rivers." S.C. Code Ann. Regs. § 61-101(F)(5)(d). Here, the DEIS acknowledges that the proposed Project will severely impact the Savannah National Wildlife Refuge, most significantly through the destruction of tidal freshwater marshes. See infra Section VIII.C.; DEIS at 5-117. For that reason as well, certification must be denied.*

Response: Section 5.01 and Appendix C-Mitigation Planning discuss the plan to mitigate impacts that would occur to wetlands on the Savannah National Wildlife Refuge. With the proposed mitigation, the USFWS concluded that the impacts of the proposed project on the Refuge are acceptable. No National Wild and Scenic Rivers, National Estuarine Research Reserves, National Ecological Preserves, or designated State Scenic Rivers are located within the project's potential impact area.

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765-DC-149-EV49

Comment: *The proposed Project would violate the Georgia Water Quality Control Act, O.C.G.A. §§ 12-5-20 et seq. ("GWQCA"), and therefore the Georgia Environmental Protection Division ("Georgia EPD" or "EPD") should not issue a CWA Section 401 Water Quality Certification ("WQC") in connection with this Proposal.*

Response: On February 16, 2011, the Georgia Department of Natural Resources, Environmental Protection Division issued the Corps of Engineers a Section 401 Clean water certification for the project, with conditions to protect state water quality standards.

765-DC-149-EV50

Comment: *As a threshold matter, we are concerned with Georgia's approach to granting a WQC for the Project. Given the size and scope of the Project and the Project's significant environmental impacts, the South Carolina Health and Environmental Control Department has determined its review may require the*

statutorily-provided time period of one year to consider the Corps' request for a WQC. In contrast, Georgia EPD has already assured the Corps that it will receive certification in the coming months while, at the same time, acknowledging the agency has not had time to complete its review.29 EPD is apparently operating under the mistaken assumption that the Corps is entitled to a WQC. To the contrary, the currently proposed Project would violate water quality standards under Georgia law. Considering the Project's degradation on water quality, it is imperative that EPD approach its obligations under the CWA in a cautious and critical manner. Consistent with this approach, and in compliance with 33 U.S.C. § 1341(a)(1), EPD should afford the citizens of Georgia an opportunity to review and comment on a draft WQC prior to reaching a final decision in this matter.

Response: With the mitigation plan in place, the proposed action would not degrade or violate any Georgia water quality standard. On February 16, 2011, Georgia issued a Section 401 water quality certification for the project with conditions to protect state water quality standards.

765-DC-149-EV51

Comment: *The GWQCA's primary objective is to "enhance water quality and prevent pollution." See Ga. Comp. R. & Regs. r. 391-3-6-.03(2)(a). SHEP's expected water quality degradation flies in the face of Georgia's Anti-Degradation Policy, which states that "[e]xisting instream water uses and the level of water quality necessary to protect the existing uses shall be maintained and protected." Id. at 391-3-6-.03(2)(b)(i) (emphasis added). The lower Savannah River that would be affected by the Project is already listed as impaired for dissolved oxygen under CWA Section 303(d). The Corps expressly recognizes that the Project "would adversely affect DO, a critical resource," DEIS at 5-37 and, thus, as discussed in detail in Section II.A.2(d), the Project would exacerbate DO problems.*

Response: Studies by independent engineering firms identified oxygen injection as the most cost-effective method to address [elevate] DO levels in the deepened harbor. Another consultant [Tetra Tech] used the approved hydrodynamic and water quality models to design a dissolved oxygen system that would effectively eliminate adverse impacts on DO [all depths]. In fact, the proposed injection system will result in a minor net improvement to DO levels in the estuary. Table 5-28 titled, *Percent of Cells with Improvement in D.O. Levels Over Existing Conditions* shows the extent of this improvement. Additionally, the District would perform post-construction monitoring to ensure the DO systems provide their intended benefits. With the proposed mitigation in place, the harbor deepening would not degrade water quality [classified uses] in either Georgia or South Carolina.

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765-DC-149-EV52

Comment:

The Project Would Needlessly Thwart the Policies of South Carolina's Coastal Zone Management Program ("CMP"), in Violation of the Coastal Zone Management Act ("CZMA") and South Carolina Law. The DEIS and GRR set forth a fundamentally flawed and incomplete analysis of the Project's impacts and therefore fail to supply the "[c]omprehensive data and information," S.C. CMP at V-20, DHEC needs to properly review the Corps' consistency determination. See supra at I.E. For that reason alone, DHEC should object to the Corps' consistency determination. Moreover, even the limited analysis provided shows that the proposed Project would not be carried out in a manner consistent with South Carolina's CMP and will cause serious and unnecessary damage to critical areas of the State's coastal zone. Accordingly, DHEC should deny the Corps' certification request and insist that the Corps explore practicable and less damaging alternatives.

Response: As described in EIS Section 5.13, the Corps performed an analysis of the proposed project with respect to resources under South Carolina's program concerning Coastal Zone Management Consistency. The analysis of Coastal Zone Management Consistency for South Carolina can be found in Appendix J of the EIS. The Federal Consistency Determination found that construction of the SHEP in conjunction with implementation of the various mitigation features was fully consistent with the Coastal Zone Management Program of South Carolina. The Federal Consistency Determination was provided to the State for review during the comment period on the DEIS.

SC DHEC-OCRM provided the results of their initial review of the Federal Consistency Determination for South Carolina on January 25, 2011. At that time, SC DHEC-OCRM did not concur that the SHEP was consistent with the South Carolina Coastal Management Plan (SCCMP). Subsequently, the Corps met with SC DHEC staff and provided additional information to address their concerns. As a result of these meetings and the additional information the Corps provided, the SC DHEC Board determined on November 15, 2011 that they had been provided reasonable assurance that the SHEP is consistent with enforceable provisions of the SCCMP. The SC DHEC-OCRM removed their objection to the Corps' finding of Consistency for the SHEP. That approval for the South Carolina Federal Consistency Determination is included in EIS Appendix Z.

With the proposed mitigation, SHEP is fully consistent with South Carolina's Coastal Management Program (SCCMP). The Federal Consistency Determination for South Carolina has been updated in the Final EIS (Appendix J).

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765-DC-149-EV53

Comment: *As an initial matter, DHEC must deny certification under the CZMA for the same reason it must do so under Section 401 of the CWA. CZMA Section 307(f) "requires States to incorporate all requirements established pursuant to the Federal Clean Water Act and Clean Air Act into their management programs." S.C. CMP at V-11; see also id. at III-20(7) (mandating that "[p]roposed port development or expansion and operation must meet existing air and water quality standards"). Because the Project would violate water quality standards and the Corps' 404 Guidelines, and thus the CWA, see supra at II.A.2., it is inconsistent with the CWA requirements incorporated into the CMP. And, the Corps' failure to properly analyze and disclose air pollution impacts, see supra at I.E.1., precludes it from certifying consistency, as DHEC lacks reasonable assurance that the Project will not violate any CAA requirements. South Carolina's CMP requires that all port expansion projects meet air and water quality standards. CMP at III-20(7). And, the Project fails to comport with that mandate.*

Response: The project would not violate the Clean Water Act or any water quality standards and would not violate the Clean Air Act or any air quality standards. See other responses to comments regarding Clean Water Act and Clean Air Act compliance. South Carolina issued a Section 401 water quality certification for the SHEP contemporaneous with South Carolina's approval of the Federal Coastal Management Program Consistency Determination for South Carolina, as required by South Carolina regulation.

765-DC-149-EV54

Comment: *The CMP requires further that projects affecting navigation, such as this one, be coordinated with the South Carolina State Ports Authority ("SCSPA"). CMP III-21; see also. S.C. Code Ann. Regs. § 30-11(B)(2) (requiring DHEC to obtain "a certificate from the South Carolina State Ports Authority declaring*

that the proposed project or activity would not unreasonably interfere with commercial navigation and shipping" before issuing a critical area permit for projects in waterways used for commercial navigation and shipping or in areas set aside for port development in an approved management plan); id. § 30-1(A)(3) (stating that DHEC's critical area permitting regulations "are to be read as part of, and to be construed with, the policies set forth in the South Carolina Coastal Management Program"). The SCPSA has expressed concern that the Project, as currently proposed, would adversely impact its interest in and the potential for the Jasper Ocean Terminal. Letter to Dean Moss (Savannah River Maritime Commission) from Colden R. Battey, Jr. (SCPSA) dated Dec. 17, 2010. In particular, the disposal cells slated for use by the SHEP proposal could preclude construction of the Jasper terminal. Id. The Corps and GPA must address these issues in the FEIS and must coordinate with the SCPSA to ensure that the Project does not adversely affect South Carolina's overall interests in port development and navigation, as well as to ensure that all reasonable alternatives to and reasonably foreseeable impacts of the Project receive the legally mandated consideration.

Response: The District has coordinated with the SC DHEC-OCRM concerning its review of the project for consistency with the SC CMP. The process included issuing a Joint Public Notice advertisement in South Carolina newspapers, submitting a copy of the report, and providing the District's Consistency Determination. In 2010, the SCSPA did voice concerns that the proposed action would adversely impact its interest in eventually constructing the Jasper Ocean Terminal. However, this position directly conflicts with statements made in 2011 by the consultant employed by the JPO, of which SCSPA is a participating member. Specifically, the JPO consultant noted that placing new work sediments from the SHEP on Disposal Areas 14A and 14B would be very beneficial to a Jasper Ocean Terminal. That is, it would save the terminal's sponsors up to as much as $300 million by raising the site to a workable elevation. Therefore, if SHEP is constructed, it would benefit the development of a terminal in Jasper County by significantly reducing its initial construction costs. It should also be noted that in December 2011, the SC SPA announced it would suspend funding related to the estimated $5 billion Jasper terminal project. As explained in responses to other comments, the SHEP NEPA alternatives analysis fully considered a proposed Jasper terminal.

765-DC-149-EV55

Comment: *Finally, for the reasons discussed in Sections II.B. and V, infra, the proposed Project does not satisfy South Carolina's regulatory requirements pertaining to the "critical areas" of the coastal zone impacted by the Project. "The critical areas are of vital importance to the State." S.C. Code Ann. Regs. § 30-11(A). The CMP therefore prohibits dredging and excavation that would "contribute to water quality degradation" or result in "lethal fish entrapments." S.C. CMP at III-56. It likewise prohibits dredging for public projects in wetland areas unless the activity is water dependant and there are no feasible alternatives. Id. And, recognizing that the "creation and maintenance of navigational channels" is a "specialized form of dredging activity" with "a potential for severe environmental impacts," the CMP provides that such activity "should meet a demonstrated public need." Id. The Corps' proposal cannot be squared with these policies.*

Response: With the mitigation in place, the proposed action would not degrade water quality or include dredging/excavation that results in lethal fish entrapments. The proposed action of deepening the existing Federal navigation channel is a "water dependent" activity which will benefit international shipping, which the US Congress has identified as both a public and national interest. As explained in a previous response, the Corps properly determined there is no feasible alternative to SHEP.

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765-DC-149-EV56

Comment: *The Project is inconsistent with Georgia's Coastal Management Program ("GCMP") and therefore the Georgia Coastal Resources Division ("CRD") should not concur with the Corps' etermination of consistency. Under the Georgia Coastal Management Act, to attain consistency with GCMP, Georgia must determine that a project is consistent with state law regulating the state's coastal resources. See O.C.G.A. § 12-5-322(3), (12). For the following reasons, the Project does not comply with various state laws governing coastal resources and is inconsistent with the objectives of the GCMP.*

Response: As required by the Coastal Zone Management Act, the District prepared a Federal Consistency Determination based on the requirements of Georgia's Coastal Zone Act (Appendix I). That determination concluded that the SHEP is fully consistent with the enforceable policies of the Georgia Coastal Zone Act. The Coastal Resources Division of the Georgia Department of Natural Resources has generally approved that finding, subject to the District making some revisions to the dredged material disposal plan and providing some additional information. The dredged material disposal plan has been revised to meet the Coastal Resources Division's request, viz., the nearshore dredged material disposal sites at Tybee Island and the two offshore fish habitat enhancement areas have been eliminated. The District has also provided additional information to the Coastal Resources Division.

765-DC-149-EV57

Comment: *The GCMP's missions is to "balance economic development in Georgia's coastal area with preservation of natural, environmental, historic, archaeological, and recreational resources for the benefit of Georgia's present and future generations." GCMP at 25. One of the primary laws furthering this mission is Georgia's Coastal Marshlands Protection Act (CMPA), O.C.G.A. §§ 12-5-280 et seq. The CMPA regulates activities and structures in the state's marshlands, intertidal areas, mudflats, waters bottoms, and tidal wetlands. The DEIS states that the Project "would affect wetlands within the jurisdiction of the [CMPA]." DEIS, App'x I at 29. Specifically, the Project would convert at least 337 acres of tidal freshwater wetlands in the Savannah National Wildlife Refuge to brackish marsh and would destroy 15.68 acres of salt marsh on the Black River. Id. at 29. Despite the significant impacts to these unique resources, the DEIS concludes that with mitigation in the form of preservation and restoration the project is consistent with the GCMP and CMPA. See id. at 30. Notably, however, the CMPA does not include or contemplate mitigation as means of offsetting destruction of marsh or wetlands under CMPA's jurisdiction. Setting aside the proposed mitigation, the Corps should conclude that the destruction of 337 acres of freshwater wetlands included in the Refuge is not consistent with the GCMP's objective of providing a "coastal zone in which the area and functional integrity of wetlands that impact the coastal region of Georgia are maintained." GCMP at 29. The destruction of hundreds of acres of coastal wetlands and marshlands renders the Project inconsistent with the GCMP.*

Response: Contrary to the stated comment, the project would not destroy hundreds of acres of coastal wetlands and marshlands. The SHEP project would result in the loss of 15.68 acres of brackish marsh, for which it would restore approximately 28.8 acres of uplands to their previous marsh condition. The SHEP would indirectly impact additional wetlands by increasing salinity in upstream areas of tidal freshwater marsh, likely resulting in their conversion to brackish marsh. However, it is also likely that many of the emergent plant species associated with this impacted marsh would still flourish on those sites after project implementation. This statement is based on the fact that many plant species associated with freshwater systems are readily observed in environments that have been defined as brackish marsh (Latham et. al., 1994). Although some characteristics of the tidal freshwater marsh

would change as brackish marsh species increase in dominance, basic wetland functions associated with these systems would not change. A comparison of potential changes in wetland function between the two community types reveals only negligible differences. Water purification, flood protection, shoreline stabilization, groundwater recharge, stream low maintenance, retention of particles, surface water storage, subsurface storage, nutrient cycling, and values to society are effectively the same. While some reduction in the fish and wildlife element may take place, it would be minor when considering the total wetland function [along with the continued existence of freshwater species in wetland areas now characterized as brackish marsh].

As mitigation for this impact to tidal freshwater marsh, the SHEP mitigation plan includes a provision to purchase lands of ecological significance in the Savannah River Basin. These lands are properties already identified in the Savannah National Wildlife Refuge's Acquisition Plan. They would consist of bottomland hardwoods, maritime forest, and uplands dominated by deciduous forest and re-growth. The bottomland hardwoods are classified as palustrine forested, broad-leaved deciduous systems that are both temporarily and/or seasonally flooded. Preserving these areas would ensure their present wildlife habitat values are protected in perpetuity. Thus, the acquisition and preservation of these lands would replace the SHEP's minor species alterations to tidal freshwater marsh.

The District prepared a Federal Consistency Determination to address the enforceable policies of the Georgia Coastal Zone Program. The District determined that the SHEP is fully consistent with the enforceable provisions of the Georgia Coastal Marshlands Protection Act because the harbor deepening provides adequate mitigation for wetland losses. The Coastal Resources Division of the Georgia Department has concurred with this determination.

765-DC-149-EV58

Comment: *Among its coastal objectives, the GCMP aims to "[p]rovide a coastal zone in which wildlife species listed as special concern, threatened, or endangered are recovered to healthy, viable populations." GCMP at 28. To effectuate this goal, the Project must be in compliance with Georgia's Endangered Wildlife Act ("EWA"), O.C.G.A. §§ 27-3-130 et seq. Under the EWA, the "destruction of the habitat of any protected animal species on public lands is prohibited." Ga. Comp. R. & Regs. r. 391-4-10-.06(a)(3). Appendix I's discussion of consistency with the EWA recognizes that the Project's dredging of the Savannah River will result in loss of habitat for the endangered shortnose sturgeon. DEIS, App. I at 33. Yet, Appendix I states that "[w]ith the proposed mitigation in place for the Shortnose sturgeon, the proposed Project is fully consistent with this policy." DEIS, App. I at 33. To the contrary, the language of the Georgia EWA is unequivocal, stating "the destruction of the habitat of any protected animal species on public lands is prohibited." Ga. Comp. R. & Regs. r. 391-4-10-06(a)(3). The DEIS's conclusion that the Project is consistent with the GCMP is flat wrong because the Project violates the Georgia EWA.*

Response: The comment misapplies the Georgia Endangered Wildlife Act, which provides: "The board shall issue such rules and regulations as it may deem necessary for the protection of protected species and for the enforcement of this of this article. Such rules and regulations shall not affect rights in private property <u>or in public or private streams</u> (underlined for emphasis), nor shall such rules and regulations <u>impede construction of any nature</u> (underlined for emphasis). Such rules and regulations shall be limited to the regulation of the capture, killing, or selling of protected species and protection of the habitat of the species on public lands".

The District prepared a Biological Assessment of Threatened and Endangered Species (BATES) which included an assessment of SHEP impacts on the Shortnose sturgeon and its habitat. Even with the flow diversion measures in place, there would still be some residual impacts on winter Shortnose sturgeon

habitat. Consequently, the SHEP mitigation plan provides for the construction of a fish bypass at the New Savannah Bluff Lock and Dam to provide opportunity for migrating Shortnose sturgeon to move past the dam and access additional historic spawning grounds at the Augusta Shoals. Construction of this bypass would also provide the Shortnose sturgeon, as well as other anadromous fish species, access to approximately 20 miles of river above the dam. NMFS has issued a Biological Opinion for the project which includes terms and conditions protecting the Shortnose sturgeon, including construction of a fish passage upriver. The project's compliance with the ESA regarding Shortnose sturgeon, Atlantic sturgeon, and other threatened and endangered species is fully documented in EIS Section 4.09, 5.11, Appendix B (Biological Assessment for Threatened and Endangered Species, and Appendix Z (NMFS Biological Opinion). The Consistency Determination also determined that the SHEP and associated mitigation plan is fully consistent with the Georgia Endangered Wildlife Act.

765-DC-149-EV59

Comment: *An additional program objective is to "[p]rovide a coastal zone in which the integrity and functioning of the sand-sharing system is maintained." GCMP at 29. Georgia's Shoreline Protection Act (SPA), O.C.G.A. §§ 12-5-231 et seq, is the state's primary legal authority on the protection and management of Georgia's sand-sharing system—including sand dudes, beaches, sandbars and shoals. Also, Georgia law addresses erosion caused by dredging for navigation purposes in tidal inlets, rivers, and harbors. O.C.G.A. §§ 52-9-1 et seq. It is state policy that there should be no net loss of sand from the island beaches because of dredging. O.C.G.A. § 52-9-1. The Corps' recent study concluded that existing dredging Project at the port has contributed to nearly eighty percent of Tybee Island's beach erosion. DEIS, App. I at 17. Yet, the Corps concludes that because the Project would "result in only minor changes in nearshore wave patterns" the Project "would be expected to have very little impact on the Tybee Island shoreline." Id. However, the Corps erroneously examines the Project's potential impacts in isolation, and fails to consider the cumulative impact of the Project and existing beach erosion. For these reasons, the Project is not consistent with the GCMP.*

Response: The cumulative impacts relating to the SHEPare fully addressed in the EIS analysis [Appendix L]. Studies conducted during the SHEP indicate that the existing entrance channel (including the entrance channel jetties) results in a deflation [ebb shoal] on the Tybee Shelf and that the existing Savannah Harbor Navigation Project is a sediment sink for almost all littoral drift sediments that move from north to south along the Tybee shelf. These studies estimated that the combined shelf/shoreline impact at Tybee Island is 78.5%. The remainder of the erosion is attributed to natural processes. Any mitigation for this effect on the Island's sand budget would be the responsibility of the existing Savannah Harbor Navigation Project.

Additional studies conducted as part of SHEP indicate that further deepening would have negligible additional effects on the Tybee island shelf or to its shoreline. This would include the magnitude of sand being transported or the transport pathways. That is, deepening the existing entrance channel would just provide a deeper hole for the same amount of sand to be sequestered. Consequently, no mitigation for additional erosion of the Tybee Island Beach is warranted under SHEP.

Cumulative impacts relating to Tybee Island beach erosion are fully addressed in EIS Section 5.13 and Appendix L. The dredged material disposal plan has been revised to meet the GA DNR Coastal Resources Division's request, viz., the nearshore dredged material disposal sites at Tybee Island and the two offshore fish habitat enhancement areas have been eliminated.

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765-DC-149-EV60

Comment: *The Project is inconsistent with the objectives of the GCMP and Georgia law protecting water quality on the coast. The GCMP seeks to ensure "that permits approved for coastal area activities are designed to minimize negative impacts on water quality . . . ." GCMP at 26. As described in Section II.C., the GWQCA states "[e]xisting instream water uses and the level of water quality necessary to protect the existing uses shall be maintained and protected." Id. 391-3-6-.03(2)(b)(i) (emphasis added). The DEIS recognizes that the Project will have significant impacts on the dissolved oxygen DO levels in the Savannah River, a water body already listed as impaired for DO. The lowering of DO would have deleterious effect on the fish populations in the Savannah River, especially the endangered shortnose sturgeon. However, Appendix I's discussion of water quality is devoid of any discussion of lowering DO levels. See DEIS, App'x I at 64-65.*

Response: The District submitted its Federal Consistency Determination to GA DNR-CRD as part of the Draft EIS. This compilation fully addresses the impacts of the SHEP on the dissolved oxygen regime in Savannah Harbor along with the mitigation for those impacts. However, additional information has been added to Paragraph 6.35.3 of Appendix I describing the SHEP's potential impact on dissolved oxygen in Savannah Harbor and the mitigation (injection of oxygen) for that impact. The project is fully consistent with the Georgia Water Quality Control Act because oxygen injection would remove the project's incremental impact on the dissolved oxygen regime in Savannah Harbor.

765-DC-149-EV61

Comment: *The GCMP requires that the port expansion be consistent with the Georgia Air Quality Control Act, O.C.G.A. §§ 12-9-1 et seq. It is undetermined whether Project is consistent with the air quality policy of the GCMP because, as described in Section I.E.1., the DEIS fails to adequately assess the Project's air quality impacts. The DEIS states that the Project would "improve ambient air quality in Savannah Harbor" because the "total number of container ships would decrease . . . ." DEIS, App'x I at 26. However, this bold assertion is based on a flawed economic assumption, is contradicted by other DEIS statements, and lacks supporting data (described in Section I.D.). A determination of consistency cannot be attained without requiring the Corps to further assess the effects of the Project on air quality.*

Response: This comment raises the same issues regarding air quality as previous comments. See response to comments 765-DC-149-EV12 through 765-DC-149-EV15.

765-DC-149-EV62

Comment: *The South Carolina Coastal Zone Management Act ("South Carolina CZMA") "was passed by the 1977 General Assembly of South Carolina to provide for the protection and enhancement of the State's coastal resources." S.C. Code Ann. Regs. § 30-1(A)(1) (2009). Pursuant to the South Carolina CZMA, "[e]xcept for those exemptions as specified in the 1977 Coastal Zone Management Act, as amended, any person wishing to alter a critical area must receive a permit from [DHEC]." S.C. Code Ann. Regs. § 30-2(B) (2009). The statute's enumerated exemptions exclude "[d]redge and fill performed by the United States Corps of Engineers for the maintenance of the harbor channels and the collection and disposal of the materials so dredged." S.C. Code Ann. § 48-39-130(D)(4) (2009); S.C. Code Ann. Reg. § 30-5(A)(4) (2009). But, they do not similarly exclude a Project such as this one, which consists of "improvements to" and "expansion of" an existing navigation project. Corps, GPA, & DHEC, Joint Public Notice, at 1, 2 (Nov. 15, 2010). And, under the CWA, the Project must comply with the state's permitting requirements. See 33 U.S.C. § 1344(t).*

Response: Under the Coastal Zone Management Act, 16 U.S.C. § 1451, et. seq., and the South Carolina Coastal Management Plan (SC CMP, Ch. V), federal activities and projects are not required to obtain a critical area permit but are required to be approved by the state as consistent with the SC CMP to the maximum extent practicable. As described in EIS Section 5.13 and Appendix J, the SHEP including its mitigation plan was determined to be fully consistent with the SC CMP and the State does not object to that determination.

765-DC-149-OC06

Comment: *The Biological Assessment prepared under the Endangered Species Act is deeply flawed.*

Response: This and following comments allege the Corps' Biological Assessment for Threatened and Endangered Species (BATES) is seriously flawed. However, the BATES was coordinated with the USFWS (jurisdiction over the West Indian manatee, piping plover, wood stork and nesting sea turtles) and NMFS (jurisdiction over whales, sea turtles, Atlantic sturgeon and Shortnose sturgeon) pursuant to Section 7 of the Endangered Species Act.

Based on their review of the project, the DEIS and the GRR, the USFWS concurred with the findings in the BATES that the SHEP may affect but is not likely to adversely affect the piping plover, wood stork, West Indian manatee, and nesting sea turtles. The USFWS concurrence letter is included in Appendix Z.

The NMFS submitted their Biological Opinion (BO) for the SHEP by letter dated November 4, 2011. The BO concurred with the findings of the BATES that the SHEP may affect but would not likely adversely affect leatherback sea turtles, green sea turtles, hawksbill sea turtles, North Atlantic right whales, and humpback whales.

However, the BO determined that construction of the SHEP would likely adversely affect Kemp's ridley sea turtles, loggerhead sea turtles, Shortnose sturgeon and Atlantic sturgeon. With implementation of Reasonable and Prudent Measures NMFS identified to protect sea turtles, NMFS concluded that the overall effect on these species would be acceptable. NMFS concluded that construction of the SHEP is not likely to jeopardize the survival and recovery of the Shortnose sturgeon or Atlantic sturgeon in the Savannah River. With implementation of Reasonable and Prudent Measures NMFS identified to protect these species, NMFS concluded that the overall effect on the Shortnose and Atlantic sturgeon would be acceptable. The BO submitted by the NMFS is included in this document as Appendix Z.

The USFWS concurrence and the NMFS BO indicate that those agencies have determined that the proposed project complies with the Endangered Species Act.

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765-DC-149-EV63

Comment: *This Project will result in a reduction in available habitat and require SNS to seek and select new home ranges of lesser quality. Young Report at 4-6. Sturgeon are bottom-feeders, and the proposed deepening Project will eliminate the benthic community in dredged areas. Young Report at 5-6. It will take years for this community to reestablish itself, and if it does, the benthic community may not be comprised of the same quality and quantity of prey items. Young Report at 5-6. The loss of feeding opportunities will require shortnose sturgeon to find and move to other areas that may or may not provide suitable prey items, and the increased expenditure of energy resulting from this increased*

movement would be detrimental to the population, resulting in poor health and lower reproductive potential. Young Report at 6.

Response: Impacts on benthic resources due to dredging are discussed in the EIS [Section 5.07.1.1] and Appendix B. Current maintenance dredging in the existing navigation channel temporarily eliminates its benthic resources and deepening will primarily be limited to the existing channel prism. Other than the normal (sometime heavy) sedimentation that occurs, the channel bottom is relatively undisturbed between the subsequent maintenance dredging events, allowing the excavated area to re-colonize. The opportunistic populations that reestablish should be similar to those eliminated during the channel deepening. Species which live in these high stress habitats are substrate dependent and the sediments involved will remain unchanged. Further, the density and diversity of the benthic community that becomes reestablished in the incrementally deepened channel will approximate that which currently exists. Therefore, from a benthic resource perspective, the sturgeon population using the navigation channel should not be impacted by deepening any more than by current maintenance dredging operations.

765-DC-149-EV64

Comment: *The deepening Project will also lower DO levels in the harbor, which is a major concern for all fish and aquatic organisms. Young Report at 6. Low dissolved oxygen will affect recolonization of benthic organisms after substrate dredging and may alter species presence and abundance after re-establishment. Young Report at 7. This will in turn affect sturgeon and other benthic fish feeding and nutrition. In light of the importance of the estuary to juvenile and adult sturgeon; the current low levels of dissolved oxygen; and the questions involving the effectiveness of the oxygenation system, Dr. Young believes the Corps has underestimated the threat of this proposal to sturgeon. Young Report at 7.*

Response: There are no adverse impacts to SNS predicted during the summer months, when D.O. is a concern. The D.O. systems would minimally improve D.O. levels on the bottom, where sturgeon and their benthic prey are found. The analyses indicate that summer SNS habitat would increase with the proposed project (as a result of the D.O. systems).

765-DC-149-EV65

Comment: *Another concern for SNS is the turbidity caused by re-suspension of sediments and the pollutants that may re-enter the water column after sediment exposure. Young Report at 7-8. Although the DEIS states that a sediment study was conducted to determine chemicals present in solid sediments, it does not appear as if the Corps conducted actual exposure toxicity tests to determine how the deepening Project would impact sensitive species, such as SNS. Young Report at 7-8. These studies should be undertaken and will likely reveal that the SHEP will have substantial negative effects on species such as SNS beyond the level described in the DEIS. Young Report at 8.*

Response: A sediment quality evaluation assessing potential contaminant impacts associated with the proposed SHEP was conducted. The evaluation used a tiered approach jointly developed by the Corps of Engineers and the Environmental Protection Agency.

Aquatic bioaccumulation studies were performed by EA Engineering, Science, and Technology and are found in the EIS [Appendix M]. Sand worms (*Nereis virens*) and the blunt-nosed clam (*Macoma nasuta*) [both borrowing animals] were the species recommended by the EPA protocols. At the end of these bioaccumulation studies, tissue samples [after preparation-freezing/grinding] were analyzed for contaminant uptake. The conclusions of the aquatic bioaccumulation study are found in Tables 36 and 37 as well as in Sections 4.2.4, 4.2.5, and 5.4. In summary, they are, "***bioaccumulation in high cadmium***

sediments appears to be well below potential levels of effect. Therefore, potential environmental impacts through bioaccumulation of cadmium by benthic organisms are expected to be minimal". Hence, the Shortnose and Atlantic sturgeon are omnivorous benthic feeders that are not likely to experience any substantive adverse impacts from exposure to sediments or constituents thereof in the water column during or after the harbor is deepened.

The Shortnose and Atlantic sturgeon are endangered species protected under Section 7 of the Endangered Species Act of 1973, as amended. A permit would be required from NMFS to catch, freeze, and grind up individuals of this species for chemical evaluation. Whether a permit could be obtained in this regard is conjectural. However, the issue is no longer moot since consultation with EPA determined that the Shortnose Sturgeon is not a species recommended for use in bioaccumulation studies.

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765-DC-149-EV66

Comment: *As the DEIS and the GRR acknowledge, the deepening Project will also exacerbate problems related to saltwater intrusion. Young Report at 9. Juveniles prefer low levels of salinity, and juveniles experience decreased energy and aerobic capacity, resulting in decreased growth and survival as salinity levels rise. Changes in prey species abundance due to increased salinity, on top of dredging and low dissolved oxygen, "will likely have profound impacts on the entire estuarine fish community, including shortnose sturgeon, Atlantic sturgeon, and striped bass." Young Report at 9.*

Response: The project will not have "profound impacts on the entire estuarine community" as speculated in the comment. The noted salinity changes will reduce the amount of winter Shortnose Sturgeon habitat in the estuary [up to 11% depending on depth and life stage], as summarized in Table 5-35, Summary of Project-Related Fishery Impacts with Mitigation. The habitat volume during the critical summer months (when SNS are stressed by salinity, temperature, and low D.O) would increase from 3 to 19% depending on depth. The fish bypass would adequately compensate for the remaining unavoidable impacts. NMFS concurred with this conclusion in its Biological Opinion.

765-DC-149-EV67

Comment: *As noted previously, the DEIS that: "Neither the Corps nor the [resource] agencies could identify any measures that could be implemented in the estuary that would restore sturgeon habitat or enhance existing habitats." DEIS at 5-91. Instead, the Corps suggested a method of allowing fish to move by the lowest dam on the river, the New Savannah Bluff Lock & Dam (NSBL&D) at Augusta, Georgia, which is operated by the Corps. DEIS at 5-91. The theory behind this proposal is that a "fishway around the structure would allow migrating fish to move past the dam" and "would open up an additional 20 miles of habitat upstream of the dam to Shortnose sturgeon, reaches that they had used in the past." DEIS at 5-91. Although the concept of fish passage offers some potential benefits to fisheries more generally, the Corps' proposal is deeply flawed because, as explained below, sturgeon species are unlikely to use the fish passage facility proposed in this case. Young Report at 11-16.*

Response: The Lake sturgeon has been observed passing constructed/natural rapids [entire river width] in the upper mid-west [US]. Passages at more shallow water depths than those proposed [3.5 to 5.5 feet] at the New Savannah Bluff Lock and Dam were frequently observed (Aadland 2010). The Lake sturgeon is larger than their Shortnose sturgeon counterparts, so the latter should not experience difficulty [depth-wise] in moving through the proposed fish bypass.

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765-DC-149-EV68

Comment: *As pointed out by Dr. Young, the DEIS lacks baseline information and an impact assessment on the Savannah River Atlantic sturgeon. Young Report at 9. The omission of discussion and impact assessment of a species proposed for listing as Endangered needs to be rectified, especially where it has been determined that the proposed activity under review – in this case, dredging – is an obstacle to the species' recovery. Young Report at 9. In addition to lacking baseline information, the main focus of impact evaluation, mitigation, and funded research has been placed on the shortnose sturgeon; however, the Atlantic sturgeon has been neglected. Young Report at 10.*

Response: The Atlantic sturgeon was included in the BATES prepared for the project. The NMFS Biological Opinion, EIS Appendix Z, contains a thorough assessment of the Atlantic sturgeon, including its characteristics, habitat, environmental baseline, and likely impacts of the project on this species and its habitat. NMFS concluded that construction of the SHEP is not likely to jeopardize the survival and recovery of Atlantic sturgeon in the Savannah River. With implementation of Reasonable and Prudent Measures NMFS identified to protect this species, NMFS concluded that the overall effect on the Atlantic sturgeon would be acceptable.

765-DC-149-EV69

Comment: *As with shortnose sturgeon, the proposed deepening will have significant negative effects on the health and survival of Atlantic sturgeon. The proposal will likely adversely affect the continued existence of the species by (1) causing a reduction in available habitat and causing changes in summer and winter habitat selection with negative consequences likely; (2) requiring these species to find new foraging habitats if they avoid the project altogether or leaving these species without a source of food due to the elimination of benthic prey from the large-scale dredging; and (3) causing these species to suffer physiologically from potential changes in water quality, including lower dissolved oxygen, increased turbidity and pollutants, caused by resuspension of sediments, and increased salinity. Young Report at 4.*

Response: Impacts on benthic resources due to dredging are discussed in the EIS [Section 5.07.1.1] and Appendix B. Current maintenance dredging in the existing navigation channel temporarily eliminates its benthic resources and deepening will primarily be limited to the existing channel prism. Other than the normal (sometime heavy) sedimentation that occurs, the channel bottom is relatively undisturbed between the subsequent maintenance dredging events, allowing the excavated area to re-colonize. The opportunistic populations that reestablish should be similar to those eliminated during the channel deepening. Species which live in these high stress habitats are substrate dependent and the sediments involved will remain unchanged. Further, the density and diversity of the benthic community that becomes reestablished in the incrementally deepened channel will approximate that which currently exists. Therefore, from a benthic resource perspective, the sturgeon population should not be impacted by deepening any more than by current maintenance dredging operations.

The Atlantic sturgeon was included in the BATES prepared for the project. The NMFS Biological Opinion, EIS Appendix Z, contains a thorough assessment of the Atlantic sturgeon, including its characteristics, habitat, environmental baseline, and likely impacts of the project on this species and its habitat. Among other things, the Biological Opinion found that habitat loss would have insignificant effects on Atlantic sturgeon because they mainly forage in the ocean. In addition, NMFS does not believe the proposed action will result in a reduction in reproduction or numbers of Atlantic sturgeon in the Savannah River,

nor will it result in a decrease in the species distribution. NMFS concluded that SHEP will not appreciably reduce the likelihood of the Atlantic sturgeon's survival in the Savannah River.

765-DC-149-EV70

Comment: *Although shortnose and Atlantic sturgeon share common traits, the DEIS assumes that the life history and behavior of Atlantic sturgeon and shortnose sturgeon is so similar that the SHEP impacts and the mitigation package will have the same outcome for both species. Young Report at 10. Such an assumption is erroneous. Young Report at 10. For example, a recent study of juvenile sturgeon abundance on in the Hudson River Estuary, has found that juvenile shortnose sturgeon prefer habitats upstream of the saltwedge (low salinity), while juvenile Atlantic sturgeon prefer habitats downstream of the saltwedge (higher salinity). Young Report at 10. Other scientists have documented differences in life history, including temperature selection and spawning habitat preferences. Young Report at 10. As previously noted, there will be some similar impacts, but there is a strong likelihood that the two species will also suffer differently in other ways. Young Report at 10. Greater analysis, therefore, is required to determine the impacts to Atlantic sturgeon and what mitigation is needed to address the harm from this Project. Young Report at 10-11.*

Response: The NMFS Biological Opinion, EIS Appendix Z, analyzes the environmental baseline and potential impacts to the Shortnose sturgeon and the Atlantic sturgeon separately and in great detail. NMFS determined appropriate mitigation for both species based on the fact that the Shortnose and Atlantic sturgeon can be grouped together based on similarity in habitat use, distribution throughout the proposed action area, foraging behavior/prey base, and subsequent risk of take relative to dredging and trawling operations. NMFS concluded that construction of the SHEP is not likely to jeopardize the survival and recovery of the Shortnose sturgeon or Atlantic sturgeon in the Savannah River. With implementation of Reasonable and Prudent Measures NMFS identified to protect these species, NMFS concluded that the overall effect on the Shortnose and Atlantic sturgeon would be acceptable. Please see previous responses concerning project impacts on sturgeon.

765-DC-149-EV71

Comment: *As part of the SHEP mitigation package, the Corps has proposed a fishway at the New Savannah Bluff Lock & Dam ("NSBLD") near Augusta, Georgia, 150 miles upriver of Savannah Harbor, as mitigation for damages to shortnose sturgeon habitat in the estuary. Young Report at 11. The Corps was unable to identify any forms of mitigation within the estuary to offset the loss of critical juvenile rearing habitat. Id. Accordingly, the fishway is a trade-off intended to alleviate impacts to important juvenile habitat by allowing passage to upstream habitat. The problem is that although a fishway might provide some benefits to other species, this proposal is highly unlikely to benefit sturgeon. According to Dr. Young, the DEIS fails to demonstrate that the proposed fish passage design – the Horseshoe Rock Ramp – will have success at passing either species of sturgeon. Id. The proposal also lacks a detailed fish passage plan listing objectives and goals for the species that would purportedly benefit from the facility. Moreover, for a fish passage facility to be effective, a suitable environment must be present above the dam to support spawning and the development of eggs, larvae, and juveniles. Id. at 11. Should sturgeon select the Augusta Shoals for spawning habitat, it will be important to ensure that proper flows and water temperature are provided. At present time, the release schedules from J. Strom Thurmond Dam (JST) do not provide adequate flows during certain times of year. Young Report at 13. The City of Augusta also diverts a significant portion of flow into the Augusta Canal, substantially reducing flow for fish and aquatic organisms. Id.*

Response: An interagency workshop was held [April 2011] which was attended by the National Marine Fisheries Service [the agency with statutory responsibility for the Shortnose sturgeon], the US Fish and Wildlife Service, and the state natural resource agencies. The main focus of the workshop was to address agency concerns over the effectiveness of the proposed fish bypass [horse shoe] which would be located at the New Savannah River Bluff Lock and Dam. Based on input from the workshop attendees and a follow-on site visit with Dr. Luther Aadland (fish passage expert with Minnesota Department of Natural Resources) that was arranged by NMFSthe District revised its proposed fish bypass design and the FEIS proposes an Off-Channel Rock Ramp to provide access to traditional spawning areas at the Augusta Shoals. As stated in the BO, the goal for the fish passage is to achieve t a 75% success rate in upstream passage coupled with 85% effectiveness for downstream passage. A detailed design, would be prepared if the project proceeds to construction.

The NMFS Biological Opinion, EIS Appendix Z, thoroughly evaluated the proposed fish passage. The Biological Opinion requires the proposed fish passage as a term and condition to implement reasonable and prudent measures. In reliance on this mitigation and other required terms and conditions NMFS issued a no jeopardy opinion regarding the Shortnose and Atlantic sturgeon for this project

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765-DC-149-EV72

Comment: *Even if it could be demonstrated that the Horseshoe Rock Ramp could be constructed at the NSBLD, modifications would likely be necessary to specifically accommodate sturgeon. Id. at 11. It is likely these changes would substantially increase the cost of the fish passage facility, and additional funding would be needed up front to ensure proper maintenance of the structure in perpetuity. The fish passage proposal would certainly require far greater levels of committed funding than currently proposed, and even then, it is uncertain that the proposed design will work here to address impacts to sturgeon. The most effective mitigation action would be the complete removal of NSBLD along with all other dams/obstructions upstream to the JST and those in the Stevens Creek Basin, a major tributary of the Savannah River between JST and the City of Augusta, in combination with a flow schedule designed to promote biological integrity. Id. at 12.*

Response: The NMFS Biological Opinion, EIS Appendix Z, thoroughly evaluated the proposed fish passage. The Biological Opinion requires the proposed fish passage as a term and condition to implement reasonable and prudent measures. In reliance on this mitigation and other required terms and conditions NMFS issued a no jeopardy opinion regarding the Shortnose and Atlantic sturgeon for this project.

Adaptive management, attraction flow commitments, and monitoring are parts of the fish passage plan detailed in EIS-Appendix D. To ensure that the passage design is the best one possible for the New Savannah Bluff Lock/Dam, the Corps will coordinate the detailed designs with the natural resource agencies prior to finalization of plans/specifications. The District also committed to monitoring/reporting the success of sturgeon using the structure to ensure it performs as intended (Appendix D). The findings and conclusions would include any recommendation to modify the bypass structure to improve SNS passage.

There is consensus that removal of the lock and dam is the preferred method to allow sturgeon and other anadromous fish access to upstream habitat. Its removal would also provide an overall benefit to the larger ecosystem. However, removal of the New Savannah Bluff Lock and Dam is not a feasible mitigation alternative for the following reasons:

1) The lock and dam is a Congressionally-authorized project; therefore, the District is obligated to maintain the project as Congress provides funding for such actions;

2) The latest Congressional authorization language for the NSBL&D (WRDA 2000, amended in Omnibus Act 2001), calls for repair and rehabilitation of the lock and dam structure, construction of a fish passage, and conveyance of the structure to the City of North Augusta;

3) Removal of the structure would adversely impact the freshwater supply of eight major users.

765-DC-149-EV73

Comment: *In light of these concerns and the others expressed in Dr. Young's report, we believe the Corps' conclusion that the "the proposed project may affect, but is not likely to adversely affect Shortnose or Atlantic sturgeon or their critical habitat" completely misses the mark. DEIS, App'x B at 182. To the contrary, Dr. Young believes that this Proposal "will directly reduce the likelihood of both the survival and recovery of shortnose and Atlantic sturgeon by reducing the reproductive fitness, numbers and distribution of each species." Young Report at 16. For these reasons, this Proposal weighs heavily in favor of the preparation of a biological opinion by NMFS to determine if the proposal will jeopardize shortnose sturgeon. We also believe that conference consultation is required for Atlantic sturgeon pursuant to 16 U.S.C. § 1536(a)(4).*

Response: NMFS has prepared a Biological Opinion, which is found at EIS Appendix Z. The BO comprehensively addresses the Shortnose and Atlantic sturgeon and determines that neither species will be jeopardized by SHEP provided the project complies with required terms and conditions implementing reasonable and prudent measures.

NMFS' "likely to adversely affect" determination for Shortnose sturgeon is primarily based on adverse effects (increase in salinity) to important estuarine winter foraging habitats for both juvenile and adult fish. While the NMFS expects these effects to be sub-lethal for individual sturgeon, these effects could reduce the Savannah River's overall carrying capacity and ability to provide optimal habitat for the Shortnose sturgeon to forage. The NMFS believes that both adults and juveniles will move to suitable habitats further upriver once the SHEP is constructed. NMFS expects that construction of the fish passage facility at the NSBL&D will result in access to historic spawning habitat upstream of the dam that is expected to increase spawning activity over the long-term. Based on these determinations, the NMFS concluded that construction of the SHEP is not likely to jeopardize the survival and recovery of the Shortnose sturgeon in the Savannah River. With implementation of the Reasonable and Prudent Measures NMFS identified to protect this species, NMFS concluded that the overall effect on the species would be acceptable.

NMFS' "likely to adversely affect" determination for Atlantic sturgeon is primarily based on NOAA's estimated incidental take of four Atlantic sturgeon during hopper dredging operations necessary to construct the SHEP and adverse effects (increase in salinity) to important estuarine foraging habitat for juveniles and adults. The estimated incidental take of four Atlantic sturgeon during entrance channel construction would not decrease the overall population of this species in the South Atlantic DPS (Distinct Population Segment) as there are significant numbers of fish found in the rivers comprising the South Atlantic DPS range of Atlantic sturgeon. The effects of SHEP on foraging habitat and spawning success of Atlantic sturgeon are similar to those for the Shortnose sturgeon.

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765-DC-149-EV74

Comment: *The Corps contends that fewer whales will be struck by vessels if the Project is completed because fewer ships will be calling on the harbor. As explained above, this position is based on an assumption that is not shared by the shipping community. The shipping community, including GPA, believes that the growth of the container traffic at the harbor will accelerate if the harbor is deepened. If GPA and the shipping community is correct, then there will be greater numbers of ships calling on the harbor. Reliance on this flawed assumption here undermines the evaluation of the Project's potential impact on right whales. Further, as discussed in Section I.D.4., the channel appears to be designed in such a manner as will require ships to travel at a speed in excess of the 10 knot speed restrictions.*

Response: The NMFS Biological Opinion determined that SHEP is not likely to adversely impact North Atlantic right whales and affirmed the District's existing whale conservation measures, which will continued to be followed. Among other things, large container vessels would continue to comply with the present NMFS's requirements on vessel speeds to protect whales. As to the claimed assumption and alleged growth of container traffic as a result of deepening, please see other responses to comments on these issues.

765-DC-149-EV75

Comment: *Four federally listed, endangered sea turtle species, the Kemp's ridley (Lepidochelys kempii), leatherback (Dermochelys coriacea), loggerhead (Caretta caretta) and the hawksbill (Eretmochelys imbricata), and one threatened species, the green (Chelonia mydas), feed in and migrate through the waters affected by the SHEP. GPA's proposal threatens harm to sea turtles due to the proposed dredging activities. Specifically, channelization of inshore and nearshore habitat and the disposal of dredged material in the marine environment can destroy or disrupt resting or foraging grounds and may affect nesting distribution through alteration of physical features in the marine environment. In addition, the associated lighting can negatively affect nesting activities. Moreover, the BA ignores the threat to turtles of ship strikes despite the fact that boat strikes have been identified as a significant and growing threat to sea turtles. Boat collisions can cause immediate death to turtles or severely debilitate them, leading to infection and decreased reproductive fitness. The frequency of injury from propellers and collisions is higher in areas where recreational boating and vessel traffic are intense. Recovery Plan for U.S. Population of Atlantic Green Turtle (1991) at 9 and Recovery Plan for U.S. Population of Loggerhead Turtle, Second Revision (2008) at I-56. Presumably, the BA ignores the threat of boat strikes, as it does with right whales, due to its conclusion that the Project will result in fewer, not more, ships over time.*

Response:

After coordination with GA DNR-CRD, the dredged material placement plan has been revised; it now calls for placement of all new work entrance channel sediments in previously-approved areas, viz., in the Ocean Dredged Material Disposal Site or an existing upland confined disposal facility. Therefore, no nearshore placement of new work sediments would occur and concerns about adverse impacts on sea turtles are greatly lessened.

Appendix B of the EIS has been revised to indicate: With deepening, the total number of vessels in the Harbor will decrease (compared to the without project condition) as vessels would be able to load more completely without the present constraints of draft. Therefore, fewer ships would transit the estuary with incrementally lesser impact on sea turtles than under the without project condition.

USFWS concurred with the findings in the BATES that the SHEP is not likely to adversely affect nesting sea turtles. NMFS determined in the Biological Opinion that the SHEP may affect but is not likely to adversely affect the Hawksbill, Leatherback and Green sea turtles, and is not likely to jeopardize Kemp's ridley and Loggerhead sea turtles.

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765-DC-149-EV76

Comment: *The West Indian manatee inhabits coastal, estuarine, and riverine systems in the southeastern United States, the Greater Antilles, eastern Mexico and Central America, and south to northeastern Brazil. About 3,000 West Indian manatees remain in the United States. The Florida subspecies (T. manatus latirostris) occupies the northern end of the species' range. These manatees occur primarily in Florida and southeastern Georgia. According to the Florida Manatee Recovery Plan, the most significant problem presently facing manatees is death or serious injury from boat strikes. U.S Fish and Wildlife Service, Florida Manatee Recovery Plan (Trichechus manatus latirostris), Third Revision, at 23. The BA states that in 2008 the Georgia Department of Natural Resources indicated it had recovered three male carcasses in the Savannah River and that "[a]ll three were located at the downtown Savannah waterfront and apparently died from ship propeller lacerations (e.g. one was cut in half)." DEIS, App'x B at 83. Again, the BA does not even mention or assess potential impacts due to increased shipping activity as a result of the Project.*

Response: Appendix B of the EIS has been revised to indicate that with deepening the total number of vessels would decrease (compared to the without project condition) as vessels would be able to load/unload without the present constraints of draft. Therefore, fewer ships would call on the port (compared to the without project condition). Manatees are generally found in shallow water (<20 feet deep) and large ships are confined to the deep navigation channel. For these reasons, ship traffic is not expected to impact manatees any more [and intuitively less] than under existing conditions. The USFWS concurred with the findings in the BATES that the SHEP is not likely to adversely affect the West Indian manatee.

765-DC-149-EV77

Comment: *For these reasons and others, the DEIS and GRR fail to adequately assess or accurately disclose the effects of the Proposal on federally endangered and threatened species such as Shortnose sturgeon, North Atlantic right whales, sea turtles, manatees, and other wildlife. For these reasons, the Corps' determination that the Proposal may affect, but is not likely to adversely affect these species, is erroneous, and we believe formal consultation with NMFS and FWS is required.*

Response: The Corps followed all applicable requirements to consult with USFWS and NMFS. The BATES was coordinated with the USFWS (jurisdiction over the West Indian manatee, piping plover, wood stork and nesting sea turtles) and NMFS (jurisdiction over whales, sea turtles, Atlantic sturgeon, and Shortnose sturgeon) pursuant to Section 7 of the Endangered Species Act.

Based on their review of the project, the DEIS and the GRR, the USFWS concurred with the findings in the BATES that the SHEP may affect but is not likely to adversely affect the piping plover, wood stork, West Indian manatee, and nesting sea turtles. The USFWS concurrence letter is included in Appendix Z.

The NMFS submitted their Biological Opinion (BO) for the SHEP by letter dated November 4, 2011. The BO concurred with the findings of the BATES that the SHEP may affect but would not likely adversely

affect leatherback sea turtles, green sea turtles, hawksbill sea turtles, North Atlantic right whales, and humpback whales.

However, the BO determined that construction of the SHEP would likely adversely affect Kemp's ridley sea turtles, loggerhead sea turtles, Shortnose sturgeon, and Atlantic sturgeon. With implementation of Reasonable and Prudent Measures NMFS identified to protect sea turtles, NMFS concluded that the overall effect on these species would be acceptable. NMFS further concluded that construction of the SHEP is not likely to jeopardize the survival and recovery of the Shortnose sturgeon in the Savannah River. With implementation of Reasonable and Prudent Measures NMFS identified to protect this species, NMFS concluded that the overall effect on the Shortnose and Atlantic sturgeon would be acceptable. The BO submitted by the NMFS is included in this document as Appendix Z.

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765-DC-149-EV78

Comment: *Although the DEIS includes an Essential Fish Habitat Evaluation, DEIS, App'x S, it is or understanding that EFH consultation has not yet commenced.*

Response: The comment is incorrect. The EFH process was initiated on November 15, 2010 with a letter to NMFS providing the District's DEIS and its EFH determination (Appendix S). The Corps has coordinated with NMFS since that time and has revised the project to address concerns expressed by NMFS and others. The Corps' understanding is that these revisions satisfy NMFS' EFH issues.

765-DC-149-EV79

Comment: *Finally, coordination between the Corp and FWS is required pursuant to the Fish and Wildlife Coordination Act, 16 U.S.C. § 661 et seq. That law provides that "whenever the waters of any stream . . . are proposed or authorized to be . . . deepened . . . or modified for any purpose whatsoever, including navigation," the agency proposing, authorizing or permitting the action "shall first consult" with the FWS and with the "head of the agency exercising administration over the wildlife resources of the particular State wherein the . . . facility is to be constructed, with a view to the conservation of wildlife resources by preventing loss of and damage to such resources . . . ." 16 U.S.C. § 662 (emphasis added). The DEIS includes a draft Fish and Wildlife Coordination Report, in which FWS expresses substantial concerns about the Proposal, including the dissolved oxygen injection system and the impacts to fisheries. DEIS, App'x E. Coordination pursuant to the Fish and Wildlife Coordination Act must be completed before the Project can proceed.*

Response: As stated in Section 6 of the EIS, the SHEP is in compliance with the Fish and Wildlife Coordination Act. The project has been fully coordinated with the US Fish and Wildlife Service which submitted a Draft Section 2(b) Fish and Wildlife Coordination Act Report used in the DEIS preparation. The Service submitted a final report after its review of the DEIS. That final report is included in the FEIS.

765-DC-149-EV80

Comment: *Overall, it does not appear as if the Corps has made much of an effort to comply with the new rules for compensatory mitigation under the CWA. On April 10, 2008, EPA and the Corps issued a Final Rule on Compensatory Mitigation for Losses of Aquatic Resources under section 404 of the Clean Water Act. See 73 Fed. Reg. 19,594-19,687 (Apr. 10, 2008) (codified at 40 C.F.R. § 230.91 and 33 C.F.R. §§ 325 and 332) (hereinafter referred to as the "Mitigation Rule" or the "Rule"). A central feature of the new Rule is the use of a watershed approach for purposes of all forms of mitigation. See 33 C.F.R. § 332.3(c)(1) ("The ultimate goal of a watershed approach is to maintain and improve the quality and*

quantity of aquatic resources within watersheds through strategic selection of compensatory mitigation sites."). The Rule states that:

Response: From a strict legal standpoint, the 2008 Mitigation Rule applies to Clean Water Act Section 404 permit applications, not Corps civil works projects such as SHEP. In addition, SHEP wetland mitigation study and planning began in 2002. The agencies devoted substantial time, effort, and expense to development of the wetland mitigation and associated flow-rerouting plan before the Mitigation Rule was promulgated in 2008. The preamble to the 2008 Mitigation Rule states : "the new requirements should not be applied retroactively to permit applicants who have invested substantial effort in developing data and plans under the previous rules and guidance." 73 Fed. Reg. 19594, at 19608 (Apr. 10, 2008). Nevertheless, the Corps has attempted in good faith to follow the 2008 Mitigation Rule to the extent practicable.

As discussed below and in a detailed analysis found in EIS Appendix C, entitled "VII Consideration of the USEPA/USACE Mitigation Rule," the SHEP wetland mitigation plan does in fact comply with the 2008 Mitigation Rule. Among other things, the detailed analysis explains the important functional assessment that was conducted to evaluate indirect impacts to wetlands expected to result from SHEP. This functional assessment was integrated with findings of a comprehensive watershed assessment that was conducted in the Lower Savannah River Watershed and Savannah Harbor during the process of evaluating potential mitigation opportunities.

One of the primary objections raised by opponents regarding SHEP wetland mitigation is that the plan reduces salinity in 740 acres of marsh without sufficient compensatory mitigation. The premise for this objection is that wetlands that were classified in the project as salt marsh (for purposes of impact evaluation) have a higher ecological function than lower salinity wetlands (classified as brackish marsh). However, this premise does not hold true in the Savannah River Basin, based on scientific investigations and guidance provided by the project's Wetland Interagency Coordination Team (Wetland ICT), which included representatives of SC DHEC, SC DNR, GA DNR, USEPA, USFWS, and NOAA Fisheries.

The issue raised is a consequence of the project's goal of minimizing impacts to freshwater tidal marsh as much as possible. The Wetland ICT determined in 2003 that freshwater tidal marsh is the highest priority wetland natural resource in the Savannah River Basin. That priority is primarily based on the wetland losses that have occurred since the 1800s in the Savannah River Basin. Tidal freshwater marsh is rare and its acreage in the Savannah River Basin has been particularly reduced over the years. Although ecologically important in their own right, salt marsh and brackish marsh are more available in other basins – over 408,000 acres in South Carolina and another 405,000 acres in Georgia based on National Wetland Inventory maps of Estuarine and Marine Wetlands. See, e.g., EIS, Appendix E, Fish and Wildlife Coordination Act Report, at 19; GRR, at Appendix C, Engineering Investigations, at 127.

The flow re-routing plan essentially directs more freshwater into the Back River area on the South Carolina side of the Savannah River Basin, as requested by USFWS and agreed to by the Wetland ICT, in part to respond to the Wetland ICT's concerns that further salinity increases in that area should be prevented and reversed if possible to avoid further reduction in diversity of the estuary. In addition to preventing further loss of tidal freshwater wetlands, the flow re-routing will restore some wetlands classified as brackish to freshwater marsh. One of the other expected effects is to reduce salinity in another 740 acres.

Without the flow re-routing plan, the -47 foot selected plan would increase salinity in 1,177 acres of freshwater tidal wetland, converting it to brackish marsh. All agencies agree this would be a measurable

loss in wetland value. With flow re-routing, the project will affect (increase) salinity in only 223 acres of freshwater wetland (located in Georgia waters), a far lesser number of acres than without flow re-routing. In part to compensate for the increased salinity in those 223 acres, the mitigation plan includes preservation of 2,245 acres of wetlands (primarily bottomland hardwood) and upland buffer that would be acquired and deeded to the Savannah National Wildlife Refuge.

Some of the wetland preservation acreage identified above would compensate for the salinity changes in 740 acres of wetland referred to as saltmarsh. The mitigation SOP calculation sheets included in EIS Appendix C document the mitigation required to compensate for impacts to freshwater march and saltmarsh.

For this project, the Wetland ICT agreed to use four parts per thousand (4 ppt) salinity as the dividing line between classification of marsh as salt marsh or brackish marsh. To illustrate, a wetland with 3 ppt salinity would be classified as brackish marsh for this project and a wetland with 5 ppt salinity would be classified as salt marsh. Establishing a dividing line at 4 ppt was necessary to enable numeric computer modeling to provide estimates of quantities and locations of salinity changes in the estuary.

However, the dividing line of 4 ppt between salt and brackish marsh used for this project is a very conservative one. In the scientific literature, there is research that supports setting the dividing line between salt and brackish marsh at 10 or even 17 ppt (the salinity of seawater is 30 ppt). If the dividing line had been set higher for SHEP, many concerns would be eliminated because the 740 acres at issue would have been classified as brackish marsh. Thus, there is a continuum, rather than a sharp distinction, between brackish and salt marsh. The real question is whether there is any functional difference between the two levels of salinity in the marsh, regardless of what salinity level is used to classify or label them. This only makes sense because once a wetland is no longer dominated by freshwater, the effect of salinity levels between, for example, 4 and 7 ppt is one of degree, not kind.

The Corps performed a scientific investigation to determine whether reduction of the salinity in the 740 acres of the marsh at issue would impair the wetland functions of this area. EIS, Appendix C, at 51 and Appendix A to Appendix C, Worksheets. Again, it is important to understand that the project would decrease salinity in the 740 acres at issue.

As set out in a key functional assessment table that is part of the Corps's detailed analysis of compliance with the 2008 Mitigation Rule, there are 11 commonly accepted functions of wetlands, ranging from water purification to fish and wildlife habitat. Wetland functions such as flood protection, streamflow maintenance, retention of particles, and surface water storage would not be affected by conversion of salt marsh to brackish marsh. EIS, Appendix B, VII, Table 1, 7-22 (negligible difference in these functions between salt marsh and brackish marsh). The amount of water and the water levels in the marsh will remain the same regardless of whether the water is saline or brackish – it is only the level of salinity that changes (decreases).

In addition, decreased salinity would not measurably change the type of vegetation found in the 740 acres at issue. The most common form of salt marsh vegetation – a plant known as Spartina alterniflora – would continue to grow and flourish in a brackish marsh setting. Similarly, fish and wildlife habitat would experience only minor change. The same large number of generalist species of fish and wildlife that use the 740 acres of salt marsh would continue to live in and use the same 740 acres after re-classification to brackish marsh.

Because the functional assessment shows the restoration of brackish marsh would cause negligible change in the 11 key wetland functions, the Corps could reasonably conclude that it is appropriate to

view the change from the salt marsh to brackish marsh classification as resulting in "no net loss of wetlands," which is the ultimate goal of the 2008 Mitigation Rule and previous wetland mitigation guidance.

In addition to the detailed technical analysis, the following observations regarding the 2008 Mitigation Rule apply to this project. First, the Rule is flexible based on what is practicable. 33 CFR 332.3(a) ("The district engineer must determine the compensatory mitigation to be required in a DA permit, based on what is practicable and capable of compensating for the aquatic resource functions that will be lost as a result of the permitted activity.") For this project, what is practicable is heavily influenced by the basic direction established by the Wetland ICT, which is to preserve as much freshwater tidal marsh as possible, and the constraint that no salt marsh mitigation banks or in-lieu fee programs are available in the Savannah River Basin.

Second, while the 2008 Mitigation Rule prefers "in-kind" mitigation, the definition of in-kind is also flexible. In-kind is broadly defined to mean "a resource of a similar structural and functional type to the impacted resource." 33 CFR 332.2 (emphasis added). The conversion to brackish marsh of 740 acres classified as salt marsh using the conservative salinity levels adopted for this project could be viewed as restoration in-kind because those particular 740 acres will be a resource of similar structural and functional type before and after. Indeed, the Rule itself draws no distinction between different types of tidal wetland. See, e.g., 33 CFR 332.3(e)(1)(" In general, in-kind mitigation is preferable to out-of-kind mitigation because it is most likely to compensate for the functions and services lost at the impact site. For example, tidal wetland compensatory mitigation projects are most likely to compensate for unavoidable impacts to tidal wetlands").

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765-DC-149-EV81

Comment: *Moreover, the mitigation package as a whole includes a great degree of uncertainty. As explained in greater detail in Section II.A.2.(d), the funding required for the elements of the proposed mitigation package is not assured by either the Corps or GPA. In fact, as explained above in Section II.A.2.(d), it is our understanding the funding needed to ensure that the dissolved oxygen injection system, for example, is maintained and operated in perpetuity will be subject to the precarious federal appropriations process. Without assurance that the proposed mitigation measures will be adequately funded, there can be no confidence in the success or effectiveness of the package as a whole. This approach again runs counter to the Mitigation Rule, which as explained above in Section II.A.2.(d), specifically provides that the "district engineer shall require sufficient financial assurances to ensure a high level of confidence that the compensatory mitigation project will be successfully completed, in accordance with applicable performance standards." 33 C.F.R. § 332.3(n)(1) (emphasis added).*

Response: See response to comment 765-DC-149-EV38.

765-DC-149-EV82

Comment: *The proposed location for the mitigation for the 14.08 acres of direct impacts to wetlands is "a previously used sediment placement area (CDF 1S) within Savannah Harbor." DEIS at 5-6. According to the Corps, this area, which is located adjacent to the confluence of the Front River and the Middle River and is within the Refuge, was identified as having the "greatest opportunity to support the long term success of a restored salt and brackish marsh system." DEIS 5-6. The proposed restoration includes grading it down to an elevation that would allow the growth of Spartina alterniflora. DEIS at 5-6. If the site does not naturally revegetate as expected, the Corps would plant Spartina to provide the basis for*

subsequent growth across the site. DEIS at 5-7. It is not clear why the Corps does not simply re-plant Spartina from the outset. Moreover, it also unclear at what point the Corps will decide to re-plant the site and how extensive the replanting will be. For example, Table 5-2 presents the "Revegetation Rate for Created Marsh," but it does explain whether, for example, the Corps will initiate planting activities if 15 percent vegetative cover is not attained in year one. Finally, if the Corps does decide to re-plant, the DEIS does not specify how extensive such planting will be.

Response: Prior to starting any restoration activities at the 1S site, the District would conduct a detailed site survey to document where wetland vegetation presently occurs. Brackish marsh that exists on the fringe of the site would be identified and not be subject to grading. The early site investigations revealed an interior parcel [approximately 40+ acres] that can easily be graded/contoured to restore 28.8 acres of saltmarsh habitat - an amount satisfying the compensatory mitigation needs for direct impacts to the 15.68 acres lost to excavation. The development of the restored marsh also includes a stipulation [part of the adaptive management plan] which would require planting juvenile *Spartina alterniflora* plants if the site does not revegetate naturally at the rate of colonization indicated in Table 5-2 of the FEIS. Natural revegetation is preferred because the plants colonizing at the site would then come from seed stock of adjacent vegetation that is well-suited to that location (salinity regime). Annual monitoring reports would be generated and provided to a Wetland Interagency Coordination Team (ICT). If the restored marsh does not meet the success criteria illustrated in Table 5-2, then the ICT would identify and/or recommend corrective actions. These would include regrading, sediment deposition, sprigging, modifying planting techniques, equipment requirements, sprig densities, or other tested measures to achieve compliance with the mandated percentages [Table 5-2]. If the restored marsh still does not meet the success criteria [within 10% of the reference site] after 7 years, then the ICT would continue to identify and/or make recommend corrective actions. The need for corrective action(s) would be determined and/or implemented annually with agency involvement and concurrence.

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765-DC-149-EV83

Comment: *Part of the mitigation package relating to impacts to tidal freshwater marshes is to implement several flow-altering modifications of the river. As discussed above in Section I.A., it was not possible at this time to perform a rigorous review of the Corps' modeling completed in connection with the Project, and we remain concerned about the significant uncertainty regarding the ability of the flow-altering modifications to limit indirect impacts to 337 acres. Moreover, we are further concerned that proposed changes to the hydrology of the river may have unintended consequences. For example, while limiting damage to the tidal freshwater wetlands, the changes in hydrodynamics may have unintended effects to fisheries, including shortnose sturgeon, Atlantic sturgeon, and striped bass.*

Response: The FEIS describes the rationale behind selection of the EFDC model in Section 5.01.2.1 of the FEIS. A comparison of impact prediction tools determined that wetland impacts identified by using the EFDC hydrodynamic model are higher (i.e., of greater magnitude) than those identified by the Marsh Succession Model at all proposed project depths. These results validated the District's use of the EFDC-derived algorithm since it provides a more inclusive/conservative estimate of project impacts than other models presently available.

Appendix C describes the process through which the flow rerouting features were identified and evaluated.

The District performed a functional assessment to address the likelihood of vegetative conversion based on changes in salinity. That assessment concluded that the differentiation between salt marsh and brackish marsh recommended by the Wetland Interagency Coordination Team and used in the DEIS was narrowly defined. The salinity range used in the SHEP model to differentiate between brackish marsh (0.6-4 ppt) and salt marsh (> 4ppt) was overly restrictive given that brackish marsh salinities have been reported with a range from 0.5-10 ppt (NOAA, 2010) and in other estuarine systems from 0.5-17 ppt (Judd and Lonard, 2004). Thus, the salinity range used to quantify salt marsh in the area of potential effect (i.e., > 4 ppt) over estimated the amount of saltmarsh in the system and under estimated the amount of brackish marsh. As such, the described conversion of salt marsh to brackish marsh, which would occur as a result of harbor deepening, could be negligible when taking into account vegetative characteristics for wetland environments with associated salinities commonly associated with a brackish marsh (i.e., range between 5 and 10 ppt).

Given the wide range of salinity reported in literature for brackish marsh systems, the inherent variability in salinity that exists for all estuarine systems, and the modeling results that report post-deepening salinity concentrations consistent with the aforementioned range, it was concluded the 740-acre calculated conversion of saltmarsh to brackish marsh if the harbor is deepened to 47-feet, is a conservative value, with actual vegetative shifts unlikely to be identifiable *in situ* in the project effect's area. That said, the District elected to use an inclusive approach in its assessment of project-related effects and incorporated the salt- and brackish marsh conversion in its calculation of minor impacts.

The conversion of 223 acres of freshwater wetland to brackish marsh represents the only significant wetland conversion that is likely to be noticeable if the harbor is deepened to 47-feet. Again, it is important to reiterate that the ecological values of the impacted freshwater wetlands would not be completely lost. Instead, in the worst-case scenario, those acres would convert to brackish marsh. The District's calculation of the number of acres of freshwater wetland that have the potential to convert to brackish marsh is based on a shift of the location of 0.5 ppt salinity, a traditional rule-of-thumb for differentiating between freshwater marsh and brackish marsh. However, data reported in the literature for Savannah Harbor suggest that a shift in vegetation (from freshwater marsh to brackish marsh) in this estuary does not occur until salinity concentrations approach 2.5 ppt (Latham et al., 1994). Even at oligohaline marsh sites with average salinity concentration of 2.1 ppt, a discriminant function (DF) analysis revealed that only in 47% of cases was there a correct pairing of environmental variables with vegetative species composition and dominance. At those same oligohaline sites, 37% of the vegetative species composition and dominance were more closely aligned with a freshwater classification (Latham et al., 1994).

The District's salinity value that denotes a defined shift from freshwater to brackish marsh (i.e., 0.5 ppt) is approximately five times lower than traditionally seen with 100% vegetative shifts *in situ* within the Lower Savannah Watershed (Latham et al., 1994) and other coastal marsh systems in the southeastern United States (NOAA, 2010). Thus, many of the existing freshwater emergent plant species, and associated ecological parameters, would likely be sustained in areas predicted to experience salinity concentrations in the range of 2.5 ppt. For those areas that transition to more brackish characteristics, traditional ecological functions associated with all emergent wetland systems would continue (see functional assessment response).

To ensure the indirect impacts are well characterized and understood, the District would implement post-construction monitoring to evaluate/quantify the degree of wetland conversion that actually occurs. In its Adaptive Management Program, the District also included acquisition/preservation of additional wetlands if monitoring demonstrates that wetland impacts are under-predicted.

In regard to the comment concerning impacts to fisheries, the District performed extensive studies to evaluate impacts to fishery resources, including the Shortnose Sturgeon. The hydrodynamic and water quality models were developed over a number of years, and their use employed approaches/assumptions that were agreed upon by all the Cooperating Agencies. The District conducted studies and worked in conjunction with a Fishery Interagency Coordination Team (of which NOAA Fisheries was a member) to identify critical species and acceptable habitat criteria for each life stage. The analyses included quantification of expected impacts to fishery resources with and without the proposed flow rerouting features. The results of the extensive analyses and mitigation planning, including fish passage at New Savannah Bluff Lock and Dam, flow re-routing, and addition of dissolved oxygen, have minimized impacts to Shortnose Sturgeon habitat. The District carried out all fisheries studies and analyses identified by the Fishery Interagency Coordination Team as being necessary to adequately evaluate the impacts of the various project alternatives.

76S-DC-149-EV84

Comment: *We are concerned about the Corps' decision to rely on the Savannah District's Standard Operating Procedure for Compensatory Mitigation (March 2004) (the "SOP") since the SOP was designed to provide guidance for projects involving ten acres of impact or less. The SOP states that it "is applicable to regulatory actions requiring compensatory mitigation for adverse impacts to 10 acres or less of wetland or other open waters" and that the "SOP may be used as a guide in determining compensatory mitigation requirements for projects with impacts greater than the above wetland and stream limits, or for enforcement actions, however, higher than calculated credit requirements would likely be applicable to larger impacts." SOP at 1 (emphasis added). In light of the extent of impacts from this Proposal to resources of national importance, we recommend that the Corps adopt a far greater ratio for preserving wetlands.*

Response: In the summer of 2003, a Wetland Interagency Coordination Team (ICT) was assembled to assist in the analysis of potential impacts from the SHEP. The team consisted of agency wetland experts from US EPA, USFWS, NMFS, GA DNR, SC DNR, and SC DHEC. After deliberation, the team identified an acceptable technical approach to determine wetland impacts, as well as the information needs necessary to effectively review the DEIS. Since creation of the Wetland ICT team, the District hosted seven meetings. During those meetings, methods for evaluating functional losses and mitigation alternatives for wetland impacts were proposed and discussed at length. After the seven meetings, the District prepared a Memorandum for Record (MFR), which was provided to all members of the ICT. Additional coordination was conducted by email.

Use of the Regulatory SOP was the suggestion of one of the Wetland ICT members as a way of quantifying the mitigation required after the flow rerouting minimized the expected impacts to freshwater marshes. Although not specifically designed for large projects, the natural resource agencies have applied the SOP to several projects in Georgia with wetland impacts exceeding 10 acres.

The Corps conducted an Agency Technical Review (ATR) to assess use of the District's Regulatory SOP in developing a mitigation plan for SHEP. The ATR was lead by the National Deep-Draft Navigation Planning Center of Expertise, with the assessment performed by Corps experts at the Engineering Research and Development Center in Vicksburg, MS. The ATR's main purpose was to determine if the SOP was an appropriate method to quantify the preservation acreage needed to compensate for SHEP's impacts. The ATR evaluated the assumptions and calculations that the District used in applying the SOP for the SHEP. It is important to note that the SOP was only used to determine the amount of preservation acreage necessary to offset losses after avoidance, minimization, and restoration measures

had been applied. After deliberation, the ATR concurred with using the SOP to determine the needed preservation acreage, as well as quantifying project impacts and the associated mitigation which would be required.

The USFWS provided a Draft Fish and Wildlife Coordination Act Report, dated August 2010. In the report, the Service concurred with SOP's use together with its calculation that preservation of the subject 2,245 acres [adjacent to the SNWR] would be sufficient to compensate for the losses attendant to the 47-foot deepening alternative. The Service provided updates to the SOP worksheets [Report-Appendix A] and adopted their overall calculations [results] for use in the DEIS. In its Adaptive Management Program, the District also proposed acquisition of additional wetlands if monitoring demonstrates that wetland impacts were under-predicted. The USFWS provided a Final Fish and Wildlife Coordination Act Report in March 2011.

765-DC-149-EV85

Comment: *The Mitigation Rule underscores the importance of providing in-kind mitigation for unavoidable impacts to "difficult-to-replace" aquatic features, such as freshwater tidal wetlands: "For difficult-to-replace resources (e.g., bogs, fens, springs, streams, Atlantic white cedar swamps) if further avoidance and minimization is not practicable, the required compensation should be provided, if practicable, through in-kind rehabilitation, enhancement, or preservation since there is greater certainty that these methods of compensation will successfully offset permitted impacts." 33 C.F.R. § 332.3(e)(3) (emphasis added). We understand the Corps' position that it was difficult to identify preservation opportunities involving freshwater tidal wetlands; however, if in-kind mitigation cannot be undertaken here, we believe that strongly counsels in favor of far more preservation mitigation as provided for in EPA Region 4's Mitigation Policy.*

Response: See response to comment 765-DC-149-EV80, which points out that while the 2008 Mitigation Rule prefers "in-kind" mitigation, the definition of in-kind is also flexible. In-kind is broadly defined to mean "a resource of a similar structural and functional type to the impacted resource." 33 CFR 332.2 (emphasis added). The conversion to brackish marsh of 740 acres classified as salt marsh using the conservative salinity levels adopted for this project could be viewed as restoration in-kind because those particular 740 acres will be a resource of similar structural and functional type before and after. Indeed, the Rule itself draws no distinction between different types of tidal wetland. See, e.g., 33 CFR 332.3(e)(1)(" In general, in-kind mitigation is preferable to out-of-kind mitigation because it is most likely to compensate for the functions and services lost at the impact site. For example, tidal wetland compensatory mitigation projects are most likely to compensate for unavoidable impacts to tidal wetlands . . . .").

In addition, the District disagrees that more preservation mitigation is required. EPA's 2001 Region 4 Compensatory Mitigation Policy provides examples of preservation projects that were used to offset impacts to aquatic resources. EPA describes these examples as, *"preservation projects that have accomplished the goals of the Clean Water Act while meeting the specific goal of the management agencies that accepted or will accept the preserved wetlands."* A project known as Walker Ranch in Osceola and Polk Counties, Florida, is included as an example. In brief, Walker Ranch [8,500 acres] was purchased and preserved by the Disney Development Company as mitigation for filling approximately 600 acres of wetlands [Stutzman, 1992]. The Orlando Sentinel newspaper reported this action as the "one of the largest wetlands losses ever requested in Florida at one time" (Regan, 1991). Although the mitigation-to-impacts ratio is 14:1, the preservation mitigation was provided in exchange for the

irretrievable *and complete loss* of 600 acres of swamp and pristine wetland. All elements of wetland function were lost as a result of filling and/or draining those 600 acres.

In contrast, the wetland impacts derived from SHEP would result in conversion of 223 acres of freshwater marsh to brackish marsh and 740 acres of saltmarsh to brackish marsh. The District's salinity value that denotes a defined shift from freshwater to brackish marsh (i.e., 0.5 ppt) is approximately five times lower than what has traditionally been observed with 100% vegetative shifts *in situ* within the Lower Savannah Watershed (Latham et al., 1994) and other coastal marsh systems in the southeastern United States (NOAA, 2010). Thus, many of the existing freshwater emergent plant species, and associated ecological parameters, will be sustained in areas predicted to experience salinity concentrations in the range of 2.5 ppt. For those areas that do transition to more brackish characteristics, they would still continue to provide the traditional ecological functions associated with emergent wetland systems (see functional assessment response). Thus, the preservation of 2,245 acres (consisting of bottomland hardwoods and upland buffer) is more than sufficient to offset any conversion in freshwater wetland vegetation that might occur. Using the higher salinity value observed in the Savannah basin for conversion to brackish marsh (2.5 ppt), less conversion would be expected, resulting in a mitigation-to-impacts ratio of roughly 10:1, which is consistent with ratios recommended in the 2001 EPA Region 4 Compensatory Mitigation Policy concerning wetland preservation. Using the DF analysis reported by Latham et al (1994) which aligned 37% of freshwater species with oligohaline sites, the 223 acres of freshwater to brackish marsh conversion is reduced further such that the mitigation-to-impacts ratio is to 16:1. It is important to reiterate that the SHEP impact would be a shift in vegetation, and that these wetlands would still provide the ecological functions associated with emergent wetland systems. This is significantly different from other example projects identified in EPA Region 4 Mitigation Policy where preservation was used for the irretrievable *and complete loss* of wetlands.

These SHEP impacts associated with indirect effects to wetlands would be mitigated by preserving 2,245 acres of bottomland hardwood wetlands and adjacent upland buffer (an area highly sought by USFWS for the purpose of protecting lands within the SNWR). Considering the previous information, the District concluded that the proposed preservation mitigation for SHEP is more than sufficient when comparing the SHEP-derived, wetland conversion to the magnitude of wetland loss afforded the Disney Development Company, which was mitigated with the preservation of the Walker Ranch Property (a project highly regarded in the 2001 Compensatory Mitigation Policy developed by USEPA Region 4).

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765-DC-149-EV86

Comment: *As discussed previously above in Section II.A.2.(d), we have serious doubts relating to the proposal to utilize the oxygenation system for purposes of mitigating the impacts associated with the lowering of already low levels of DO in the water column. In addition to not being able to verify the Corps' modeling results at this time, we are already skeptical of the proposal given the results of the demonstration project, which indicated that any reported benefits were within the natural ranges of variability. Moreover, it is highly dubious that such a system can be maintained and run effectively in perpetuity, especially in light of the fact that funding for its maintenance and operation is not even assured.*

Response: See responses to comments 765-DC-149-EV34 through 765-DC-149-38.

765-DC-149-EV87

Comment: *As explained above, in Section VI.C., the Corps has proposed a fishway at NSBLD as mitigation for damages to shortnose sturgeon habitat in the estuary. The DEIS fails to demonstrate that the proposed fish passage design – the Horseshoe Rock Ramp – will have success at passing SNS. The proposal also lacks a detailed fish passage plan listing objectives and goals for the species expected to benefit from the facility. Moreover, for a fish passage facility to be effective, a suitable environment must be present above the dam to support spawning and the development of eggs, larvae, and juveniles. Even if it could be demonstrated that the Horseshoe Rock Ramp could be constructed at the NSBLD, modifications would likely be necessary to specifically accommodate sturgeon. It is likely that these changes would substantially increase the cost of the fish passage facility, and additional funding would be needed up front to ensure proper maintenance of the structure in perpetuity. The fish passage proposal would certainly require far greater levels of committed funding than currently proposed, and even then, it is uncertain that the proposed design will work here to address impacts to sturgeon. The most effective mitigation action would involve the complete removal of NSBLD along with upstream modifications to promote a flow schedule designed to promote biological integrity.*

Response: See response to comment 765-DC-149-EV71. The fish bypass will definitely benefit the Shortnose sturgeon. There is consensus that removal of the lock and dam is the best way to allow sturgeon and other anadromous fish access to upstream habitat. However, that is not a feasible mitigation alternative for the following reasons:

1) The lock and dam is a Congressionally-authorized project; therefore, the Corps is obligated to maintain the project as Congress provides funding for such actions;
2) The current authorization language for the NSBL&D (WRDA 2000, amended in Omnibus Act 2001) call for repair and rehabilitation of the lock and dam structure, construction of a fish passage, and conveyance of Lock and Dam to the City of North Augusta;
3) Removal of the structure would adversely impact the freshwater supply of eight major users.
The following habitat information was not available when the Draft EIS was published. However this information will be added to Appendix B and C.:
In the 20-mile study area [Augusta Shoals/Savannah Rapids upstream of the New Savannah Bluff Lock and Dam] substrate data were collected at 57 sites. Forty percent of the sites had a substrate type[s] considered suitable for sturgeon spawning (NMFS 2007), whereas the combined frequency of marginally suitable sites was 37%. The remaining sites [33%] had unsuitable substrates.

Benthic substrate frequency in Augusta Shoals study area

Class	Benthic substrate	SI[1]	Number of Sites	Frequency (%)
1	Mud, soft clay/fines	0.0	0	0
2	Silt, sand (diameter < 2.0 mm)	0.0	7	12
3	Sand, gravel (diameter > 2.0 mm to < 64 mm)	0.5	0	0
4	Cobble/gravel (diameter > 64 mm to < 250 mm)	1.0	3	5
5	Boulder (diameter 250 mm to 4,000 mm)	0.8	20	35
6	Bedrock w/ fissures w/ gravel/cobble mixtures	0.6	21	37
7	Bedrock smooth w/ few fissures or gravel	0.2	6	11

[1]1.0 indicates highest suitability; 0.0 the lowest.

The following link contains the full report of the investigation of Shortnose sturgeon spawning habitat in the Savannah River [Georgia and South Carolina]: http://www.sas.usace.army.mil/plnew.html

765-DC-149-EV88

Comment: *We are troubled about the proposal to provide a lump sum payment in exchange for significant impacts to the striped bass fishery. Such a proposal should only be considered as a measure of last resort. If no alternative measures can be identified to protect the existing fishery, this proposal must be significantly expanded as impacts to spawning habitat will likely be greater than predicted. Young Report at 3. The Corps has proposed to fund at a 20 percent spawning habitat loss level, but this amount falls well short of what would be needed. Young Report 15. In fact, the Corps has previously underestimated impacts from estuary modifications to the striped bass population in the 1970s and 1980s. Id. The Tide Gate and Diversion Canal installed in the late 1970s and operated through the 1980s caused a 96 percent decline in striped bass reproduction, prompting a moratorium on striped bass fishing and harvest for an extended period of time. Id. The losses were a result of saltwater intrusion and hydrodynamic changes negatively impacting spawning and the survival of early life stages, and a major restocking effort was needed to rebuild the population. Id. To avoid repeating the mistakes of the past, the Corps should anticipate funding at a 100 percent loss level with funding made available prior to initiation of the Project.*

Response: The Striped bass mitigation proposal was thoughtfully developed. Budgeting for a 100% loss in the Striped bass population [due to SHEP] would be unreasonable, since that degree of impacts well exceeds the expected project effects. Nonetheless, the Adaptive Management Plan (Appendix D) has been modified to include funding for additional Striped bass stocking if the expected impacts are exceeded. As indicated in DEIS -Section 5.3.2, a lump sum payment would be made to the Wildlife Resources Division (WRD) of the Georgia Department of Natural Resources to expand its stocking program. All Cooperating Agencies and the Fisheries Interagency Coordination Team members agreed to this approach. Since WRD has long-term expertise in stocking operations, the Team was confident that appropriate techniques and genetic stock would be employed.

Section 4.04 of the EIS and Appendix C have been modified to indicate there may be two populations of striped bass in Savannah Harbor, viz., one spawning near the estuary and the other near the fall line.

According to Martin and Paller 2007 (http://sti.srs.gov/fulltext/WSRC-MS-2007-00076.pdf), "Historically striped bass (*Morone saxatilis*) spawning occurred as far up the Savannah River as the Fall Line (also known as the Augusta Shoals) at about 7 river kilometer (RK) 326; however, currently striped bass have difficulty migrating in any numbers past the New Savannah Bluff Lock and Dam." If this is the case, fish passage at New Savannah Bluff Lock and Dam should help mitigate for impacts to this population of Striped bass.

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765-DC-149-EV89

Comment: *As the Corps explains in its adaptive management plan, there are five components to a adaptive management – predicting impacts, developing appropriate mitigation for those impacts, implementing the mitigation, monitoring the mitigation, and adapting the mitigation as necessary. DEIS, App'x D at 3. The Corps has not made adequate provisions in its adaptive management plan to ensure that the fifth element – adapting the mitigation – will be completed. If, for instance, the chloride levels in the tidal freshwater wetlands reach levels higher than expected and many more of these rare wetlands are degraded as a result, then more wetlands mitigation would be required than is provided for under the adaptive management plan. And under the Corps' plan there is no guarantee that money will be available for such mitigation because the necessary funds will have to be approved by the Administration and appropriated by Congress on a yearly basis. In the current of climate of fiscal restraint, there is no assurance that Congress would appropriate money for additional mitigation for a civil works project that would, by that time, be completed.*

Response: The Adaptive Management Plan has been thoughtfully developed. The State of Georgia has indicated it is willing to place its share of the Adaptive Management costs in an escrow account so they would be available if/when needed. The District intends to obtain Adaptive Management funds during the dredging portion of the project so they would be available if/when needed. Development of the SHEP Mitigation Plan, Monitoring Plan, and Adaptive Management Plan, together with their funding, complies with Corps of Engineers policy, regulations, and procedures. See also response to comment 765-DC-149-EV38 regarding funding commitments.

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765-DC-149-EV90

Comment: *On top of the uncertainty surrounding the funding of the monitoring and adaptive management components of the Project, there is a significant question as to whether the adaptive management sums incorporated in the plan are sufficient. For example, the adaptive management plan allows $1,341,500 for the purchase of additional wetlands if the wetlands mitigation incorporated in the project mitigation plan proves insufficient. Id. at 34. This figure represents only 5 percent of the mitigation costs the Corps included in the wetlands mitigation plan. The Corps does not explain why it chose this amount. Without more, this calculation is arbitrary and capricious.*

Response: The Adaptive Management Plan has been thoughtfully developed. There are no specific criteria regarding the development of adaptive management costs for Corps of Engineers water resource development projects. Although developed separately, the costs for project modifications identified for the Adaptive Management Plan are to be viewed as a whole, rather than as individual components. The total amount identified for Adaptive Management may be expended on whatever project modification is identified as being warranted. The amounts that may be spent on individual

features would not be limited by the amount identified in the FEIS, but would be whatever is needed to fix the problem, up to the total amount identified for Adaptive Management. If additional funds are required for project modifications, funding would be sought through the Corps' normal budget process.

765-DC-149-EV91

Comment: *Furthermore, the Corps does not explain what happens if the harbor deepening destroys far more wetlands than the Corps has predicted. If, for instance, the Project destroys 15 percent more wetlands than the Corps predicts, will the Corps mitigate for those wetlands destroyed that are above the Corps' 5 percent "cap"? This is especially important because there is such a disparity in the amount of wetlands that are at risk as a result of the Project. If the "replumbing" of the estuary works correctly, the Corps predicts that 337 acres of freshwater wetlands will be destroyed. DEIS, App'x C at 54. But if the re-plumbing does not work according to plan this number could be significantly higher.*

Response: See previous response.

765-DC-149-EV92

Comment: *In a similar vein, the Project calls for the use of three "Speece cones" to increase dissolved oxygen levels in the harbor. Id. at 95. If more Speece cones are needed to raise dissolved oxygen levels to acceptable levels, the adaptive management cost schedule only authorizes the Corps to spend an additional 10 percent for more Speece cones. DEIS, App'x D at 34. It would seem, based on the Corps' numbers, that this amount would not even cover one additional Speece cone. This is alarming when one takes into account that it was not that long ago that the Corps was suggesting that as many as twenty-nine Speece cones would be needed for the Project.34 As the FWS has pointed out, it is inappropriate to use the performance goals for the Project as the thresholds for remedial action under the adaptive management plan 35. Because of the uncertainty of the models, the actual impacts of the proposed Project could differ substantially from the predicted impacts.36 Consequently, the amount of funding set aside for adaptive management should be increased to 10 or 15 percent of the initial cost of construction of the various mitigation components. And this additional amount should be included in the cost of the Project.*

Response: See EIS-Section 5.02.2 for details. The District is proposing oxygen injection at two locations and three injection sites, not by using three cones. There would be 13 Speece Cones total at three different locations. The proposed Speece Cone technology has been used in other applications worldwide for 30 years and underwent on-site testing in Savannah Harbor during 2007. The DO system design for Savannah Harbor already includes reserve capacity and an operational back-up unit at each of two installation locations. The estimated life of the cones and lines is 40 years and the estimated life of the controls, oxygen generator, and pumps is 20 years. During construction, there will be a Transfer Efficiency Study to optimize the DO system operation. During the project's 10-year post-construction monitoring period, needed adjustments and modifications to the DO system will be funded through the project's $18 million Adaptive Management plan. Successful installation, operation, and maintenance of the DO system is already or will be a requirement of several approvals for the project, including Georgia and South Carolina's water quality certifications. See also response to comment 765-DC-149-EV38.

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765-DC-149-EV93

Comment: *The Federal Modeling Performance Goals do not seem to recognize that other pollution control efforts are ongoing on the Savannah River upstream of the harbor. For example, to come into compliance with the TMDL for dissolved oxygen, upstream dischargers will be undertaking projects to reduce their contributions of biological oxygen demand to the River. These efforts could have a significant impact on dissolved oxygen levels in the harbor. If the Corps fails to take this into account in its monitoring, then it will not get a true reading of whether or not certain components of the adaptive management plan should be triggered. In other words, the Project should not be able to escape its obligations to increase dissolved oxygen levels because upstream dischargers are acting responsibly.*

Response: The EIS addressed the Draft 2010 TMDL. Further, the proposed mitigation is not intended to bring DO levels in the harbor into compliance with State standards or the TMDL. Congress did not include environmental restoration or enhancement in its authorization of the Savannah Harbor Expansion Project. Congress has established procedures for such Federal actions, but it did not include those project purposes in this proposal.

District consultants used the approved hydrodynamic and water quality models to design a dissolved oxygen system that would eliminate a deepening alternative's adverse impacts on DO. Fortunately, the injection system will also result in a minor net improvement to the estuary's DO levels. EIS -Table 5-28 *Percent of Cells with Improvement in D.O. Levels Over Existing Conditions* shows the extent of this improvement. The project would meet its mitigation responsibilities independent/irrespective of actions by upstream dischargers.

765-DC-149-EV94

Comment: *The preconstruction monitoring for physical characteristics and biological resources should be extended to three lunar cycles to ensure an accurate baseline is established. In addition to wetlands and shortnose sturgeon, the Atlantic sturgeon and stripped bass should be monitored. Also, a monitoring plan should be developed to cover the planting of vegetation at the brackish marsh creation site. Furthermore, if additional mitigation is required under the adaptive management plan, the current plan only allows for one year of additional monitoring. This period should be increased to three years. Finally, the proposed long-term monitoring plan appears to be funded for only one year past the initial 5-year post-construction monitoring period. If this long-term monitoring is dependent on future Congressional appropriations, it is unlikely that this monitoring will ever take place. The Corps needs to find a way to better assure that this monitoring will be funded.*

Response: The full year of pre-construction monitoring would include the three lunar cycles requested – assuming the commenter refers to the 28-day lunar cycle that most directly affects the tides. The pre-construction monitoring also includes monitoring of wetlands and Shortnose sturgeon, as requested.

Analysis of SHEP's effects on Striped bass habitat has been added to the Monitoring and Adaptive Management Plan. The field data that are collected will be used in the updated water quality models to evaluate impact on Striped bass habitat. The Atlantic sturgeon has been listed as an endangered species. The NMFS BO concluded that SHEP would not jeopardize the existence of that species in the Savannah River. Project monitoring would include activities to assess actual impacts to this species.

The Monitoring Plan and Adaptive Management Plan outline the success criteria for the re-vegetation of Disposal Area 1S and the use of sprigging brackish marsh vegetation, if necessary. Additional discussion

concerning the monitoring of Disposal Area 1S has been added to the document including monitoring for invasive species and actions that would be taken to control these species, if required.

The monitoring period[s] that would occur after implementation of an adaptive management measure has been expanded. If any of the mitigation features have to be modified, site-specific monitoring would be conducted for two years after implementation to ensure it performs as intended.

After the SHEP is considered a "completed" project, it would leave "Construction" and enter the "Operation and Maintenance" (O&M) phase. O&M funds would be required to maintain the entire project, including its mitigation features. Funds needed for mitigation for operating projects receive the Corps' highest priority because the project is dependent on maintaining/honoring mitigation requirements.

765-DC-149-EV95

Comment: *We appreciate the opportunity to submit these comments on the proposal to deepen the Savannah Harbor. For the reasons described herein, we believe the Proposal raises serious concerns under the National Environmental Policy Act, the Clean Water Act, the Endangered Species Act, and other state and federal laws and regulations. Our review of the DEIS and Draft GRR reveal that the Corps has failed to provide the public with a meaningful opportunity to review a major, publicly-funded infrastructure project by not providing timely access to the numerous models relied upon by the Corps in rendering its analysis. Until the public is afforded the ability to rigorously review the Corps' analysis, the Corps has frustrated the goals of NEPA by severely limiting public input.*

Response: The District provided ample opportunities for the public to review the proposed project. The GRR and EIS taken together describe the analyses that were performed, including specific details on model development and application. A number of comments were received requesting additional time to review the documents because they were so voluminous and [in part] contained relatively complicated information. In general, these requests were granted.

The NEPA process provided the framework for compliance with other environmental statutory requirements, including the Clean Water Act, Endangered Species Act, and other state and federal laws and regulations and was effectively used in this instance.

The EIS was modified and revised as appropriate to resolve the comments received during the iterative public review. The end result is the FEIS document. The Record of Decision is the final step in the NEPA process and is only issued after the FEIS has been approved and is in full compliance with all applicable laws and regulations. In summary, the DEIS is just a step in the iterative NEPA process and its full compliance with all other applicable laws and regulations will only be achieved when the FEIS is completed and the ROD is signed.

See also responses to comments 765-DC-149-EV02 and 765-DC-149-EV03.

Note: Comments are taken from Exhibit D: Report of Robert Stearns. Most of the comments in this report were made and addressed previously. To the extent any additional responses are provided here they shall be deemed to include any other previous responses on these topics whether or not expressly identified.

Page Exhibit D-2

765-DC-149-EC13

Comment: *Statements by the Georgia Ports Authority (GPA) and other business and community leaders indicate their belief that this project is needed for the port's underlying business, thereby contradicting the Corps' contention that the port's growth rate will be the same with or without the project. The GRR and the DEIS fail to rectify these divergent views;*

Response: The GPA, the Corps, and independent economic forecasting firms predict that significant cargo growth will continue at Savannah Harbor. The same volume of cargo would move through Savannah with or without a harbor deepening project. A Multiport analysis of alternate ports and networks indicated that most of the cargo imported and exported out of Savannah serves a distinct hinterland with little cargo being rerouted from other ports. A deepening project would allow the same volume of cargo to be moved more efficiency via larger or more fully-loaded vessels. This basic position is supported by the fact that PPX 1 vessels are calling Savannah in increasing numbers and are anticipated to call in greater numbers once the Panama Canal is enlarged. The Corps is aware that GPA does not agree with everything contained in the GRR and EIS. For example, GPA stated in its comments on the draft reports that it believes the District is too conservative in its economic analysis of the proposed deepening.

765-DC-149-EC14

Comment: "*the Corps' so-called "multi-port analysis" and "regional port analysis" are based on inconsistent assumptions and fail to address the most important question of which port (or ports) in the southeast could be enlarged to accommodate the Post-Panamax ships with the least cost and fewest environment impacts;*

Response: The regional port analysis concluded that no single port could be sufficiently enlarged to accommodate the growth that is expected for the region. All ports (existing and proposed) have location, operational, and environmental constraints. The 1999 Congressional authorization for the project does not include a system-wide analysis of deep-draft harbors on the east coast. As explained in several places in the GRR/EIS, including EIS Appendix H, Section 404(b)(1) Evaluation (Practicable Alternatives), among the conclusions reached as a result of the Regional Port Analysis, the Multiport Analysis, and the analysis of eight alternative sites for the project along the Savannah River were the following: (1) there is no feasible alternative to improving Savannah Harbor because the major South Atlantic ports will experience so much cargo growth from 2005 to 2050 they will all need deepening or improvement currently planned, (2) no one South Atlantic port has the ability to expand to accommodate all the growth in container volume expected in the region, (3) the proposed deepening of Savannah Harbor would not divert container traffic from other ports because the shipping cost efficiencies would not outweigh the additional landside transportation costs (largely due to the longer distances from each port to and from population centers that are outside its primary service area).

See also responses to comments 765-DC-149-EN01, 765-DC-149-EV27, and 765-DC-149-EC12.

765-DC-149-EC15

Comment: *the Corps' forecasts made in 2004 did not anticipate the 2008-09 international economic downturn and therefore are overly optimistic in predicting future container traffic levels. Less container traffic reduces project benefits. The Corps' attempts to account for this downturn are inadequate;*

Response: The updated economic analysis uses actual TEU traffic volumes through 2010. Using those volumes, the analysis forecasts TEU volumes at the base year of 2015 until 2030. In 2008, just before the start of the national economic downturn, the Garden City Terminal handled 2.6M TEU. The volumes decreased to 2.4M TEU in 2009, but have recovered to 2.9M TEU in 2010, the latest full year reported by GPA. The updated analysis is included in the GRR-Economics Appendix. Container traffic continues to grow at the Garden City Terminal in line with or ahead of pre-recession forecasts.

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765-DC-149-EC16

Comment: *the trend in larger ships calling at Savannah, induced in part by the deeper channel, may create new incentives to raise the Talmadge Bridge to accommodate even larger ships, leading to significant additional costs that taxpayers will have to bear;*

Response: See previous responses on this matter. See other responses on this matter [e.g., 765-DC-149-EC09].

765-DC-149-EC17

Comment: *the Corps fails to acknowledge that many of the so-called "national" economic benefits from the cost savings associated with the proposed improvements to the port may actually accrue to foreign manufacturers and shipping lines rather than U.S. consumers and industries, and consequently the Corps fails to raise important national policy issues that should have been considered;*

Response: See response to 765-DC-149-EC08.

765-DC-149-EC18

Comment: *the benefits of deepening U.S. ports such as Savannah to reduce the cost of imports must be seriously weighed against the impact this has on the competitive position of U.S. manufacturers in international commerce; and*

Response: Savannah Harbor is one of the rare US ports that has a relative balance between import and exports. The economic analysis includes both imports and exports and projected benefits would be split accordingly [i.e., not accrue solely to imports as stated].

765-DC-149-EC19

Comment: *the Corps provides no evidence that any permanent jobs will result from the Port expansion, especially in light of the analytical assumption that the Port of Savannah's market share will not change because of the expansion.*

Response: The Corps' analysis did not reveal that additional permanent jobs would be created as a result of the harbor deepening. The jobs that are identified would be associated with [and generally limited to] the construction phase of this project.

765-DC-149-EC20

Comment: *The Corps' Planning Guidance Notebook states that in conducting a "National Economic Development" analysis, the Corps must base its analysis on the most likely with- and without-project scenarios.1 In analyzing this project, the Corps assumed that the growth rate of the port as measured by tonnage received and shipped would be the same regardless of whether the port was deepened or not;*

Response: See, e.g., response to comments 765-DC-149-EC06 and 765-DC-149-EV08.

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765-DC-149-EC21

Comment: *In light of the divergent views between the Corps' economic models and the shipping community's assessment of the effect the project would have on container traffic, the Corps has not adequately explained why its assumption is valid and the shipping community's assessment is invalid. The answer to this question is paramount because:*

Response: The economic benefits that the Corps predicts would occur as a result of harbor deepening would be the result of reductions in transportation costs rather than changes in cargo volume. The Corps' position is reasonable/valid and is supported by the analyses contained in the project documents. See also other responses to comments on this issue.

Page Exhibit D-6

765-DC-149-EC22

Comment: *If GPA and other members of the shipping community are correct, the failure to deepen the harbor may lead the shipper to look for a deeper port that can accept the bigger ship. This will most likely be a cost-based decision. It may mean, for example, that instead of using Savannah at 42 feet, the shipper might choose Norfolk as the port of entry. The savings associated with switching ports could be as much as $19,999.18 But for purposes of this example, if the savings associated with switching to Norfolk are only $9,000, then the benefits attributable to a deeper Savannah Harbor would only be $11,000 instead of the full $20,000 that results from the Corps' assumption of no-diversion. This hypothetical shows that project benefits could be smaller if the shipping community is right about Savannah Harbor losing traffic if the channel is not deepened. And, if the project benefits are smaller than calculated by the Corps, then net benefits (benefits minus costs), which drive the decision for a deeper channel, will also be less than reported in the NED analysis.*

Response: The Corps' analyses indicate that the volume of cargo likely to move through the port would be the same, i.e., the with and without project conditions. The economic benefits that the District predicts would occur as a result of harbor deepening would be the result of reductions in transportation costs rather than changes [increases] in cargo volume. This position remains reasonable/valid and is supported by the analyses contained in the project documents. See also other responses to comments on this issue.

Page Exhibit D-7

765-DC-149-EC23

Comment: *For purposes of the multiport analysis, the Corps has failed to adequately consider the interplay between different ports and competing port expansions. Economic principles dictate that to be complete, a comprehensive multiport analysis for SHEP should include each of the following study elements (i)-(iv):*

Response: The District adequately considered other ports. The multiport and regional port analyses considered most of the elements in this comment; however, the last item identified is outside the authorization Congress provided to the Corps for implementing this project. See also other responses to comments on these issues.

Page Exhibit D-8

765-DC-149-EC24

Comment: *As an initial matter, it is interesting to note that for purposes of this report, the Corps has concluded that deepening can affect market shares, an assumption clearly at odds with the NED analysis. In addition to this inconsistency, the Regional Port Analysis is flawed because the authors failed to at least consider the possibility that ports would still be able to compete successfully for at least some of the projected growth traffic even if they were in competition with a single "super port." If the authors had considered this possibility, they might have come to a significantly different conclusion. For example, with the construction of a so-called "super port," it is possible (consistent with the assumption of the Corps Regional Port Study) that as the overall level of traffic grows, most of the incremental containers shipped to the East Coast would arrive on Post Panamax ships and that those ships would almost always call on the super port.*

Response: The regional port analysis is not flawed. The savings per TEU for the ocean voyage costs range from about $10 to $60 depending on the trade route distance, percentage of Savannah cargo, and other technical factors. This is derived by dividing the "benefiting tonnes" on each trade route by the ocean voyage transportation costs for the respective routes. At these levels of savings, there is not a sufficient differential to divert large amounts of cargo from or to other ports. Landside trucking costs [$100-150/round trip locally or $1.50-2.00/mile regionally] are also an important determinant in precluding significant amount of traffic from other venues. There are numerous other factors [involved in port economics] that would have a greater affect on cargo diversions such as new container yard developments, location of distribution centers, and landside transportation improvements.

The best estimates [available without more detailed research] are that thirty percent of imports are delivered within 30 miles of Garden City and another thirty percent have a destination along the I-16/75 Corridor to and including Atlanta. Export origins for pulp paper and poultry [200 miles] account for 45 percent, clay [200 miles] about 20 percent, and grain stuffing [30 miles] accounts for about 5 percent.

At these levels of savings, there is not a sufficient differential to support the additional handling cost involved in any "Super Port" concept.

See also other responses to comments relating to the Regional Port Analysis and Multiport Analysis.

765-DC-149-EC25

Comment: *By focusing on terminal capacity constraints, the Corps' Regional Port Study missed a major opportunity to develop a strategic plan for federal spending on port improvements throughout the Southeast Atlantic Coast region. This question, clearly one of the stakeholder concerns as acknowledged by the Corps (see above) is equivalent to my Study Element (iv). It was apparently not considered even though it is a critical issue of national importance. With limited federal resources available for port development projects, it is essential to determine where incremental port development funding can be most efficiently spent.*

Response: The savings per TEU for the ocean voyage costs range from about $10 to $60 depending on the trade route distance, percentage of Savannah cargo, and other technical factors. This is derived by dividing the "benefiting tonnes" on each trade route by the ocean voyage transportation costs for the respective routes. At these levels of savings, there is not a sufficient differential to divert large amounts of cargo from or to other ports. Landside trucking costs [$100-150/round trip locally or $1.50-2.00/mile regionally] are also an important determinant in precluding significant amount of traffic from other venues. There are numerous other factors [involved in port economics] that would have a greater affect on cargo diversions such as new container yard developments, location of distribution centers, and landside transportation improvements.

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At these levels of savings, there is not a sufficient differential to support the additional handling cost involved in any "Super Port" concept.

See also other responses to comments on these issues.

765-DC-149-EC26

Comment: *By failing to determine where incremental port development funding can be most efficiently spent, the Corps has not completed a rational and complete assessment of the benefits and costs of this project. If, for example, there is only sufficient funding to deepen one harbor in the southeast at this time and another already-existing port in the region could be deepened to 48 feet for $200 million and cause limited environmental impacts, whereas the Savannah Harbor project will cost over $500 million dollars and will cause greater environmental impacts, it would make little sense to move forward with SHEP. Without this type of comparison, the NED analysis is flawed.*

Response: See other responses to comments on these issues .

Page Exhibit D-9

765-DC-149-EC27

Comment: *By using baseline commodity forecasts completed in 2004, the Corps could not have anticipated these recent events. Since lower traffic levels mean fewer project benefits, changes in the world economy could seriously alter the basic benefit/cost equation. The Corps "considered" the dip in trade in one of its sensitivity scenarios and concluded that it would reduce project benefits by only one percent.24 The recent economic downturn appears to have affected the Corps' forecasts, but only slightly.*

Response: As stated in previous response above, a commodity forecast has been developed that incorporates historical data through 2010 and updated South Atlantic/Savannah long term growth. As noted in the response, this data includes the impact of the recent economic downturn. In 2008, just before the start of the national economic downturn, the Garden City Terminal handled 2.6M TEU. The volumes decreased to 2.4M TEU in 2009, but have recovered to 2.9M TEU in 2010, the latest full year reported by GPA.

765-DC-149-EC28

Comment: *This conclusion raises two important questions. First and most obviously: is it based on sound economic analysis? While the Corps "used" 2009 data in its sensitivity scenario, it did not simply use 2009 traffic as its new forecasting baseline. Instead, it calculated a baseline by taking the average for trade-route specific data from 2005 through 2009.25 Thus, the downturn was given only a 20 percent weight in a revised baseline. This procedure is arbitrary and raises serious questions about the projected totals for future years, especially in the next decade. As a consequence of the procedure chosen, the Corps' forecast for 2010 is significantly higher than actual tonnage. The forecasts predicted that container traffic (combined exports and imports) would be 10.1 percent higher in 2010 in comparison to 2008.26 Using Census data that is now available through November 2010, the actual tonnage (while rebounding from the extraordinary losses in 2009), is only 0.1 percent above the 2008 levels.*

Response: As stated in response to comment 765-DC-149-EC02, a commodity forecast has been developed that incorporates historical data through 2010 and includes updated South Atlantic/Savannah long term growth. As noted in the response, these data include the impact of the recent economic downturn.

Page Exhibit D-10

765-DC-149-EC29

Comment: *Even if the Corps' conclusion that such scenarios are not likely, with actual traffic failing to meet the Corps' short term forecasts, consideration should be given to delaying the start of the project. Because net benefits are calculated by discounting future years, the project's net benefits and benefit-to-cost ratio may actually be higher with a later startup date. Postponing construction may not only be better from a benefit/cost (NED) perspective, but it would also support the broader federal objective of deficit reduction that has become a critical national priority. In light of these concerns, the Corps should include a sensitivity scenario that gives greater weight to recent trade data and show what happens to project economics if the trade developments are significantly below the baseline forecasts. A full evaluation of this scenario would include consideration of timing alternatives for the project and disclose*

the comparative benefits and costs of differing construction schedules. Failure to conduct this analysis would be unreasonable.

Response: The expansion of the Panama Canal [scheduled to be completed in 2014] has been a primary motivation for the SHEP. Delaying construction only makes sense under unlikely scenarios, e.g., where worldwide economic and trade growths are near zero. Given more probable growth rates, a construction delay would result in higher transportation cost and missed opportunity.

The GRR Economic Appendix will be modified to discuss construction timing more completely.

See also other responses to comments on growth/traffic issues.

Page Exhibit D-12

765-DC-149-EC30

Comment: *The Corps contends that the larger Generation Three ships will not call on Savannah Harbor, but will instead be used elsewhere in the world, where ports are bigger and deeper. Therefore, a Generation Three ship was not used as the "design" vessel for this project.*

Response: Careful consideration was given to the height constraint imposed by the Talmadge Bridge. The fleet forecast used for economic justification in the SHEP included only vessel that could traverse under the bridge. Excluding consideration of raising the bridge was not a convenient analytical assumption, but rather an analytical requirement. Raising the bridge would be a separable increment of the project and its cost would have to be incrementally justified by the reduction in transportation cost. There is no expectation that "Generation Three" ships will call at Savannah on any regular bases even if the Talmadge Bridge were raised.

The Trans Atlantic and Asia trade routes account for the majority of expected growth at Savannah. The larger vessels will not be deployed on these routes. Vessels of the Emma Maersk class or the new 18,000 TEU size vessels are too large to fit through the expanded Panama Canal. The economies of scale they enjoy are only realized on long service hauls. In fact, they are not economical on the Trans Atlantic trade route. These are the major reasons they are not expected to call at US east coast ports in any large quantity or regular frequency. See also other responses to comments on this issue.

765-DC-149-EC31

Comment: *If a major bridge alteration were part of SHEP, there is a real possibility that the high cost of this related work would mean that SHEP would not generate any net economic benefits as traditionally defined by the Corps. The analytical assumption that Generation Three ships will not call at Savannah Harbor is a convenient way to dismiss this potential problem. If the Corps' baseline vessel forecast is right, there is a strong probability that the largest ships would be calling at some ports on the Southeast Atlantic Coast. Given the shipping lines' business practice of multiple ports of call, GPA may soon want to accommodate these larger ships at Savannah Harbor. The height of the Talmadge Bridge will become an increasingly contentious issue.*

Response: As stated in response to comment 765-DC-149-EC02, a commodity forecast has been developed that incorporates historical data through 2010 and includes updated South Atlantic/Savannah long term growth. As noted in the response, these data include the impact of the recent economic downturn.

Page Exhibit D-14

765-DC-149-EC32

Comment: *A primary source of benefits attributed to this project by the Corps is derived from the fact that a deeper harbor leads to lower transportation costs of goods imported into this country, mostly from the Far East. Such savings, assuming that they occur, will be distributed among various entities. The savings may be absorbed by the exporting company or by shipping companies (thereby generating what economists define as "producer surplus"), or passed on to the consumer ("consumer surplus"). Determining how the savings would be distributed would depend on a number of factors, including the elasticities of supply and demand. The Principles and Guidelines clearly state that the Corps' analysis should be focusing on benefits to the planning area and the rest of the nation. The analysis for Savannah Harbor Expansion is therefore incomplete unless the Corps attempts to determine where SHEP benefits are likely to accrue.*

Response: All economic benefits are based on willingness to pay. This is the standard determinant in any benefit-cost analysis. In the case of navigation improvement projects, the proxy for willingness to pay is "transportation savings". All economic benefits from navigation improvements ultimately accrue to individual entities. No attempt is made to distribute these benefits in accordance with their geographic location or the extent of their participation in the economic cycle. Production, transportation, distribution, wholesale and retail selling, and consumption are all elements in this cycle.

NED benefits have been measured in accordance with the Economic and Environmental Principles and Guidelines for Water and Related Land Resources Implementation Studies (P&G). The commenter's reference to the Planning Guidance Notebook is citing language also found in the P&G, in Chapter II - National Economic Development (NED) Procedures, Section VII-NED Benefit Evaluation Procedures: Transportation (Deep Draft Navigation).

See also other response to comment 765-DC-149-EC08.

Page Exhibit D-15

765-DC-149-EC33

Comment: *The Corps may argue that once NED benefits are calculated, any subsequent breakdowns of the data, such as those presented here, are "out of scope." But there is a critical difference between measuring "benefits to the nation" (as described in the Principles and Guidelines), and "measuring NED benefits" (as described in the Corps' own Planning Guidance Notebook). Projects of the SHEP's magnitude must be analyzed using both perspectives, something the Corps has not done.*

Response: See response to comment 765-DC-149-EC32.

Page Exhibit D-17

765-DC-149-EC34

Comment: *These tables tell many stories (such as the degree to which U.S. imports come from China). My purpose here is to point out perhaps the most important difference between the tables. The imports through Savannah are generally manufactured products and not "raw materials," while the exports are generally the opposite. So while deepening the harbor may make it less expensive to export stone, clay,*

and glass to Japan, it also makes it less expensive to import furniture and fixtures from China. From the perspective of the U.S. manufacturing base, this seems like a poor trade-off.

Response: See response to comment 765-DC-149-EC32.

765-DC-149-EC35

Comment: *As I stated earlier in Section IV, the Corps assumes the Savannah Harbor Expansion Project will not induce any additional port traffic. This assumption severely limits the project's ability to create new jobs for Georgia and South Carolina beyond the work associated with the actual deepening itself. Clearly, there will be no induced jobs created by changing market share if the Corps is correct that this project is unrelated to increasing the port's business. Increased business (i.e., more imports and exports using the port) is no doubt the main source of job creation that might be anticipated by the local sponsor.*

Response: Estimated local jobs associated with the channel deepening result from construction spending and are expected to be relatively short-term [4 years]. As noted previously, there is no reason to suppose employment will change significantly as the forecasted traffic through the port is expected to be the same with or without harbor deepening. The transportation cost savings attributed to harbor deepening would not exceed the additional trucking costs that would result if cargo were diverted from another port. Therefore, no shifts in origins, destinations, or routes are expected. However, the net transportation savings expected from the proposed harbor deepening would be substantial, more than $177 million per year.

Page Exhibit D-18

765-DC-149-EC36

Comment: *According to the Corps' recently released draft General Reevaluation Report,50 the Corps is asking the American tax payer and the project's local sponsor to pay over $600 million to deepen the Savannah Harbor to 48 feet. If the Corps is correct that the project is unrelated to the port's underlying business, then there is no need to deepen the channel to keep Savannah Harbor functional and competitive. Even if the deepening would produce efficiencies that would in turn reduce shipping costs, the Corps has failed to determine that these efficiency savings will accrue to U.S. citizens. On the other hand, if the Georgia Port Authority is correct that the deepening is needed to maintain or increase its business, then the Corps' economics analysis is fundamentally flawed. Moreover, the Corps has failed to perform a true multiport analysis to determine, in light of the limited availability of federal funds, if the federal government could deepen a different port in the southeast more cost effectively and with fewer impacts on the environment. In evaluating port expansion projects, it is especially important that the Corps' analytical basis for its recommendation to proceed be objective, rigorous and comprehensive. For the Savannah Harbor Expansion Project, the Corps has not met these standards.*

Response: This comment is a restatement of previous comments. See other responses to comments on these issues, including comments 765-DC-149-EC01 through EC35..

Note: Comments are taken from Exhibit E, Report of Shawn Young. Most of the comments in this report were made and addressed previously. To the extent any additional responses are provided here they shall be deemed to include any other previous responses on these topics whether or not expressly identified.

Page Exhibit E-2

765-DC-149-EV96

Comment: *Even with this caveat, having reviewed the relevant materials that have been made available, it is my professional opinion that deepening Savannah Harbor to -45 or -48 feet will have a significant impact on the shortnose sturgeon (Acipenser brevirostrum), Atlantic sturgeon (Acipenser oxyrincus oxyrincus), and striped bass (Morone saxatilis) populations in the Savannah Harbor and that the impacts will be substantially higher than the level of impacts predicted by the United States Army Corps of Engineers (USACE) in the GRR and DEIS. The DEIS does acknowledge that the project will have impacts, but underestimates the potential environmental degradation of such a project and the associated adverse impacts on aquatic organisms. Fisheries experts with knowledge of shortnose and Atlantic sturgeon ecology have identified dredging as a contributor to their declining numbers and distribution, and future dredging of their habitat as an obstacle to recovery (NMFS 1998, ASSRT 2007, Federal Register Volume 75 61904-61929 Oct 6, 2010).*

Response: See other responses to comments regarding Striped bass, Shortnose sturgeon, and Atlantic sturgeon. Impacts to these species have been reasonably assessed in the final EIS and, with regard to sturgeon, in the NMFS Biological Opinion. Mitigation for impacts to these species was developed in consultation with the Fisheries Interagency Coordination Team, which included members from resource agencies. Mitigation for Striped bass impacts is required by the Georgia and South Carolina water quality certifications, and mitigation for sturgeon impacts is required by the NMFS Biological Opinion. The Monitoring and Adaptive Management Plan would be used to determine if additional mitigation for impacts to Striped bass or Shortnose sturgeon is warranted and adaptive management funds would be available to provide further mitigation should assessments show that is warranted.

Page Exhibit E-3

765-DC-149-EV97

Comment: *The estuary in the vicinity of Savannah Harbor is an important habitat for the Savannah River shortnose sturgeon and Atlantic sturgeon populations and is essential to their continued existence. The DEIS acknowledges this importance; yet, does not accurately estimate the effects of such a large-scale disruption to the estuarine habitat with a projected duration of up to six years. Researchers have concluded that Savannah River shortnose and Atlantic sturgeon have not been successfully reproducing, and most of the current population originates from stockings intended to boost the population to offset this lack of reproduction. The harbor deepening project will have significant negative effects on the health and survival of already endangered shortnose sturgeon and Atlantic sturgeon populations and will reduce their potential recovery by (1) causing a reduction in available habitat and causing changes in summer and winter habitat selection with negative consequences likely; (2) requiring these species to find new foraging habitats if they avoid the project altogether or leaving these species without a source of food due to the elimination of benthic prey from the large-scale dredging; (3) causing these species to suffer physiologically from potential changes in water quality, including lower dissolved oxygen, increased turbidity and pollutants, caused by re-suspension of sediments, and increased salinity.*

Response: See other responses to comments regarding Shortnose sturgeon and Atlantic sturgeon, including response to comment 765-DC-149-EV96. Impacts to these species have been reasonably assessed in the final EIS and in the NMFS Biological Opinion. Mitigation for impacts to these species was developed in consultation with the Fisheries Interagency Coordination Team, which included members from resource agencies. Mitigation for sturgeon impacts is required by the NMFS Biological Opinion. The Monitoring and Adaptive Management Plan would be used to determine if additional mitigation for impacts to Shortnose sturgeon is warranted and adaptive management funds would be available to provide further mitigation should assessments show that is warranted.

The proposed deepening will occur within the footprint of the existing channel. Moreover, although excavation would occur over a four year time frame, only one to two dredges are expected to be working simultaneously, so the estuarine waters would not experience continual widespread dredging impacts. Once a portion of the channel is excavated, it will remain undisturbed until maintenance is needed, in most locations that would be 12 months. This hiatus will allow for re-colonization by opportunistic benthic organisms. Since these species are substrate dependent, their populations should be similar to those initially eliminated. There is no reason to believe that maintenance of the deepened channel will alter/limit the density and diversity of the reestablished benthic community any more than existing maintenance activities. Therefore, from a benthic resource perspective, the impacts to the sturgeon population should not be materially different from those of current operations. Modeling studies indicate that adult summer habitat for SNS would improve as result of the project (due to the oxygen injection systems).

Page Exhibit E-4

765-DC-149-EV98

Comment: *In sum, the Biological Assessment, included as an appendix to the DEIS, concludes that "the proposed project may affect, but is not likely to adversely affect shortnose or Atlantic sturgeon or their critical habitat." Biological Assessment at 182. For the reasons described in my report, I strongly disagree with this conclusion. Accordingly, I recommend that the Corps and National Marine Fisheries Service (NMFS) engage in formal consultation and that the NMFS prepare a Biological Opinion.*

Response: See other responses to comments regarding Shortnose sturgeon and Atlantic sturgeon, including response to comment 765-DC-149-EV96. NMFS has prepared a Biological Opinion regarding the Shortnose sturgeon and Atlantic sturgeon. Impacts to these species have been reasonably assessed in the final EIS and in the NMFS Biological Opinion. Mitigation for impacts to these species was developed in consultation with the Fisheries Interagency Coordination Team, which included members from resource agencies. Mitigation for sturgeon impacts is required by the NMFS Biological Opinion. The Monitoring and Adaptive Management Plan would be used to determine if additional mitigation for impacts to Shortnose sturgeon is warranted and adaptive management funds would be available to provide further mitigation should assessments show that is warranted.

Page Exhibit E-5

765-DC-149-EV99

Comment: *The proposed ruling to list the Atlantic sturgeon as federally endangered and the shortnose sturgeon recovery plan specifically discuss dredging as a cause for endangerment and an obstacle to recovery for both species. The project will cause long-term habitat modifications that will likely change sturgeon distribution with potentially negative consequences. Collins et al. (2000) found shortnose sturgeon juveniles exhibited a switch in home ranges during the 1990's and attributed the distribution and behavioral changes to harbor modifications.*

Response: See other responses to comments regarding Shortnose sturgeon and Atlantic sturgeon.

765-DC-149-EV100

Comment: *The effects of large-scale dredging over a 3-6 year period will likely have a profound negative effect on the foraging behavior of shortnose and Atlantic sturgeon. Sturgeon are known to be benthic (bottom) feeders. Thus, dredging has a major impact on sturgeon feeding behavior because dredging causes the elimination of the benthic organism community when the benthic substrate is removed. The DEIS acknowledges the immediate and complete loss of the benthic community in dredged areas. The benthic community will re-establish after some period of time, but the benthic community will not likely be comprised of the same quantity and quality of prey items as the pre-dredging community (Kenny and Rees 1996, Boyd et al. 2005). Re-colonization of dredged areas is dependent on several factors, intensity and extent of deepening and maintenance dredging, benthic species' life history and resiliency to disturbance, hydrodynamics and water quality of affected area, and substrate type (Kenny and Rees 1996, Boyd et al. 2005, Szymelfenig et al. 2006). Re-colonization will likely take years considering 38 million cubic yards of material will be dredged across several years in order to deepen the harbor to -48 feet, and maintenance dredging will occur annually.*

Response: See other responses to comments regarding Shortnose sturgeon and Atlantic sturgeon.

Page Exhibit E-6

765-DC-149-EV101

Comment: *The large-scale dredging is expected to cause a decline in dissolved oxygen concentrations. This is a major concern for all fish and aquatic organisms. The estuary is already impaired by low dissolved oxygen concentrations, as low as ~ 3 ppm during the summer. Most fish species require > 2.0 – 3.0 ppm dissolved oxygen levels for survival, and physiological impairment such as reduced growth and condition for many fish begins at < 5.0 ppm (Neill and Bryan 1991). This includes shortnose sturgeon (Jenkins et al. 1993, NMFS 1998, Campbell and Goodman 2004), Atlantic sturgeon (Secor and Gunderson 1998, Federal Register 2010), and striped bass (Bain and Bain 1982, Coutant 1990). Dissolved oxygen needs are dependent on water temperature and life history stage of the organism. Increased temperature requires increased oxygen consumption by fish, and typically early life stages have higher oxygen requirements to support accelerated metabolism during these periods of rapid development.*

Response: The SHEP's impacts on the dissolved oxygen regime in the Savannah Harbor estuary are discussed in detail in the EIS/GRR-Engineering Appendix. A mitigation plan [oxygen injection system] is included in the project to remove the project's incremental impacts on D.O. levels. The spacing of the Speece Cones will improve the estuary's dissolved oxygen regime in over 90 percent of the project

effects area compared to existing conditions. See also other responses to comments regarding dissolved oxygen issues.

Page Exhibit E-7

765-DC-149-EV102

Comment: *For fish and aquatic organism populations, a major concern for any dredging operation is the turbidity caused by re-suspension of sediments and the pollutants that may re-enter the water column after sediment exposure (Wilber and Clark 2001). The DEIS states that a sediment study was conducted to determine chemicals present in solid sediments. The study concluded that the only pollutant of concern is cadmium. The study measured levels of common organic, inorganic, and metals found in the Savannah Harbor sediments, but did not conduct actual exposure trials to pore-water where sensitive organisms such as shortnose sturgeon are exposed to waters containing the re-suspended pollutants. Pore-water tests better reflect the toxicity levels organisms will encounter in the water than just solid sample surveys.*

Response: Exposure trials were conducted, i.e., sensitive organisms were exposed to pore-water from sediments containing elevated concentrations of naturally-occurring cadmium.

Sediment quality issues are discussed within the EIS - Sections 5.04, 6.03, and in Appendix M. Section 6.02 of Appendix M states: *Samples of maintenance sediments from the entrance channel were tested to evaluate the toxicity and bioaccumulation potential of chemical contaminants which may be associated with those maintenance sediment materials (Ward et al 1993). These site-specific test results indicate that the maintenance sediments meet the testing criteria of the EPA Ocean Dumping Regulations and Criteria and are, therefore, acceptable for transportation for ocean dumping under Section 103 of the Marine Protection, Research, and Sanctuaries Act of 1972, as amended. USEPA, Region IV, concurred with this determination by letter dated December 21, 1993.*

Additional sampling and testing (bioaccumulation studies) are in progress to update and renew site designation approval for the Savannah ODMDS. The ODMDS would receive both new work and maintenance sediments from the entrance channel.

Section 6.02 also states: *Samples of bottom sediments from the excavation area in the entrance channel were tested to evaluate contaminants which may be present in new work sediment materials. No contaminants were detected at levels of concern. Those evaluations are described fully in Appendix M - Sediment Quality Evaluation.*

Appendix M, Sections 3.10.7, 3.10.8, 3.10.9, and 3.10.10 describe the results of the sediment pore-water and bioaccumulation studies that were performed. Section 4.2.2 also discusses the potential for movement of cadmium from sediment into the water column and then to aquatic biota within the river.

As stated previously, EPA did not approve use of Shortnose sturgeon for the sediment exposure trials. NOAA Fisheries approval would also have been required given the species status.

See also previous response to comment 765-DC-149-EV65.

Page Exhibit E-9

765-DC-149-EV103

Comment: *Savannah Harbor deepening will allow the saltwedge to move upriver. Thus, saltwater intrusion will increase. This will increase the salinity of important habitats for juvenile and adult shortnose and Atlantic sturgeon, for striped bass spawning and early life stages, and the aquatic community as a whole, including freshwater marshes. Salinity affects ion/water balance in fish and aquatic organisms. Salinity preference and tolerance varies by species and between life history stages of a species, and determines habitat selection and ultimately organism community structure in an estuarine environment. Shortnose sturgeon juveniles prefer low salinity, and salinity tolerance increases with body size. Juvenile shortnose sturgeon salinity can tolerate up to 20 ppt, but suffer decreased energy and aerobic capacity, resulting in decreased growth and survival, as salinity increases (Jarvis et al. 2001, Jarvis and Ballantyne 2003, Zeigeweid et al. 2008). Atlantic sturgeon preference and tolerance is not well defined. Juveniles select lower salinity habitat, and adults are known to inhabit marine environments. Savannah River striped bass eggs and larvae are negatively impacted and experience mortality as salinity increases toward 15-18 ppt (Winger and Lasier 1994).*

Response: The proposed project will not have "profound impacts on the entire estuarine fish community". Modeling indicates that changes in salinity would reduce the amount of winter Shortnose Sturgeon habitat in the estuary as summarized in Table 5-29, Summary of Hydrodynamic-Related Fishery Impacts with Mitigation and previous responses. The modeling also indicates the summer habitats [when SNS are highly stressed] would improve as a result of the project. The Cooperating Agencies agreed that constructing a fish bypass around the New Savannah Bluff Lock and Dam [along with the other proposed features] would increase the overall amount of SNS spawning habitat and adequately mitigate for habitat losses associated with the deepening. If the Atlantic Sturgeon is formally listed, then the District would evaluate project effects on this species. For Striped bass, the agency representatives concluded that the only practical means of addressing habitat loss would be through a stocking program. The District included funding for expansion of that program in the mitigation plan.

Since dredging would primarily occur within the footprint of the existing navigation channel, direct impacts to benthic invertebrates would be minimal in comparison [annual basis] to the status quo [maintenance dredging].

The District performed the investigations and analyses [identified by the Fishery Interagency Coordination Team] needed to identify potential project impacts on the harbor's fisheries. The Team selected specific species to evaluate in detail as representatives of guilds of fish species that reside in or pass through the project's potential impact area. The studies/analyses identified by the Fisheries Interagency Coordination Team were sufficient to evaluate the impacts of the various project alternatives. In addition, the proposed mitigation features would more than mitigate for the predicted impacts.

See also other responses to comments on these issues.

765-DC-149-EV104

Comment: *The SHEP DEIS has no mitigation directly targeting Atlantic sturgeon. The DEIS also lacks baseline information and an impact assessment on the Savannah River Atlantic sturgeon. The National Oceanic and Atmospheric Administration (NOAA) recently proposed to list the South Atlantic distinct population segment (DPS) of Atlantic sturgeon, under which the Savannah River population is included, as endangered under the Endangered Species Act (ESA) (Federal Register Volume 75 61904-61929 Oct 6,*

2010). Within the proposed ruling, dredging is listed as a contributor to their declining populations and an obstacle to recovery. The omission of discussion and impact assessment of a species proposed for listing as Endangered needs to be rectified. Even if there is a general lack of knowledge concerning the Savannah River Atlantic sturgeon population, the DEIS should state so in order to prompt research efforts to fill in the information gaps concerning population size and structure, spawning habitat selection, habitat selection of early life stages, and estuary use in the SHEP vicinity. The main focus of impact evaluation, mitigation, and funded research has been placed on the shortnose sturgeon for good reason; however, the Atlantic sturgeon has been neglected.

Response: See other responses to comments on Atlantic sturgeon issues, including 765-DC-149-EV-69-73.

Page Exhibit E-16

765-DC-149-EV105

Comment: *SHEP will result in adverse modification of critically important habitat for Savannah River shortnose and Atlantic sturgeon.*

Response: See other responses to comments on Shortnose and Atlantic sturgeon issues, including 765-DC-149-EV69-73. Also, it should be noted that the Savannah River is not designated critical habitat under the Endangered Species Act for the Shortnose sturgeon or the Atlantic sturgeon. Nevertheless, the SHEP will provide mitigation required by the NFMS Biological Opinion for impacts to Shortnose sturgeon habitat.

From: kristen mielhe
To: CESAS-PD, SAS
Subject: Savannah Harbor expansion plan
Date: Tuesday, January 25, 2011 11:36:53 PM

Dear Mr. Bailey,

As a property owner on Tybee Island, I am concerned about the proposed Savannah Harbor Expansion Project and the study undertaken by the Army Corps of Engineers. I believe that the study does not adequately address the following issues:

-Preservation of wildlife habitats of the surrounding areas - which is home to endangered species including sea turtles.
-Preservation of the Tybee Island Beach which is a primary economic engine for the people of Tybee Island.
-Mitigation of additional beach erosion that will occur if the Savannah Harbor is dredged an additional 6' feet.
-Reduction in Savannah tourism as a result of increased industrialization of Savannah.
-Preservation of a safe, swimmable beach (my husband and I have a young son whose safety in the water is, obviously, extremely important to us).

I urge you to conduct further studies to address these areas of concern. It is my understanding that the current port is a viable economic engine for the region and that expanding the port service would degrade existing economies and jeopardize a fragile eco-system and further harm endangered species. I have not seen enough in the existing studies that adequately addresses these concerns. It would be wrong to proceed with the deepening of the Savannah Harbor without further study and a proven plan to mitigate these negative consequences.

Thank you for your consideration in this matter.

Sincerely,
Kristen Mielhe
14 Logan Street
Tybee Island, GA 31328

From: Jeffrey Petrou
To: CESAS-PD, SAS
Subject: Savannah Harbor Expansion Project:
Date: Tuesday, January 25, 2011 11:11:02 PM

Dear Mr. William Bailey:

I am a property owner on Tybee Island and an entrepreneur. I am greatly concerned by the proposed Savannah Harbor Expansion Project and the study undertaken by the Army Corps of Engineers. I believe that the study does not adequately address the following issues:

Preservation of wildlife habitats of the surrounding areas - which is home to endangered species including sea turtles
Preservation of the Tybee Island Beach which is a primary economic engine for the people of Tybee Island.
Mitigation of additional beach erosion that will occur if the Savannah Harbor is dredged an additional 6' feet.
Reduction in Savannah tourism as a result of increased industrialization of Savannah.

Please conduct further studies to address these areas of concern. It is my understanding that the current port is a viable economic engine for the region and that expanding the port service would degrade existing economies and jeopardize a fragile eco-system and further harm endangered species. I have not seen enough in the existing studies that adequately addresses these concerns. It would be wrong to proceed with the deepening of the Savannah Harbor without further study and a proven plan to mitigate these negative consequences.

Thank you for your consideration in this matter.

Sincerely,
Jeffrey Petrou

Kristen Mielhe, Jeffrey Petrou

779-JK-07-EV01, 779-JK-07-EN01, 779-JK-07-EN02, 779-JK-07-EN03, 779-JK-07-EC01

Comment: *-Preservation of wildlife habitats of the surrounding areas - which is home to endangered species including sea turtles.*
-Preservation of the Tybee Island Beach which is a primary economic engine for the people of Tybee Island.
-Mitigation of additional beach erosion that will occur if the Savannah Harbor is dredged an additional 6' feet.
-Reduction in Savannah tourism as a result of increased industrialization of Savannah.
-Preservation of a safe, swimmable beach (my husband and I have a young son whose safety in the water is, obviously, extremely important to us).

Response: An updated and expanded socioeconomic resources section is included in the final document. Output from the *Impact Forecasting System Model* is also included to describe the potential economic impacts to the local economy.

The District evaluated and designed SHEP such that impacts are avoided and minimized to the maximum extent practicable while still achieving the project's basic purpose and need. For remaining impacts, compensatory mitigation has been provided as a means to ensure no net functional loss to aquatic resources and/or wildlife habitat. The Corps has revised its plans for placement of sediments excavated from the entrance channel. In response to concerns expressed by the State and local governments, those sediments would be placed in existing sediment disposal sites: either the Ocean Dredged Material Disposal Site or an existing upland confined sediment containment area. The Corps prepared a Biological Assessment of Threatened and Endangered Species and coordinated this document with the USFWS and NMFS. The NMFS has provided their Biological Opinion (BO) which includes reasonable and prudent measures to be taken to protect endangered sea turtles. The BO can be found in Appendix Z.

The report, "Impacts of Savannah Harbor Expansion Project", concluded that channel deepening would have only a negligible effect on the Tybee Island system.

Public safety is always considered during project design. No public safety concerns were predicted as a result of placing sediment in the nearshore area. That project element has been removed at the request of the Georgia Department of Natural Resources and the City of Tybee Island.

779-JK-07-EC02, 478-JK-07-EV02

Comment: *I urge you to conduct further studies to address these areas of concern. It is my understanding that the current port is a viable economic engine for the region and that expanding the port service would degrade existing economies and jeopardize a fragile eco-system and further harm endangered species. I have not seen enough in the existing studies that adequately addresses these concerns. It would be wrong to proceed with the deepening of the Savannah Harbor without further study and a proven plan to mitigate these negative consequences.*

Response: An updated and expanded socioeconomic resources section is included in the final document. Output from the *Impact Forecasting System Model* is also included to describe the potential economic impacts to the local economy.

The District has evaluated and designed SHEP such that impacts are avoided and minimized to the maximum extent practicable while still achieving the project's basic purpose and need. For the remaining impacts, compensatory mitigation has been provided as a means to ensure no net functional loss to aquatic resources. Potential impacts to threatened and endangered species have also been examined with the finding that SHEP is not likely to adversely affect the majority of state or federally listed species. For the Shortnose sturgeon, Atlantic sturgeon, Loggerhead sea turtle, and Kemp's ridley sea turtle, NMFS has concluded in their final Biological Opinion that the overall effect on these species would be acceptable with implementation of the Reasonable and Prudent Measures. Savannah District believes that it has evaluated potential adverse impacts from harbor deepening and presented the findings of those evaluations in the project reports in a manner that provides sufficient basis on which to reach decisions on the feasibility and environmental acceptability of the proposed action.

From: stephen willis
To: CESAS-PD, SAS
Subject: Harbor Deepening Response
Date: Tuesday, January 25, 2011 10:29:36 PM

January 25, 2011

Colonel Jeffrey M. Hall
District Commander
US Army Engineer District, Savannah

Mr. William Bailey
ATTN: PD Post Office Box 889
100 West Oglethorpe Avenue
Savannah, GA 31402-0889

Phone No. (912) 652-5781

Submitted via e-mail to CESAS-PD@usace.army.mil

Subject: **DRAFT - TIER II ENVIRONMENTAL IMPACT STATEMENT (EIS) FOR SAVANNAH HARBOR EXPANSION PROJECT, CHATHAM COUNTY, GEORGIA AND JASPER COUNTY, SOUTH CAROLINA, RELEASED 15 NOVEMBER 2010**

Dear Mr. Bailey:

These comments are submitted concerning the Draft Tier II EIS for the Savannah Harbor Expansion Project (SHEP).

I am Steve Willis, a resident of Savannah, a Vietnam veteran, and US Citizen. I care deeply about the future of Savannah and the Low Country region. I hope you do too.

Anyone who has examined the facts knows that Savannah is already at the tipping point. Our unequaled historical and cultural center is at the tipping point. The region is already at the tipping point, ready to break under the weight of ever increasing industrial blight. The natural environment, so beautiful we found it, is sick and dying.

Please, do not destroy the Lower Savannah and the Low Country for some egotistical game or the profit of the Corps of Engineers. This is no threat, but if you do you will regret it, not because you personally will be hurt, but because you will forevermore have to live with what you have done. You know what I am talking about.

Please post this comment.

Steve
Willis

Public Comment- Steve Willis

778-JK-01-EV01

Comment: *Anyone who has examined the facts knows that Savannah is already at the tipping point. Our unequaled historical and cultural center is at the tipping point. The region is already at the tipping point, ready to break under the weight of ever increasing industrial blight. The natural environment, so beautiful we found it, is sick and dying.*

Response: Your comments are noted. Savannah District evaluated the proposed harbor deepening to determine whether it is both economically justified and environmentally sustainable. The Corps' civil works projects must meet both of those criteria. The Corps believes the proposed action meets those criteria.

From: Glenda Brown
To: CESAS-PD, SAS
Subject: RE: Savannah Harbor Expansion Project
Date: Tuesday, January 25, 2011 1:10:57 PM
Importance: High

This is written in support of The Savannah Harbor Expansion Project. It is the belief of our association this deepening to 48 feet is crucial to the future of our port and the state of Georgia. As you know, The Savannah River provides and supports numerous companies, manufacturers, transportation and thousands of jobs. This improvement will assure that the port of Savannah remains competitive in the future.

We also feel these improvements will provide a safer transit, with less restrictions, for the larger and deeper vessels to come. The post Panamax vessels have been coming to Savannah for several years, operating with limited drafts. The improvements will allow vessels to carry deeper drafts with less restrictions and also provide channel improvements for passing.

The Savannah Pilots have maintained one of the safest records in the country and it is our intention to maintain this safety record.

This will supplement our earlier comments in support of the Savannah Harbor Expansion Project

- **The members of the Savannah Pilots Association regularly handle 8500 TEU vesssels and 48' will allow for safe and adequate movement of these vessels.**
- **A depth of 48' will allow for improved maneuverability of vessels in the harbor.**
- **The Project will support 2 way traffic.**
- **Passing lanes are important to permit proper queuing of vessels.**
- **The entrance relocation is adequate; it supports 2 way traffic; and the entrance relocation was made with input from members of our Association.**

Thank you for your favorable consideration of our comments.

Tommy Browne

Master Pilot

Savannah Pilots Association
P.O. Box 9267
Savannah, Georgia 31412
(912) 236-0226
(912) 236-6571 fax

Glenda Brown

795

Comment: *We also feel these improvements will provide a safer transit, with less restrictions, for the larger deeper vessels to come. The post Panamax vessels have been coming to Savannah for several years, operating with limited drafts. The improvements will allow vessels to carry deeper drafts with less restrictions and also provide channel improvements for passing.*

Response: Concur. The project design was coordinated [extensively/iteratively] with the Savannah Harbor Pilots' Association. The District appreciates the Pilot Association's concurrence that the proposed channel design would allow safe and adequate movement of 8,500 TEU vessels and improve their maneuverability in the harbor.

From: seawheels2000@aol.com
To: CESAS-PD, SAS
Subject: ATTN: PD, US Army Corps of Engineers, Savannah District,
Date: Wednesday, January 26, 2011 12:03:04 AM

Mr. William Bailey,

First of all I want to apologize for sending this at the last minute to be on record with my comments on this matter of utmost importance. I didn't realize until this past week the deepening would effect the plans of a new port facility on the South Carolina side as I have just learned. I also wanted to make a few other comments and add some late thoughts.

I am one of several thousand small independent business truckers who haul ocean shipping containers arriving or departing at the port of Savannah,GA. Although I live across the river in SC, I have hauled out of Savannah,GA ports since the seventies. Speaking on behalf of truckers who operate at the port of Savannah I first applauded the idea of deepening the Savannah river to make way for bigger ships expanding the port. Yes we are certainly all for the new jobs it would create however I don't approve of any project that will delay the construction of a much needed new deep water port in Jasper county, SC.

If this project to deepen the river channel cannot be accomplished in any other way other than to dump the spoils in the same area as the new port facility I think this work should be delayed until further investigation can be done. A more suitable alternative spoil location should be explored or at least additional time for more open discussion should be provided to the general public for comment of how citizens feel after now learning the Jasper county port may be sacrificed for expansion of the Georgia ports facility. I feel many SC citizens have been hoodwinked at the final hour.

The importance of a Jasper county deep water facility for future growth in this area totally out-ways any short term gains of expanding the Georgia port authority at present location. The infrastructure outside the Garden City port terminal is fast becoming impassable due to the tremendous increase of commercial traffic flow over the past ten years. The potential risk of even worse highway bottle necks after harbor deepening will skyrocket due to the additional container volume which soon will surely choke off the roadways that make passage to I-95 & I-16 connectors possible.

The planned Jimmie Deloach parkway extension into highway 25 will not handle the amount of new truck traffic this port deepening project will generate. Within the next few years the commercial traffic flow on the Georgia side of the river will max out the new infrastructure leaving this area without the ability to build a larger SC port because the prime area in Jasper county has once again been reserved for dredge spoil. SC already has the land availability and tremendous potential for a simpler less intrusive transportation infrastructure system which when completed would be a much more direct/safer route connecting major interstates from a new deep water port.

The potential for major run off pollution into the river because of outpaced insufficient highway infrastructure to handle the thousands of future loads from this deepening should also be cause for major concern. I see no study has been done on this subject or the fact that there is a critical shortage of safe parking areas around the Garden City port that already have hundreds of dangerous loads hazardous to the fragile marine environment parked in locations that directly drain into the Savannah river.

The port of Savannah has fought aggressively in the past to stop any construction of a new Jasper county port that would compete against their ability to attract all South Georgia ocean shipping customers. This attitude has not been good for business or low-country workers on either side of the river. This deepening project as it stands now would be a blessing to the GPA in halting any deep water port on the Carolina side but a travesty to those of us who would like to see this be a joint southeastern mega area for shipping on both sides of the harbor. I don't think at this time without consideration for a long term shipping plan for both states along the Savannah river this project will

equally benefit the citizens of both states or the environment.

Thank you for your time,
Jim Stewart
Hardeeville, SC
202-360-2632

Jim Stewart

804-MM-03-EV01

Comment: *I am one of several thousand small independent business truckers who haul ocean shipping containers arriving or departing at the port of Savannah,GA. Although I live across the river in SC. I have hauled out of Savannah,GA ports since the seventies. Speaking on behalf of truckers who operate at the port of Savannah I first applauded the idea of deepening the Savannah river to make way for bigger ships expanding the port. Yes we are certainly all for the new jobs it would create however I don't approve of any project that will delay the construction of a much needed new deep water port in Jasper county,SC.*

Response: Justification of the Jasper Ocean Terminal is outside the scope (as defined by Congress) of the proposed project. However, economic studies presented in the GRR and EIS indicate that under both scenarios: without and with project conditions, the Garden City Terminal would reach its capacity at 6.5 million TEUs [around 2030]. Upon reaching this build-out capacity, another terminal would have to accommodate any additional container traffic moving through the Port of Savannah. The environmental impacts resulting from SHEP have been minimized to such an extent that its construction/operation would not preclude other future harbor developments in the region. However, a significant future action [such as a new terminal] would be dependent on multiple economic considerations and the outcome of a host of very detailed environmental studies [to include replacing affected confined sediment disposal areas in a very sensitive estuary].

Specifically, construction of the proposed project [SHEP] will in no substantive way delay/preclude the construction of a terminal in Jasper County. Deposition of excavated material at Areas 14A/14B could have a positive effect on this notional facility. The consultant working for the Joint Project Office [proponent for that development] has publically stated that the proposed placement of new work sediments from SHEP on Areas 14A and 14B would save the terminal development project over $200 million by raising its elevation to a workable height. Therefore, if SHEP is constructed, it is likely to benefit the development of the Jasper Ocean Terminal by significantly reducing initial construction costs. Based on considerations which occur at this time, the District concludes that continued deposition of dredged sediment in the subject sites is the least-cost environmentally acceptable alternative for the deepening project. The District is open to changes in those long term plans if the Federal Government is made whole by a project proponent that ensures that the Government's O&M costs would not increase because it no longer had use of those sites.

804-MM-03-EV02

Comment: *The planned Jimmie Deloach parkway extension into highway 25 will not handle the amount of new truck traffic this port deepening project will generate. Within the next few years the commercial traffic flow on the Georgia side of the river will max out the new infrastructure leaving this area without the ability to build a larger SC port because the prime area in Jasper county has once again been reserved for dredge spoil. SC already has the land availability and tremendous potential for a simpler less intrusive transportation infrastructure system which when completed would be a much more direct/safer route connecting major interstates from a new deep water port.*

Response: Section 5.19 in the EIS states: *GPA continues to work closely with the State of Georgia to develop more improvements to the highway system outside the terminal. GPA has developed a plan that would provide expressway connection of Interstate highways directly to the Terminal. In 2010, the State of Georgia approved $120 million in bond revenue for use toward completing the Jimmy DeLoach*

Highway from Interstate 95 to the Garden City Terminal. That work is scheduled to begin in 2011 and be complete by the base year of the project. Additionally, the Georgia Department of Transportation's long-term highway plan includes construction of the Brampton Road Connector which will provide direct access from the Garden City Terminal to Interstate 516 and connections to Interstate 16. No other terminal in the US has such an expressway of highways directly to the terminal. Those road improvements are shown in Figure 5-63. The completion of those roads will remove terminal traffic from neighborhoods and lessen congestion and the accompanying air quality impacts.

Appendix D [Plan Formulation] of the GRR describes the process the District used to address the navigation problems being experienced in the harbor and winnow those measures to the alternatives receiving detailed considerations. Structural and non-structural methods of reducing the navigation problems were examined. Further, potential alternate terminal locations were investigated. The proximity to major north-south and east-west highways and existing rail support are major factors that favor the Garden City Terminal over other locations along the Savannah River navigation channel. From an environmental perspective, other potential locations would require significant infrastructure projects to access the site, with all the attendant mitigation this would entail.

804-MM-03-EV03

Comment: *The potential for major run off pollution into the river because of outpaced insufficient highway infrastructure to handle the thousands of future loads from this deepening should also be cause for major concern. I see no study has been done on this subject or the fact that there is a critical shortage of safe parking areas around the Garden City port that already have hundreds of dangerous loads hazardous to the fragile marine environment parked in locations that directly drain into the Savannah river.*

Response: The Corps considered potential adverse effects that could result from implementation of the SHEP. The Congressional authorization of the project did not include a broad authority to restore or improve environmental conditions in the harbor. The Georgia Ports Authority was issued a stormwater runoff permit that addresses runoff from its terminal facilities, including on-terminal parking areas. The Corps expects them to continue to operate their facilities in a manner that complies with that permit, thereby protecting the environment from potential adverse impacts from stormwater runoff and the pollutants that it can carry. Permits that Georgia DOT obtains for construction of new roads or improvements to existing roads include assessments of potential stormwater runoff and features to address the runoff if regulators deem it necessary.

#817

Gmail

William Cliett Jr. <wocliett@gmail.com>

Harbor Deepening

1 message

William Cliett Jr. <wocliett@gmail.com> **Tue, Jan 25, 2011 at 9:47 AM**
Draft To: cesas-pd@usace.army.mil.
Cc: Epro@aol.com, mmcliett@cornerstonephilanthropy.com

As a life long resident of Savannah and deeply involved in the maritime industry I wanted to share a few observations about the harbor deepening project.
PRO,
1.) Everyone has to remember that Savannah is one of the three most western ports on the east coast.
2.) It has the most area to be developed (I.E. additional terminals, long and short term warehousing space) than the other two nearest ports being Charleston and Jacksonville.
3.) It provides good services pilotage and tug or the LNG facility would not be here.
4.) Dredging wise Savannah still has the available spoil area to facilitate a large scale deepening project such as this, reducing the cubic yard cost.
5.) If this is not approved then a port such as Norfolk which has the available water depth now will dominate the container industry along with Newark.

Concerns:
1.) I am concerned that with the advent deeper draft vessels with a greater beam that this will create a one way traffic scheme for navigational safety. Is this just deepening with no widening.
2.) This would be addressed to the port management, in my opinion GA 21 is a train wreck waiting to happen, what does management plan to upgrade, beside cranes that would be have the available reach to work these newer vessels. Does the GPA have any plans to create dedicated fly overs, thorough fares, rail lines, that would serve to move this expected increase in volumn of freight. Why deepen if there is not going to be a commitment to invest and better what is presently in place.
3.) Has all interest especially environmental concern both from any impact to the water supply, material placed in the disposal areas, any endangered species issues been addressed and satisfied so this project does not get halted once all equipment is in place.

Thanks for giving me the opportunity to speak on this issue.

Sincerely

William Cliett

William Cliett

812-MM-03-EN01
Comment: *I am concerned that with the advent deeper draft vessels with a greater beam that this will create a one way traffic scheme for navigational safety. Is this just deepening with no widening.*

Response: Ship simulation verified that the deepened channel design can accommodate a design vessel (post-panamax Generation 2; 140' beam) meeting a smaller vessel. The ship simulator study verified that widening at 3 bends in the channel would maintain this two-way traffic capability. The addition of two meeting areas to the inner harbor channel would provide the capability to have two design vessels meet in these areas. The two meeting areas would also provide additional flexibility in channel operations and reduce delays for two design vessels meeting. The fact that two design vessels could not meet at all times in all channel segments was taken into consideration in economic analyses for the project.

812-MM-03-EV01
Comment: *This would be addressed to tt1e port management, in my opinion GA 21 is a train wreck waiting to happen, what does management plan to upgrade, beside cranes that would be have the available reach to work these newer vessels. Does the GPA have any plans to create dedicated fly overs, thorough fares, rail lines, that would serve to move this expected increase in volumn of freight. Why deepen if there is not going to be a commitment to invest and better what is presently in place.*

Response: As noted in EIS-Section 5.19, GPA and the State have made substantial investments [time/money] to increase the efficiency of cargo movement within the terminal and its immediate environs. Moreover, GPA continues to work closely with the State to improve the highway system that connects the port its hinterland markets. For example, GPA has developed a plan that would provide direct expressway connections from the terminal to interstate highways. The State of Georgia approved $120 million in bond revenues in 2010 to complete the Jimmy DeLoach Highway from Interstate 95 to the GCT. Construction is scheduled to begin in 2011 and should be completed by the project's base year [2015]. Additionally, the Georgia Department of Transportation's long-term highway plan includes construction of the Brampton Road Connector which will provide direct access from the GCT to Interstate 516 along with connections to Interstate 16. Upon completion, no other port terminal in the US will have a comparable ground transport system. The subject road improvements are detailed in EIS-Figure 5-63. Their completion will remove much of the terminal traffic from adjacent neighborhoods, which will lessen congestion and adverse air quality impacts.

Further, the GCT is the only US port terminal with two Class 1 rail service providers [Norfolk Southern and CSX] located on site. While only 18% of the cargo currently transits the terminal by rail, GPA's intends to increase the percentage of containers transported via this mode.

The GCT has a total of 33 on-road truck container interchange lanes divided between two locations on the terminal; this system can processed over 8,200 gate transactions on a single day. GPA's facility master plan includes construction of a third set of gates. Collectively, this would provide access to the terminal from the east, west and south, thereby spreading out traffic and reducing waiting times at the gates. This dispersal of truck traffic will reduce congestion and lessen noise issue, air emissions, adverse impacts on adjacent neighborhoods, etc. GPA expects to implement this improvement within the next 10 years.

81Z-MM-03-EV02

Comment: *Has all interest especially environmental concern both from any impact to the water supply, material placed in the disposal areas, any endangered species issues been addressed and satisfied so this project does not get halted once all equipment is in place.*

Response: Since 2000, Savannah District has coordinated all aspects of the SHEP with the Cooperating Agencies, state natural resource agencies, and the public in an attempt to resolve all relevant issues prior to completing the Record of Decision. That is the final step in the NEPA process and is only accomplished after the FEIS has been approved and full compliance on all applicable laws and regulations has been achieved.

From: Bernetta Anderson
To: CESAS-PD, SAS
Subject: Hudson Hill Community Concerns
Date: Tuesday, January 25, 2011 11:43:40 PM

Dear Sir,

Hudson Hill is the only residential community that lies North of Bay Street in Savannah. Our community is adjacent to the Savannah River and the ports and we too have concerns regarding the environmental impact of the Savannah Harbor Expansion Project. This community has existed here for over 100 years. Some have lived here for generations and can trace our roots back thru segregation days, Jim Crow days, Share Cropping days and back to the days of slavery, in this very same area, on these very same grounds, North and South of the Savannah River.

We have a high incidence of asthma, bronchitis, cancer and other respiratory diseases in our people. We are concerned about the impact on our air and water quality. We need a community outreach with information and/or a q&a for residents to settle their fears/concerns. We seek resources for community awareness, health reassurances and community capacity building. We have not been represented at the table and we are probably the most affected stakeholders in regards to proximity to the ports.

Because many of our residents work at the ports, we support the expansion project, however, we do have these legitimate concerns.

Along with our sister communities of West Savannah and Woodville, both lying adjacent to Hudson Hill just South of Bay Street, there resides approximately 10,000 people in this area of greater West Savannah.

I anticipate your response.

Bernetta B. Anderson
Outgoing President, Hudson Hill Community Organization
President, Ivory Bay Community Development Corporation

Hudson Hill Community

1111-MR-01-EV01

Comment: *We have a high incidence of asthma, bronchitis, cancer and other respiratory diseases in our people. We are concerned about the impact on our air and water quality. We need a community outreach with information and/or a q&a for residents to settle their fears/concerns. We seek resources for community awareness, health reassurances and community capacity building. We have not been represented at the table and we are probably the most affected stakeholders in regards to proximity to the ports.*

Response: EIS Section 5, especially Section 5.02, Water Quality, Section 5.05, Air Quality, and Section 5.19, Protection of Children and Environmental Justice, thoroughly addresses the concerns about impacts to air and water quality raised in this comment.

In general, although the Corps expects the harbor to continue to grow in the future, no additional increases in cargo are expected as a result of the proposed harbor deepening. As a result, the project would not affect the number of containers that move through the areas that surround the port. The economic benefits of the project would result from the use of larger, more cost-effective container ships, not an increase in the number of containers. Therefore, noise, air emissions (including air toxics), and traffic would not increase as a result of the proposed deepening, and the proposed harbor deepening would have no adverse landside impacts outside the Garden City Terminal.

As indicated in Section 5.20 in the EIS, GPA established a Stakeholders Evaluation Group (SEG) in the late 1990's. The SEG had as its mission, purpose and function the providing of advice to the Georgia Ports Authority (GPA) pertaining to the Savannah Harbor Expansion Project to help insure that all issues pertaining to the project are addressed to the fullest extent practicable. To accomplish this mission, purpose, and function, the SEG shall operate with the following Operating Guidelines: The SEG shall provide the following: **A public forum to permit <u>members of the general public to voice their support or concerns</u>, to become acquainted with the project, and to provide whatever input they wish (emphasis added by the writer)**.

The SEG met about every other month. The meetings were announced on the web site of the Georgia Ports Authority, the local sponsor for the project, and extensive reports and findings were posted to the site as well. The website is located at: http://sav-harbor.com/ . The date, time and location of the next SEG meeting are shown on that web page. The *Savannah Morning News*, the local newspaper, regularly published information about upcoming SEG meetings, and later wrote about the discussions that took place at those meetings. GPA funded nearly every study that the Stakeholder Evaluation Group recommended as a body. The Corps regularly participated in the SEG meetings and obtained insights from the group on the views and concerns of the public.

From: dimarian21@aol.com
To: CESAS-PD, SAS
Subject: Savannah Harbor Federal Navigation Project
Date: Tuesday, January 25, 2011 10:33:54 PM

Dear Mr. Bailey,

I have several questions and concerns regarding the Savannah Harbor Project. Some are listed below:

1. What assurances can the Corps provide as to the accuracy of its predictions regarding the impact on the aquifer and on the City of Savannah's Abercorn Creek I & D water inlet upstream? The availability of fresh water from the aquifer is vital to our local economy, and indeed, to our ability to live and work in Chatham County. The Abercorn Creek inlet provides our only currently available alternative source of drinking water. If there is even a remote risk of salt-water contamination of the aquifer, I could not support it.

2. With regard to the Project's anticipated impact on the salt water wedge and the infiltration of salt water into freshwater and tidal marshlands, what is the statistical confidence interval for the modeling program? Has the modeling program been used to calculate the impact of similar projects, and if so, is there empirical evidence regarding the accuracy of the model? I am very concerned that the Corps may be underestimating the impact of the Project on the salt water wedge and on freshwater and tidal marshlands. The history of the tide gate project does not help to instill my confidence.

3. With regard to the Project's anticipated impact on the dissolved oxygen levels in the Savannah River, I have the same questions and concerns as noted in paragraph 2, above.

4. Presuming the project goes forward, what are the expected annual costs of dredging and maintenance, and who will pay the costs? Will ships entering and leaving the Port pay a harbor maintenance fee or other fees that will be dedicated exclusively to the Project and its maintenance?

5. Will the Corps guarantee that the Project will not cause erosion problems along the Savannah River or the many interconnected rivers and creeks? If the Project does cause erosion, who will pay for the damage to property?

6. Will the Corps guarantee that the Project will not cause interconnected rivers and creeks to become filled in with sediment? In particular, I am concerned about St. Augustine Creek, Turner's Creek, the Back River, and the South Channel.

7. The Corps' report indicates that the Project will result in improvement to air quality due to the fact that larger ships entering the harbor will result in fewer total ships entering and leaving. It seems obvious that the report did not consider the impact on air quality that will result from the increased number of containers that will be moved through the Port by rail and truck as a result of the Project.

8. It also seems that your report does not address the impact of increased truck traffic on the costs of road maintenance, on the quality of life in West Chatham County, or on the tourism industry, which according to your report, makes up a larger segment of our local economy than the transportation sector. In my opinion, any report that does not include these costs and impacts is incomplete. I have the same comments and concerns regarding the impact of increased rail traffic that will result from the Project.

9. Your report indicates that mitigation of the loss of fish spawning areas will be addressed by lump sum payment. To whom will the payments be made? Certainly the fish will not be cashing a check. How will a lump sum payment enable my children and grandchildren to catch striped bass in the river? Will they receive a check?

10. If the Corps cannot guarantee the accuracy of its models with regard to the impact of the Project on the aquifer and the movement upstream of the salt water wedge, wouldn't it make sense to deepen the Harbor in graduated phases of 1 to 2 feet per phase?

11. Has the data provided by GPA been independently reviewed by auditors or other qualified experts to ensure its accuracy? In particular, has GPA been required to produce underlying records and documentation supporting its conclusions regarding the need for the Project?

12. Page 102 of the Corps' report indicates that ships approaching the Port of Savannah are queued based on factors including draft restrictions, canal appointments, and "tide jobs/labor costs." Isn't it true that ships wait to enter the Harbor in order to avoid overtime charges in the loading and unloading of ships? If so, please quantify how many ships waited to enter the harbor, and for how long, in order to avoid labor costs, as opposed to how many ships waited, and for how long, due to draft restrictions.

13. What is the required bridge clearance of empty or partially loaded post-Panamax ships? Will the existing bridge from downtown Savannah to South Carolina need to be replaced to accommodate these ships?

14. If the Project is approved, can GPA provide assurances that post-Panamax ships will choose to serve the Savannah Port instead of other ports that provide more direct access to the ocean, such as Charleston?

15. Has GPA or any other entity quantified the positive (or negative) impact of the Project on other segments of the economy? I have already inquired in Paragraph 2 regarding the impact of increased truck traffic to and from the Port on tourism. Has any study been done to determine whether the combined effects of Port expansion and increased truck and rail traffic will result in the loss of opportunities to attract other types of development? For example, is warehousing the highest and best use of industrial property in Chatham County and the surrounding counties? Are the jobs that will be created by the Project and its long-term impacts quality jobs, or jobs that will be filled by temporary workers at minimum or near-minimum wage?

I appreciate your consideration of my comments, questions, and concerns. Thank you.

Eric Gotwalt
Chatham County Resident and Property Owner

Eric Gotwalt

1112-MR-17-EN01

Comment: *What assurances can the Corps provide as to the accuracy of its predictions regarding the impact on the aquifer and on the City of Savannah's Abercorn Creek I&D water inlet upstream? The availability of fresh water from the aquifer is vital to our local economy, and indeed, to our ability to live and work in Chatham County. The Abercorn Creek inlet provides our only currently available alternative source of drinking water. If there is even a remote risk of salt-water contamination of the aquifer, I could not support it.*

Response: The information provided in the GRR- Appendix C: Potential Ground-Water Impacts to the Upper Floridan Aquifer [2007] has been reviewed by multiple groundwater experts and represents an accurate depiction of the project area's geologic framework and its hydrological regime. The groundwater flow and transport model predictions based on these studies agree with field data.

For the municipal intake chloride studies, the Corps has revised the analysis described in the DEIS to incorporate additional data. It used that new data to update the model used to predict chloride levels at the City's water intake. During that update, two different methodologies [EFDC model and Artificial Neural Network] were used. The results obtained from each one were comparable [mutually supporting], which provides confidence in their conclusions. Both analyses concluded that chloride levels would increase with harbor deepening during spring tide events and times when freshwater flows down the Savannah River are low from their roughly present average level of 12 mg/l. However, this would require the City of Savannah to increase its treatment (chlorine) of the water they obtain from the intake, which in turn could increase lead corrosion in pipes and disinfectant byproducts. Consequently, the mitigation plan in the FEIS includes construction of a raw water storage impoundment which the City could use during high chloride spikes (these occur during low flows and high tides).

1112-MR-17-EN02

Comment: *With regard to the Project's anticipated impact on the salt water wedge and the infiltration of salt water into freshwater and tidal marshlands, what is the statistical confidence interval for the modeling program? Has the modeling program been used to calculate the impact of similar projects, and if so, is there empirical evidence regarding the accuracy of the model? I am very concerned that the Corps may be underestimating the impact of the Project on the salt water wedge and on freshwater and tidal marshlands. The history of the tide gate project does not help to instill my confidence.*

Response: Details regarding the hydrodynamic and water quality model development process, extensive reviews, and uncertainty analysis can be found in the report , "Development of the Hydrodynamic and Water Quality Models for the Savannah Harbor Expansion Project" [January 2006], which is included in the Supplemental Materials to the Engineering Appendix. That report includes a discussion detailing the model's accuracy for various parameters [including salinity and dissolved oxygen] throughout the Savannah River estuary [including Middle and Back Rivers]. The hydrodynamic and water quality models employed for SHEP were developed through an iterative process closely coordinated with the SHEP Water Quality Interagency Coordination Team, which followed in the footsteps of the Modeling Technical Review Group that was established in the late 1990s to review the model that would be developed for the deepening project and determine its viability for use with SHEP impact evaluations and mitigation development. The group consisted of technical modelers from the Corps, US EPA Region 4, USGS, Georgia DNR-EPD, South Carolina DHEC, and technical modeling experts

[under contract to develop and refine the SHEP model]. The group ultimately decided to adopt a model [originally developed for the TMDL] for evaluating the effects of harbor deepening because it allowed simulation of the harbor's salinity stratification and was state-of-the-art with its 3-dimensional capabilities. After three years of intense work, the original TMDL model was sufficiently enhanced/modified [specifically as regards the calibration of the existing harbor conditions] to receive final acceptance letters from federal, state, and industry reviewers. These letters of acceptance can be found in the Supplemental Materials to the Engineering Appendix (Correspondence Regarding Hydrodynamic & Water Quality Model Acceptability).

1112-MR-17-EN03

Comment: *With regard to the Project's anticipated impact on the dissolved oxygen levels in the Savannah River, I have the same questions and concerns as noted in paragraph 2, above.*

Response: The hydrodynamic (salinity) and dissolved oxygen models were developed simultaneously through the process described in the response to the previous comment.

1112-MR-17-EV01

Comment: *Presuming the project goes forward, what are the expected annual costs of dredging and maintenance, and who will pay the costs? Will ships entering and leaving the Port pay a harbor maintenance fee or other fees that will be dedicated exclusively to the Project and its maintenance?*

Response: As discussed in Section 10.3.6 of the GRR, the cost for maintaining the Savannah Harbor Navigation Project would incrementally increase after construction of the deepened channel. Funding for current maintenance comes from yearly appropriations authorized by Congress and this practice would continue after SHEP. In accordance with requirements of the Water Resources Development Act of 1986, "the non-federal interest shall be responsible for an amount equal to 50 percent of the excess of the cost of the operation and maintenance of such project over the cost which the Secretary determines would be incurred for operation and maintenance of such project if such project had a depth of 45 feet." In other words, the local sponsor would share in the cost of maintaining the Navigation Project if it's depth is greater than 45 feet. The Water Resources Development Act of 1986 also established the Harbor Maintenance Trust Fund, but it is not dedicated specifically to the Savannah Harbor Navigation Project. No harbor-specific maintenance fee is envisioned.

1112-MR-17-EV02

Comment: *Will the Corps guarantee that the Project will not cause erosion problems along the Savannah River or the many interconnected rivers and creeks? If the Project does cause erosion, who will pay for the damage to property?*

Response: As part of the evaluation studies, the District performed several shoreline erosion studies. Their findings indicate that construction of SHEP [including the proposed navigation and mitigation features] will not materially change the location or amount of erosion that presently occurs within the harbor. See the GRR, Appendix C, Section 9.0 (Shoreline Effects) for further information.

1112-MR-17-EV03

Comment: *Will the Corps guarantee that the Project will not cause interconnected rivers and creeks to become filled in with sediment? In particular, I am concerned about St. Augustine Creek, Turner's Creek, the Back River, and the South Channel.*

Response: As part of the overall evaluation studies, a sedimentation investigation was performed. Its findings indicate that construction of SHEP [including the proposed navigation and mitigation features] will not materially change the location, rate, or ultimate amount of shoaling in area creeks [compared to the status quo]. Please see the GRR, Appendix C, Section 10.0 (Sedimentation Analyses) for further information.

1112-MR-17-EV04

Comment: *The Corps' report indicates that the Project will result in improvement to air quality due to the fact that larger ships entering the harbor will result in fewer total ships entering and leaving. It seems obvious that the report did not consider the impact on air quality that will result from the increased number of containers that will be moved through the Port by rail and truck as a result of the Project.*

Response: Under both the without and with project conditions, the Garden City Terminal will reach its build-out capacity in 2030 when the total number of TEUs processed [annually] reaches 6.5 million. This determination is based on factors such as the size of the terminal, the number of gates that provide access to the property, the number and size of the berths, the number and size of the container cranes, the number of jockey trucks that move the containers within the terminal, how the containers are stacked within the terminal, and the number of railroads that service the terminal and the frequency of their trains. It is projected that without deepening, more vessels will be required to transport the cargo that is expected to transit the port. With deepening, the total number of vessels decreases, as vessels would be able to load/unload without the current constraints of draft.

No incremental increases in cargo are expected to occur as a result of the proposed harbor deepening. As a result, the project would not affect the number of containers that move through the areas that surround the port. The economic benefits of the project would result from the use of larger, more cost-effective container ships, not an increase in the number of containers. Hence, noise, air emissions (including air toxics), and traffic would not be increased [over the status quo] as a result of the proposed deepening. Therefore, the proposed harbor deepening will have no adverse landside impacts beyond the Garden City Terminal boundaries.

1112-MR-17-EV05

Comment: *It also seems that your report does not address the impact of increased truck traffic on the costs of road maintenance, on the quality of life in West Chatham County, or on the tourism industry, which according to your report, makes up a larger segment of our local economy than the transportation sector. In my opinion, any report that does not include these costs and impacts is incomplete. I have the same comments and concerns regarding the impact of increased rail traffic that will result from the Project.*

Response: No incremental increases in cargo are expected to occur as a result of the proposed harbor deepening. As a result, the project would not affect the number of containers that transit the areas that surround the port. The economic benefits of the project would result from the use of larger, more cost-effective container ships, not an increase in the number of containers. Noise, air emissions (including air toxics), and traffic would not be increased [compared to the status quo] as a result of the proposed deepening. Therefore, the proposed harbor deepening will have no adverse landside impacts outside the Garden City Terminal.

Section 5.19 in the EIS states: *GPA continues to work closely with the State of Georgia to develop more improvements to the highway system outside the terminal. GPA has developed a plan that would provide expressway connection of Interstate highways directly to the Terminal. In 2010, the State of Georgia approved $120 million in bond revenue for use toward completing the Jimmy DeLoach Highway from Interstate 95 to the Garden City Terminal. That work is scheduled to begin in 2011 and be complete by the base year of the project. Additionally, the Georgia Department of Transportation's long-term highway plan includes construction of the Brampton Road Connector which will provide direct access from the Garden City Terminal to Interstate 516 and connections to Interstate 16. No other terminal in the US has such an expressway of highways directly to the terminal. Those road improvements are shown in Figure 5-63. The completion of those roads will remove terminal traffic from neighborhoods and lessen congestion and the accompanying air quality impacts.*

Currently, the Garden City Terminal [GCT] is the only US facility with two intermodal rail yards for Class I carriers (Norfolk Southern and CSX) located onsite. Approximately 18% of its cargo moves through the terminal by rail. Since rail is able to move an equal amount of cargo [actually much more] with less fuel than trucks, total diesel emissions from the port's operations will be reduced. Further, GPA's future plans call for an increase in the percentage of containers that will be handled by rail [lessening emissions even more]. GPA will also continue to work with its carriers to ensure that trains leaving or entering the port will not cause excessive delays at West Bay Street, GA 17, and GA 21.

As you indicate, tourism is a large segment of the local economy. However, the impacts of SHEP on the tourism industry are projected to be nominal [both in the short- and long-term]. In fact, by letter dated, 19 January 2011, the Savannah Area Chamber of Commerce states: *On behalf of our 2,100 business members representing over 77,000 employees in our area, we strongly encourage the U.S. Army Corps of Engineers to proceed with the Savannah Harbor Expansion Project.*

1112-MR-17-EV06

Comment: *Your report indicates that mitigation of the loss of fish spawning areas will be addressed by lump sum payment. To whom will the payments be made? Certainly the fish will not be cashing a check. How will a lump sum payment enable my children and grandchildren to catch striped bass in the river? Will they receive a check?*

Response: As indicated in Section 5.03.2 of EIS, the lump sum payment would be made to the Wildlife Resources Division of the Georgia Department of Natural Resources to fund a Striped bass stocking program.

1112-MR-17-EN04

Comment: *If the Corps cannot guarantee the accuracy of its models with regard to the impact of the Project on the aquifer and the movement upstream of the salt water wedge, wouldn't it make sense to deepen the Harbor in graduated phases of 1 to 2 feet per phase?*

Response: Incremental deepening the harbor would be manifestly inefficient and would not meet project needs since the cost of construction would be significantly higher and the time to realize economic benefits more protracted.

The information provided in the GRR- Appendix C: Potential Ground-Water Impacts to the Upper Floridan Aquifer [2007] has been reviewed by multiple groundwater experts and represents an accurate depiction of the project area's geologic framework and its hydrological regime. The groundwater flow and transport model predictions based on these studies are also comports with field data. For the

municipal intake chloride studies, two different methodologies [EFDC model and Artificial Neural Network] were used. The data from each were close approximation of one another [mutually supporting] which provides confidence in their conclusions. Therefore, dredging the harbor in phases to address the noted chloride concerns is neither necessary nor economically feasible.

1112-MR-17-EV07

Comment: *Has the data provided by GPA been independently reviewed by auditors or other qualified experts to ensure its accuracy? In particular, has GPA been required to produce underlying records and documentation supporting its conclusions regarding the need for the Project?*

Response: The data provided by GPA has not been independently verified, but has been examined by the Corps of Engineers' Deep Draft Center of Expertise in Mobile, AL for internal consistency. An independent external peer review [conducted by experts outside the Corps of Engineers] has been completed. The review concluded that the growth projections cited by GPA appear valid.

1112-MR-17-EV08

Comment: *Page 102 of the Corps' report indicates that ships approaching the Port of Savannah are queued based on factors including draft restrictions, canal appointments, and "tide jobs/labor costs." Isn't it true that ships wait to enter the Harbor in order to avoid overtime charges in the loading and unloading of ships? If so, please quantify how many ships waited to enter the harbor, and for how long, in order to avoid labor costs, as opposed to how many ships waited, and for how long, due to draft restrictions.*

Response: Ships approaching the Port of Savannah are queued based on the following ranking factors: (1) draft restrictions [tide], (2) jobs/labor costs, and (3) Panama Canal appointments. Figure 4-3 and Table 4-8 of the GRR indicate that carriers are responding to existing operating draft restrictions by loading vessels so as to maintain unrestricted access to the channel, viz., using operating drafts no deeper than -38 feet. The loading limitations noted in the recent historical data continue through the present. In the first half of 2010, 80% of vessels that called at Garden City Terminal were considered depth constrained, and 20% of transits relied on tidal assistance. Waiting for the tide is a costly operational inefficiency for schedule-driven service carriers. For inbound vessels, this waiting adds to the operational cost of a voyage by increasing the vessel's time at sea. Outbound vessels waiting for the tide must spend more time at the dock and, in turn, may delay the arrival of a vessel scheduled to use the same berth. Further, carriers are averse to waiting for the tide because it disrupts the vessel's scheduled arrival time at the next and following ports. Vessels may increase speed between ports to make up time lost waiting for the tide, but this also adds to the cost of the voyage via increased fuel consumption/equipment maintenance. Vessels may be subject to penalty fees for missing their scheduled time slot at the Panama Canal or may need to pay overtime fees due to a late port arrival. In addition, with deeper vessel drafts [beyond -38.00 feet] the tidal window becomes relatively narrow, e.g., vessels loaded to the channel's maximum operating draft of 42 feet have only one hour before and after each high tide. This narrow window increases the risk that the vessel may miss the opportunity for transit due to LNG vessel operations or cargo related delays.

1112-MR-17-EN05

Comment: *What is the required bridge clearance of empty or partially loaded post-Panamax ships? Will the existing bridge from downtown Savannah to South Carolina need to be replaced to accommodate these ships?*

Response: The conservative air draft [measured from the lower edge of the span] of the Talmadge (Savannah River) Bridge is 185 ft MHHW. The air draft of the Susan Maersk [with its antenna up and a minimum light load draft] is 170 ft; therefore, there would be no need to replace the bridge in this regard. Moreover, all the vessels forecasted to call at Savannah during the project life will be able to pass [uneventfully] under the Talmadge Bridge.

1112-MR-17-EV09

Comment: *If the Project is approved, can GPA provide assurances that post-Panamax ships will choose to serve the Savannah Port instead of other ports that provide more direct access to the ocean, such as Charleston?*

Response: GPA plans to expand the GCT to 6.5 million TEUs regardless of whether or not the Savannah Harbor navigation channel is deepened. Under both without and with project conditions, the Garden City Terminal will reach its build-out capacity in about 2030 [6.5 M]. This is the maximum number of containers that could reasonably be processed based on the size of the terminal, the number of gates that provide access to the property, the number and size of the berths, the number and size of the container cranes, the number of jockey trucks that move the containers within the terminal, how the containers are stacked within the terminal, and the number of railroads that service the terminal and the frequency of their trains.

As discussed in detail in Section 5 of the GRR, the future projected uses of the Savannah Port are based on detailed analysis of US East Coast /Gulf Coast Port configurations/capacities, GCT infrastructure/ capacity, international trade projections, commodity forecasts, etc.

1112-MR-17-EV10, 1112-MR-17-EV11, 1112-MR-17-EV12

Comment: *Has GPA or any other entity quantified the positive (or negative) impact of the Project on other segments of the economy? I have already inquired in Paragraph 2 regarding the impact of increased truck traffic to and from the Port on tourism. Has any study been done to determine whether the combined effects of Port expansion and increased truck and rail traffic will result in the loss of opportunities to attract other types of development? For example, is warehousing the highest and best use of industrial property in Chatham County and the surrounding counties? Are the jobs that will be created by the Project and its long-term impacts quality jobs, or jobs that will be filled by temporary workers at minimum or near-minimum wage?*

Response: GPA plans to expand the GCT to 6.5 million TEUs [maximum capacity] whether or not the Savannah Harbor navigation channel is deepened. Under both without and with project conditions, the District expects the Garden City Terminal to reach its build-out capacity in about 2030. No incremental increases in cargo are expected to occur as a result of the proposed harbor deepening. As a result, the project would not affect the number of containers that transit the areas that surround the port. The economic benefits of the project result from the use of larger, more cost-effective container ships, not an increase in the number of containers. Likewise, no adverse effects on employment, taxes, and property values are expected from implementation of the proposed harbor deepening. Some additional temporary jobs may be available during SHEP's major construction phases. A determination of the highest and best use for industrial lands in the region is beyond the scope of this project.

From: Jody Lane
To: CESAS-PD, SAS
Subject: Savannah Harbor Deepening
Date: Tuesday, January 25, 2011 8:03:28 PM

Although like many citizens of Savannah, I am interested in the economic health of our city and state, I do not support the proposed harbor deepening at this time.

I understand there continue to be very serious questions about negative inpacts upon the environment. I'd also like to know any risks associated with the LNG facilities and pipelines. No economic interest should trump serious environmental issues and the risks of a busier port. There has been a great push to convince the populace that we must have this harbor deepening in order to protect our econonomic interests, but I am not convinced of the economic necessity nor that the environment could be adequately protected.

Sincerely,
Jody Lane
110 Stonewall Drive
Savannah, Ga 31419

Jody Lane

1113-MR-01-EV01

Comment: *I understand there continue to be very serious questions about negative impacts upon the environment. I'd also like to know any risks associated with the LNG facilities and pipelines. No economic interest should trump serious environmental issues and the risks of a busier port. There has been a great push to convince the populace that we must have this harbor deepening in order to protect our economic interests, but I am not convinced of the economic necessity nor that the environment could be adequately protected.*

Response: Your concern about the potential adverse environmental impacts of the proposed harbor deepening is noted. Savannah District has evaluated the proposed deepening for over 10 years. It performed many scientific investigations and analyses to identify potential adverse environmental impacts and then minimize the ones that were identified. It used Corps experts from other parts of the country when they were more qualified than local staff. It consulted with the natural resource agencies across the region to ensure their concerns were considered. It sought the views of the public, organizations, and government agencies through several means, including review of the DEIS. After that extensive process, Savannah District has concluded that the harbor can be deepened in a cost-effective and environmentally-sustainable manner. Adverse environmental impacts would be adequately mitigated.

LNG vessels were included in the District's analysis of the fleet that calls at Savannah and the potential effects on that fleet from a potential harbor deepening. However, a broader consideration of risks associated with the LNG facilities and pipelines is outside the scope of this project.

From: Theresa Wexel
To: CESAS-PD, SAS
Subject: SAVANNAH Harbor Deepening
Date: Tuesday, January 25, 2011 7:33:24 PM

Please advise what is the link between the proposed harbor deepening and the El Paso LNG facility application for permit to truck LNG across the City of Savannah?

Will the existing double 30" pipes from Elba Island, under the Savannah River, be lowered or abandoned? This needs to be addressed publicly. If there is no problem, that needs to be clearly shown.

Sincerely,
Theresa Wexel
238-4540

--

Theresa Wexel

1114-MR-02-EV01

Comment: *Please advise what is the link between the proposed harbor deepening and the El Paso LNG facility application for permit to truck LNG across the City of Savannah?*

Response: There is no direct link between the SHEP and the LNG facility. As stated in Section 4.4 of the GRR, the Federal Energy Regulatory Commission issued an order [2003] authorizing the expansion of the Elba Island facility. The order included adding a second and third docking berth, a fourth cryogenic storage tank, and associated facilities. The proposed expansion will increase the Elba Island facilities' working gas capacity from 4.0 to 7.7 billion cubic feet of gas equivalent (Bcfe). The Corps is unaware of any link between the SLNG application for a permit to truck LNG across the City and either the SHEP or the plant expansion authorized in2003.

1114-MR-02-EV02

Comment: *Will the existing double 30" pipes from Elba Island, under the Savannah River, be lowered or abandoned? This needs to be addressed publicly. If there is no problem, that needs to be clearly shown.*

Response: The Corps consulted with SLNG in its evaluation of potential impacts from harbor deepening on those pipelines. The determination is that a 48-foot channel could be constructed without requiring the existing 30" pipes from Elba Island to be relocated. Language will be added to Section 4.4 of the GRR to that clarify that point.

From: Bobbie Harrison
To: CESAS-PD, SAS
Cc: andrew cobb; Catherine Harrison; Margaret Harrison; fife220@aol.com
Subject: Savannah Harbor Expansion Project
Date: Tuesday, January 25, 2011 3:16:52 PM

Mr. William Bailey
USACE
Savannah District
Savannah, GA 31401

Dear Mr. Bailey: Fife Plantation
SC side of Back River

Reference requests for last minute comments, please let this go on record to advise that we have yet to be contacted about our concerns with the new harbor deepening project. We were advised several years ago by the GPA that our concerns would be addressed at a later time and only recently did Mr. Schaller advise that we should contact the Corps direct.

Fife Plantation, which is now in a charitable land trust, for the protection wetlands, historic preservation and education, has been threatened by the insurgence of salt water ever since the tide gate was installed in 1976. This was further exacerbated by the harbor deepening in the late 80s and now the advent of further deepening will no doubt further increase the salinity of our marshes and in our canals exposed to Back River. It was proved by your own studies in the late 90s that the removal of the tide gates did not return fresh water to our marshes and that the river is still brackish at best.

Besides losing close to 300 acres of fresh water marsh to almost a purely salt water marsh, our tide gates(trunks) have deteriorated rapidly to where our two main structures have been riddled with salt water toreadors to the point where they will have to be replaced soon. Much repair work has had to be done in the last 25 years just to keep them partially operating. I am certain that the USFWS has proven to the Corps that they have had similar problems which you are addressing right now with the project on the diversion canal which serves both them and us.

We have a simple plan we would like to discuss with your which I think will help solve this problem for years to come. We would like to meet with you at your earliest convenience to discuss this. I have been in touch briefly with the GPA and Allen Garrett, both of whom have expressed their willingness to meet. I hope you can respond very soon.

With thanks, I am

Very truly yours,

Harrison Family Charitable Trust

R. L. Harrison, Managing Trustee

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dissemination, forwarding, printing, or copying of this e-mail is strictly prohibited.

Fife Plantation SC side of Back River

1115-MR-01-EV01

Comment: *Besides losing close to 300 acres of fresh water marsh to almost a purely salt water marsh, our tide gates(trunks) have deteriorated rapidly to where our two main structures have been riddled with salt water toreadors to the point where they will have to be replaced soon. Much repair work has had to be done in the last 25 years just to keep them partially operating. I am certain that the USFWS has proven to the Corps that they have had similar problems which you are addressing right now with the project on the diversion canal which serves both them and us.*

Response: The Freshwater Control System in the Savannah National Wildlife Refuge has been repaired. The District will soon begin rehabilitation of a portion of the system located on private lands.

CENTER FOR A SUSTAINABLE COAST

Conserving Coastal Georgia's Heritage, Investing in Our Children's Future

www.sustainablecoast.org

January 25, 2011

VIA E-MAIL AND U.S. MAIL

Jeffrey M. Hall, Colonel, US Army, Commanding
US Army Corps of Engineers, Savannah District
100 West Oglethorpe Avenue
Savannah, Georgia, 31401

Re: ***Notice of Availability of a Draft Tier II Environmental Impact Statement and Draft General Reevaluation Report for Savannah Harbor Federal Navigation Project, Chatham County, GA and Jasper County, SC***

Dear Colonel Hall:

Following are comments on the above documents being submitted on behalf of the Center for a Sustainable Coast. These augment and support other statements made on our behalf by the Southern Environmental Law Center (SELC), submitted separately. Note that we may file additional, supplemental comments at a later date as accommodated by the schedule for project review under NEPA. We would appreciate a written response to our comments and ask that both our comments and your response be posted on the Corps website for this project.

Unreliable Projection of Benefits

Claimed economic benefits from the project derive solely from improved efficiencies gained by accommodating mega-ships. The alleged benefit from such efficiency suffers from at least two critical sources of doubt: (1) only cargo transported by mega-ship can be associated with such benefits, yet for the foreseeable future much cargo, including most exports, will be shipped using smaller vessels, and (2) the cumulative benefits are directly dependent on the accuracy of projected port commerce to be transported using mega-ships. If projections are high, efficiency benefits will be correspondingly inflated. Consider the accuracy of projections made prior to the global economic plummet that began several years ago. Projected commerce made on the basis of past growth was significantly higher than the actual cargo volume at Savannah once the recession took hold, since no one doing such projections anticipated the severe downturn in business activity that began in late 2007, continues to the present, and is now predicted to persist.

Although the commerce forecast has, at last, been adjusted downward to reflect this dismal global economic outlook, this major revision casts doubt on general methodologies that cannot anticipate such threshold events. It is our understanding that the Corps is now forecasting a three-fold increase in commerce over the 50-year project period, half of the preceding projection used in earlier assessment of this project. While it is encouraging that such an adjustment has been made, it raises questions about the Corps' ability to realistically project future trade volumes and types. Since the alleged project benefits are based entirely on growing volume of mega-shipped commerce over the project period, forecasting error is a very critical flaw in the EIS findings.

Sensitivity Analysis Insufficient

To a certain extent, deviations between forecasted and actual commerce (among many variables relevant to the EIS assessment) may be compensated by so-called sensitivity analysis, but the reliability of that methodology is in doubt for various reasons. The most likely reason is that significant changes, such as extreme tide conditions caused by coincident lunar cycle phasing in combination with wind conditions, can cause both navigation constraints and adverse environmental project impacts that are beyond the range of modeling assessment. The extent to which these extremes, as well as other variables like trends and patterns in waterborne commerce, can be accommodated by sensitivity analysis depends on factors that remain unexplained and unexamined. Another example, evidently overlooked in the EIS, is the rather remarkable trend in river flow, which has drastically dropped during certain periods in recent years (see attached table of USGS data taken at Thurman Dam). If similar trends continue, salinity conditions could go above, and dissolved oxygen below, any levels assumed in applied sensitivity analysis. There is insufficient assurance that limits of analysis are adequate if future conditions are subject to similar variability and volatility demonstrated by actual occurrences.

Opportunity & Distributional Costs Not Adequately Considered

Public resources that are compromised or lost due to this project are proposed to be fully compensated by mitigation steps completed at approximately their corresponding estimated costs. Not only does this assume successful mitigation within reasonable range of cost, but alternative uses for these resources that may have greater value to the public are not considered. For example, air quality limitations under federal law implicitly require the allocation of air emissions among existing and future sources of air pollution. By allocating any given portion of air quality to a particular project, activity, or permit-holder, alternative uses for that increment of compromised air are inescapably precluded. To reach a rational decision that serves the public, supporting analysis must include some reasonable exploration of what those alternatives are and how they rank in relation to the project being immediately considered. In the case of air quality, the project may impose future constraints on vehicular (highway) traffic, industrial development, or, due to perceived reductions in quality of life, markets for tourism and second-homes and/or retirement-homes.

Similarly, environmental costs and economic benefits are seldom, if ever, uniformly distributed. This means that people living closer to the sources of project impact are likely to suffer more than those living further away. In this project, it is probable that noise and pollution caused by trucks carrying commodities to and from the port and related facilities, such as distribution centers, will harm low-income communities more than others. Yet, in the EIS there is no corresponding assessment of such impacts or alternatives for avoiding or reducing them. If larger

ships are used as a result of this project, on average there will be higher peak inventories of commodities moving through the port. This could translate into higher volumes of transshipment with corresponding higher elevations of air pollution at peak periods.

Modeling Deficiencies

Misjudgments in the development of highly complex mathematical models are not merely academic arguments. If misjudgments exist and are allowed to stand as SHEP moves forward, they will become risk-inducing linchpins prone to causing gross environmental damage and the misuse and/or loss of hundreds of millions of tax dollars through misguided mitigation efforts.

Because of the timing of the decisions to use the enhanced EFDC, there is reason to believe that political considerations could have been playing an inappropriate role in decisions about modeling choices. At the time, EPA was facing a federal court-ordered deadline to set TMDLs in the Savannah River Harbor and they urgently needed a predictive tool. Time was important to EPA and the agencies which had concurrence responsibilities on TMDLs. Also, participation in SEG and SEG-related meetings leads us to believe that Corps leadership during the time of modeling development might have been more focused on complying with a tight schedule than scientific accuracy. While it is fiscally responsible to use similar tools for somewhat similar uses when they have been adequately evaluated for all tasks, results can be disastrous when time and politics become greater drivers than science, supported by diligent use of empirical observation.

A primary concern is whether or not the models are able to deal with the twice-daily tidal cycles in our valuable wetlands and whether or not the model was ever adequately evaluated to be predictive. An error in either or both could render the work in the SHEP DEIS and GRR virtually worthless. Expert opinion given in testimony by hired consultants gives us concern on that basis.

> From the Oct 2005 SEG meeting transcript, in a statement made by Joe Hoke:
>
> "So just to review the basic problem, this is from the Kinetic Analysis Corporation, which is Chuck Watson, the executive summary from his report that's in the -- it's the appendix for the May 2005 Tetra Tech modeling report. It says, even with stability problems, the enhanced grid model appears to present a significant improvement over the TMDL model, has the potential to become an extremely useful tool in studying the Lower Savannah River. However, the inability to conduct seven year test runs is a source of serious concern, with respect to the suitability of the models for predictive purposes. Therefore, Kinetic Analysis Corporation does not recommend the operational use of the enhanced grid model for predictive modeling of bathymetric changes, means deepening, until the stability issues can be resolved."
>
> Chuck Watson: "The problem was when we tried some of the other runs, one of the things we do is called a perturbation analysis, where we take the grid and randomly make very small changes to the bathymetry to see how that changes the model. We were unable to successfully complete a lot of those runs. Those crashed or aborted at times other than December 2000."

And from comments submitted by Chuck Watson (January 2011), " Peak daily salinity levels are often used for evaluating impacts to wetlands and are explicitly used for mitigation estimates

such as water intakes for industrial and other uses. It should be noted that the model severely under predicts peak daily salinity levels in key locations, especially during low flow conditions which is when infrastructure and wetlands are most vulnerable."

Adaptive Management Problems

Inadequate Performance Criteria

To be effective in achieving management goals and consistent with the term's use, "adaptive management" (AM) must include specific criteria that apply to relevant field conditions in the impact area of the referenced project. As proposed in Appendix D, the only criteria for management success are the "goals" adopted for development and approval of the hydrologic and salinity modeling. According to experts describing the approach, AM should include reconsideration of goals, building, revamping and refining applicable models, and setting and calibrating performance standards unique to the project. [*See excerpt below.*]

We believe there is overwhelming expert opinion that the goals used in modeling alone do not provide sufficient performance criteria for reliable and effective use of AM in this project. Furthermore, in Appendix D there is no process proposed for calibrating or refining performance standards as needed and thus no basis for determining when and how these functions would be executed.

> *In contrast, the adaptive management framework is more evolutionary and interdisciplinary, relying on iterative cycles of goal determination, model building, performance standard setting, outcome monitoring, and standard recalibration. Indeed, advanced versions of adaptive management incorporate an experimental research element, in which management actions deliberately probe for information to evaluate testable hypotheses about the effects of active intervention in ecological processes, such as evaluating the effects a chosen habitat management action and its alternatives might have on invasive species by running small-scale test plot experiments.*
>
> Source: "Adaptive Management in the Courts" by J.B. Ruhl and Robert L. Fischman, published in Minnesota Law Review, © 2010

Further justification for detailed performance criteria are provided in the memo adopted by the Stakeholder Evaluation Group (SEG) advising Georgia Ports Authority in reviewing the project and its impacts, cites as follows.

These methods must specify in detail the protocol for gathering and assessing information, and the criteria to be used to trigger enactment of contingency plans for controlling adverse effects if and when they arise. Contingency procedures should include the use of more rigorous monitoring and assessment methods to assist in determining the causes of undesired impacts and the alternatives for reducing or eliminating them. Such procedures must also include the option of stopping project implementation activities for an indeterminate period to prevent unacceptable impacts from occurring. In any case, project analysis and recommendations must specify the threshold of conditions that must be ensured to enable the project to remain feasible in the public interest. If these conditions cannot be maintained, procedures must be clearly outlined for intervening to prevent the project or its mitigation from causing further damage to public resources.

[Source: ***Recommendation for SEG position on Corps use of study committee reports and other information in preparing the General Reevaluation Report (GRR), Mitigation Plan, and draft EIS for the Savannah Harbor Expansion Project***, adopted by the SEG and recommended to Georgia Ports Authority, May 2008.]

No Standards for Determining Major Project Modifications

Under NEPA, when a project must be modified to a substantive extent, a Supplemental EIS (SEIS) must be prepared, circulated, and approved. An acknowledged potential benefit of AM is that it offers the possibility of preventing a project or its mitigation from having such unacceptable impacts that a major modification would be necessary because – *if the AM program is properly designed and administered* – pre-emptive corrective action could be taken soon enough to prevent significant deviations from project goals. To help ensure this advantage is attainable, it would be useful, if not imperative, to predetermine in the AM procedures what level of field conditions and/or what extent of project modification would serve as the threshold for invoking the need for preparing a Supplemental EIS. Predetermining this threshold would provide the project managers a means for understanding in advance when corrective action is essential to avert the cost and delay of engaging in the SEIS process.

Inadequate Administrative Structure

In Appendix D, the decision-making approach requires that, for any modification in the project – including mitigation methods – agreement must be reached by all state and federal agencies sharing responsibility for approving the project. While we agree that significant modification of the project should require approval of all these parties (as well as the public), it is impractical to conduct effective adaptive management, which is intended to make incremental adjustments in project implementation and mitigation on a real-time basis. Such quick, timely response would be prohibited by the complexity and delay of reaching formal consensus among all these participating agencies. It is therefore essential that the AM process is structured to distinguish between major and minor modifications and to articulate corresponding management devices to provide the dual benefits of timely intervention for minor project modifications and the assurance of damage control and public accountability for major ones.

Inadequate Budget and Inconsistent Budgeting Estimates

The estimates of cost for implementing AM, presented on page 34 of Appendix D, are arbitrarily based on certain percentages of the mitigation cost estimates for corresponding proposed mitigation steps. For several reasons, this is an unacceptable means for pre-determining a budget to support responsible adaptive management.

- If mitigation costs prove to be inaccurately estimated, AM budgets will be changed unexpectedly.
- There is no inherent, fixed proportional relationship between the cost of implementing a particular type of mitigation and conducting a legitimate AM process applicable to related impacts and resources.
- The very reasoning that is the basis for justifying an AM approach suggests that not all impacts that may occur can be effectively mitigated by advanced planning, and thus not only may the costs be erroneous, but there may be mitigation steps required that have not even been anticipated.

- Budget shortfalls for unanticipated mitigation needs, and/or the actual costs of valid AM functions, must be covered by a predictable and reliable source of funds. If this source is the local sponsor, Georgia Ports Authority (GPA), the amount of contingencies must be determined and provisions for ensuring their timely availability must be specified as part of the adaptive management plan. This AM plan and an acceptable, enforceable means for governing it must be set forth in the EIS for the EIS to be eligible for approval.
- It is our understanding that the Corps originally proposed a budget for AM that was based on the entire project cost, not just mitigation. At some point, the basis for AM budgeting became only the mitigation budget, which is a small fraction of total project cost. To our knowledge, an explanation for this major revision in AM budgeting methodology was never provided.

While we enthusiastically support attempts to apply the principles of adaptive management in such major projects, primarily due to the complexity and uncertainty of how natural systems may respond to project activities, including mitigation efforts, in combination with a host of other systemic impacts on these systems caused by human activities, the approach outlined in Appendix D is substantively deficient and thus cannot ensure protection of the public interest.

Regional Port Analysis is Incomplete

An alternative to the project with realistic possibilities is the creation of a single mega-port in the Southeast rather than accommodating multiple ports competing for the limited single-call traffic of mega-ships. Such multi-port competition will be inclined toward building overcapacity that cumulatively causes unnecessary environmental disruption at wasteful expense to the taxpayers. In spite of the crucial, policy-setting implications of the decision on this project and the requirement under NEPA for all reasonable alternatives to be considered, there has been no substantive assessment of the practical advantages of a single mega-port serving the entire Southeast, or any exploration of various criteria to be applied in locating such a facility. It appears that the assessment under this EIS was driven by an unsubstantiated assumption, if not a foregone conclusion, that continuing a trend of serially deepening every major commercial port is in the nation's best interest. Such an assumption is not explained or justified in the EIS and, given current shipping trends, seems extremely difficult to reconcile with reality.

This concludes our initial remarks on the referenced documents. We trust you will carefully consider them and respond thoroughly. Thanks for your prudent attention.

Respectfully,

David C. Kyler
Executive Director

Center for a Sustainable Coast

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1117-MM-21-EV01

Comment: *Following are comments on the above documents being submitted on behalf of the Center for a Sustainable Coast. These augment and support other statements made on our behalf by the Southern Environmental Law Center (SELC), submitted separately. Note that we may file additional, supplemental comments at a later date as accommodated by the schedule for project review under NEPA. We would appreciate a written response to our comments and ask that both our comments and your response be posted on the Corps website for this project.*

Response: A written response to all comments is included asAppendix A in the FEIS, and the document will be posted on the Savannah District's website.

1117-MM-21-EC01, 1117-MM-21-EC02

Comment: *Claimed economic benefits from the project derive solely from improved efficiencies gained by accommodating mega-ships. The alleged benefit from such efficiency suffers from at least two critical sources of doubt: (1) only cargo transported by mega-ship can be associated with such benefits, yet for the foreseeable future much cargo, including most exports, will be shipped using smaller vessels, and (2) the cumulative benefits are directly dependent on the accuracy of projected port commerce to be transported using mega-ships. If projections are high, efficiency benefits will be correspondingly inflated. Consider the accuracy of projections made prior to the global economic plummet that began several years ago. Projected commerce made on the basis of past growth was significantly higher than the actual cargo volume at Savannah once the recession took hold, since no one doing such projections anticipated the severe downturn in business activity that began in late 2007, continues to the present, and is now predicted to persist.*

Response: See response to comment 765-DC-149-EC02, which, among other things, explains that the trade forecast has been updated and that post-recession container traffic data confirms shipping growth has resumed its upward trend.

The *HarborSym* analysis considers benefits to all vessels by estimating their efficiency gains from reduced congestion; whereas the Transportation Cost Savings Model estimates the efficiency gains from vessels being able to load/unload without the current constraints of draft. Conversion of the operating fleet to larger vessels would also substantially reduce transportation costs after implementation of SHEP. The largest vessels would experience the most benefit from a deeper channel, but there will also be some incremental gains in efficiency to smaller vessels as a result of reduced harbor/channel congestion.

Global Insight's commodity forecasts are based on a large number of economic factors and were vetted several times by economists for its applicability [reasonable assumptions] to the Savannah Harbor study. Corps guidance on deep-draft navigation projects emphasizes using empirical data whenever possible and forecasting over a 50-year period of analysis. Data on the past and present problems help shape the future without-project condition scenario. This, in turn, serves as a baseline for project formulation and evaluation. As would be expected, a 50-year forecast contains uncertainty; therefore, several sensitivity analyses were performed using lower growth rates, no growth, and increased packaging

densities. The project was found to be economically justified under most of the scenarios that were considered.

Page 2

1117-MM-21-EC03

Comment: *Although the commerce forecast has, at last, been adjusted downward to reflect this dismal global economic outlook, this major revision casts doubt on general methodologies that cannot anticipate such threshold events. It is our understanding that the Corps is now forecasting a three-fold increase in commerce over the 50-year project period, half of the preceding projection used in earlier assessment of this project. While it is encouraging that such an adjustment has been made, it raises questions about the Corps' ability to realistically project future trade volumes and types. Since the alleged project benefits are based entirely on growing volume of mega-shipped commerce over the project period, forecasting error is a very critical flaw in the EIS findings.*

Response: See response to comment 765-DC-149-EC02, which, among other things, explains that the trade forecast has been updated and that post-recession container traffic data confirms shipping growth has resumed its upward trend. As noted in response to another comment, *Global Insight's* commodity forecasts are based on a large number of economic factors and were carefully examined multiple times by economists for its applicability to the Savannah Harbor study. Corps guidance on deep-draft navigation projects emphasizes using empirical data whenever possible and to making forecasts over a 50-year period of analysis. Data on the past and present economic problems help shape the future without project condition scenario. This, in turn, serves as a baseline for project formulation and evaluation. As would expected, a 50-year forecast contains uncertainty; therefore, several sensitivity analyses were performed using lower growth rates, no growth, and increased packaging densities. The project was found to be economically justified under most of the scenarios that were considered.

1117-MM-21-EC04, 1117-MM-21-EV02

Comment: *To a certain extent, deviations between forecasted and actual commerce (among many variables relevant to the EIS assessment) may be compensated by so-called sensitivity analysis, but the reliability of that methodology is in doubt for various reasons. The most likely reason is that significant changes, such as extreme tide conditions caused by coincident lunar cycle phasing in combination with wind conditions, can cause both navigation constraints and adverse environmental project impacts that are beyond the range of modeling assessment. The extent to which these extremes, as well as other variables like trends and patterns in waterborne commerce, can be accommodated by sensitivity analysis depends on factors that remain unexplained and unexamined. Another example, evidently overlooked in the EIS, is the rather remarkable trend in river flow, which has drastically dropped during certain periods in recent years (see attached table of USGS data taken at Thurman Dam). If similar trends continue, salinity conditions could go above, and dissolved oxygen below, any levels assumed in applied sensitivity analysis. There is insufficient assurance that limits of analysis are adequate if future conditions are subject to similar variability and volatility demonstrated by actual occurrences.*

Response: Potential environmental impacts were evaluated under the conditions and scenarios recommended by the Interagency Coordination Teams. Those teams discussed the use of both normal and extreme events. For some resources, a Team may have suggested evaluating the impacts using normal conditions, while in others (dissolved oxygen), critical conditions were identified for analysis.

The analysis of extreme events must also be weighed against the expected frequency of their occurrence.

The sensitivity analyses applied to the water quality and dissolved oxygen modeling are sufficiently comprehensive to capture reasonable estuarine events. Moreover, low-flow conditions were not "overlooked" in the model design. With regard to river flows, the basic evaluation condition for the water quality and dissolved oxygen modeling was conducted using low-flow (critical) conditions, not average flow conditions as indicated in the comment. Instead, sensitivity analyses were run to evaluate model response to average flows, as indicated in Section 7.4.3 of the Engineering Appendix of the GRR. Furthermore, as indicated in the GRR, the models employed and the criteria established were developed by the interagency team using an iterative process. Please see Section 7.4 of the Engineering Appendix of the GRR for a more detailed description on model development and selection. All water quality and dissolved oxygen analyses were run as identified by the Water Quality Interagency Coordination Team and adequately evaluate the impacts of the various project [depth] alternatives.

1117-MM-Z1-EV03

Comment: *Public resources that are compromised or lost due to this project are proposed to be fully compensated by mitigation steps completed at approximately their corresponding estimated costs. Not only does this assume successful mitigation within reasonable range of cost, but alternative uses for these resources that may have greater value to the public are not considered. For example, air quality limitations under federal law implicitly require the allocation of air emissions among existing and future sources of air pollution. By allocating any given portion of air quality to a particular project, activity, or permit-holder, alternative uses for that increment of compromised air are inescapably precluded. To reach a rational decision that serves the public, supporting analysis must include some reasonable exploration of what those alternatives are and how they rank in relation to the project being immediately considered. In the case of air quality, the project may impose future constraints on vehicular (highway) traffic, industrial development, or, due to perceived reductions in quality of life, markets for tourism and second-homes and/or retirement-homes.*

Response: This comment is unclear and/or misstates applicable NEPA requirements. The analysis requested exceeds the scope of the evaluation required under NEPA. Section 4 of the EIS and Appendix C (Mitigation Planning) includes an assessment of the environmental resources in the project area. Section 5 of the EIS evaluates the environmental consequences of the proposed action. Section 3 of the EIS and other parts of the EIS/GRR properly address alternatives under NEPA. The without-project condition (no-action alternative) evaluates potential future changes in the harbor's environmental resources [which are expected to remain essentially unchanged as regards the existing navigation project].

The air quality analysis in Section 5 of the EIS and Appendix K was properly conducted under NEPA. As reflected in the EIS, the total air emissions from the fleet would decrease if the number of vessels decreases as forecasted (comparing without project and with project fleets). As explained previously, harbor deepening is not the causal factor that would lead to growth in container volume through the port on any given time line. The District's analysis forecasts emissions over time, with or without a harbor deepening. Since air emissions would not increase as a result of the project, the project would not impose future constraints on traffic, development, etc. See also other responses to comments regarding air quality. In addition, air quality in the project area is actually expected to improve over time as recent US EPA regulations are implemented that reduce Sulfur, NOx, and PM emissions from both

marine and land-based diesel engines. Property adjacent to the USFWS Refuge is expected to undergo increasing likelihood of development in the future without regard to the project..

1117-MM-21-EV04

Comment: *Similarly, environmental costs and economic benefits are seldom, if ever, uniformly distributed. This means that people living closer to the sources of project impact are likely to suffer more than those living further away. In this project, it is probable that noise and pollution caused by trucks carrying commodities to and from the port and related facilities, such as distribution centers, will harm low-income communities more than others. Yet, in the EIS there is no corresponding assessment of such impacts or alternatives for avoiding or reducing them. If larger ships are used as a result of this project, on average there will be higher peak inventories of commodities moving through the port. This could translate into higher volumes of transshipment with corresponding higher elevations of air pollution at peak periods.*

Response: This comment raises concerns about environmental justice and impacts to people living near the Garden City Terminal. These issues are fully addressed in EIS Section 5.0, including Section 5.06, Air Quality, and Section 5.19, Protection of Children and Environmental Justice. .

As explained in Section 5.0, the proposed harbor deepening will have no adverse landside impacts beyond the Garden City Terminal or cause air pollution problems. See also other responses to similar comments.

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1117-MM-21-EV05, 1117-MM-21-EV06

Comment: *Because of the timing of the decisions to use the enhanced EFDC, there is reason to believe that political considerations could have been playing an inappropriate role in decisions about modeling choices. At the time, EPA was facing a federal court-ordered deadline to set TMDLs in the Savannah River Harbor and they urgently needed a predictive tool. Time was important to EPA and the agencies which had concurrence responsibilities on TMDLs. Also, participation in SEG and SEG-related meetings leads us to believe that Corps leadership during the time of modeling development might have been more focused on complying with a tight schedule than scientific accuracy. While it is fiscally responsible to use similar tools for somewhat similar uses when they have been adequately evaluated for all tasks, results can be disastrous when time and politics become greater drivers than science, supported by diligent use of empirical observation.*

Response: Political considerations did not play an inappropriate role in decisions about modeling choices, nor was technical accuracy sacrificed to meet schedule requirements.

The hydrodynamic and water quality models employed for SHEP were developed through an iterative process closely coordinated with the SHEP Water Quality Interagency Coordination Team, which followed in the footstep of the Modeling Technical Review Group which was established in the late 1990s to review the model developed for the deepening project and determine its viability for use with SHEP impact evaluations and mitigation development. The group consisted of technical modelers from the District, US EPA Region 4, USGS, Georgia DNR-EPD, South Carolina DHEC, as well as modeling experts under contract to develop and refine the SHEP model.

After deliberation, the group decided to adopt a model [for SHEP] that was originally developed by EPA for the harbor's TMDL evaluation. This model was chosen because it simulated the harbor's salinity

stratification and was state-of-the-art in its 3-dimensional capabilities. After three years of intense effort to calibrate the existing condition[s] component, the enhanced TMDL model for SHEP received formal acceptance from federal, state, and industry reviewers. The letters of acceptance can be found in the Supplemental Materials to the Engineering Appendix (Correspondence Regarding Hydrodynamic & Water Quality Model Acceptability).

The models employed and the criteria established were developed through an iterative process with the model review team and the water quality interagency coordination team. The model selection, development, and refinement process occurred from 1999 to 2005. Use of the WASP and enhanced EFDC models were both certified for use in accordance with EC 1105-2-407. The manifest changes that were made over the course of the seven-year period together with the elaborate certification process are an indication of the thorough and deliberative process employed to ensure the model met all performance criteria. Further, this was all accomplished prior to conducting any model runs that would predict impacts associated with the proposed project.

Although the schedule for the SHEP is important, making good, science-based decisions is a higher District priority. As the 12-year study process shows, scientific accuracy was not compromised to comply with the project schedule.

1117-MM-21-EN01

Comment: *A primary concern is whether or not the models are able to deal with the twice-daily tidal cycles in our valuable wetlands and whether or not the model was ever adequately evaluated to be predictive. An error in either or both could render the work in the SHEP DEIS and GRR virtually worthless. Expert opinion given in testimony by hired consultants gives us concern on that basis.*

Response: This is a valid concern; however, the models are able to deal with the twice-daily tidal cycles and are useful tools to identify the impacts and develop mitigation plans. Together the hydrodynamic and water quality models simulate the complex estuarine dynamics, including hourly, daily and monthly tidal variations, salinity and dissolved oxygen dynamics, and spatial distribution within the system. The models are applicable over a wide range of conditions, including low and high river flows. The model grid incorporates surveyed bathymetry, extends from Clyo, Georgia (river mile 61, USGS stream gage 02198500) downstream through the harbor to Fort Pulaski (river mile 0), and out to 17 miles offshore in the Atlantic Ocean. It includes point and non-point pollution sources in the watershed. The model was calibrated and validated using observed data from 1997 to 2006 and has been designed to meet the expectations of the modeling technical review group that was established in the late 1990s with the goal of developing a valid, acceptable model for use with SHEP impact determination and mitigation development. Members of this group included representatives from the Corps, US EPA Region 4, USGS, Georgia DNR-EPD, South Carolina DHEC, and technical modeling experts tasked with developing the SHEP models. An independent technical review and uncertainty analysis have been conducted on the models and resulting comments and concerns were incorporated into the final version. Details regarding the hydrodynamic and water quality model development process, extensive reviews and uncertainty analysis can be found in the report titled "Development of the Hydrodynamic and Water Quality Models for the Savannah Harbor Expansion Project" dated January 2006, which is included in the Supplemental Materials to the Engineering Appendix. Letters of acceptance from agencies involved in the modeling technical review group can be found in the document titled "Correspondence Regarding Hydrodynamic & Water Quality Model Acceptability" which is included the Supplemental Materials to the Engineering Appendix.

1117-MM-21-EN02

Comment: *And from comments submitted by Chuck Watson (January 2011), " Peak daily salinity levels are often used for evaluating impacts to wetlands and are explicitly used for mitigation estimates such as water intakes for industrial and other uses. It should be noted that the model severely under predicts peak daily salinity levels in key locations, especially during low flow conditions which is when infrastructure and wetlands are most vulnerable.*

Response: The hydrodynamic and water quality models simulate the complex estuarine dynamics including hourly, daily and monthly tidal variations, salinity and dissolved oxygen dynamics, and spatial distribution within the system. The models are applicable over a wide range of conditions including low and high freshwater flow. The model grid incorporates surveyed bathymetry, extends from Clyo, Georgia (river mile 61, USGS stream gage 02198500), downstream through the harbor to Fort Pulaski (river mile 0), and out to 17 miles offshore in the Atlantic Ocean. It includes point and non-point pollution sources in the watershed. The model was calibrated and validated using observed data from 1997 to 2006 and has been designed to meet the expectations of the modeling technical review group which was established in the late 1990s with the goal of developing a valid, acceptable model for use with SHEP impact determination and mitigation development. Members of this group included representatives from the Corps, US EPA Region 4, USGS, Georgia DNR-EPD, South Carolina DHEC, and technical modeling experts tasked with developing the SHEP models. An independent technical review and uncertainty analysis have been conducted on the models and resulting comments and concerns were incorporated into the final version. Details regarding the hydrodynamic and water quality model development process, extensive reviews and uncertainty analysis can be found in the report titled "Development of the Hydrodynamic and Water Quality Models for the Savannah Harbor Expansion Project" dated January 2006, which is included in the Supplemental Materials to the Engineering Appendix. Letters of acceptance from agencies involved in the modeling technical review group can be found in the document titled "Correspondence Regarding Hydrodynamic & Water Quality Model Acceptability" which is included the Supplemental Materials to the Engineering Appendix.

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1117-MM-21-EV07

Comment: *To be effective in achieving management goals and consistent with the term's use, "adaptive management" (AM) must include specific criteria that apply to relevant field conditions in the impact area of the referenced project. As proposed in Appendix D, the only criteria for management success are the "goals" adopted for development and approval of the hydrologic and salinity modeling. According to experts describing the approach, AM should include reconsideration of goals, building, revamping and refining applicable models, and setting and calibrating performance standards unique to the project. [See excerpt below.]*

Response: The Monitoring Plan and Adaptive Management Plan would initially involve revamping and refining applicable models, and thereafter setting and calibrating performance standards. As discussed in Appendix D, the District, Cooperating Agencies, and the state natural resource agencies will review post-construction monitoring data to determine whether impacts are generally as expected or whether changes to the project and/or mitigation plan should be implemented.

The hydrodynamic and water quality models would be used in conjunction with actual field data to evaluate how the project is performing and the adequacy of the mitigation features. Even though the potential impacts of the project were evaluated under a range of circumstances, the conditions that are

experienced after construction will be somewhat different from those documented during its feasibility phase. Consequently, the hydrodynamic and water quality models will allow an evaluation of actual project performance under post-construction conditions [high, low, drought, or a combination thereof]. The performance of the hydrodynamic and water quality models [per se] would be assessed and the models recalibrated, if necessary. This would occur once during pre-construction monitoring and twice during post-construction monitoring. The objective of this model assessment is to improve the accuracy of the models to the maximum extent possible for impact evaluation purposes. Since post-construction field data would be available, use of the additional data points should increase the models' accuracy. At the end of this model assessment, the range of the models' uncertainty limits would be established.

The natural resource agencies will use the models after the post-construction assessment/calibration to evaluate the performance of the project and its mitigation features. Model runs would be conducted using conditions measured in the field and the results compared to monitoring data for the parameter being evaluated. If the model results are within the range of their established uncertainty limits, the project would be deemed to be performing as expected and no modifications would be implemented.

1117-MM-21-EV08

Comment: *We believe there is overwhelming expert opinion that the goals used in modeling alone do not provide sufficient performance criteria for reliable and effective use of AM in this project. Furthermore, in Appendix D there is no process proposed for calibrating or refining performance standards as needed and thus no basis for determining when and how these functions would be executed.*

Response: The Monitoring Plan and Adaptive Management Plan would initially involve revamping and refining applicable models, and thereafter setting and calibrating performance standards. As discussed in Appendix D, the District, Cooperating Agencies, and the state natural resource agencies will review post-construction monitoring data to determine whether impacts are generally as expected or whether changes to the project and/or mitigation plan should be implemented.

The hydrodynamic and water quality models would be used in conjunction with actual field data to evaluate how the project is performing and the adequacy of the mitigation features. Even though the potential impacts of the project were evaluated under a range of circumstances, the conditions that are experienced after construction will be somewhat different from those documented during its feasibility phase. Consequently, the hydrodynamic and water quality models will allow an evaluation of actual project performance under post-construction conditions [high, low, drought, or a combination thereof]. The performance of the hydrodynamic and water quality models [per se] would be assessed and the models recalibrated, if necessary. This would occur once during pre-construction monitoring and twice during post-construction monitoring. The objective of this model assessment is to improve the accuracy of the models to the maximum extent possible for impact evaluation purposes. Since post-construction field data would be available, use of the additional data points should increase the models' accuracy. At the end of this model assessment, the range of the models' uncertainty limits would be established.

The natural resource agencies will use the models after the post-construction assessment/calibration to evaluate the performance of the project and its mitigation features. Model runs would be conducted using conditions measured in the field and the results compared to monitoring data for the parameter being evaluated. If the model results are within the range of their established uncertainty limits, the project would be deemed to be performing as expected and no modifications would be implemented.

1117-MM-21-EV09

Comment: *Further justification for detailed performance criteria are provided in the memo adopted by the Stakeholder Evaluation Group (SEG) advising Georgia Ports Authority in reviewing the project and its impacts, cites as follows.*

Response: The Monitoring and Adaptive Management Plan provides a discussion of post-construction monitoring and the decision-making process that would determine if additional monitoring and/or mitigation measures are warranted. Purposely, the plan does not identify specific acceptability criteria for water quality or biological parameters that would trigger the need for additional monitoring or modifications to mitigation measures. The District believes it is preferable to defer to the judgment of agency technical experts rather than just use a specific parameter in determining when changes are necessary. Based on their experience, some resource experts may see a need to modify the monitoring and/or a mitigation measure, even though a specific [parameter] threshold has not been reached. Further, there is a concern about the potential cumulative/synergistic impacts of multiple parameters, even though the threshold limits had not been exceeded for any one parameter. If thresholds had been established for individual parameters, this flexibility would have been lessened. Appendix D in the FEIS contains some thresholds for specific parameters, which will be used to assess the project's performance.

Decisions about changes in the monitoring plan or mitigation features can be reached at any time during the post-construction monitoring effort. Monitoring data and reports would be made available to the resource agencies as soon as possible. Data from fixed water quality monitoring stations will be available on a near real-time basis [on-line]. The plan provides for an annual meeting [end of monitoring year] between the District and the natural resource agencies to discuss the data and any necessary changes. However, the schedule is sufficiently flexible to convene a meeting any time that concerns dictate. If the monitoring identifies impacts that are well outside of those predicted, consultation with the resource agencies will begin immediately. Corrective actions could range from a change in the monitoring plan to a cessation of construction activities until a problem is rectified.

Page 5

1117-MM-21-EV10

Comment: *Under NEPA, when a project must be modified to a substantive extent, a Supplemental EIS (SEIS) must be prepared, circulated, and approved. An acknowledged potential benefit of AM is that it offers the possibility of preventing a project or its mitigation from having such unacceptable impacts that a major modification would be necessary because – if the AM program is properly designed and administered – pre-emptive corrective action could be taken soon enough to prevent significant deviations from project goals. To help ensure this advantage is attainable, it would be useful, if not imperative, to predetermine in the AM procedures what level of field conditions and/or what extent of project modification would serve as the threshold for invoking the need for preparing a Supplemental EIS. Predetermining this threshold would provide the project managers a means for understanding in advance when corrective action is essential to avert the cost and delay of engaging in the SEIS process.*

Response: As directed in 40 CFR 1502.9 , agencies shall prepare and file a Supplement to the Final EIS if substantial changes are made in the proposed action that are relevant to environmental concerns or significant new circumstances or information develop relevant to environmental concerns which have bearing on the proposed action or impacts. No specific criteria (numerical) have been established for parameters (salinity, dissolved oxygen, etc.) that would trigger the need to prepare a Supplement to the

Final EIS. The District in coordination with its Cooperating Agency partners and the state resource agencies will assess the impacts of the SHEP and the effectiveness of the mitigation measures based on data developed during the various monitoring activities. A Supplement to the Final EIS could be required if impacts occur that are significantly beyond those predicted to occur and modifications to the mitigation feature cannot address those impacts. The Corps could implement the list of actions identified in Section 10.B of the Monitoring and Adaptive Management Plan without further NEPA coordination.

1117-MM-21-EV10

Comment: *In Appendix D, the decision-making approach requires that, for any modification in the project – including mitigation methods – agreement must be reached by all state and federal agencies sharing responsibility for approving the project. While we agree that significant modification of the project should require approval of all these parties (as well as the public), it is impractical to conduct effective adaptive management, which is intended to make incremental adjustments in project implementation and mitigation on a real-time basis. Such quick, timely response would be prohibited by the complexity and delay of reaching formal consensus among all these participating agencies. It is therefore essential that the AM process is structured to distinguish between major and minor modifications and to articulate corresponding management devices to provide the dual benefits of timely intervention for minor project modifications and the assurance of damage control and public accountability for major ones.*

Response: The Monitoring and Adaptive Management Plan would likely be refined as its implementation approaches. Extensive collaboration and timely decision-making is often a difficult combination to achieve. Your suggestion of differentiating between major and minor modifications may be one that could help the process.

1117-MM-21-EV11

Comment: *The estimates of cost for implementing AM, presented on page 34 of Appendix D, are arbitrarily based on certain percentages of the mitigation cost estimates for corresponding proposed mitigation steps. For several reasons, this is an unacceptable means for pre-determining a budget to support responsible adaptive management.*

Response: The cost estimates for possible adaptive measures presented in Appendix D were not developed in an arbitrary manner. These estimates are based on current information [price, equipment, and labor lists] of what modification[s] to a particular mitigation feature would cost [if changes become necessary]. There are no set criteria or standards for developing cost estimates for adaptive management of Corps civil works mitigation features. The cost estimates are to be viewed as a group. The total amount of money identified would be requested and made available for use on whatever modifications are identified as being warranted. The funding available for a given modification would not be limited to the amount identified in the FEIS.

Page 6

1117-MM-21-EV12

Comment: *Budget shortfalls for unanticipated mitigation needs, and/or the actual costs of valid AM functions, must be covered by a predictable and reliable source of funds. If this source is the local sponsor, Georgia Ports Authority (GPA), the amount of contingencies must be determined and provisions for ensuring their timely availability must be specified as part of the adaptive management plan. This AM plan and an acceptable, enforceable means for governing it must be set forth in the EIS for the EIS to be eligible for approval.*

Response: The State of Georgia has offered to place its share of the Adaptive Management Plan costs in an escrow account so they would be available if/when needed. Savannah District intends to request its share of those expenses as the dredging construction proceeds, so — similarly – those would also be available if/when needed. SHEP would remain in the construction program phase until all construction is complete [including all mitigation features].

1117-MM-21-EV13

Comment: *It is our understanding that the Corps originally proposed a budget for AM that was based on the entire project cost, not just mitigation. At some point, the basis for AM budgeting became only the mitigation budget, which is a small fraction of total project cost. To our knowledge, an explanation for this major revision in AM budgeting methodology was never provided.*

Response: The study evaluation period has been extended for quite a few years and the District does not remember an early proposal for Adaptive Management as you describe. When viewed together, the mitigation for the proposed project (including the monitoring and adaptive management) represent between 30 and 40 percent of the total project cost, well exceeding the normal levels seen in Corps civil works projects.

1117-MM-21-EV14

Comment: *While we enthusiastically support attempts to apply the principles of adaptive management in such major projects, primarily due to the complexity and uncertainty of how natural systems may respond to project activities, including mitigation efforts, in combination with a host of other systemic impacts on these systems caused by human activities, the approach outlined in Appendix D is substantively deficient and thus cannot ensure protection of the public interest.*

Response: The Corps disagrees that the Monitoring and Adaptive Management Plan is deficient. The Monitoring and Adaptive Management Plan took years to develop and involved extensive coordination with the Cooperating Agencies and state resource partners before consensus was reached. This plan follows a scientific, logical, measured strategy, viz., monitor project impacts [degree/kind], assess the effectiveness of the project's mitigation features, and modify mitigation measures if impacts are in excess of predictions.

1117-MM-21-EC05

Comment: *An alternative to the project with realistic possibilities is the creation of a single mega-port in the Southeast rather than accommodating multiple ports competing for the limited single-call traffic of mega-ships. Such multi-port competition will be inclined toward building overcapacity that cumulatively causes unnecessary environmental disruption at wasteful expense to the taxpayers. In spite of the crucial, policy-setting implications of the decision on this project and the requirement under NEPA for all reasonable alternatives to be considered, there has been no substantive assessment of the practical*

advantages of a single mega-port serving the entire Southeast, or any exploration of various criteria to be applied in locating such a facility. It appears that the assessment under this EIS was driven by an unsubstantiated assumption, if not a foregone conclusion, that continuing a trend of serially deepening every major commercial port is in the nation's best interest. Such an assumption is not explained or justified in the EIS and, given current shipping trends, seems extremely difficult to reconcile with reality.

Response: The EIS/GRR neither assumes nor states that the serial deepening of every major commercial port is in the Nation's best interest. Rather, the EIS/GRR is a study and reevaluation of a previously-authorized project in a manner that follows procedures established by the Congress, the Council on Environmental Quality, and the US Army Corps of Engineers. Congress has not authorized the Corps to evaluate the feasibility of improvements at deep-draft navigation projects on a system-wide basis. However, the EIS/GRR did perform a thorough alternatives analysis under NEPA, including other port locations in the South Atlantic region, as described in previous responses to comments (e.g., response to comment 765-DC-149-OC02).

From: rfcoa2003@comcast.net
To: CESAS-PD, SAS
Subject: COMMENTS CONCERNING DEEPENING SAVANNAH HARBOUR AND TEMPORARY REDUCTION OF FLOWS FROM THURMOND DAM
Date: Sunday, December 26, 2010 10:15:43 AM

Please use the data from the previous drought.

Please do not deepen the Savannah harbor

From: Gary Crider
To: CESAS-PD, SAS
Subject: Savannah harbor deepening
Date: Thursday, January 20, 2011 10:13:35 PM

Please improve your plans for the Savannah harbor deepening to better protect the environment.
Thank you.
Gary Crider

From: KATTESNABA51@aol.com
To: CESAS-PD_SAS
Subject: RIVER
Date: Tuesday, January 25, 2011 8:05:04 AM

NO NO TO DEEPING OF THE SAV RIVER. BIGGER IS NOT BETTER !
ITS ALL ABOUT THE ALMIGHTY DOLLAR. THE SHIPS COMMING IN THE PORT
NOW ARE BIG ENOUGH. MAYBE THE BIGGER SHIPS SHOULD FIND BIGGER PORTS.
SHARE THE WEALTH. SAVANNAH CAN NOT HANDLE BIGGER.

The two comments above oppose the Savannah Harbor Expansion Project. However these comments have raised no issues to be addressed.

The following comments are comments of support that have no issues to address.

From: McLeod Rominger
To: CESAS-PD, SAS
Subject: Deepening Savannah Harbor Federal Navigation Project
Date: Friday, November 19, 2010 10:39:42 AM

Dear Mr. Bailey:

Upon reviewing the EIS and the GRR, please add my name to the list in support of the Harbor deepening to -48 feet MLW. It is the belief of most of the business community that the benefits of the deepening to the region, the market, and the well being of our community at large will far outweigh the perceived damages to the river system.

Thank you.

McLeod Rominger

1st Vice-President

Propeller Club of the United States

Port of Savannah

112 Harlan Dr.

Savannah, GA 31406

912-604-0233

From: Coffman, Margaret G (Meghan)
To: CESAS-PD_SAS
Cc: Humes, Christopher Eugene (Chris)
Subject: Comments on the Savannah Harbor Expansion Project General Re-Evaluation Report (GRR) and Tier II Environmental Impact Statement
Date: Friday, January 07, 2011 6:19:25 PM
Attachments: 1_7_11 Letter Re Comments on SHEP.pdf

Dear Mr. Bailey:

Attached are comments of Mr. Chris Humes, director of LNG Operations for El Paso Corporation, the owner/operator of the Southern LNG terminal located near Savannah, Georgia in support of the Savannah Harbor Expansion Project (SHEP).

Thanks,

Meghan

Margaret G. Coffman

Counsel

Southern Natural Gas Company

569 Brookwood Village, Suite 501

Birmingham, Alabama 35209

(205) 325-7424 (office)

(205) 504-1953 (mobile)

****
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****

Martin Marietta Materials

42 Forbes Rd
Savannah, GA 31404
Ph: (912) 231-8130
Fx: (912) 231-8845

To: Mr. William Bailey
Attn: PD, US Army Corps of Engineers, Savannah District
100 West Oglethorpe Avenue
Savannah, Georgia 31401-3640
CC: Todd Wilson; Bill Jakubsen; Hope Moorer; Thomas Wright
Date: January 6, 2011
Subj: Savannah Harbor Deepening Project

Mr. Bailey,

First, we would like to thank the Army Corp of Engineers for their time and efforts on this project. You have done a great service to your community and I'm sure it will pave the way for a successful future for Savannah and beyond. I would also like to take this opportunity to introduce myself and my company and how the deepening project will affect us and our employees.

Martin Marietta Materials is the second largest supplier of stone aggregate in the United States and has been doing business in Georgia for decades. We operate 20 quarries and yards in the state, which includes a marine terminal in Savannah. At this terminal, we import limestone from Freeport, Grand Bahamas and granite from Nova Scotia, Canada for use primarily in the construction industry.

Our materials are used in the production of asphalt and concrete, and also in the construction of roads, bridges, schools, churches and countless other applications. We are also supplying the 150,000+ tons of armor and rip rap stone for the Revetment Project currently under construction on the north side of the river.

With the deepening of the harbor, we would be capable of bringing in larger ships and therefore reducing our costs while being able to more readily serve our customers. Our company and employees would also benefit from the growth the deepening is sure to encourage in this area.

So it is in our opinion, the deepening of the harbor is a necessity for both Savannah and Georgia.
Again, I thank you for your service and the time you have taken in listening to our thoughts.

Regards,

Brett L. Henderson

Brett L. Henderson
Martin Marietta Materials
Sales Rep – Savannah, GA
brett.henderson@martinmarietta.com

CBRE
CB RICHARD ELLIS

Terminus 100, Suite 1400
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Atlanta, GA 30305

404 923 1496 Tel
404 923 1593 Fax

blaine.kelley@cbre.com
www.cbre.com

Blaine Kelley, SIOR
Senior Vice President

CB Richard Ellis, Inc.
Industrial Brokerage Services
Global Supply Chain Practice

January 5, 2011

Mr. William Bailey
US Army Corps of Engineers, Savannah District
ATTN: PD
100 West Oglethorpe Avenue
Savannah, GA 31401-3640

Dear Mr. Bailey,

I am writing you today to express my full support of the Savannah Harbor Expansion Project (SHEP). This project is critical to the continued growth of metro Atlanta, Georgia and the Southeast Region. International trade and the movement of goods are essential to our economic prosperity. Increasing the capacity of Savannah's Port will enable increased trade throughout the region, promote future growth, and create jobs for Georgia.

As you know, the Port of Savannah has been the fastest growing container port in the country over the past decade and its continued success is critical to economic recovery in Georgia and throughout the Southeast. The Savannah River Navigation Channel must now be deepened from 42 feet to as deep as 48 feet to accommodate the new generation of deep-draft vessels that will dominate trade when the expanded Panama Canal opens in 2014. The efficiency gained by these larger ships will lower transportation costs of U. S. exports and will solidify Georgia's role as a national leader in international commerce and could shift as much as 25% of ocean trade flows from west to east coast. In Georgia alone, our ports support more than 286,000 jobs, contribute some $14.9 billion in income, $3.5 billion in federal taxes, and $2.8 billion in state and local taxes each year. Most importantly, more than $6 Billion worth of goods were shipped through Georgia's ports to counties within the Metropolitan Atlanta area. With SHEP, that will continue to grow.

As a real estate professional specializing in supply chain logistics, I believe the Savannah Harbor Expansion Project (SHEP) will provide a highly cost-effective return on investment to Georgia and the federal government. This expansion represents a once-in-a-generation opportunity to significantly enhance Georgia's economic prosperity. Based on the importance and the potential long range impact of this project for metro Atlanta, Georgia and the Southeast's economy, I fully support this project.

Sincerely,

Blaine Kelley
Senior Vice President
Global Supply Chain Practice

From: Joe Marchese
To: CESAS-PD, SAS
Subject: SHEP
Date: Friday, January 14, 2011 4:46:38 PM

Sir,

Please accept this email as my support of the Harbor Deepening project. As a contractor I am in favor of growth. As the father of three Georgian girls I am a steward of the future. As a LEED AP I believe that the studies show that this is an environmentally sound project. It has my unqualified support.

Thanks

joe

From: Voth, Rhoda
To: CESAS-PD, SAS
Subject: Support for Savannah Harbour Expansion Project
Date: Friday, January 14, 2011 3:51:40 PM

Dear Sir or Madame:

This email is written in support of the Savannah Harbour Expansion project.

I would like for my children to be able to find a job in Savannah one day, and believe this is a critical project for the economic development of Savannah. This will increase both blue collar and white collar demand for labor.

The larger ships are where the business is going to go in the future due to the economies of scale. We are one of the best port cities in the United States and would like to continue to be.

Please support this project.

Best regards,

Saga Forest Carriers Savannah

Rhoda Voth

Commercial Manager

Suite 900 - 7 E. Congress St. Savannah, GA 31410

Phone dir: +1 (912) 447 0270 | Mobile: +1 (912) 59 69529 | Telefax: +1 (912) 447 0850

rlv@sagafc.com | www.sagafc.com

JCB

JCB INC

#23

John Patterson
Chairman

Headquarters Savannah
2000 Bamford Boulevard
Pooler, Georgia 31322
Tel: (912) 447-2240
Fax: (912) 447-2164
email: john.patterson@jcb.com
www.jcb.com

December 15, 2010

Mr. William Bailey
ATTN: PD, US Army Corps of Engineers, Savannah District
100 West Oglethorpe Avenue
Savannah, GA 31401-3640

Dear Mr. Bailey:

I want to make you aware of my support for the Savannah Harbor Expansion Project (SHEP). As the Chairman and CEO of JCB, I believe this expansion project is paramount to our continued success as a Savannah based manufacturer.

We as a company are heavily reliant the Georgia Ports for the import and export of our products. The proximity and strength of the Georgia Ports were primary factors in JCB's decision to base our North American headquarters here in Savannah, GA. The SHEP will allow larger, deeper draft ships to call on the Port of Savannah. The economies of scale offered by Post Panamax ships will result in an average of 17% cost savings to exporters, and importers, such as JCB, when compared to the operating costs of Panamax vessels. At a time when the costs of doing business are continually in flux, a savings of this size is critically important to our business.

After reading the study documents released by the Army Corp of Engineers, I am confident that proceeding with the Savannah Harbor Expansion Project is the right thing to do. I am in full support of the SHEP and deepening the harbor from its current 42ft depth to 48ft.

Sincerely,

John Patterson
Chairman/CEO

From: Matt O'Connor
To: CESAS-PD, SAS
Subject: Savannah Harbor Expansion Project
Date: Saturday, December 04, 2010 9:18:38 AM

Mr. William Bailey,

The deepening of the port of Savannah is critically important for the expansion of commerce for Rockline Industries. We completely support the initiative and welcome a speedy implementation. If you wish to talk further about the effects of this expansion, please do not hesitate to give me a call and we can discuss.

Regards,

Matt O'Connor

Vice President of Logistics

Rockline Industries

920.451.3510

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Viruses: This email message has been scanned for viruses by Mimecast.

Please consider the environment - do you really need to print this email?

From: byron@shipperservices.com
Subject: Savannah Deepening project
Date: Saturday, December 04, 2010 2:46:53 PM
Attachments: sigimg1

I writing this email as a vote of support for this project. It is long overdue and will be at a critical juncture when underway due to the widening of the Panama canal completion scheduled for 2014. Decisions will be made by shippers and carriers on port choices and those choices will depend largely on port capability. Th business of the Port, the State and the entire southeast hang in the balance, not to mention small business owners such as myself who are dependant upon efficient port operations.

Byron X. Hock, Partner
172 Blue Heron Bluff
Dawsonville, Ga. 30534
(P) 706-531-1546
(F) 706-531-1547
(C) 706-531-6642

From: jkaufman@GAPORTS.COM
To: CESAS-PD, SAS
Subject: Support of Savannah Harbor Expansion Project
Date: Wednesday, December 08, 2010 4:30:02 PM

To Whom It May Concern:

I am writing in the utmost support of the Savannah Harbor Expansion Project (SHEP). I have been a resident of Savannah, GA for the last six years, and an employee of the Georgia Ports Authority for the last seven months.

I have been hearing about this project in the community for several years and have always been extremely supportive of this initiative, as this is a vital step to ensure our ports remain competitive; not to mention the tremendous financial impact it will have not only in our local community, but for the entire state of Georgia.

We are extremely excited about what the future will bring when the river is deepened. Again, I express my complete support for this crucial step for Georgia's future.

Thank you for your time,
Julie Kaufman
Trade Development, Georgia Ports Authority

P Think green! Please leave it on the screen.

Julie Kaufman
Trade Development

Phone 912.964.3824 | Fax 912.964.3869
email: jkaufman@gaports.com <mailto:jkaufman@gaports.com> | www.gaports.com <http://www.gaports.com/>

Physical Address:
Georgia Ports Authority
2 Main Street
Garden City, Georgia 31408 Mailing Address:
Georgia Ports Authority
P.O. Box 2406
Savannah, Georgia 31402

From: byron@shuportservices.com
To: CESAS-PD, SAS
Subject: Savannah deepening project
Date: Saturday, December 04, 2010 3:24:59 PM
Attachments: sjamq1

I writing this email as a vote of support for this project. It is long overdue and will be at a critical juncture when underway due to the widening of the Panama canal completion scheduled for 2014. Decisions will be made by shippers and carriers on port choices and those choices will depend largely on port capability. The business of the Port, the State and the entire southeast hang in the balance, not to mention small business owners such as myself who are dependant upon efficient port operations.

Byron X. Hock, Partner
172 Blue Heron Bluff
Dawsonville, Ga. 30534
(P) 706-531-1546
(F) 706-531-1547
(C) 706-531-6642

From: Matt Huey
To: CESAS-PD_S&S
Subject: Savanah Harbor Deepening Project
Date: Monday, December 06, 2010 9:32:33 AM

Dear Sir,

As a citizen of Georgia and one of the thousands of people who's job is tied to the port of Savannah I urge you to support the deepening of the harbor. The warehousing, truck, rail, and distribution network that currently flow through the port cannot be recreated without significant economic impact to the southeast and, some would argue, the entire country. One thing to keep in mind is the impact the opening of the Panama Canal will have on the flow of cargo to the east coast. The port of LA/Long (the largest terminal complex in the US in terms of volume) beach have implemented programs like Pier Pass, Alameda Corridor Tax, Clean truck that add from $150 to $200 in cost to each container that move through the terminal. Oakland and Seattle are implementing similar program. Importers and exporters are targeting east coast ports to avoid these costs. Combine projected population growth in the southeast with the economic benefits of the larger vessels and the cost savings associated with shifting from the west coast the need to deepen the Savannah terminal becomes clear. I urge you to support this initiative.

Thanks and best regards,

Matt Huey

From: GVANBRUNT@GAPORTS.COM
To: CESAS-PD_SAS
Subject: Savannah Harbor Expansion Project
Date: Monday, December 06, 2010 11:15:20 AM

Dear Mr. Bailey,
I am sending you this email to express my Support for the Savannah Harbor Expansion Project. I believe that bringing the Harbor levels to a depth of 48 feet is crucial to the future success of the Port of Savannah & the surrounding economies not only in Georgia, but also in South Carolina, & Northern Florida, too.

Please do not hesitate to contact me if further information or support is needed.

Best Regards,
Greg Van Brunt
P Think green! Please leave it on the screen.

Greg Van Brunt
Cargo Sales Representative

Phone 912.963.6996 | Cell 912.247.5912 | Fax 912.964.3869
email: gvanbrunt@gaports.com <mailto:gvanbrunt@gaports.com> | www.gaports.com
<http://www.gaports.com/>

Physical Address:
Georgia Ports Authority
2 Main Street
Garden City, Georgia 31408 Mailing Address:
Georgia Ports Authority
P.O. Box 2406
Savannah, Georgia 31402

From: Carl Varner
To: CESAS-PD, SAS
Subject: RE: Savannah Harbor Expansion Project (SHEP) Update
Date: Monday, December 06, 2010 11:58:53 AM

Dear Mr. William Bailey,

We are a mid-sized Agriculture exporting company. We export between 20-40,000 containers annually. We work closely with Ga Ports and maintain a Transloading facility in Ga.

We are very excited about the recent news with regards to the expansion. We feel it is imperative that the facilities at the Ga Ports be ready to better handle the big ships once the new Panama Canal locks open up.

Sincerely,

Carl Varner

Contract Manager

www.fornazor.com

www.tradewindsintl.us

757-392-0104 Tel

From: JTHOMAS@gaports.com
To: CESAS-PD, SAS
Subject: Savannah Harbor Deepening
Date: Tuesday, December 07, 2010 1:46:06 PM

Dear Sir:

I am a seven year employee with the Georgia Ports Authority, my name is Jeannette Thomas.

I would like to explain to you how much the harbor deepening project at the Savannah River means to my family & me. I am second
generation GPA and my family is fourth generation ILA. The Savannah River has provided and is providing us with meaningful & lasting
employment opportunities.

In my seven years with the GPA, I have seen the awesome level of growth first hand. I am in the Communications department and with
every milestone reached my team and I have been actively involved.

The GPA is not only a dynamic economical force because of the jobs we support or the contributions to the state income & revenue,
we are a pillar in the community. I have had careers with several Fortune 500 companies, but none can compete with the GPA's level
of caring.

I am very proud to call the Georgia Ports Authority my employer and I can assure you we will care for the harbor after deepening
to 48ft even more so than at 42ft because we are a company with environmental integrity.

Thank you for the opportunity to sing my praises and show my pride for and of the GPA!

Jeannette Thomas
Georgia Ports Authority
Support Services Supervisor

From: Schnede, Klaus
To: CESAS-PD, SAS
Subject: Savannah Harbor Expansion Project
Date: Wednesday, December 08, 2010 9:06:57 AM

Dear Mr. Bailey:

This email is in support of the proposed Savannah Harbor Expansion Project. Eastman Chemical Company is an export centric company with focus on the east-west trades, i.e. shipping to Asia and Europe mostly.

Over time the port of Savannah developed as the "main gate" to Asia and as such we are very interested in seeing the port of Savannah continue to grow and expand to be able to accommodate larger than current vessel size in the future.

As we expect Eastman to grow in the future, we will have a need to be able to ship larger volumes via the port of Savannah. It is healthy to see two ports compete with each other, i.e. Savannah and Charleston over export/import volumes and it is in our interest to keep competition alive, see the port of Savannah to be able to grow and expand its current facilities. Without SHEP Savannah competitiveness will be in jeopardy which certainly is not in our interest!

We appreciate all the work that's being done on this project and look forward to its progress.

Happy Holidays and a great New Year.

Regards,

Klaus Schnede
Eastman Chemical Company
Manager, Marine-Air-Facilities Procurement
Email: kschnede@eastman.com
Phone: 423-229-4691
Cell: 423-967-3694
Fax: 423-224-7351

From: PYARBOROUGH@gaports.com
To: CESAS-PD, SAS
Subject: SHEP support
Date: Wednesday, December 08, 2010 11:57:25 AM

Dear Mr. William Bailey,

This letter is to manifestate my personal commitment and support for this project of national interest to the U.S Army Corps of Engineers,Secretary of the Army, Department of Commerce, Department of the Interior, Department of the Army and the Environmental Protection Agency for the deepening of the Savannah Harbor to 48 ft. at low water.

As you know , the U.S. Army Corps of Engineers is funded and tasked by Congress to provide information
to our Senators and House of Representatives offering detailed analysis of such opportunities in the Corp's
General Evaluation Reports; therefore, ensuring that international commerce has a safe and adequate access
to ports throughout North America. In a decade long, $40 million dollar study and with extensive communication
and collaboration with all mandatory agencies, the U.S. Army Corps of Engineers economic and environmental
model has undoubtedly confirmed the need to fund and complete this project with immediate financial insistence
from Congress and the President.

At this occasion, we must prepare to accommodate the larger vessels navigating the Panama Canal in 2014.
This project, if correctly implemented, will assist the nation in successfully meeting the National Export Initiative
created by Executive Order of President Obama, as well as secure the current and future Statewide employment
base in Georgia.

Respectfully submitted,

Paul A. Yarborough, Sr.

From: DGRONE@gaports.com
To: CESAS-PD_SAS
Subject: Support for SHEP
Date: Wednesday, December 08, 2010 12:46:00 PM

Dear Mr. Bailey,

I support the Savannah Harbor Expansion Project and the need for a 48 foot channel depth. The success of the project will have positive results for the state of Georgia in terms of commerce, job creation and much needed revenue generation.

I express my support, not only as an employee of the GPA, but as a private citizen.

Thank you kindly,

Danica Grone

Danica Grone
Manager of Port Relations
Georgia Ports Authority
P.O. Box 2406
Savannah, Georgia 31402
U.S.A.

Tel: 912.964.3885
Cel: 912.657.0444
Fax: 912.964.3921

From: MTROUGHTON@gaports.com
To: CESAS-PD_SAS
Subject: Sign me up as a supporter of the harbor deepening
Date: Wednesday, December 08, 2010 1:53:24 PM

Thanks
Regards,
Mark D. Troughton
Global Accounts Executive
Georgia Ports Authority
800-342-8012 Ext. 3958
Phn: 912-964-3958
Fax: 912-964-3869

From: Ron Barnett
To: CESAS-PD_SAS
Subject: Why Deeper
Date: Friday, December 10, 2010 10:50:49 AM

It is said that the back bone of this country is small business if you stand at the gate of the port and look at the door of the trucks running in out of the port is thousands of small business. needing to grow. If the river is deeper it will make way for larger ships to load and unload at the Savannah, GA Port. This is revenue for Garden City, GA, The State of GA and every small Business in GA, SC, FL and all other states that will take the advantage of this opportunity. With our States Unemployment so high this should be done without question.

Thank you ofr your time.

Ron Barnett
ceo
RW BARNETT
Trucking and Logistics Company
rwbarnett@rocketmail.com

Cell 770 468 0797

From: JBLOESS@gaports.com
To: CESAS-PD_SAS
Subject: SHEP Project
Date: Wednesday, December 08, 2010 4:33:12 PM

December 8, 2010

Mr. William Bailey
ATTN: PD, US Army Corps of Engineers, Savannah District
100 West Oglethorpe Avenue
Savannah, GA 31401-3640

Re: SHEP Project

I am sending you an email concerning the importance in which the SHEP Project has on both my personal livelihood and the overall economy. The depth needed to keep the Georgia Ports competitive in global trade is essential for our entire community as well as for our future generations. Studies reveal that this project has a five to one benefit cost ratio that will allow not only the Georgia Ports but the city, county, state, region and the entire nation to prosper. I request that you please press forward with this extremely important and worthwhile investment in a timely manner so that our ports and ecocomy continue to grow. Failure to do so will jeopardize our future.

Best regards,

John Bloess

From: Ruehn, Elfriede on behalf of Nardi, John
To: CESAS-PD, SAS
Subject: Savannah Harbor Expansion
Date: Wednesday, December 08, 2010 4:59:08 PM
Attachments: deepening of savannah harbor support letter to Army Corps of Engineers december 7, 2010.doc

---

Please find attached a copy of our letter to Mr. William Bailey, US Army Corps of Engineers Savannah District pertaining to this project which we fully support.

Kind regards,

John J. Nardi

Senior Vice President Corp. Operations

Hapag-Lloyd (America) Inc.

399 Hoes Lane

Piscataway, NJ 08854

732-885-6107

jjn@hlag.com

From: dalphe32@aol.com
To: CESAS-PD, SAS
Subject: PD, US Army Corps Of Engineers, Savannah District
Date: Wednesday, December 08, 2010 7:56:12 PM

My fiancee is a Longshoreman, I am a Supervisor at Savannah Hilton head International Airport. He told me about the Harbor being deepening. I support this and I think this will be very beneficial to Savannah and Georgia. I vote YES, YES, YES, YES!!!!!

From: Richard Mike
To: CESAS-PD, SAS
Subject: PD, US Army Corps of Engineers, Savannah District
Date: Wednesday, December 08, 2010 7:58:15 PM

I am a Longshoreman from local 1414 and I vote YES, YES for the Harbor deepening. See you on the 15th!!!!!

From: Harper, Susan
To: CESAS-PD, SAS
Subject: port deepening project
Date: Thursday, December 09, 2010 9:11:02 AM

Dear Mr. Bailey,

In such an unstable economic time, anything we can do to bring commerce into our community, and area, can only be viewed as a gain.

I urge you to give as much weight to the economic benefits of this project as possible, as I am sure the environmentalists will be very vocal.

Thank you for helping keep jobs in Savannah!

Sincerely,

Sue Harper

From: Georgina Geremia
To: CESAS-PD_SAS
Cc: GVANBRUNT@GAPORTS.COM
Subject: Dec 15th Work Shop
Date: Thursday, December 09, 2010 9:41:41 AM

Dear William,

Thank you for the invite...However I will not be able to attend.

I will keep in contact with Greg for any future working with the GA Ports, as we just signed a deal to purchase Oxford Industries based in Lyons Georgia who imports into Savannah and rails to Atlanta.

Kind regards, and Happy Holidays.

Georgina Geremia

Director of Logistics

cid:image003.jpg@01C98C44.0F233480

1450 Broadway, 5th Floor

New York, New York,10018

Direct line (646) 839 7552

Mobile (917) 545-8067

From: Camille Russo
To: CESAS-PD, SAS
Subject: Channel Deepening
Date: Thursday, December 09, 2010 11:37:12 AM

Dear Corps of Engineers,

I am writing to express my support for the deepening of the Savannah River channel to accommodate the larger vessels that will be coming through the Panama Canal upon its completion. I am a partner in a business started and based in Savannah called Alta Innovations. We build distribution networks for medical equipment that is new to the market, and oftentimes we serve as the import site and logistics coordinator for our foreign vendors. Our business is fast-paced, and constant innovations in the medical industry require us to be nimble. Our proximity to the Georgia port in Savannah plays a key role in our effectiveness. Please do everything within your power to ensure that our port stays at the forefront of the shipping industry by not limiting the types of ships that can call on it.

Sincerely,

Camille Russo
Partner
Alta Innovations
www.alta-innovations.com
912-344-5440

From: Barri Marshall
To: CESAS-PD, SAS
Subject: SHEP
Date: Thursday, December 09, 2010 2:13:02 PM

The deepening of the harbor would be a great thing for Savannah. Let's get and keep more money for our beautiful city!

Thank you

From: Michael J Carbo
To: CESAS-PD, SAS
Subject: Savannah Harbor Expansion Project (SHEP)
Date: Thursday, December 09, 2010 2:49:52 PM

To the attention of:

Mr. William Bailey

PD, US Army Corps of Engineers, Savannah District
Savannah, GA 31401-3640

Sir,

Our company is a small electrical engineering service firm located in Savannah, Ga. We have been serving this area for over twenty years and over time have seen our customer base erode by virtue of companies shutting down completely or cutting production as much as one half. We have had to search for our work outside the 100 mile radius we set up years ago. Expansion and growth of the Georgia Ports by implementing the Savannah Harbor Expansion Project will bring more jobs, more ships, and bottom line more revenue to our local economy. More business for the ports means more business for many local contractors like ourselves. Please take my vote and count it for support of 48 feet of opportunity.

Sincerely,

Michael J. Carbo

EEU Inc

912-232-7402 Office

912-667-8218 Cell

From: Charlie Porter
To: CESAS-PD, SAS
Cc: chawkins@gaports.com; cholt@gaports.com
Subject: SHEP
Date: Thursday, December 09, 2010 3:45:57 PM

Mr. William Bailey

ATTN: PD, US Army Corps of Engineers, Savannah District

100 West Oglethorpe Avenue

Savannah, GA 31401-3640

Dear Mr. Bailey,

Having been in the transportation business for over 30 years and either worked for, with or along side of trucking companies, steamship lines, customhouse brokers , freight forwarders and warehouses,

I can tell you that the need for deepening the Savannah River is essential to the continued leadership of Savannah and the state of Georgia in the economic world as well as well as the economic growth of the Southeastern part of the United States.

Manufacturers and retailers have had to cut costs in all areas to keep up with this global economy that we find ourselves living in today. After all labor costs have been cut as far as they can, transportation costs are the next line item that has to be kept competitive to survive either in an export or import industry. With the carriers moving to larger vessels, they will have to bypass any port that cannot handle them. This will increase transportation costs for all shippers and receivers of cargo in the entire Southeastern area of the United States. When costs go up, demand goes down and the eventual market falling begins a chain of economic dominos falling making our economy worse than it already is today.

Georgia and the leadership of the Port of Savannah have done a superlative job of surviving the present and preparing for the future growth of our area of this country. The only " leg" left to insure survival and growth in the future is the deepening of the Savannah River. During a recent conference, I attended in Atlanta, leaders from the port , Mayor of Atlanta, CEOs of leading retailers and shippers as well as Presidents of Atlanta and Georgia Chambers of Commerce attested to the dire need, to their areas, for the deepening of the river. Our economic survival is dependent on the river bed being lowered to 48 feet.

Being in the Corps, you have seen all the impact reports done over the last several years. All seem to indicate a minimal, if any, adverse effect on our environment. A failure to lower the river bed would have a catastrophic impact in the loss of thousands of jobs both directly and indirectly if the river bed is not lowered. This would be a direct result of larger steamship carriers bypassing the Port of Savannah. Even today ships have to enter and leave according to the prevailing tide. This situation will only get worse and the steamship lines will have to eventually bypass the port of Savannah.

As you may know, the lowering of the river bed would not be complete until 2014 to coincide with the widening of the Panama Canal. Time is also critical for our economy and all of the workers in the South East. We are dependent on your unwavering support.

Thank you for your time and consideration as well as your support.

Best regards,

Charlie Porter

Supply Chain Management, LLC

437 Telfair Road

GArden City , GA 31415

PH: (800) 433-0588

FX: (912) 443-5036

CELL: (912) 220-1520

From: Bryan Bailey
To: CESAS-PD_SAS
Subject: Support For the River Deepening Project
Date: Thursday, December 09, 2010 3:47:50 PM

To whom it may concern,

As a GA resident, and resident of Savannah, I feel that the deepening of the Savannah River to accommodate the larger ships coming through the newly deepened Panama Canal is the most important project to impact the economy of our city and state. We need to be able to compete with the other ports along the east coast. The bigger ships are coming, and if we can't handle them, they will simply go elsewhere. This was an issue that influenced how I voted in this past midterm election.

Thank you for your time

Steve Gerard

From: ansley harrison
To: CESAS-PD, SAS
Subject: Harbor Deepening
Date: Thursday, December 09, 2010 11:23:18 PM

I for one support the project. I can tell you first hand how important the project is. I work at the GPA as a Crane operator and I see first hand of how many jobs this company creates. Please whatever you do make this lifelong dream for me my family and my coworkers a reality

From: Eric Holmes
To: CESAS-PD, SAS
Subject: Harbor Deepening Project
Date: Friday, December 10, 2010 10:09:18 AM

The SHEP project in Savannah is of vital importance for the economic future of Georgia. Please move forward with all haste to keep Georgia Ports up to speed to handle the changing shipping needs of the World Market.

Eric Holmes
Executive Vice President & COO
Howard Sheppard, Inc.
eric@howardsheppard.com

From: Al Dallas
To: CESAS-PD, SAS
Subject: Importance of the SHEP
Date: Friday, December 10, 2010 10:14:28 AM
Attachments: image001.png

To Whom It May Concern:

The Savannah Harbor Expansion Project is of absolute importance to this region. The State of Georgia and the entire Southeast region has continued to increase its investment in the logistics community. The number of families that are dependent of this vibrant industry sector continues to grow as a result of the State's commitment to making the necessary infrastructure improvements to support this growth. The SHEP will be a monumental step in continuing the work that many have done and support over the last few decades.

Thank you for your time and consideration

Al Dallas

Client Relations Manager

1511 4-H Club Road

Augusta, GA 30906

Cell: (404) 538-8988

Phone: (706) 724-0106 Ext. # 144

Fax: (706) 793-8520

Email: Al@rbwlogistics.com

Website: www.rbwlogistics.com

From: Pratt Summers
To: CESAS-PD, SAS
Subject: SHEP - Savannah Harbor Expansion Project
Date: Tuesday, December 14, 2010 4:22:24 PM

To Whom it May Concern –

I would like to register my support for the Savannah Harbor Expansion Project. The true value of the Port of Savannah to the local and national economy is immeasurable. Over the past fifteen years, Local, State, Federal and private funds have been spent to develop the Port of Savannah into the fastest growing and third largest port in the United States and a true economic engine with the capacity for continued growth. Without the development of the harbor to accommodate post-panamax vessels, this effort will be relegated to history. It is imperative that we deepen the harbor for the continued growth of the Southeastern economy.

Best Regards,

T. Pratt Summers

Assistant Vice President, Operations

Colonial Group, Inc.

PSummers@ColonialGroupInc.com

(912) 443-6950

From: Lee Hardeman
To: CESAS-PD, SAS
Subject: Savannah Harbor Expansion Project
Date: Friday, December 10, 2010 11:10:59 AM

We STRONGLY support the project to keep Savannah competitive. If this project is not completed by 2014, the "post Panamex" vessels will not be able to call Savannah, putting our port at a great disadvantage. Your favorable consideration is essential to the economic well-being of our area.

Sincerely,

Lee Hardeman, President
Lee Hardeman Customs Broker, Inc.
Direct: 404-477-3452
PH: 404-361-1114 ext. 452
FAX: 404-361-1013
email: LeeH@LHCB.com

CELEBRATING 24 YEARS OF SERVICE TO OUR CUSTOMERS!

Physical address:

277 Southfield Parkway, Suite 135
Forest Park, GA 30297

Please visit our website at www.lhcb.com

<http://www.lhcb.com/> All transactions subject to our terms and conditions posted on our website.

IMPORTANT REMINDER: The ISF ("10+2") penalty phase has been implemented. Please also be reminded that importers are required to transmit accurate and complete ISF information to CBP at least "24 hours prior to the cargo being laden on the vessel". This means we must have the information at least 3 working days prior to vessel loading. You should contact us immediately if you have any questions or uncertainty of the requirements.

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From: Randall Simons
To: CESAS-PD, SAS
Subject: The Savannah Harbor Expansion Project
Date: Friday, December 10, 2010 1:10:46 PM

Mr. William Bailey

PD, US Army Corps of Engineers, Savannah District

100 West Oglethorpe Avenue

Savannah, GA 31401-3640

Please consider the positive impact that the SHEP will have on our community and the future of our State.

I am in support of this project.

Teamwork,

Randy Simons

Facilities Manager

IKEA DC 490

202 Little Hearst Parkway

Port Wentworth, GA 31407

Ph: (912)966-1490 x 2508

Fx: (912)966-1419

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immediately at 1-912 966-1490 extension 2508 or return it promptly by mail.

From: BWILES@avtron.com
To: CESAS-PD_SAS
Subject: SHEP Project in Georgia
Date: Friday, December 10, 2010 2:29:45 PM

To Whom it May Concern,

I wanted to e-mail my support of the SHEP project for Georgia. This is a very important project that will offer new jobs for Georgia and surrounding areas. AS the US participates in the global market, port growth will be key to that market. Also, with the opening of the Panama canal, the East Coast will become more of a player in cargo traffic.

States like Florida will also benefit as it will bring more opportunities to the Southeast.

Please support this project and continue the growth of the Southeastern United States.

Avtron Crane Systems

Barry W. Wiles, PE
Industry Manager - Crane Systems

Office: (813) 995-2448
Mobile: (216) 533-3525
Fax. (216) 750-5007

From: Ed Thomas
To: CESAS-PD, SAS
Subject: SHEP
Date: Sunday, December 12, 2010 7:19:47 PM

I am in full support of the Savannah Harbor Expansion Project. This is necessary to keep commerce in the Southeastern United States growing now and in the future.

Please try to move forward with this project as soon as possible.

Ed Thomas

Thomas Agency, Inc.

PO Box 531142

Birmingham, AL 35253

205-951-3100 o

205-951-3005 f

205-253-7633 c

www.thomasagency.com <http://www.thomasagency.com>

From: bowenrebo@comcast.net
To: CESAS-PD, SAS
Subject: SHEP Project
Date: Monday, December 13, 2010 8:31:16 AM

It would be in the best interest of every person in Georgia and the south east for the Ga Ports Authority to be able to get the harbor deeper to accommodate the larger vessels. The Ports provides and supports more good paying jobs than any other employer in the region. It needs to be able to compete when the Panama Canal gets larger they have invested every resource to maintain its competitive role in the shipping industry they have purchased the largest and fastest ship to shore cranes in the world and have already proved that they can still be productive even in the most challenging economies in decades. Thank you for your time.

Thanks Again:

Gerald Bowen

1455 Camellia Dr.

Pembroke, Ga. 31321

912-653-2469

From: MRUSHING@gaports.com
To: CESAS-PD_SAS
Subject: Savannah River Deepening
Date: Monday, December 13, 2010 9:12:34 AM

The Savannah river deepening is very important to our local community and the whole state of Georgia. The first and most important contribution from this project is jobs. In an atmosphere of layoffs and a sinking economy, good jobs would spur the Georgia economy and help to take us out of the Great Recession.

The second most important contribution from this project is jobs. Deepening the harbor would insure that the ports of Savannah would stay competitive or even exceed other ports as the foremost port of the coast. Larger ships would be able to enter our ports to discharge their larger cargos and more of our Georgia products could be loaded on these vessel. If the river is not deepened, our ports would become a less desirable place for this new cargo and even our existing cargo would go to rival locations.

The third most important contribution from this project is jobs. Larger ships, carrying and loading more cargo, decreases the transportation charges. We all know that by decreasing costs, more shippers would import and export more cargo. With more shippers and more cargo, comes more jobs all over the state and greater prosperity for all the citizens of Georgia.

There is also an added benefit for the state and the federal government that these institutions love more than all others, more taxes to levy to help finance much needed projects like roads, education, and reducing debt.

Thank you for your assistance in this matter in advance
Lead Billing Coordinator
912-966-3622
FAX: 964-3629
E-Mail: mrushing@gaports.com

From: Deutsch, Doris J SAS
To: McIntosh, Margarett (Mackie) SAS
Cc: Bailey, William G SAS; Garrett, Thomas A SAS; Oddi, Peter A SAS
Subject: FW: Extension of Comment Period Sav Harbor Expansion Draft Envir Impact Statement (UNCLASSIFIED)
Date: Monday, December 13, 2010 9:58:11 AM
Attachments: Extension of Comment Period Sav Harbor Expansion Draft Envir Impact Statement.msg

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Classification: UNCLASSIFIED
Caveats: FOUO

This action should have had a suspense on it. Please prepare a response by Wed, 15 Dec.

Thanks,
Doris

Doris J. Deutsch
Executive Assistant
Savannah District, US Army Corps of Engineers.
(912)652-5122, fax (912)652-5222.

Classification: UNCLASSIFIED
Caveats: FOUO

From: Joe Tyre
To: CESAS-PD_SAS
Subject: SHEP Project
Date: Monday, December 13, 2010 10:48:25 AM

The Georgia Ports Authority has for a number of years been a customer of our shop. This project will help the families of not only Ga Ports but families that depend on the support businesses such as ours. We welcome any opportunity that Ga Ports has to expand their business. The effects of that expansion will be felt throughout this community. In this economy any opportunity to stimulate the businesses associated with Ga Ports will be approached with open arms. In short we here at TAW Savannah Service Center see this project as a much needed opportunity to continue to support the families that are employed by this facility and it has our full support.

Regards,

Joe Tyre | Outside Sales Representative
TAW Savannah Service Center
1753 Old Dean Forest Road | Pooler, GA 31322
tel: 912-966-1020 x2500 | fax: 912-966-5632 | cell: 912-210-7451
Joe.Tyre@tawinc.com | http://www.tawinc.com

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From: Stephanie Wagner
To: CESAS-PD, SAS
Cc: vickie.brown@accellatrans.com
Subject: SHEP
Date: Monday, December 13, 2010 11:31:31 AM

Mr. William Bailey,

I am writing to express my support for the Savannah Harbor Expansion Project (SHEP). I operate a 3rd party warehouse about 1.5 miles from the port of Savannah and I also operate a trucking agency named Falcon Transport. Between these two companies, we are directly responsible for employing directly or through subcontractors about 70 people. Our business success is highly dependent on the growth and continued competitiveness of the Georgia Ports Authority. I know that SHEP will allow the GPA to continue to be a first ranked port. If not completed, we won't continue to compete on a national scale and the GPA will suffer which will in turn hurt the my 2 businesses as well as the local maritime community at large and in effect the regional and state economy will suffer resulting in more job losses. Please ensure SHEP moves forward so that our community can continue to grow and prosper. Thank you for your consideration.

Thank you and Best Regards,

Stephanie Wagner, Vice President

Accellatrans Warehousing and Logistics, 6030 Commerce Boulevard, Savannah, Georgia 31408

Office: (912) 966-1858 ext 205 | Fax: (800) 652-0403 | Email: Stephanie.Wagner@Accellatrans.com <mailto:Stephanie.Wagner@Accellatrans.com> | Website: www.Accellatrans.com <http://www.accellatrans.com/>

About WERC http://www.atlmaritime.org/images/AMAshipwheel.jpg

From: Steve Waters
To: CESAS-PD, SAS
Subject: Harbor Widening
Date: Monday, December 13, 2010 12:26:21 PM

This is of the utmost importance. We need this project now to stay competitive. This must not be delayed any longer.
Our economy in Georgia needs this. Georgia needs jobs.

Steve R. Waters, RLS

Phone: 912.354.4626
FAX: 912.354.8617
E-Mail: swaters@hgbd.com
Web: www.hgbd.com <http://www.hgbd.com/>
FTP: files.hgbd.com <http://files.hgbd.com/>
Hussey, Gay, Bell & DeYoung
Post Office Box 14247 • Savannah, GA • 31416

From: Thompson, Ryan
To: CESAS-PD, SAS
Subject: Georgia Ports Authority - SHEP
Date: Monday, December 13, 2010 12:36:26 PM

I am sending this email in support of the Savannah Harbor Expansion Project.

Ryan P. Thompson
Landscape Architect
Thomas & Hutton
www.thomasandhutton.com <http://www.thomasandhutton.com/>
thompson.r@thomasandhutton.com <mailto:email@thomasandhutton.com>
(P) 912-721-4135 (F) 912-721-4235 (C) 912-547-5724

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From: Vickie Brown
To: CESAS-PD, SAS
Cc: Stephanie.Wagner@Accellatrans.com
Subject: ATTN: PD, US Army Corps of Engineers, Savannah District
Date: Monday, December 13, 2010 1:18:11 PM

Good Afternoon Mr Bailey,

I am writing you in regard to SHEP. I have been in the transportation business for over 30 years. I have never seen as an important issue come up as the Harbor deepening project. If this does not pass it will put the port of Savannah years behind most other ports in the United States. Due to the enormous impact this will have on the Southeast I feel we need to do whatever it takes to make this project happen. As a small business owner in both the transportation and warehousing industry in the Savannah area this project will directly affect our business as well as many, many others. I really hope this gets passed so I will not be forced to lay off some of my 70 employees. It appears we are already behind on this project and need to get it moving forward as soon as possible. I look forward to watching this project mature.

Best Regards,

Vickie Brown

President

cid:image007.jpg@01CB23AC.FD215BC0

Accellatrans Warehousing and Logistics, 6030 Commerce Boulevard, Savannah, Georgia 31408

Office: (912) 966-1858 | Fax: (800) 652-0403 | Email: vickie.brown@accellatrans.com| Website: www.Accellatrans.com <http://www.accellatrans.com/>
http://www.linkedin.com/in/savannahwarehouse <http://www.linkedin.com/in/savannahwarehouse>

cid:image008.jpg@01CB23AC.FD215BC0cid:image009.jpg@01CB23AC.FD215BC0About WERC
http://www.atlmaritime.org/images/AMAshipwheel.jpgcid:image012.jpg@01CB23AC.FD215BC0

From: Lolly Whatley
To: CESAS-PD, SAS
Subject: ATTN: PD, US Army Corps of Engineers, Savannah District
Date: Monday, December 13, 2010 1:44:32 PM

Dear Mr. Bailey,

I am writing you in regard to SHEP. I have been in the transportation business for over 10 years. But my mom has worked in it ALL MY life so it has been a port of me for 37 years. I have never seen as an important issue come up as the Harbor deepening project. If this does not pass it will put the port of Savannah years behind most other ports in the United States. Due to the enormous impact this will have on the Southeast I feel we need to do whatever it takes to make this project take effect. As me and my mom are both in this business me on the warehousing industry and her in the custom house broker industry in the Savannah area this project will directly affect our business as well as many, many others. I really hope this gets passed so I will not lose my job. It appears we are already behind on this project and need to get it moving forward as soon as possible. I look forward to watching this project mature.

Thank You,

Lolly Whatley

Customer Service Rep.

cid:image004.jpg@01CB3256.FCFDD160

Accellatrans Warehousing and Logistics, 6030 Commerce Boulevard, Savannah, Georgia 31408
Office: (912) 966-1858 Ext:208 | Fax: (800) 652-0403 | Email: Lolly.Whatley@Accellatrans.com |
Website: www.Accellatrans.com <http://www.accellatrans.com/>

cid:image002.jpg@01CAF292.55E812E0cid:image003.jpg@01CAF292.55E812E0About WERC
http://www.atlmaritime.org/images/AMAshipwheel.jpgcid:image006.jpg@01CAF292.55E812E0

From: Ruth Wilson
To: CESAS-PD_SAS
Subject: river deepened
Date: Tuesday, December 14, 2010 8:51:24 AM

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for the sake of Savannahs future RUTH WILSON ISLE OF HOPE 7637 LaRoche Ave, 31406

From: Paul Wilson
To: CESAS-PD, SAS
Subject: Deepening Savannah harbor
Date: Tuesday, December 14, 2010 9:05:53 AM

Deepening Savannah harbor is a necessity as it will benefit Savannah, Georgia and the entire country.

This endeavor is to be supported at all levels!

Paul & Marie Wilson

From: Ray Nickens
To: CESAS-PD, SAS
Subject: Deepening of Savannah Harbor
Date: Tuesday, December 14, 2010 9:31:19 AM

Sirs:
I am in favor of the deepening of the Savannah Harbor to 48'. I feel that this would be an economic plus to our community that would offset any of the adverse effects caused by this process. Also, I feel that problems caused by this could be corrected.
Thank You

Ray Nickens
BILMAR CNC
Telephone:912-756-4900
Fax:912-756-2087
E-Mail: bilmar@coastalnow.net

From: helen.beasley@oocl.com
To: CESAS-PD, SAS
Subject: Savannah Harbor
Date: Tuesday, December 14, 2010 9:34:47 AM

I work for OOCL which is a Steamship line that currently calls the port of Savannah. To remain competitive in the market it is vital the harbor be deepen to allow larger

vessels into the port especially after the Panama Canal expansion is completed. Larger vessels will be coming through and if Savannah cannot accommodate, business for Georgia

will be directed to other ports.

Thanks for Choosing OOCL,
Helen Beasley
Account Executive
OOCL USA Inc/Savannah
912-754-1764

Inside sales - Timela Woods
901-762-8302

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/_________O O C L _________/
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From: amorrison@gaports.com
To: CESAS-RD, SAS
Subject: Support for the Savannah Harbor Expansion Project
Date: Tuesday, December 14, 2010 11:14:06 AM

U.S. Army Corp of Engineers,

As a Georgia Ports Authority (GPA) employee and local resident, I consider the final approval and completion of the Savannah Harbor Expansion Project (SHEP) to be especially vital to regional, state and local economies. I am a personal witness of over 29 years that the GPA has implemented strong, responsible economic strategies that have been of enormous benefit to numerous entities in a highly competitive global shipping market. GPA, the fourth busiest container port in the United States of America, is poised to fully take advantage of benefits associated with larger capacity cargo vessels requiring deeper water to efficiently transit the Savannah Harbor.

As the anticipated Panama Canal Expansion completion date quickly approaches, it has become more evident that the SHEP approvals and funding are now necessary without delay. The inter-modal port community is in strong support of this project. The U.S. Corps of Engineers continued support and partnership is greatly needed and appreciated.

Best regards,

Artis Morrison, Facility Security Manager - Brunswick
Georgia Ports Authority
157 Penniman Circle
Brunswick, Georgia 31523
(912) 262-3280 Phone
(912) 280-6942 Fax
email: amorrison@gaports.com

From: mark bowers
To: CESAS-PD, SAS
Subject: Deepening of the harbor
Date: Tuesday, December 14, 2010 2:29:30 PM

I believe that this project is in the best interest of all of Georgia because of the economic impact it will have towards Georgia's future. Without it, South Carolina or Florida could gain all of the benefits.

From: Tom Wiley
To: CESAS-PD, SAS
Subject: Savannah Harbor Expansion Project
Date: Tuesday, December 14, 2010 2:22:36 PM

Sir or Madam:

I am writing to offer my support for The Savannah Harbor Expansion Project (SHEP). I have been following this project for many years and recognize it as not only significant to our local, state and southeast economy but truly one of national importance. The port of Savannah is responsible for already moving 8.3% of all containerized cargo throughout the United States. It is the fourth largest container port in our nation and the fastest growing. It currently serves approximately 21,000 companies in all 50 states, over 75% of which are headquartered outside of Georgia.

The SHEP will allow larger, deeper draft ships to call on the Port of Savannah, the import/export gateway to 44% of the US population. The economies of scale offered by Post Panamax ships will result in an average of 17% cost savings to US exporters and importers when compared to the operating costs of Panamax vessels. This deepening is a must to remain competitive in the market and ensure shipping companies do not find other alternatives.

I understand the SHEP serves as a model for future Corps projects with significant Federal Agency collaboration throughout the study process.

Thank you for your consideration,

Tom Wiley

Tom Wiley

Chairman, President\Chief Executive Officer

(912) 201-4930

(912) 201-7397 (fax)

twiley@thecoastalbank.com

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From: Mark Lytle
To: CESAS-PD, SAS
Subject: Savannah Harbor Channel Deepening
Date: Tuesday, December 14, 2010 2:31:08 PM

Mr. William Bailey
ATTN: PD, US Army Corps of Engineers

Savannah District
100 West Oglethorpe Boulevard
Savannah, GA 31401-3640

Re. Savannah River Channel Deepening Project

Dear Mr. Bailey,

As a citizen of Georgia for nearly forty years, I can tell you that I am not aware of any project since the interstate highway system that can have a greater positive impact on the overall economy of southeast region of the US than the Savannah River Channel Deepening project. Enhancing the Savannah port capacity is one of the most effective and cost efficient ways to create long-term quality jobs and investment both from foreign and domestic companies across the entire southeast region.

As a federal level officer I certainly appreciate that Georgia's economy is not your only concern. I also know that there are other candidates for this type of channel deepening all the way from Miami to Charleston.

With that said, I am convinced that none of those other locations will provide the significant logistical advantages to shipping companies that Savannah possesses. That container handling advantage, port expansion potential and closer access to markets is what brings the shipping companies. Savannah's more central and western location on the east coast means that products coming and going through the Port of Savannah can easily reach any city from Miami to Kentucky to the Northeast states in only one day's truck drive, thereby bringing jobs and investments in the logistical network across that entire region vs. at isolated hubs with other locations.

I encourage you to make a positive recommendation for the deepening of the Savannah River channel. If there is any information I can provide to support your decision making process, please let me know how I can help.

Sincerely,

Mark Lytle

Director of International Investment

Global Commerce Division

Georgia Department of Economic Development

Direct: 404-962-4025

Fax: 404-962-4021

E-mail: mlytle@georgia.org

From: Henry Minis
To: CESAS-PD, SAS
Subject: FW: Savannah Harbor Deepening
Date: Tuesday, December 14, 2010 2:40:19 PM
Importance: High

We must keep up with the needs of THE PORT OF SAVANNAH. The port is a major part of the economic pie for our city,state and the country, so it is of upmost importance the the HARBOR OF SAVANNAH MUST BE 48 FEET.
Henry H Minis

From: Cliff McCurry [mailto:cliff.mccurry@seacrestpartners.com]
Sent: Tuesday, December 14, 2010 11:54 AM
To: seacrestpartners.com users
Cc: JMCCURRY@gaports.com
Subject: FW: Savannah Harbor Deepening

Seacrest team,

I am forwarding this email from my son Jamie to you for information and hopefully your support for this project that is critical to our city, state and region. The economic impact for all of Georgia will be huge, when this project is completed and will allow our Savannah port to continue to grow and accommodate the "mega ships" that are coming when the Panama Canal expansion and deepening is completed in 2014.

On the other hand, if this project is not approved and funded, it will be devastating to our local and state economy.

Please see the statistics and information below and take the time to send your comments to the Corps of Engineers email address below, and share with others as well.

Thank you!

J. Cliff McCurry, CPCU

Vice Chairman

Seacrest Partners, Inc.

P.O. 8004

Savannah, Ga. 31412-8004

(912) 544-1922

From: JMCCURRY@gaports.com [mailto:JMCCURRY@gaports.com]
Sent: Tuesday, December 14, 2010 11:25 AM
To: JMCCURRY@gaports.com
Subject: Savannah Harbor Deepening

Friends,

The Savannah Harbor Expansion Project (SHEP) reached a milestone on November 16, 2010, when the US Army Corps of Engineers released the study documents for public comment. While this marked an important step toward project study completion, your participation remains important to completing this project of national significance.

A Public Workshop will be held this Wednesday, December 15 from 4:00 to 8:00 p.m. at the Savannah Civic Center on the second floor. This workshop is an open format meaning with no formal presentation, but will include exhibits for the environmental, engineering and economic aspects of the project. Comment cards and a court recorder will be available for public comments on the project. Individual participation in this workshop is welcomed and encouraged.

Your formal comments either by US mail or via email are critical to assisting the agency authorities in understanding the importance of this project to you or your business. The Corps of Engineers needs to know why you think the river should be deepened to 48 feet.

The deadline for comments is January 10, 2011. Please send your written support via US mail to:

Mr. William Bailey
ATTN: PD, US Army Corps of Engineers, Savannah District
100 West Oglethorpe Avenue
Savannah, GA 31401-3640

Comments can also be emailed to: CESAS-PD@usace.army.mil <mailto:CESAS-PD@usace.army.mil> .

Please take the time to communicate your support for the SHEP. This is an important project to the future of our state and to the future transportation infrastructure needs of our nation. The decision makers need to know the importance of this project to you.

Thanks for your continued support.

Jamie

James C. McCurry, Jr.
Director of Administration
Georgia Ports Authority
Phone: (912) 964-3877
Fax: (912) 966-3615
e-mail: jmccurry@gaports.com

About the SHEP.....

The Savannah Harbor Expansion Project (SHEP)

The Savannah Harbor Expansion Project is a project of national significance.

o The Port of Savannah is responsible for moving 8.3% of all US containerized cargo and more than 18% of all East Coast trade.

o As the fourth largest container port in the country, the Port of Savannah serves approximately 21,000 companies in all 50 states, over 75% of which are headquartered outside of Georgia.

o The SHEP will allow larger, deeper draft ships to call on the Port of Savannah, the import/export gateway to 44% of the US population. The economies of scale offered by Post Panamax ships will result in an average of 17% cost savings to US exporters and importers when compared to the operating costs of Panamax vessels.

The SHEP will assist the nation in successfully meeting the National Export Initiative created by Executive Order of President Obama.

o In order to meet the National Export Initiative aimed at doubling US exports over the next five years, the port infrastructure must be in place to accommodate the export growth.

o The Port of Savannah handled 12% of all U.S. containerized exports in FY2010, a total of 1.14 million export TEUs (twenty-foot equivalent units), with an export ratio of 54%.

The SHEP serves as a model for future Corps projects with significant Federal Agency collaboration throughout the study process, as well as the incorporation of adaptive management.

o The USFWS, EPA and NMFS have been involved throughout the study process since 1999 and have served as cooperating agencies in the production of the EIS since 2001.

o This project will represent the first deep-draft navigation project which incorporates adaptive management as mandated by WRDA 2007.

The Statewide Economic Impact of Georgia's Deepwater Ports (FY2009):

295,443 full and part-time jobs (7% of Georgia's total employment);
$61.7 billion in sales (9% of Georgia's total sales);
$26.8 billion in gross state product (7% of Georgia's total GSP);
$15.5 billion in income (5% of Georgia's total personal income);
$3.5 billion in federal taxes
$2.6 billion in state and local taxes

From: frrichard38R@aol.com
To: CESAS-PD, SAS
Subject: SHEP
Date: Tuesday, December 14, 2010 3:32:17 PM

To Whom It May Concern:

I am very much in favor of the SHEP project, to increase the depth of the Savannah River to 48 feet. Savannah is a lovely, historic city; however, our reliance upon tourism as a major source of income is tenuous and overly dependent on the viccisitudes of consumerism. Making our seaport more accessible and desireable will have immediate and positive effects on our local economy for the indefinite future. Savannah is poised to be THE port city for the southeastern States, and this project is instrumental to that eventuality.

Respectfully yours,

The Rev. Richard Nelson, rector
St. Thomas Episcopal Church
Isle of Hope, Savannah

From: John A. Henry, J.D.
To: CESAS-PD, SAS
Subject: Comments SHEP
Date: Tuesday, December 14, 2010 3:58:48 PM
Attachments: John A Henry.vcf

Mr. William Bailey
ATTN: PD, US Army Corps of Engineers, Savannah District
100 West Oglethorpe Avenue
Savannah, GA 31401-3640

Mr. Bailey,

I would like to lend full support to the Savannah Harbor Expansion Project (SHEP) as it represents a tremendous economic benefit to Effingham County, the Coastal Georgia region, the State of Georgia and the entire Southeast. We rely heavily upon the benefits that the Georgia Ports Authority's terminals in Savannah to recruit new industry to this area. We have been the direct beneficiary of several industrial projects that have provided jobs, tax receipts and other economic benefits directly related to the importing and/or exporting through the ports here.

I believe that as we see burgeoning foreign markets continue to grow, we will see the need for greater import and export functions through the ports in order to maintain our national competitiveness. Maintaining a competitive port is an essential ingredient in maintaining a competitive economy in this region.

Best Regards,

John A. Henry, CEO

Effingham County Industrial Development Authority

effinghamindustryqrcodesm

From: teresa.gates@wellsfargo.com
To: CESAS-PD, SAS
Subject: SHEP
Date: Wednesday, December 15, 2010 10:21:04 AM

I am a Savannah resident and work in downtown Savannah and I am in full support of the SHEP. It will be beneficial to our growth and the future infrastructure of Savannah and it's port.

Teri Gates, Vice President
Wells Fargo Private Client Group
25 Bull ST,
Savannah GA 31402
912-231-6855 P
912-236-2869 F
912-433-6795 C
teresa.gates@wellsfargo.com

From: GSMITH@gaports.com
To: CESAS-PD_SAS
Date: Tuesday, December 14, 2010 4:43:47 PM

Mr. Bailey:

The Savannah river deepening is very important to our local community and the entire state of Georgia. Deepening of the Harbor will insure that the ports of Savannah stay competitive when larger ships start going through the Panama Canal. It would enable them to enter our ports to discharge more cargo and more of our Georgia products could be loaded on these vessels. I see the larger vessels as a way for the Shipping Lines to minimize their costs so probably more will put them into service. If they are not able to call here, larger vessels would be forced to go elsewhere, which would result in job losses for Georgia and surrounding areas.

I am afraid that this could be detrimental to our economy.

I am in full support of SHEP and hereby cast my vote in support of deepening the Savannah Harbor.

Thank you,
Glenda Smith
Savannah, Georgia
912-963-6990
912-596-4148

From: bill.shira@gulfstream.com
To: CESAS-PD, SAS
Cc: kdye@seda.org; shiras2@springmail.com
Subject: Support for Savannah Harbor Deepening
Date: Tuesday, December 14, 2010 5:46:03 PM

By this email I express my strong support for the deepening of the Savannah Harbor. The Port of Savannah has been one of Savannah's greatest economic assets since the founding of Georgia and in order to remain so, it must be deepened to 48 feet to continue to compete globally. The Port of Savannah serves approximately 21,000 companies in all 50 states, over 75% of which are headquartered outside of Georgia. So while this project is critical to the economic prosperity of our state, it is also important to the future transportation infrastructure needs of our nation.

The Savannah Harbor Expansion Project, SHEP, is a project of national significance.

o The Port of Savannah is responsible for moving 8.3% of all US containerized cargo and more than 18% of all East Coast trade.

o As the fourth largest container port in the country, the Port of Savannah serves approximately 21,000 companies in all 50 states, over 75% of which are headquartered outside of Georgia.

o The SHEP will allow larger, deeper draft ships to call on the Port of Savannah, the import/export gateway to 44% of the US population. The economies of scale offered by Post Panamax ships will result in an average of 17% cost savings to US exporters and importers when compared to the operating costs of Panamax vessels.

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production of the EIS since 2001.

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$61.7 billion in sales (9% of Georgia's total sales);
$26.8 billion in gross state product (7% of Georgia's total GSP);
$15.5 billion in income (5% of Georgia's total personal income);
$3.5 billion in federal taxes
$2.6 billion in state and local taxes

Sincerely,

Bill Shira, 5507 Waters Drive, Savannah, GA 31406, 912-354-9934);

Chair Elect, Savannah Area Chamber of Commerce Board

Member, Board of Trustees, Mighty 8th Air Force Museum

Vice President Marketing, Gulfstream Aerospace

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From: Greg Parker
To: CESAS-PD, SAS
Subject: I strongly agree that we need to deepen the Savannah River Harbor.
Date: Tuesday, December 14, 2010 6:03:39 PM

Gregory M. Parker

The Parker Companies

Savannah, GA 31401

(d)912-721-2881

(f)912-721-2871

www.parkersav.com

From: Michael Giebner
To: CESAS-PD, SAS
Date: Tuesday, December 14, 2010 6:14:44 PM

Dear Sir,

My name is Michael Giebner. I respectfully request that SHEP be approved. Seventy percent of U.S. consumers and seventy percent of job creating companies are located east of a line drawn from Chicago to Dallas. The Port of Savannah is strategically positioned to reach forty four percent of the U.S. population and forty two percent of all job creating companies. I believe that an economic loss of this magnitude as a result of a failure to approve SHEP would have a devastating effect on our nation's economy. The result of which we can ill-afford especially during today's economic environment.

Thankyou for your attention on this matter.

Sincerely Yours,

Michael L. Giebner
1895 Ga. Hwy. 17 N.
Guyton, Ga. 31312

From: Barry Mathis
To: CESAS-PD, SAS
Subject: Savannah River Harbor deepening project
Date: Tuesday, December 14, 2010 7:35:20 PM

Please allow me to express my support for the Harbor deepening project. As a local business owner, I know how our ports are such a vital part of our local economy and we need to be able to continue to compete with other ports along our coast line. I strongly feel that our community as a whole should support this effort and recognize the positive impact the harbor deepening project will have on Savannah's continued economic strength.

Thank you for the opportunity to provide my comments in support of this worthwhile project.

Barry L Mathis

President,

Wilmington Cabinet Company

bmathis@wilmingtoncabinet.com

912.349.2879 O

912.220.1632 M

From: Maria Lancaster
To: CESAS-PD, SAS
Subject: Support for deepening of the Savannah Harbor
Date: Wednesday, December 15, 2010 8:36:18 AM

To Whom it may concern:

I would like to express my strong support for the deepening of the Savannah Harbor. With the port of Savannah comes a reputation of being an International city, an international hub. The world sees Savannah not only as a place for tourists to visit, but also as a place to do international business. With growth in worldwide communications and commerce, without the port Savannah will lose its competitive edge to other southern cities along the eastern seaboard with ports who are aggressively pursuing the deepening of their harbors. Savannah will not be able to attract new businesses that will in turn generate business for the companies already based in Savannah.

Without the deepening of the harbor there will be, overtime, no Port of Savannah. Savannah will be seen as just another sleepy, quaint southern town. Jobs will be lost without a way to create them elsewhere. Savannah and the state of Georgia will lose jobs, commerce and revenues.

Sincerely,
Maria Lancaster

Maria G. Lancaster
Development and Patron Services Director

(w) 912.234.3378 x105
(m) 912.604.4499

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Savannah, GA 31401

www.savannahmusicfestival.org

From: Patrick Onofrio
To: CESAS-PD_SAS
Subject: Savannah Harbor
Date: Wednesday, December 15, 2010 8:39:40 AM

As a former employee of the Ports, I strongly support for the deepening of the Savannah Harbor. The Port of Savannah has been one of our greatest economic assets since the founding of Georgia and in order to remain so, it must be deepened to 48 feet to continue to compete globally.

Patrick Onofrio - CPA
Treasurer
TMX Finance LLC
15 Bull Street
Savannah, GA 31401
912-629-1516

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From: Jim Rayburn
To: CESAS-PD, SAS
Subject: Savannah Harbor Expansion Project
Date: Wednesday, December 15, 2010 9:16:12 AM

My purpose in writing is to express my strong support for the Savannah Harbor Expansion Project. The project provides a vital tool for the import/export capabilities of the entire eastern seaboard of the United States. I urge you to do whatever you can to move the project forward to a successful conclusion. Thank you for your time.

James L. Rayburn, PE

President

RWP Engineering

31 West Congress Street, Ste. 305

Savannah, GA 31401

Phone 912.231.9212

Fax 912.231.9220

Jim.Rayburn@rwpeng.com <mailto:mJim.Rayburn@rwpeng.com>

From: Vic Burke
To: CESAS-PD_SAS
Subject: Deeping of the Savannah Harbor
Date: Wednesday, December 15, 2010 9:22:51 AM

As a lifelong resident of the Savannah area, I've concluded from experience that the economic well-being is founded on port activity. I strongly support the deepening of the Savannah River harbor and believe it will be economically beneficial not only to my home area but to the entire state of Georgia as well.

Thanks,

Vic Burke
vicburke@mac.com
Ung Roy, Ung Foy, Ung Loy

From: Tim Blanco
To: CESAS-PD_SAS
Subject: Support Going to 48 feet
Date: Wednesday, December 15, 2010 9:25:03 AM

As a resident of Savannah and a believer in the benefits of the impact of deepening the port of Savannah, this e-mail is intended to serve as support of the project moving forward. Thanks, Tim

Timothy S. Blanco, CPCU, CIC

Vice President - Thomas J. Sheehan Insurance, Inc

(912) 650-2806

(912) 656-9984 - mobile

(912) 650-2826 - fax

tblanco@tjsheehanins.com

How is our service? Please let us know at info@tjsheehanins.com

From: Lee Hardeman
To: CESAS-PD, SAS
Subject: Savannah Harbor Expansion Project (SHEP)
Date: Wednesday, December 15, 2010 9:25:31 AM

ATTN: Mr. William Bailey

The Port of Savannah is a critical link connecting Atlanta and the Southeastern U.S. with markets around the world. In order to accommodate the larger ships that will begin transiting the Panama Canal beginning in August of 2014 the Savannah Harbor needs to be deepened to 48 feet. SHEP is critical to our future competitiveness and essential to enable Georgia businesses like mine to compete. Studies have shown it could shift as much as 25% of current trade flows from the west to east coast. That will attract new facilities and create jobs here in Georgia. We strongly urge you to approve this important project.

Warmest regards,

Lee <><
Lee Hardeman Customs Broker, Inc.
Direct: 404-477-3452
PH: 404-361-1114 ext. 452
FAX: 404-361-1013
email: LeeH@LHCB.com

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From: Tim Cooper
To: CESAS-PD, SAS
Subject: SAVANNAH HARBOUR DEEPENING PROJECT (SHEP)
Date: Wednesday, December 15, 2010 9:27:20 AM

Dear Sir

I am the President of Plumtree Company. We import and distribute plant equipment for the Commercial and Newspaper Printing businesses in USA and Canada through the Port of Savannah.

It is of great interest to me and my Company that Savannah maintains its premium position as a port of entry on the East Coast of USA.

Please record my support for this project.

Yours sincerely,

T.S.B. Cooper
President
Plumtree Company

From: Pete White
To: CESAS-PD, SAS
Cc: Archie C. White, III; Tim White; Annette D. Howard; Mina Price; Pete White; Fred Southiere
Subject: Savannah Harbor Expansion Project
Date: Wednesday, December 15, 2010 9:37:58 AM
Attachments: Savannah Harbor Expansion Project.doc

Mr. Bailey,

Our Company is a Georgia headquartered company with multiple locations in the state and we are proudly celebrating our 85th anniversary in 2011. We strongly feel the Savannah Harbor Expansion Project will ultimately effect our company as well as all other Georgia based companies in the years to come. Please consider our formal thoughts in the attached document.

Best Regards!

Pete White

1775 Founders Parkway
Alpharetta, Georgia 30009

770-325-9118
404-309-1858 -C.
770-325-9180 -F.
www.acwhite.com <http://www.acwhite.com/>

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From: Ralph Maggioni
To: CESAS-PD, SAS
Date: Wednesday, December 15, 2010 9:43:32 AM

Dear Mr. Bailey:

If we do not deepen the Savannah Harbor, the financial effects on the region and the entire state will be disastrous. It has taken many years to develop the port at Savannah into the fastest growing port in the U.S. Attracting shipping lines to Savannah hinges on a deeper river.
We can ill afford to destroy such an engine of productivity, especially a port that has an ideal balance of imports and exports.

Merry Christmas and God bless,

Ralph

Ralph Maggioni, Director
Savannah Foreign Trade Zone 104
1315 Wings Court, Suite A
Savannah, GA 31408-9010
(912) 964-0904 Tel
(912) 966-7969 Fax
(912) 313-5582 Cell

From: Diane Welker
To: CESAS-PD, SAS
Subject: Deepen the Harbor
Date: Wednesday, December 15, 2010 9:58:41 AM

Dear Sir or Madam---

Deepening the Savannah River harbor will be a godsend for business and for the port. Let's do it!

Diane Welker
7792 Burkhalter Road
Statesboro, GA 30461

From: Rex Benton
To: CESAS-PD, SAS
Subject: Deepen the Savannah Harbor
Date: Wednesday, December 15, 2010 10:03:35 AM
Attachments: image003.png
image004.png

As a commercial real estate agent with work experience in both Atlanta & Savannah over the last 10 years, I have seen boost to both area economies thanks to growth of Savannah's ports. But, the port is much more vital to just the state of Georgia. The Port of Savannah serves approximately 21,000 companies in all 50 states, over 75% of which are headquartered outside of Georgia.

The "growth" of the port, not just the existing output, is vital to the expansion of the state's economy, especially in competing with our neighboring states for the new larger panamax ships. Deepening the harbor is crucial to our economy & for providing job growth/economic development, tax revenue & multiple other "trickle down" benefits.

Please move forward on the project & recommend the harbor be deepened to 48'. Please do not delay any further.

Thank you!

Rex Benton

NAI Savannah

(formerly Mopper-Stapen, Commercial)

J. Rex Benton, III
Advisor

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Savannah, Georgia 31401

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From: GELMORE@gaports.com
To: CESAS-PD_SAS
Subject: SAVANNAH RIVER
Date: Wednesday, December 15, 2010 11:03:29 AM

I'm in agreement deepening the Savannah River to 48 feet. I have worked for the Georgia Ports Authority for the past 30 years and as we all know the importance of deepening the Savannah River.
Regards,
Greg Elmore
Maintenance Supervisor
(912) 262-3042
Cell 912-269-0655
Fax (912) 261-3931

From: workshop Savannah
To: CESAS-PD, SAS
Subject: Jonathan Carter Comments
Date: Wednesday, December 15, 2010 11:18:16 AM

I think that this will be extremely important for our developing economy in Savannah and Georgia. We will need to able to keep up with the other large ports around the world. Keep up the good work!

From: wwaters@gaports.com
To: CESAS-PD, SAS
Subject: HARBOR
Date: Wednesday, December 15, 2010 11:29:00 AM

STATE OF GEORGIA NEEDS THE ECONOMIC GROWTH THE RIVER CAN PROVIDE

From: CY_Savannah Historic District GA MDOS (F)
To: CESAS-PD_SAS
Subject: Savannah Harbor Deepening
Date: Wednesday, December 15, 2010 11:30:02 AM

Good afternoon -

I am writing in support of Savannah Harbor deepening. The positive economic impact will be felt for years to come. As our port has increased in tonage over the years - we have kept up with demand - adding cranes, train lines, and expanding I-95 south of Savannah, etc. Why would we decide to no longer keep up with the changing times? Is it due to money? With the amount of money needed for the deepening - how much ROI (return on investment) will we have? And not ROI for just the ports but for the local, state, nation and world. The server in the restaurant down the street, the value of people's homes in the area, the local store clerk selling bread - all require the ports for job security. As do people in Indonesia, China, and Mexico - all crafting items we buy, sell and trade. Savannah needs to set the trend for the rest of the world at 48 feet deep and we need to ensure we are not left behind.

Thank you,

Marie Dalis-Brown
Market Director of Sales
912-373-1283 Direct Line
cy.savdt.mdos@marriott.com
Courtyard by Marriott Savannah Historic - www.savannahcourtyard.com
<file://www.savannahcourtyard.com>
Residence Inn by Marriott Historic - www.residenceinnsavannahdowntown.com
<file://www.residenceinnsavannahdowntown.com>
Residence Inn by Marriott Midtown - NEW ROOMS & LOBBY www.residenceinnsavannahmidtown.com
<file://www.residenceinnsavannahmidtown.com>
TownePlace Suites by Marriott Midtown - www.towneplacesuitessavannah.com
<file://www.towneplacesuitessavannah.com>

From: Courtney Snyder
To: CESAS-PD, SAS
Subject: Savannah Harbor Deepening
Date: Wednesday, December 15, 2010 11:42:30 AM

I wanted to send in my support for the Savannah Harbor Expansion project. GA Ports as a whole are a huge asset to the region, state, country and the world. Since exports are needed for the future growth of the entire nation I feel this project must go forward to keep us competitive with other countries. We know that Panama is moving forward with their deepening project and other cities will be vying to win the business from shipping lines. Savannah and the GA Ports must keep up the momentum. The 48 feet dredging project will help to keep the unemployment rate low, maintain housing prices and allow for growth.

Best regards,

Courtney Snyder

Sales Manager

Courtyard by Marriott Downtown/Historic District

Residence Inn by Marriott Midtown-Newly Renovated

Towneplace Suites by Marriott Midtown

Residence Inn by Marriott Downtown/Historic District

912-373-1286 Direct Line

912-238-9386 Fax Line

912-656-1040 Cell Phone

savannahsm2@mckibbonhotels.com

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www.residenceinnsavannahdowntown.com <http://www.residenceinnsavannahdowntown.com/>

From: RMACDONALD@gaports.com
To: CESAS-PD_SAS
Subject: SHEP is ECONOMIC RECOVERY!!
Date: Wednesday, December 15, 2010 11:54:15 AM

The Savannah Harbor Expansion Project is the one necessary investment component that ensures the volume of international cargo, which sustains our economic model, will continue flowing into our country and region.

Without this project commerce is stifled and economic growth stunted. SHEP is ECONOMIC RECOVERY!!

Thank-you.

Ryan Macdonald
Georgia Ports Authority
(912)964-3801
rmacdonald@gaports.com

From: mfajen@comcast.net
To: CESAS-PD, SAS
Subject: Dredging of the Savannah River Channel to "48
Date: Wednesday, December 15, 2010 12:02:18 PM

On behalf of myself and my wife Linda, just a note to let you know that we wholeheartedly support the deepening of the channel to 48'. I believe that this will improve Savannah's economic status and benefit the nation as a whole. Prior to retiring I managed CITGO Asphalt refinery with its active dock importing crude and shipping out refined products and asphalt. I fully understand that deepening the channel in advance of the work on the Panama canal will allow Savannah and the southeast to enjoy reduced transportation cost (both ways)and help us to compete with other marine markets. This is an important project which should be undertaken as soon as possible.

Mike and Linda Fajen
20 Myrtlewood Drive
Savannah, Georgia 31405
912 224 9646

Today's mighty oak is just yesterday's nut that held its ground...

From: Rusty Ross
To: CESAS-PD_SAS
Date: Wednesday, December 15, 2010 10:19:13 AM
Attachments: rustyross@mmmlaw.com.vcf

Ladies and Gentlemen,

As a native Savannahian, I grew up hunting and fishing around our wonderful town and up and down the Savannah River and its many tributaries. I find our environment has actually improved since the days that large industry and paper mills crowded the port and Ralph Nader was writing about it. Today, we have a relatively clean industry that is taking shape very nicely, container traffic, logistics and transportation. We should encourage this and I fully support the Harbor Deepening project.

Basically, it has taken 13 years to get to the stage where every logical person has concluded that the Project is feasible, profitable and can be done with minimal damage to the environment. If we had more thoughtful and well researched projects like this, our money would be much better spent by the politicians in Washington.

I realize that there are fringe groups on the environmental side that will never accept any development or any project that disturbs the environment. Unfortunately, we can't go back to the days of the Indians and General Oglethorpe. We must move forward, rationally and realistically. I believe this is what has happened over the 13 years and with the report from the Corp. All voices have been heard, all studies done and it is now time.

We have few occasions when we have the opportunity to do the right thing for the economy, nationally and locally, for the environment and for the people. Now is that time. We need the boost to the economy.

<http://www.mmmlaw.com/signature/mmm-email-signature.gif> Joseph R. Ross
Partner
Morris, Manning & Martin, LLP
24 Drayton Street
Suite 712
Savannah, GA 31401
Direct: 912.232.7182
Cell: 912-657-4687
Fax: 912.232.7184
rross@mmmlaw.com

Please consider the environment before printing this email.

For information on Morris, Manning & Martin, LLP, please visit www.mmmlaw.com <http://www.mmmlaw.com/> or http://twitter.com/mmm_law.

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From: Kepp, John
To: CESAS-PD, SAS
Cc: Miller, Bryan
Subject: Savannah Harbor Deepening Project
Date: Wednesday, December 15, 2010 10:20:38 PM

Mr. William Bailey

ATTN: PD, US Army Corps of Engineers, Savannah District

Hello, Zebra Enterprise Solutions (ZES), a division of Zebra Technologies Corporation, supports the Savannah Harbor Deepening Project. The goal of the project is to increase container flow in the state of Georgia. The increase in container flow will create new employment opportunities for Georgians and U.S. logistic solution providers. ZES is U.S.-based and recognizes the Georgia Port Authority (GPA) as one of its most valuable customers since 2000. GPA has grown its facility over the last 10 years and has looked to ZES to help develop its ongoing automation strategies. ZES believes that GPA has been a good steward to its employees and continues to grow its employee base as volumes increase.

Please feel free to contact me if you have any questions.

John Kepp

Vice President, Professional Services

Americas and Asia Pacific

O: +1.510.267.5116

C: +1.510.289.6876

Zebra Enterprise Solutions

Description: http://www.zebra.com/id/zebra/na/en/index.zebralogo.Single.Image.gif
<http://www.zebra.com/id/zebra/na/en/index.html>

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From: Karen.GUINN@jcb.com
To: CESAS-PD, SAS
Subject: Support for the Savannah Harbor Expansion Project
Date: Wednesday, December 15, 2010 3:39:26 PM

Dear Mr. Bailey:

I want to make you aware of my support for the Savannah Harbor Expansion Project (SHEP).

I work for JCB and know that our company is heavily reliant on the Georgia Ports for the import and export of our products. The proximity and strength of the Georgia Ports were primary factors in JCB's decision to base our North American headquarters here in Savannah, GA. Today, JCB employs nearly 500 people based out of Savannah and we have plans to expand our workforce in 2011 and 2012. Moving forward with the expansion project will allow us to continue to grow and prosper in this community.

We need to have the port infrastructure in place in order to continue to attract businesses to this area, and to help support the businesses that have made the commitment to move here. In addition, the SHEP will assist our nation in successfully meeting the National Export Initiative, created by Executive Order of President Obama.

After reading the study documents released by the Army Corp of Engineers, I am confident that proceeding with the Savannah Harbor Expansion Project is the right thing to do. I am in full support of the SHEP and deepening the harbor from 42ft to 48ft.

Sincerely,

Karen Guinn

Karen Guinn | PR & Communications Manager | JCB North America | Tel 912 447 2033 | Mobile 912 507 8519 | E-mail karen.guinn@jcb.com

JCB.jpg <http://jcbinc.wordpress.com/>

J. C. Bamford Excavators Ltd.
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Registered No. 561597 England

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From: RKESSLER@gaports.com
To: CESAS-PD_SAS
Subject: shep
Date: Wednesday, December 15, 2010 3:40:08 PM

I would like to voice my support for this project. This will help continue the growth of GPA and help keep jobs for people all over the state.

From: ALEIGHTON@gaports.com
To: CESAS-PD_SAS
Subject: Savannah Harbor Expansion Project
Date: Wednesday, December 15, 2010 3:47:47 PM

Yes, I do support the Harbor Expansion Project.
This will help grow the economy with additional jobs across the State of Georgia.

Thank You
Andrew J Leighton
8924 Old Montgomery Road
Savannah Georgia
31406

Cell phone 912-667-2703

From: Wolf, Travis
To: CESAS-PD, SAS
Subject: Savannah Harbor Expansion Project
Date: Wednesday, December 15, 2010 3:52:33 PM

Mr. William Bailey:

I am writing to you to express my very strong support for the Savanah Harbor Expansion Project. The recommended improvements below are necessary for the growth and expansion of business in Georgia and the Southeast. The Port of Savannah must be competitive in the future and remain a strategic asset for the region.

Recommended improvements:

- channel deepening from the sea through the Harbor Entrance Channel to the Garden City Terminal
- channel widening to create meeting areas at Long Island and Oglethorpe Ranges
- widening and deepening of the Kings Island Turning Basin
- channel widening at three bends

Best of wishes in this endeavor;

Travis Wolf

KPMG LLP

R. Travis Wolf
Area Market Director - Midsouth & Coastal Business Units
Global Advisory Services
303 Peachtree Street N.E., Suite 2000, Atlanta, GA. 30308
Office: (404) 614-8751 | Mobile: (770) 335-6418 | rwolf@kpmg.com <mailto:rwolf@kpmg.com>

Exe. Support: Hope Mabry | (404) 979-2295 | hmabry@kpmg.com

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****

From: Rick Parrish
To: CESAS-PD, SAS
Subject: Comment to Support the Deepening of the Savannah Harbor
Date: Wednesday, December 15, 2010 3:53:52 PM
Attachments: image001.png

To Whom it May Concern:

I am writing to provide comment on the proposed deepening of the Savannah Harbor.

1. It is evident to all that the economy of the Greater Savannah Area is heavily dependent upon the success of GA Ports.

2. Deepening the harbor will allow for larger ships, carrying more containers, to access the Ports.

3. More container traffic multiplies into more jobs and investment in equipment by the Ports, but also has far reaching affects to other private industries in the area (logistics, lodging, fuel, restaurants, real estate, etc.).

With today's economy, we need more projects like this to stimulate the economy, providing both short and long term benefits to this community.

Rick Parrish, LEED AP

Sr. Project Manager

Choate Construction Company

101 W. Mulberry Blvd, Suite 200 • Pooler, Georgia 31322

Direct: 912-330-7417 • Main: 912-790-0011

Cell: 912-429-0691 • Fax: 912-790-0010

rparrish@choateco.com <mailto:rparrish@choateco.com> • http://www.choateco.com <http://www.choateco.com/>

From: rhutcheson@gaports.com
To: CESAS-PD, SAS
Subject: Savannah Harbor Expansion Project
Date: Wednesday, December 15, 2010 4:10:02 PM

I would like to pledge my support for the Savannah Harbor Expansion Project. I feel that this is a much needed project to keep the economic engine for the State of Georgia competitive in today and tomorrow's global economy.

Thanks,
Randy Hutcheson
Manager, System Administration
Georgia Ports Authority
912-966-3621 (Office)
912-663-2374 (Cell)

From: workshop Savannah
To: CESAS-PD, SAS
Subject: Channel Expansion
Date: Wednesday, December 15, 2010 4:15:19 PM

I think this is a great idea and a long time coming!

Martin Wade
www.StayInSavannah.com

martin.wade@hilton.com

ST. Joseph's/Candler
Live smart.

December 15, 2010

Mr. William Bailey
ATTN: PD, US Army Corps of Engineers, Savannah District
100 West Oglethorpe Avenue
Savannah, GA 31401-3640

Dear Mr. Bailey:

St. Joseph's/Candler proudly joins with our community's economic and political leaders in support of all efforts to enhance the Savannah Harbor.

For more than 275 years the port of Savannah has been an economic engine for our community, the state and the nation. Today, it is a successful and thriving hub of commerce and trade and ranks as the 4th largest containers port in the country. The proposed harbor expansion project will allow Savannah and the state of Georgia the necessary competitive edge to advance the commercial needs and trade expectations of our nation and the world.

Unlike other ports where empty containers are shipped back across the ocean to supply overseas producers, Savannah is unique in it is the country's only major port with a relatively balanced volume of imports and exports. With more than 300,000 jobs statewide attributed to the Georgia Ports Authority, it is also the state's biggest generator of jobs.

As President and CEO of the region's largest healthcare provider---another leading economic engine for our community---- I endorse any such initiatives that will further lead to the economic development of our community, our state and our nation.

Sincerely,

Paul P. Hinchey
President and CEO

/tc

St. Joseph's Hospital
11705 Mercy Boulevard
Savannah, Georgia 31419
(912) 819-4100

Candler Hospital
5353 Reynolds Street
Savannah, Georgia 31405
(912) 819-6000

Candler Hospital • Georgia Infirmary • St. Joseph's Hospital • Mary Telfair Hospital for Women

St. Joseph's/Candler is the recipient of the National Magnet Award for Nursing Excellence.
www.sjchs.org

From: Caroline Edwards
To: CESAS-PD, SAS
Subject: SHEP
Date: Wednesday, December 15, 2010 4:19:52 PM

As a member of the Savannah/Chatham County Community I would like to voice my support for the deepening of the Savannah River.

Thank you & Merry Christmas~

Caroline P. Edwards

The Gourmet Marketplace-Store Manager

Byrd Cookie Company

6700 Waters Ave.

Savannah, GA 31406

912-721-1562 direct

1-800-291-2973

912-721-1520 Fax

carolinep@byrdcookiecompany.com <mailto:carolinep@byrdcookiecompany.com>

From: Bob Pertierra
To: CESAS-PD, SAS
Subject: MAC Letter of Support - (SHEP)
Date: Wednesday, December 15, 2010 4:20:14 PM
Attachments: Gaffney SHEP ltr of support dec 2010.pdf

Mr. William Bailey

US Army Corps of Engineers, Savannah District

ATTN: PD

100 West Oglethorpe Avenue

Savannah, Georgia 31401-3640

Dear Mr. Bailey,

The Port of Savannah is a critical link connecting Atlanta and the Southeastern U.S. with markets around the world. In order to accommodate the larger ships that will begin transiting the Panama Canal beginning in August of 2014 the Savannah Harbor needs to be deepened to 48 feet. The Savannah Harbor Expansion Project (SHEP) is critical to our future competitiveness and essential to enable Georgia businesses to compete. Studies have shown it could shift as much as 25% of current trade flows from the west to east coast. That will attract new facilities and create jobs here in Georgia.

As vice president of supply chain development and the executive director of the Supply Chain Leadership Council for the last seven years I have become an expert in Georgia's logistics industry. This project is critical to the continued growth and success of that industry and will create thousands of jobs for metro Atlanta. Additionally, it will significantly improve the efficient flow of interstate commerce in the Southeast and the nation.

On behalf of the Supply Chain Leadership Council attached is a letter of support from our chairman Chris Gaffney, President of Coca-Cola Supply.

Metro Atlanta Chamber

Bob Pertierra
Vice President Supply Chain Development
Metro Atlanta Chamber
235 Andrew Young International Blvd.,NW • Atlanta, GA 30303
404.586.8445 • FAX 404.586.8464
bpertierra@macoc.com <mailto:bpertierra@macoc.com> • www.MetroAtlantaChamber.com
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Bringing the best together to help Atlanta thrive.

From: Robert Pryor
To: CESAS-PD, SAS
Subject: Harbor Deepening
Date: Wednesday, December 15, 2010 4:44:47 PM

---

hello,
My name is Robert Pryor and i just wanted to express my support for the deepening project.

From: pj daniels
To: CESAS-PD, SAS
Subject: The Savannah Harbor Expansion (SHEP)
Date: Wednesday, December 15, 2010 4:53:11 PM

Dear Mr. William Bailey,

I would like to comment why the Savannah Harbor should be expanded. The Harbor is a vital source of livelihood for not just our immediate community, but for those far away as well. Those ships that come into our harbor bring goods from around the world that is transported by truck, train and even air to many cities throughout our nation. It allows our military and their equipment to be transported to various locations in the world and keeps our local economy stable. So many lives depend on the immeasurable work that comes from the port, not just directly but the support jobs as well. We NEED the expansion especially since the work that comes through the port has increased and will continue to increase with this expansion.

My life has been directly blessed because of the port like so many others locally and I hope my comments will make a difference in support of the Savannah Harbor Expansion.

Sincerely,
Patricia J. Daniels

From: workshop Savannah
To: CESAS-PD, SAS
Date: Wednesday, December 15, 2010 4:56:10 PM

I have been in the logistics industry for twelve years, eight of which have been spent here in the Savannah market. It is critical that the Savannah Harbor Expansion Project goes into effect for not only long term positive growth for the city of Savannah, but the long term positive growth of the state of Georgia.

Regards,

Cameron Cobb

PLS Logistics Services

912-346-0153

ccobb@plslogistics.com

From: rd daniels
To: CESAS-PD, SAS
Subject: The Savannah Harbor Expansion (SHEP)
Date: Wednesday, December 15, 2010 5:10:10 PM

Dear Mr. Bailey,

I am a member of the International Longshoremen Association and have been for the last 37 years. I am definitely in support of the Savannah Harbor Expansion because it will bring more work to our ports. Once the Panama Canal opens those huge cargo ships and the economic impact it will bring could go to the west coast because the east coast, particularly Savannah's port, would be unable to accommodate them due to their size if the dredging is not done. It will guarantee the growth of our Port and it will secure jobs for our future generations. It will keep the money flowing in our community and keep our local Savannahians employed. I LOVE my job and I have all the years I have worked the waterfront. I hope and pray the expansion goes through because so many jobs, lives and the future of countless people depend on it.

Thank you,
Harold L. Daniels

From: workshop Savannah
To: CESAS-PD_SAS
Subject: SHEP Comment Card
Date: Wednesday, December 15, 2010 5:52:17 PM

I am here tonight to show my support for the deepening of the Port of Savannah Harbor. I am old enought to recall the previous deepening projects. The benefits have been exceeded in each case and likewise the negatives have not been realized. This port is crucial to the national safety and economic wellbeing. We are an export and import port, which many other ports cannot lay claim to.

The deepening meets the national economic goals of jobs throughout Georgia and the USA. Frankly, 50 feet would be suitable to me.

Eli Karatassos
eli@elipk.com

From: workshop Savannah
To: CESAS-PD, SAS
Subject: SHEP Comment Card
Date: Wednesday, December 15, 2010 6:00:58 PM

---

i am in favor of this project think it the best for Savannah and the state of Ga it will produce many new jobs.

Daniel Mulcahy
daniel.mulcahy@konecranes.com

From: workshop Savannah
To: CESAS-PD, SAS
Subject: SHEP Comment Cared
Date: Wednesday, December 15, 2010 6:03:20 PM

I support the deepening of the river. This would help strengthen the hole economics of the greater Savannah area. Go for it

Ty Smalley
tysmlly@yahoo.com

From: workshop Savannah
To: CESAS-PD, SAS
Subject: SHEP Comment /CARD
Date: Wednesday, December 15, 2010 6:06:29 PM

I SUPPORT THE DEEPENING OF THE RIVER IT WILL HELP PRODUCE MORE JOBS, AND STIMULATE THE ECONOMY. I SAY YES AND GO FOR IT.

MATTHEW SHIFFLETT

shifflett58@hotmail.com

From: workshop Savannah
To: CESAS-PD, SAS
Subject: SHEP Comment Card
Date: Wednesday, December 15, 2010 6:37:15 PM

I am in support of this project. I believe it will be a boost for the Ga economy. The study has been well researched.

From: workshop Savannah
To: CESAS-PD, SAS
Subject: shep comment card
Date: Wednesday, December 15, 2010 6:39:41 PM

Can't wait to the project to start. My husband is ILA 1475, he can't wait to go to work when all of this takes place.
Way to go! LETS GET STARTED!

From: JAKE WATSON
To: CESAS-PD, SAS
Date: Wednesday, December 15, 2010 8:55:25 PM

Making Savannah River deeper will make the economy better in Savannah and surrounding county, meaning bigger ships more cargo more jobs! and at times like this jobs are number (1) on the waiting list.

THANKS
HERBERT WATSON

From: Webb924@aol.com
To: CESAS-PD, SAS
Subject: SHEP
Date: Thursday, December 16, 2010 9:12:50 PM

Harbor deepening will be the most paramount infrastructure event of this century, both encouraging growth and jobs in this region, yes not just Savannah or even Georgia but all of the surrounding areas in this region.

Jobs in shipping, transportation (road, sea, and rail), distributing centers, stores and the manufacturing groups, it will allow families to prosper and assist with rebuilding our countries economy.

As a riverfront worker I cannot express to importance of you to move forward rapidly with this project to keep it in the same time line with the Panama canal widening, when the larger vessels move through we need to be prepared to receive them in Savannah.

Keep moving forward with this project.

Best regards, Melvin Webb

From: Alton Brown Jr.
To: CESAS-PD, SAS
Subject: harbor expansion project
Date: Thursday, December 16, 2010 7:10:26 AM

Subject: Maintenance of the Existing Savannah Harbor Federal Navigation Project

Chatham County, Georgia and Jasper County, South Carolina

I am providing this email in response to the Joint Public Notice dated 15 November 2010 and to express my full support of the subject project. Since its inception in 1733, the Savannah River and it's Port have been the engine driving the economic viability of this region. The historic channel maintenance, frequent improvements, and ability to adapt to the ever changing shipping industry have sustained the Port of Savannah. Considering those historic modifications required in the past and looking forward to the port and global shipping industry of the future, the proposed harbor deepening project is critical to the sustainability of the Port of Savannah and the economy of this region of the Southeast.

The U.S. Army Corps of Engineers (USACE) has provided a sound proposal to facilitate deepening of the harbor while considering and fully mitigating for any unavoidable environmental impacts. We appreciate the level effort of provided by the USACE, exhaustive studies completed in association with the project, and the development of an appropriate harbor deepening plan. Were this harbor deepening postponed or abandoned, there is no local or state industry which could fill the resulting economic void or which would prohibit the inevitable economic collapse of the Lowcountry of Georgia and South Carolina. We can only hope that the project will receive direct approval and that the construction phase will begin immediately.

Alton Brown, Jr. - Principal
Resource & Land Consultants

41 Park of Commerce Way, Suite 303
Savannah GA, 31405

P 912 443 5896

F 912 443 5898

C 912 659 0084

http://www.rlandc.com

From: Stringer, Christopher
To: CESAS-PD_SAS
Subject: U.S. Army Corps of Engineers Savannah Harbor Expansion Project
Date: Thursday, December 16, 2010 8:35:27 AM

To Whom it May Concern:

I am in full support of the U.S. Army Corps of Engineers Savannah Harbor Expansion Project. By deepening the harbor, we are paving way for future economic growth in Savannah and outlying areas. In summary I feel it is absolutely critical that this project move forward, and I issue my full support.

Sincerely,

Christopher Stringer

From: Johnny Wilson
To: CESAS-PD_SAS
Subject: SHEP Support
Date: Thursday, December 16, 2010 8:58:41 AM

As a terminal equipment solutions provider with over 40 years of experience and operations in more than 20 marine terminals along the Eastern and Gulf Seaboards, TIOC (Terminal Investment Corporation) supports the Savannah Harbor Expansion Project because of its significant national importance. While there are certainly positive state and local implications to be realized through the expansion, TICO views SHEP, similar to many other programs moving forward across the nation, as a critical infrastructure investment that will enable our Country to remain competitive in the international trade scene. 2014 is fast approaching, and with it comes the opening of the wider, more efficient Panama Canal. We must move with all deliberate speed in preparation for what we know lies ahead.

I personally believe the minimal impact, if any, on the environment would be more than justified to open the door for so many that are now unemployed.

Johnny Wilson

VP of Maintenance

TICO/Terminal Services

From: Christopher Yarbrough
To: CESAS-PD, SAS
Cc: Dad Yarbrough
Subject: Shep
Date: Thursday, December 16, 2010 10:11:28 AM

12-16-2010

Hello,

I'm am writing you today to express to you the importance to the port of Savannah that this expansion project be carried to the fullest extent possible. Without this project, the shipping companies whom are already our loyal customers, creating thousands of jobs, and billions of dollars in revenue for the state of Georgia, can and must find a port that will accommodate them! This project will not only help Savannah to keep the business which we already have worked so hard to achieve, but ensure the further growth of the port, the creation of thousands of more jobs, billions more in revenue, and secure the future of the port! Without this project the well being of the port of Savannah and it's ability to thrive may be severely jeopardized, along with the billions of people who depend on the port of Savannah in their everyday lives!

We appreciate all of your hard work and dedication to this project that all of the Corp personnel has put forth. It is a pleasure to have you working with us to secure the future of the port of Savannah, Ga USA.

-Christopher L. Yarbrough Jr
Savannah Pilots Assoc.
912-308-5103

From: Melcher, Jan
To: CESAS-PD, SAS
Subject: Savannah Harbor Deepening
Date: Thursday, December 16, 2010 10:47:14 AM

To whom it may concern:

Your consideration of the economic and trade implications for the deepening of the Savannah Harbor is greatly appreciated and supported in the region.

As the fourth largest container port in the country, the Port of Savannah serves approximately 21,000 companies in all 50 states, over 75% of which are headquartered outside of Georgia. So while this project is critical to the economic prosperity of our state, it is also important to the future transportation infrastructure needs of our nation.

Time is of the essence due to the domino effects of improvements with the Panama Canal.

We need to keep jobs in Georgia and create additional ones. This would provide a much needed boost to our local economy in Savannah as well as for the State of Georgia.

As an economic development professional, I ask your support for the deepening of the Savannah Harbor.

Sincerely,

Jan Melcher

Jan Melcher, CEDT

Director | Eastern Project Operations

Georgia Quick Start

912.965.6385 office | 912.965.6388 fax | 404.626.3775 cell

190 Crossroads Parkway, Suite 200 | Savannah, GA 31407

jmelcher@georgiaquickstart.org <mailto:rrussell@georgiaquickstart.org> | www.GeorgiaQuickStart.org <http://www.georgiaquickstart.org/>

From: Angela Hendrix
To: CESAS-PD, SAS
Subject: Port Harbor Deepening
Date: Thursday, December 16, 2010 1:43:07 PM

The Port of Savannah is one of our state's greatest economic assets. We need to approve deepening to 48 feet to continue to compete globally. This is not only critical to our state's economic prosperity and Savannah's but to the future transportation infrastructure needs of our nation.

Angela Hendrix
AMH Communications
912.856.7329
468 Kingston Circle
Richmond Hill, Ga. 31324
angela@amhcommunications.net

From: GMOTORPOOL@gaports.com
To: CESAS-PD, SAS
Subject: SHEP
Date: Thursday, December 16, 2010 2:47:12 PM

The Harbor deepening project is very important to Savannah and Surrounding Areas. The impact of Georgia Ports is felt in many states outside of Georgia and this will only grow. This will help boost our Economy and create many new jobs, that we desperately need. The Future of your children and my children depends on the harbor deepening.

Sincerely,

Robert Mark Warren

From: William B. Hood
To: CESAS-PD, SAS
Subject: Savannah Harbor Expansion Project
Date: Thursday, December 16, 2010 2:52:03 PM

The Port of Savannah is one of the few bright spots in the State of Georgia's economy. With the current domestic recession that we are experiencing the SHEP will allow our businesses in Georgia and the rest of the United States to export much higher volume of trade goods much more efficiently resulting in new jobs here in Georgia. SHEP is critical to Georgia's competitiveness in the U.S. and offshore.

We urge you to get this project completed.

Best regards,

William B. Hood, CPA

Business Development Executive

Carr, Riggs & Ingram, LLC

4360 Chamblee Dunwoody Road
Suite 420

Atlanta, GA 30341

Voice: 770-457-6606

Fax: 770-255-6096

Mobile: 678-428-9645

http://www.cricpa.com <http://www.cricpa.com> <http://www.cricpa.com>

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From: DWHITE@gaports.com
To: CESAS-PD_SAS
Subject: SHEP
Date: Thursday, December 16, 2010 3:57:22 PM

Mr. Bailey:

I just want to voice my opinion on the deepening of the harbor. I think it is very important for the future of our local community as well as the state of Georgia. If the bigger ships can not come to Savannah, they will go to the port that can service them. The shipping lines will be using larger vessels because it will reduce the overall cost for them. The port of Savannah is responsible for many jobs in our state and if we can not keep up with the competition, Georgia will lose out in the end.

I support SHEP and would vote in favor of deepening the harbor.

Thank you,
Dianne White
Tel: (912) 964-3900
Fax: (912) 544-8322

From: Michelle Rice
To: CESAS-PD, SAS
Subject: Savannah Harbor Expansion Project (SHEP)
Date: Thursday, December 16, 2010 4:06:00 PM

I would like to extend my strong support for the Savannah Harbor Expansion Project. This project ensures economic growth and stability locally and regionally. SHEP's positive impact will be seen for generations to come.

Regards,

Michelle Rice
Senior Sales Manager
Savannah Marriott Riverfront
912-373-2002 (direct) 912-233-8897 (fax)
mrice@marriottsales.com
www.marriott.com/savrf

From: djohnson@gaports.com
To: CESAS-PD, SAS
Subject: SHEP
Date: Thursday, December 16, 2010 4:38:39 PM

To whom it may concern

I would like to express my support for the Savannah Harbor Deepening Project. As an employee of Georgia Ports, I am very proud of Georgia's ports and am excited about the possibilities for the port in the future. Making our port accessible to the larger container vessels that are coming into service will be an open door to growth for the economy of the state.

Devin Johnson
Operations Adm. Coordinator
GPA - Mayors Point
(912) 264-7295

From: Bob Pertierra
To: CESAS-PD, SAS
Subject: MAC Letter of Support - (SHEP)
Date: Thursday, December 16, 2010 5:37:15 PM
Attachments: Ltr of support SHEP - from Sam Williams.pdf

Mr. William Bailey

US Army Corps of Engineers, Savannah District

ATTN: PD

100 West Oglethorpe Avenue

Savannah, Georgia 31401-3640

Dear Mr. Bailey,

On behalf of the Metro Atlanta Chamber and our more than 4,000 members, I am writing you today to express our full support of the Savannah Harbor Expansion Project (SHEP). This project is critical to the continued growth of metro Atlanta, Georgia and the Southeast Region. International trade and the movement of goods are essential to our economic prosperity. Increasing the capacity of Savannah's Port will enable increased trade throughout the region, promote future growth, and create jobs for Georgia.

Please enter the attached letter from our President Sam A. Williams into the formal record.

Metro Atlanta Chamber

Bob Pertierra
Vice President Supply Chain Development
Metro Atlanta Chamber
235 Andrew Young International Blvd.,NW • Atlanta, GA 30303
404.586.8445 • FAX 404.586.8464
bpertierra@macoc.com <mailto:bpertierra@macoc.com> • www.MetroAtlantaChamber.com
<http://www.metroatlantachamber.com>
Bringing the best together to help Atlanta thrive.

From: Cliff McCurry
To: CESAS-PD, SAS
Subject: Savannah Harbor Deepening
Date: Thursday, December 16, 2010 6:21:23 PM

Mr. Bailey,

I regret that I was unable to attend the public hearing yesterday at the Savannah Civic Center, but I am writing you to let you know of my strong support for this project. As you may know, my son Jamie is the Director of Administration at the Georgia Ports Authority, so I have certainly been kept up to date on the extensive environmental and economic impact studies that have been done.

As a past Chairman of the Savannah Area Chamber of Commerce, the Savannah Economic Development Authority, and a current board member of the Georgia Chamber of Commerce, I feel that this project is critical to our city, region, and nation. If we are to continue the growth of imports and exports through the fastest growing port in the U.S., and provide growth in employment for our citizens, it is imperative that the Port of Savannah be in a position to handle the mega ships that will be transiting the Panama Canal in 2014.

Thank you for your support of this vital project.

Best regards,

J. Cliff McCurry, CPCU

Vice Chairman

Seacrest Partners, Inc.

P.O. 8004

Savannah, Ga. 31412-8004

(912) 544-1922

From: John Beasley
To: CESAS-PD, SAS
Subject: Savannah Harbor Deepening Project
Date: Friday, December 17, 2010 11:15:17 AM

I believe that the proposed deepening of the Savannah Harbor is vital for the future of this nation's fastest growing container port. The recently
completed study of the environmental and economic impacts of this project
appears to be very thorough and deliberative and I support going forward with this project.

Sincerely,

John R. Beasley
225 Lyman Hall
Savannah GA 31410

From: Dave Williams
To: CESAS-PD, SAS
Subject: My Support for SHEP
Date: Friday, December 17, 2010 11:47:44 AM

To Whom It May Concern -

Please give your full support to the approval and funding of the Savannah Harbor Expansion Project (SHEP). Georgia's Ports have been a leader in the industry and an economic stimulus for Savannah, Georgia, and the United States! Georgia's Ports create hundreds of thousands of jobs and generate billions of dollars in federal, state, and local tax revenues.

Thank you.

David H Williams
Statesboro, GA

From: GMOTORPOOL@gaports.com
To: CESAS-PD_SAS
Subject: SHEP
Date: Friday, December 17, 2010 1:52:51 PM

Sir
As an Employee of the Georgia Ports Authority I felt compelled to write you with my views on the Savannah Harbor Deepening Project.
I think the bottom line up front is that this project needs to be completed as soon as possible so the port can continue to enjoy the growth that
I've seen since I've been employed here. I also think that this will bring more good paying jobs to this area as well as the state of Georgia
and surrounding states I understand from reading the news paper that this has been in the planning stages for many years and I feel that the time
has come to deepen the channel to the recommended 48' so that when the Panama Canal is completed we will be ready to handle the bigger ships
that will want to call on the port of Savannah.

Respectfully

Terrance J. Jeffrey
Fleet Mechanic
Georgia Ports Authority

From: Jeanne Seaver
To: CESAS-PD_SAS
Cc: jeanneseaver@aol.com
Subject: GA Ports Authority Deepening
Date: Friday, December 17, 2010 4:12:59 PM

Dear Ladies & Gentlemen:

I wanted to relay my support of the deepening of the Savannah Harbor. I agree with most in the state that by deepening the ports it will bring more business and jobs to our State and the nation. It will also create additional revenues.

I attended the GPA annual meeting and also the meeting in Atlanta earlier this month and feel I am well educated on the project and without a doubt is a win win situation for all Georgians and citizens in the USA! The GPA Team is a first class act with all their ducks in a row. They understand the commitment it takes to run a business and the proven track record of successful! The business is busting at the seams and we need to let it keep growing!

On my journey as a former 2010 candidate for U.S. House of Representatives in the GA 12th, I met many Georgians in my travels over the past year. There was only a few that I came across that were against it and one of them happened to be a lawyer that on one hand was against the deepening for some bologna of an excuse, environmentally and then continued to tell me he was an attorney that represents one of the local unions, which the ports happens to keep employed. What a joke!

It would be a huge mistake to pass this opportunity up! I have seen the reports 6% of jobs in this state are supported by the GA Ports and 7% of revenues for the State of Georgia come from GPA. Why would anyone not be in support of the expansion. The reports are in, no impact environmentally, millions of dollars spent on the study, and 10 years to get this far! It's time to move forward!

Thank you for your time! The only thing I am confused with is, why hasn't the funding on the federal level been secured? Thank you Georgia for your commitment of funding! I would be coming down on the very Congressman that represents this District on getting this process expedited and the funding secured.

If there is any assistance that I can provide to get this project moving forward, please let me know.

Sincerely yours,

Jeanne Seaver
Former 2010 GA12th Congressional Candidate
Resident of Chatham County

Jeanne Seaver
P.O. Box 16204
Savannah, GA 31416
(912) 663-8728

=

From: Tom Wesley
To: CESAS-PD_SAS
Subject: Savannah Port Modifications
Date: Friday, December 17, 2010 3:22:42 PM

To Mr. William Bailey, US Army Corp of Engineers

We sincerely appreciate any efforts that might be extended to aid in the deepening of the Savannah River to accommodate the larger ships that the expanded Panama Canal will be bringing to the eastern United States. This modification to the existing Savannah Port is essential to the further development of the State of Georgia as a global player in International Trade as it attempts to compete with other major port facilities on the East Coast.

Thank you and best regards,

Tom

Thomas J. Wesley, III

The Wesley Company

Building Success in Atlanta for Over 100 Years

200 Ashford Center North

Suite 335

Atlanta, GA 30338-2668

Direct 770-677-0000

Fax 770-393-2786

Cell 404-697-6754

wesley@thewesley.com

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From: kathy lauo
To: CESAS-PD_SAS
Cc: Michelle Rice
Subject: Savannah Harbor Expansion Project
Date: Monday, December 20, 2010 6:35:05 PM

I support the Savannah Harbor Expansion Project and the many positive things that will result from it.

Thank you,
Kathy Smith

From: Kirk Diamond
To: CESAS-PD, SAS
Subject: Savannah Port
Date: Sunday, December 19, 2010 10:08:53 AM

Mr. William Bailey

US Army Corps of Engineers, Savannah District

ATTN: PD

100 West Oglethorpe Avenue

Savannah, Georgia 31401-3640

Mr. Bailey,

I am very much in favor of deepening the Savannah port facilities to 48 feet. I have been in the commercial office and industrial leasing business in Atlanta for over 30 years. With the widening of the Panama Canal it is absolutely critical that Savannah's port be deepened to accommodate the larger ships. The southeastern portion of the US will benefit greatly from this deepening of the port – encouraging both imports and exports into our region and across the world. I can be reached at the following address, phone numbers and email if you wish to discuss this in greater detail. Take care and have a great day.

Kirk

Kirk L. Diamond
Senior Vice President
Carter
171 17th Street NW
Suite 1200
Atlanta, GA 30363-1032
Phone: 404-888-3393

Cell : 404-680-8057
Fax: 404-888-4393

kdiamond@carterusa.com

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From: MTAYLOR@gaports.com
To: CESAS-PD, SAS
Subject: Harbor Deepening
Date: Monday, December 20, 2010 8:38:09 AM

I support the deepening of the Savannah Harbor to 48 feet. Thanks!

American-Israel Chamber of Commerce
Southeast Region
400 Northridge Rd., Suite 250
Atlanta, GA 30350

December 20, 2010

Mr. William Bailey
US Army Corps of Engineers, Savannah District
ATTN: PD
100 West Oglethorpe Avenue
Savannah, GA 31401-3640

Dear Mr. Bailey,

On behalf of the American-Israel Chamber of Commerce, I am writing to share our support of the Savannah Harbor Expansion Project (SHEP). This project is critical to the continued trade between Israel and the Southeast Region. International trade and the movement of goods are essential to the economic prosperity of both areas. Increasing the capacity of Savannah's Port will enable increased trade throughout the region, promote future growth, and create jobs for Georgia, other states in the Southeast, and Israel.

The Port of Savannah is the South Atlantic headquarters of ZIM, Israel's national shipping company, and ZIM is the 7th largest customer there for the Georgia Ports Authority. It has been the fastest growing container port in the country over the past decade and its continued success is critical to economic recovery in Georgia and throughout the Southeast. The Savannah River Navigation Channel must now be deepened from 42 feet to as deep as 48 feet to accommodate the new generation of deep-draft vessels that will dominate trade when the expanded Panama Canal opens in 2014. We believe the Savannah Harbor Expansion Project (SHEP) will provide a highly cost-effective return on investment to Georgia and the federal government.

Sincerely,

Tom Glaser

Tom Glaser
President

From: JERRY
To: CESAS-PD_SAS
Subject: Savannah Harbor Expansion Project
Date: Monday, December 20, 2010 9:39:44 AM

JERRY S MICHAELS

2301 PRICE STREET

SAVANNAH, GA 31401

912-236-2273

JSMICHAELS@COMCAST.NET

I am in favor of the Savannah Harbor Expansion Project. It's positive impact on the economic stability of our area far outweighs any negative factors. It is important for the Savannah / Garden city port to remain competitive with other ports in this area. The project should move forward as quickly as possible.

Jerry Michaels

From: Rhett Willis
To: CESAS-PD, SAS
Cc: kdye@seda.org
Subject: Support for SHEP
Date: Monday, December 20, 2010 2:23:10 PM

To Whom it may concern,

I am writing to register my very strong support for the funding of the Savannah Harbor Expansion Project. My company, DJ Powers is an 80 year old Savannah based logistics company founded in 1930. We have 3 offices in the state of Georgia, as well as in SC, NC, Tenn and Texas, and employ over 70 people. All of our offices, and especially the Georgia based offices, are very dependent on the business brought to us as a result of the Georgia Ports, and all have a vested interest in seeing GPA not only continue but continue to grow its activity. Our customers are located throughout the USA, and they are also very dependent on having a prosperous and growing port of Savannah.

I urge you to approve the deepening project for the continuation of jobs, future job growth and the continued growth and prosperity of the State of Georgia and the surrounding areas.

Thank you for allowing me to speak on behalf of all our employees.

Regards,

Rhett Willis

Rhett Willis, COF, CES
President/CEO
D J POWERS CO., INC.
5000 Business Center Dr., Ste 1000
Savannah, GA 31405
Phone: (912) 234-7241/ direct: 790-1944

Cell: (912) 507-2123
E-mail: rhett.willis@djpowers.com

www.djpowers.com

DJ POWERS WILL BE CLOSED ON FRIDAY 12/24 AND FRIDAY 12/31 IN OBSERVANCE OF THE CHRISTMAS AND NEW YEARS HOLIDAYS.

From: Katie Dye
To: CESAS-PD, SAS
Subject: FW: A message from the SEDA Chairman and President
Date: Monday, December 20, 2010 2:48:28 PM

Support for SHEP below --

Katie Dye

Director of Marketing and Public Relations

Savannah Economic Development Authority

PO Box 128, Savannah, GA 31402

912.447.9699 direct

912.447.8450 ext.12 main

912.447.8455 fax

kdye@seda.org

For more information about Savannah, visit www.seda.org <http://www.seda.org>

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From: Tanya Milton [mailto:tanya@savannahtribune.com]
Sent: Monday, December 20, 2010 2:03 PM
To: Katie Dye
Subject: Re: A message from the SEDA Chairman and President

Hi Katie,

We at the Savannah Tribune also support the deepening of the Savannah Harbor. I have not had a chance to go by the Savannah Civic Center. Please can you forward our response. Thanks

Tanya Milton
Vice President & Advertising Director
The Savannah Tribune
(912) 233-6128 office
(912) 658-2813 cell

From: Katie Dye <kdye@seda.org>
Sent: Tue, December 14, 2010 4:48:37 PM
Subject: A message from the SEDA Chairman and President

Friends:

On behalf of the board of directors of the Savannah Economic Development Authority, we express our strong support for the deepening of the Savannah Harbor. The Port of Savannah has been one of our greatest economic assets since the founding of Georgia and in order to remain so, it must be deepened to 48 feet to continue to compete globally.

On Wednesday, December 15 from 4-8pm at the Savannah Civic Center, the U.S. Corps of Engineers will be hosting an open format workshop with relevant exhibits. The public is invited to attend and give input. Comment cards and a court recorder will be on hand.

If you are local, we encourage you to drop in to offer comments on the importance of this project to you, your business, the Savannah community, coastal Georgia and the entire state.

If you cannot attend the event on December 15, please submit your formal comments either by US mail or via email before January 10, 2011.

Comments can be mailed to:

Mr. William Bailey
ATTN: PD, US Army Corps of Engineers, Savannah District
100 West Oglethorpe Avenue
Savannah, GA 31401-3640

Comments can also be emailed to: CESAS-PD@usace.army.mil.

Please take the time to communicate your support for the deepening of the Savannah Harbor. As the fourth largest container port in the country, the Port of Savannah serves approximately 21,000 companies in all 50 states, over 75% of which are headquartered outside of Georgia. So while this project is critical to the economic prosperity of our state, it is also important to the future transportation infrastructure needs of our nation. Your physical presence and/or your comments are vital to its success.

Thank you,

Thomas C. Hester, SEDA Chairman

Steven W. Weathers, SEDA President & CEO

About the SHEP: The Savannah Harbor Expansion Project (SHEP)

The Savannah Harbor Expansion Project is a project of national significance.

o The Port of Savannah is responsible for moving 8.3% of all US containerized cargo and more than 18% of all East Coast trade.

o As the fourth largest container port in the country, the Port of Savannah serves approximately 21,000 companies in all 50 states, over 75% of which are headquartered outside of Georgia.

o The SHEP will allow larger, deeper draft ships to call on the Port of Savannah, the import/export gateway to 44% of the US population. The economies of scale offered by Post Panamax ships will result in an average of 17% cost savings to US exporters and importers when compared to the operating costs of Panamax vessels.

The SHEP will assist the nation in successfully meeting the National Export Initiative created by Executive Order of President Obama.

o In order to meet the National Export Initiative aimed at doubling US exports over the next five years, the port infrastructure must be in place to accommodate the export growth.

o The Port of Savannah handled 12% of all U.S. containerized exports in FY2010, a total of 1.14 million export TEUs (twenty-foot equivalent units), with an export ratio of 54%.

The SHEP serves as a model for future Corps projects with significant Federal Agency collaboration throughout the study process, as well as the incorporation of adaptive management.

o The USFWS, EPA and NMFS have been involved throughout the study process since 1999 and have served as cooperating agencies in the production of the EIS since 2001.

o This project will represent the first deep-draft navigation project which incorporates adaptive management as mandated by WRDA 2007.

The Statewide Economic Impact of Georgia's Deepwater Ports (FY2009):

295,443 full and part-time jobs (7% of Georgia's total employment);
$61.7 billion in sales (9% of Georgia's total sales);
$26.8 billion in gross state product (7% of Georgia's total GSP);
$15.5 billion in income (5% of Georgia's total personal income);
$3.5 billion in federal taxes
$2.6 billion in state and local taxes

Katie Dye

Director of Marketing and Public Relations

Savannah Economic Development Authority

PO Box 128, Savannah, GA 31402

912.447.9699 direct

912.447.8450 ext.12 main

912.447.8455 fax

kdye@seda.org

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Zebra

Zebra Enterprise Solutions

December 20th, 2010

Re. Savannah Harbor Expansion Project

To Whom It May Concern;

As an interested party and long time technology provider to the Georgia Ports Authority (GPA) I would like to extend my support for this project. GPA has done an outstanding job creating new jobs and opportunities for the people of Georgia. GPA is a critical provider of services enabling cargo to flow through our eastern seaboard into the rest of the country. To stay competitive GPA must be able to handle the larger container vessels bringing cargo from Europe and Asia. Additionally GPA has completed a number of projects over the past few years that will allow them to handle additional cargo without significant impacts to the environment including:

- RTG automation to allow the current equipment at GPA to handle more moves. This reduces the total pieces of equipment deployed and has a reduction on overall diesel emissions.
- New CSX intermodal facility making it more efficient to ship containers into the US heartland thus reducing truck traffic on highways and reducing emissions.
- Truck gate automation to reduce the idling time for trucks as they enter GPA, reducing emission and allowing the trucking community to be more efficient.

As you can see GPA has undertaken many projects that not only benefit the Georgia economy but have significant environmental benefits.

Please regard this letter as our vote of support for this project and for the continued success of the Georgia Ports Authority.

Best Regards,

Chuck Schneider

Chuck Schneider
Vice President
Zebra Enterprise Solutions

From: pkm021922@comcast.net
To: CESAS-PD, SAS
Subject: Savannah Harbor Expansion Project
Date: Monday, December 20, 2010 3:59:23 PM

Dear Mr. William Bailey

ATTN: PD, US Army Corps of Engineers, Savannah District

100 West Oglethorpe Avenue

Savannah,, GA 31401-3640

I just wanted to send you a note to voice my opinion regarding the harbor expansion project. I believe that the benefits of this project far outweigh the drawbacks that it will cause. If you think back to the history of Savannah, it was originally built on marsh to begin with. It grew and has become a flourishing city due to the improvements and changes we have made to our environment. Nature forever adapts. Things always change. We adapt too. Not to belittle the dynamics of this project, but moving soil from one place to another is one of the least damaging ways to do what we need to in order to progress. Not to mention, the jobs that this will open up are needed so badly. Just think: If you look at the faces of a hungry child and a small green frog, which one would you feed?

Thank you for your time,

Peter M. Kress

P.S.O.

GPA

US Army Corps of Engineers
Savannah District

#167

Comment on the Savannah Harbor Expansion Project

The Savannah District, U.S. Army Corps of Engineers welcomes your comments on the Savannah Harbor Expansion Project. Once completed, place the card in the "comments" box or add postage and mail it back to us. Comments can also be provided online at **CESAS-PD@usace.army.mil**.

From: (optional) Rosemary Taylor

Comments:

I feel the Harbor Expansion Project is vital to the City of Savannah, State of Georgia and the USA. I feel it is necessary to deepen the Harbor I place much importance on this project

KIA MOTORS

January 10, 2011

Via Electronic Mail – CESAS-PD@usace.army.mil
Mr. William Bailey
Attn: PD
US Army Corps of Engineers, Savannah District
100 West Oglethorpe Avenue
Savannah, GA 31401-3640

Re: Savannah Harbor Expansion Project – Comments on Draft General Re-evaluation Report and Environmental Impact Statement

Dear Mr. Bailey:

Kia Motors Manufacturing Georgia (KMMG) appreciates this opportunity to express support for the recommendations in the Army Corps of Engineers Draft General Re-evaluation Report and Environmental Impact Statement concerning the proposed Savannah Harbor Expansion Project. KMMG employs more than 2,000 workers at its West Point, Georgia facility, building Kia Sorento and Hyundai Santa Fe vehicles. Since opening in November 2009, KMMG has built about 170,000 vehicles.

Our West Point facility plays a critical role in Kia's manufacturing operations; of the 356,268 vehicles Kia sold in the U.S. since the beginning of 2010, 30% come from Georgia. And production at the West Point facility is growing at a healthy pace; KMMG currently has more than 2,500 team members and local suppliers are expected to create an additional 7,500 job in the area.

To build cars at West Point, KMMG receives certain car components via the Port of Savannah, which are then transported to our plant. In 2010, KMMG transported 1,400 containers from the Port of Savannah and our suppliers transported 2,300 containers. This will increase up to 3,500 for KMMG and 7,500 for our suppliers in the coming years. Because our business depends upon just-in-time delivery of many items, the ability to receive necessary components in a timely and reliable manner is critical to Kia. In fact, Kia's decision to build its $1 billion facility in West Point was in no small measure due to the proximity of the Port of Savannah and the proliferation and continued growth of supplier companies in that area depend upon the Port.

KMMG commends the Port of Savannah for its efforts to operate as efficiently as possible under the current circumstances. However, we are concerned that existing challenges will become increasingly difficult to address. Savannah's Garden City terminal is the East Coast's second largest container port but at 42 feet deep, Savannah harbor is the shallowest of

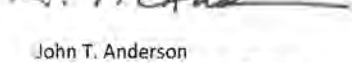
the nation's top ten container ports. Currently, carriers are adapting to the shallow depth through measures such as waiting for high tide, light loading, using smaller vessels, or bypassing Savannah altogether. However, such measures can ultimately impact shippers like KMMG and supplier companies with which it works through decreased efficiency and reliability, and increased costs. These problems will only be exacerbated when the Panama Canal completes its expansion in 2014, allowing even larger ships to access the East Coast ports, more of which may bypass Savannah due to shallow harbor depth.

Accordingly, KMMG supports the Army Corp of Engineers' proposed expansion project for the Savannah Harbor, which will deepen the harbor to a sufficient depth to alleviate many of the navigational difficulties currently facing vessels, and to accommodate larger vessels capable of carrying more cargo. We believe the project will allow the Port of Savannah to maintain and enhance its economic contribution to the region and the nation, as the Corp of Engineers report concludes. What this means to KMMG as a shipper is logistical efficiency and reliability which, as mentioned, are critical to our operations. These enhancements will be especially important moving forward, because KMMG's efficiency and growth translates to much-needed jobs for the entire region.

Environmental concerns certainly should not be overlooked, and KMMG notes the Corps of Engineers' finding that allowing larger vessels to access the port could reduce air emissions because fewer of such vessels would be needed to carry cargo through the port. We also believe an expanded port would reduce or alleviate the instances of vessels bypassing Savannah in favor of more distant, deeper ports, which now forces some Georgia-area shippers to transport the cargo greater distances by truck.

Efficient operation of KMMG's supply logistics plays a key role in the ability of KMMG and its suppliers to grow. And efficient operation of the Port of Savannah, with the ability to expand its cargo capabilities, will help KMMG meet its expansion goals, to the ultimate benefit of the entire region. For these reasons, KMMG is pleased to express its support for the proposed Savannah Harbor expansion project.

Sincerely,



John T. Anderson
Director, Government Affairs
Kia Motors, Washington, D.C.

From: CESAS-CCO, SAS
To: "Roger Pinckney XI"
Subject: Your comment on: Jasper Ocean Terminal (UNCLASSIFIED)
Date: Wednesday, January 12, 2011 2:39:05 PM

Classification: UNCLASSIFIED
Caveats: NONE

Dear Mr. Pinckney:

Thank you for sending your comments regarding the Savannah Harbor Expansion Project. I will forward your note to the office compiling comments.

For the record: The Corps of Engineers does not "oppose" the Jasper Ocean Terminal. Our evaluation finds that it is in the best economic interest of the nation to deepen the harbor to the Garden City port that already exists rather than to a non-existing port.

We welcome comments on our projects.

Sincerely,

BILLY E. BIRDWELL

Public Affairs Specialist

Savannah District, US Army Corps of Engineers

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From: Roger Pinckney XI [mailto:rpinck@hargray.com]
Sent: Wednesday, January 12, 2011 1:39 PM
To: CESAS-CCO, SAS

Subject: Jasper Ocean Terminal

Sirs--

Please accept my thanks for your opposition to the contemplated Jasper Ocean Terminal at Field's Cut. The proposed container port would be 4.5 miles from Daufuskie Island, a National Register site.

The light and noise would forever degrade the quality of life here on the island. After 50 years, we can finally eat our oysters again. Would hate to lose them to spilled oil.

Many thanks,

Roger Pinckney

Daufuskie Island SC

www.rogerpinckney.com

Classification: UNCLASSIFIED
Caveats: NONE

From: David Sink
To: CESAS-PD, SAS
Cc: John Neely; Cliff Dales; Ashley Smith; Maxwell Penn; Danny Chase; Sherri Stroud; Hilary Bel; Ellen Lynes
Subject: Savannah Harbor Expansion Project
Date: Monday, January 10, 2011 4:45:27 PM
Attachments: image001.png

Dear Mr. Bailey:

Please accept this note as our firm's support of the Savannah Harbor Expansion Project (SHEP). Our company, formerly known as Neely/Dales, LLC, is fortunate to have been involved in a majority of the larger industrial real estate transactions that have occurred in the Savannah market over the past 25+ years. We interact on a regular basis with key decision makers within companies that are analyzing the strengths and weaknesses of the various east coast port markets. Our clients include many of the largest occupiers and developers of industrial warehouse facilities in the region, which gives us a unique perspective on the market and the SHEP. This project is of great importance, not only to the Savannah industrial market, but also to the surrounding counties in Georgia and South Carolina, the I-95 corridor, the I-16 corridor, the Atlanta industrial market, and beyond.

Thank you for your work on this essential project.

Best regards,

David Sink

David J. Sink, SIOR
Principal
Dir +1 912 233 7111 x 102
Main +1 912 233 7111 | Fax +1 912 236 1200
david.sink@colliers.com

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www.colliers.com <http://www.colliers.com>

Description: Description: http://www.colliers-international.com/CorporateMarketing/image001.png

View the current issue of Knowledge Leader <http://www.knowledge-leader.com/magazine.cfm> .

From: Kelly, Ruth
To: CESAS-PD, SAS
Subject: Savannah Port Expansion
Date: Thursday, January 13, 2011 10:45:00 AM

Mr. William Bailey,

ATTN: PD, US Army Corps of Engineers, Savannah District
100 West Oglethorpe Avenue
Savannah, GA 31401-3640

I represent Beall's outlet Stores import operations. I have been with the company for 17 years. I have had the opportunity over several years to visit the Georgia Port Authority offices in Savannah. I have been on a few port tours and are quite excited about the changes I see happening at the Port of Savannah.

As a retailer who imports the major portion of our products from the Asia area, the prospect of the Port of Savannah being able to handle the larger ships that are sailing out of China is of interest to us. We are always working with the ocean carriers to keep our container costs in check and we see this as an opportunity to accomplish cost savings by booking on these mega-vessels.

Once again I like what I see in terms of expansion and the professional way the Port of Savannah is run and we plan to continue to use the facility.

Ruth Kelly

Beall's Outlet Import Operations and Compliance Manager

January 13, 2011

Mr. William Bailey
US Army Corps of Engineers - Savannah District
100 West Oglethorpe Avenue
Savannah, Georgia 31401-3640
Via e-mail: CESAS-PD@usace.army.mil

Dear Mr. Bailey,
I am writing to state, for the record, the importance of the Savannah Harbor Expansion Project. Our company currently utilizes the Port of Savannah as a major east coast gateway for import/exporting our products and provided adequate infrastructure is available, we plan to continue to grow our trade through the port for many years to come. However, the current -42 foot mean low water depth of the Savannah River is no longer sufficient to accommodate the post-Panamax vessels we rely on today to transport our goods. This deficiency will be more significant in the future as we expect larger containerships to be introduced by carriers serving the US east coast upon completion of the Panama Canal expansion.

As you know, the newer post-Panamax vessels offer greater economic and environmental efficiencies that make their use both a preference as well as a priority to older generation vessels. SHEP is critical to the continued cost-effectiveness of our business and our ability to create jobs and reduce costs to U.S. consumers. By being able to load more boxes on fewer ships, our transportation costs are significantly decreased. Furthermore, ready access to the newer larger vessels at the Port of Savannah will avoid the higher financial and environmental costs of trucking our products to/from ports that are further from our markets and distribution network."

It is imperative that the Savannah Harbor be deepened to -48 feet at mean low water and that this project is completed as quickly as possible. Our business and that of other United States exporters and importers, is depending on it.

Sincerely,

Patrick M. Butler
Vice President of Logistics
Hasbro Inc.

From: Mike Kistler
To: CESAS-PD, SAS
Subject: Port Deepening
Date: Friday, January 14, 2011 12:04:25 PM

We definately need this expansion for our port in Savannah. It is good for the community, the state and he Southeast. Without this expansion, our economy will be hurt and left behind in this industry. I am in full support of the channel deepening project.

Mike Kistler

From: Chervenak, Gene
To: CESAS-PD, SAS
Subject: Savannah River Deepening
Date: Friday, January 14, 2011 12:24:06 PM

To Whom It May Concern,

I am in support of the Savannah River deepening project in Savannah, GA. Savannah and the state of Georgia are in need of more commerce and available jobs. Please let this project get underway as soon as possible.

Thank you,

Gene Chervenak

Gene Chervenak, CSI, CDT

Construction Services

Department Leader

Thomas & Hutton

www.thomasandhutton.com <http://www.thomasandhutton.com/>

chervenak.g@thomasandhutton.com <mailto:chervenak.g@thomasandhutton.com>

(P) 912-721-4102 (F) 912-721-4202

(C) 912-657-2305

"Relationships and Solutions for Success"

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From: Patrick Summerlin
To: CESAS-PD, SAS
Subject: Savannah Harbor Deepening
Date: Friday, January 14, 2011 12:54:12 PM

I would like to voice my support for the deepening of the Savannah Harbor. I work for Colonial Oil, and this project would only help our company grow. This project would allow more ships to call on the Savannah Port, which would in turn create more business for companies that service the Georgia Ports. This would create more business for Colonial Oil by offering new potential Fueling/Bunkering customers, and it would greatly impact the department that I am in; as we service the Georgia Ports Authority and TICO with all of their lubricant needs (i.e. Motor Oil, hydraulic oil, etc.). I would like to thank you for taking the time to read my email and hopefully take it into consideration when making the final decision on this project.

Best Regards,

Patrick Summerlin

Picture

Patrick Summerlin

General Manager, Lubricants Division

Colonial Oil Industries

Phone: (912) 443-6584

Fax: (912) 235-3877

From: Denton Stone
To: CESAS-PD, SAS
Subject: Savannah Harbor Deepening
Date: Friday, January 14, 2011 2:37:59 PM

Dear Sirs,

As a company who builds many structures supporting the logistics industry here in Savannah and surrounding areas, we are wholly supportive of deepening the Savannah Harbor. Please know that the impact this project will have will be felt directly by my company, its employees, and our affiliated subcontractors.

With Warmest Regards,

Denton Stone

Stone Construction Services, LLC

From: dexter@autoexpertsllc.com
To: CESAS-PD, SAS
Subject: Harbor Work At Savannah, Georgia
Date: Friday, January 14, 2011 3:21:25 PM

This work must be preformed for the well being of our economic base, at a time when we are losing jobs by the thousands we can not afford to hender our ability to export. Dexter E Elliott

#191

Norfolk Southern Corporation
Three Commercial Place
Norfolk, Virginia 23510-9251
Telephone: 757/629-2748
FAX: 757/629-2849
remartin@nscorp.com

Robert E. Martínez
Vice President
Business Development

January 7, 2011

Mr. William Bailey
ATTN: PD
US Army Corps of Engineers
Savannah District
100 West Oglethorpe Avenue
Savannah, GA 31401-3640

Re: Savannah Harbor Expansion Project (SHEP)

Dear Mr. Bailey:

On behalf of Norfolk Southern Corporation, I am writing to express our support of the Savannah Harbor Expansion Project and hope for a timely completion of the deepening of the Savannah Harbor to -48 feet at low water.

This project is important to the business Norfolk Southern handles in Savannah. It is important to the State of Georgia, and it is a critical project for increased economic well-being of the United States and for job-creation.

Sincerely,

#211

US Army Corps of Engineers
Savannah District

Comment on the Savannah Harbor Expansion Project

The Savannah District, U.S. Army Corps of Engineers welcomes your comments on the Savannah Harbor Expansion Project. Once completed, place the card in the "comments" box or add postage and mail it back to us. Comments can also be provided online at CESAS-PD@usace.army.mil.

From: (optional) Tom Mahoney III

Comments:

Please count my comments as being in favor of this project. The project is well thought out. Valid concerns have been adequately addressed. The benefits greatly outweigh any real concerns. The concerns are more than adequately mitigated. The benefit of jobs to the state of Georgia and the Southeast region are tremendous. Moreover, the Savannah port is environmentally clean, and we should invest in moving cargo through this modern, clean facility. It is closer to inland distribution points, and that efficiency will save on inland transportation costs, fuel and pollution. Please note my strong support for the project. Thank you.

TM

US Army Corps of Engineers
Savannah District

Comments 187-493

#189

Comment on the Savannah Harbor Expansion Project

The Savannah District, U.S. Army Corps of Engineers welcomes your comments on the Savannah Harbor Expansion Project. Once completed, place the card in the "comments" box or add postage and mail it back to us. Comments can also be provided online at **CESAS-PD@usace.army.mil**.

From: (optional) HENRY S. MORGAN Savannah Ga

Comments:

① I am in favor of! This project is meritorious for the United States and for Savannah.

② This project will create and/or preserve jobs.

③ This project should sharpen the focus on aquifer withdrawals of a commercial not residential nature.

④ The addition of approx 2000 acres to the wild life refuge should be considered as extremely adequate.

Thank you and good luck.

US Army Corps of Engineers
Savannah District

#193

Comment on the Savannah Harbor Expansion Project

The Savannah District, U.S. Army Corps of Engineers welcomes your comments on the Savannah Harbor Expansion Project. Once completed, place the card in the "comments" box or add postage and mail it back to us. Comments can also be provided online at **CESAS-PD@usace.army.mil**.

From: (optional)

Comments: I feel the harbor deepening is needed for the commerce it will provide Georgia Savannah and the Southeast. If we do not do the harbor deepening the Savannah port will lose its position it has gained with shippers and relegate it to a second tier harbor in the future.

#194

US Army Corps of Engineers
Savannah District

Comment on the Savannah Harbor Expansion Project

The Savannah District, U.S. Army Corps of Engineers welcomes your comments on the Savannah Harbor Expansion Project. Once completed, place the card in the "comments" box or add postage and mail it back to us. Comments can also be provided online at **CESAS-PD@usace.army.mil**.

From: (optional) Ann H Austin

Comments: I believe it would be a great asset to SAVANNAH to have the harbor deepened. I am in favor of having this done.

Thanks.
Ann Austin
2 St. Moritz Ct
Savannah GA 31419

#195

US Army Corps of Engineers
Savannah District

Comment on the Savannah Harbor Expansion Project

The Savannah District, U.S. Army Corps of Engineers welcomes your comments on the Savannah Harbor Expansion Project. Once completed, place the card in the "comments" box or add postage and mail it back to us. Comments can also be provided online at **CESAS-PD@usace.army.mil**.

From: (optional)

Comments: I have worked on and around the harbor of Savannah for a number of years and I think it is important that the harbor be deepened.

Daniel E. Clinton
645 INDIAN ST.
SAVANNAH, G. 31401

#196

US Army Corps of Engineers
Savannah District

Comment on the Savannah Harbor Expansion Project

The Savannah District, U.S. Army Corps of Engineers welcomes your comments on the Savannah Harbor Expansion Project. Once completed, place the card in the "comments" box or add postage and mail it back to us. Comments can also be provided online at **CESAS-PD@usace.army.mil**.

From: (optional) I.L.A Local 1414

Comments: We need jobs to provide for our families. The state Georgia needs to continue dredging river to 48 ft. depth. Thank-you.

#197

US Army Corps of Engineers
Savannah District

Comment on the Savannah Harbor Expansion Project

The Savannah District, U.S. Army Corps of Engineers welcomes your comments on the Savannah Harbor Expansion Project. Once completed, place the card in the "comments" box or add postage and mail it back to us. Comments can also be provided online at **CESAS-PD@usace.army.mil**.

From: (optional) CHARLES L. WILLIAMS

Comments: This project has been thoroughly reviewed and should be completed as soon as possible. Ships are getting bigger, not smaller and with the expansion of the Panama Canal, this project is vital to this region.

#198

US Army Corps of Engineers, Savannah District

Comment on the Savannah Harbor Expansion Project

The Savannah District, U.S. Army Corps of Engineers welcomes your comments on the Savannah Harbor Expansion Project. Once completed, place the card in the "comments" box or add postage and mail it back to us. Comments can also be provided online at **CESAS-PD@usace.army.mil**.

From: (optional) Thank

Comments: Yes, I'm for the Harbor Deepening

#199

US Army Corps of Engineers, Savannah District

Comment on the Savannah Harbor Expansion Project

The Savannah District, U.S. Army Corps of Engineers welcomes your comments on the Savannah Harbor Expansion Project. Once completed, place the card in the "comments" box or add postage and mail it back to us. Comments can also be provided online at **CESAS-PD@usace.army.mil**.

From: (optional) Patricia H. Neal

Comments: As an employee of the Georgia Ports Authority I am sure you can understand that I support the Harbor Expansion Project. But aside from my desire for job security, I support the harbor deepening because of the benefit to all of the supporting businesses in the Southeast. If the harbor is not expanded to allow for entry of the large container ships, those ships will simply have to go elsewhere. If the future of shipping is changing then the Ports have to change to adapt. Failure to complete this project would have a negative impact on not only the coast of Georgia but the entire state and surrounding areas.

#200

US Army Corps of Engineers, Savannah District

Comment on the Savannah Harbor Expansion Project

The Savannah District, U.S. Army Corps of Engineers welcomes your comments on the Savannah Harbor Expansion Project. Once completed, place the card in the "comments" box or add postage and mail it back to us. Comments can also be provided online at **CESAS-PD@usace.army.mil**.

From: (optional) Cecelia B. Williams / Charles L. Williams, Bro.

Comments:

I am all for the harbor expansion project. This expansion would allow Savannah to become a larger player in the global shipping industry.

Therefore, Savannah must keep up with the ever changing demands of the global market.

#201

US Army Corps of Engineers, Savannah District

Comment on the Savannah Harbor Expansion Project

The Savannah District, U.S. Army Corps of Engineers welcomes your comments on the Savannah Harbor Expansion Project. Once completed, place the card in the "comments" box or add postage and mail it back to us. Comments can also be provided online at **CESAS-PD@usace.army.mil**.

From: (optional) ROBIN GODWIN - SAVANNAH, GA

Comments:

I AM IN FAVOR OF THE SAVANNAH HARBOR EXPANSION PROJECT. I AM CONVINCED THAT ADEQUATE RESEARCH, STUDIES AND FAR TOO MUCH EXPENSE HAS GONE INTO THIS PROJECT TO ALLOW FORWARD DIRECTION TO DEEPEN THE HARBOR TO 48 FEET. ACCOMMODATING THE LARGER SHIPS PRIOR TO THE COMPLETION OF THE WIDENING OF THE PANAMA CANAL WILL BE FRUITFULL TO OUR ECONOMY BY INCREASED JOB SECURITY AS WELL AS THE CREATION OF MORE JOBS.

SOUNDS LIKE A NO BRAINER TO ME....

THINK LIKE NIKE AND JUST DO IT!!!

#202

US Army Corps of Engineers
Savannah District

Comment on the Savannah Harbor Expansion Project

The Savannah District, U.S. Army Corps of Engineers welcomes your comments on the Savannah Harbor Expansion Project. Once completed, place the card in the "comments" box or add postage and mail it back to us. Comments can also be provided online at **CESAS-PD@usace.army.mil**.

From: (optional) Ralph Maggioni, Director, Savannah Foreign Trade Zone

Comments: After a protracted evaluation process we are poised to rescue many thousands of jobs for all of Georgia and parts of the South Carolina Low Country. It is incumbent upon all of us to support this project especially since our balance of imports and exports is nearly perfect. Our President has asked us to increase exports across the nation. If Savannah cannot keep up, exports will suffer severly.

This project must proceed immediately to maintain the financial health of the entire region.

Merry Christmas, and may God bless all of you.

Ralph Maggioni

#203

US Army Corps of Engineers
Savannah District

Comment on the Savannah Harbor Expansion Project

The Savannah District, U.S. Army Corps of Engineers welcomes your comments on the Savannah Harbor Expansion Project. Once completed, place the card in the "comments" box or add postage and mail it back to us. Comments can also be provided online at **CESAS-PD@usace.army.mil**.

From: (optional) Richard Brown

Comments: We are looking forward to the dredging of our river. The last huge vessel was tighted up for 4 days which is too long for the Savannah Port to maintain its status as the best seaport. ILA has a long history of progressively discharging cargo. Dredge the Savannah harbor ASAP.

Thanks

#204

US Army Corps of Engineers, Savannah District

Comment on the Savannah Harbor Expansion Project

The Savannah District, U.S. Army Corps of Engineers welcomes your comments on the Savannah Harbor Expansion Project. Once completed, place the card in the "comments" box or add postage and mail it back to us. Comments can also be provided online at **CESAS-PD@usace.army.mil**.

From: (optional) William Golson

Comments: Deepening Sav. River will increase commerce for Sav. area that will increase jobs for the area which mean more work for me and my family. I thank you for your input in the situation.

12/16/10

#205

US Army Corps of Engineers, Savannah District

Comment on the Savannah Harbor Expansion Project

The Savannah District, U.S. Army Corps of Engineers welcomes your comments on the Savannah Harbor Expansion Project. Once completed, place the card in the "comments" box or add postage and mail it back to us. Comments can also be provided online at **CESAS-PD@usace.army.mil**.

From: (optional) mailroom

Comments: I would like to see the harbor deepen because its would make it easier for bigger ship to call on the port.

#206

US Army Corps of Engineers, Savannah District

Comment on the Savannah Harbor Expansion Project

The Savannah District, U.S. Army Corps of Engineers welcomes your comments on the Savannah Harbor Expansion Project. Once completed, place the card in the "comments" box or add postage and mail it back to us. Comments can also be provided online at **CESAS-PD@usace.army.mil**.

From: (optional) Gina Bagnis

Comments: I feel that we should move forward with the Savannah Harbor Expansion Project for the growth of our port. If we don't utilize this opportunity we will be giving away business to other ports. This will definitely help to keep our jobs as well as having the possibility to ensure new job openings. This is definitely a road that our economy needs to take.

I do hope you determine that we are right on this matter. Expanding our port can only be good for the future of our business as well as our economy. The State Georgia is in a win-win situation by expanding.

#207

US Army Corps of Engineers, Savannah District

Comment on the Savannah Harbor Expansion Project

The Savannah District, U.S. Army Corps of Engineers welcomes your comments on the Savannah Harbor Expansion Project. Once completed, place the card in the "comments" box or add postage and mail it back to us. Comments can also be provided online at **CESAS-PD@usace.army.mil**.

From: (optional) William F Conaty

Comments: I need the harbor deepened to 48 FT!

My job depends on it!

#208

US Army Corps of Engineers
Savannah District

Comment on the Savannah Harbor Expansion Project

The Savannah District, U.S. Army Corps of Engineers welcomes your comments on the Savannah Harbor Expansion Project. Once completed, place the card in the "comments" box or add postage and mail it back to us. Comments can also be provided online at **CESAS-PD@usace.army.mil**.

From: (optional) STEVE WANDERS

Comments:

- OBVIOUSLY STUDIED THOROUGHLY
- TRANSPARENT PUBLIC PROCESS
- SIGNIFICANT ECONOMIC BENEFIT

GREAT PROJECT - I SUPPORT!

#209

US Army Corps of Engineers
Savannah District

Comment on the Savannah Harbor Expansion Project

The Savannah District, U.S. Army Corps of Engineers welcomes your comments on the Savannah Harbor Expansion Project. Once completed, place the card in the "comments" box or add postage and mail it back to us. Comments can also be provided online at **CESAS-PD@usace.army.mil**.

From: (optional) JAMES ILER

Comments:

A MORE VIEWER-FRIENDLY ROOM COULD HAVE BEEN USED FOR THE WORKSHOP WITH BETTER AUDIO FEATURES SO EVERYONE COULD HEAR THE SPEAKER (& SEE HIM TOO).

PLENTY OF INFORMATIVE LITERATURE WHICH IS A GOOD THING.

#250

US Army Corps of Engineers, Savannah District

Comment on the Savannah Harbor Expansion Project

The Savannah District, U.S. Army Corps of Engineers welcomes your comments on the Savannah Harbor Expansion Project. Once completed, place the card in the "comments" box or add postage and mail it back to us. Comments can also be provided online at **CESAS-PD@usace.army.mil**.

From: (optional)

Comments: I'M FOR THE EXPANSION OF THE SAVANNAH HARBOR IT WILL CREATE FOR REV. FOR THE PORTS, AS WELL AS CREATE JOBS IT WILL ALSO CREATE FUTURE WORK ALONG THE RIVER

#251

US Army Corps of Engineers, Savannah District

Comment on the Savannah Harbor Expansion Project

The Savannah District, U.S. Army Corps of Engineers welcomes your comments on the Savannah Harbor Expansion Project. Once completed, place the card in the "comments" box or add postage and mail it back to us. Comments can also be provided online at **CESAS-PD@usace.army.mil**.

From: (optional) JAY DEERING jdeering@eeu-inc.com

Comments: I FEEL THE HARBOR EXPANSION SHOULD BE DONE IN ORDER TO MAINTAIN THE ECONOMIC VITALITY OF THIS AREA.
MY FAMILY AND MANY FRIENDS INCLUDING ARE DIRECTLY AND INDIRECTLY AFFECTED BY THE PROSPERITY OF THE PORT.
THANKS,

#212

US Army Corps of Engineers, Savannah District

Comment on the Savannah Harbor Expansion Project

The Savannah District, U.S. Army Corps of Engineers welcomes your comments on the Savannah Harbor Expansion Project. Once completed, place the card in the "comments" box or add postage and mail it back to us. Comments can also be provided online at **CESAS-PD@usace.army.mil**.

From: (optional) SCOTT RASPLICKER

Comments: WE OWN 3 BUSINESSES IN SAVANNAH EMPLOYING 75-100 PEOPLE WORKING PRIMARILY IN THE SAVANNAH REGION, BUT ALSO COAST-TO-COAST. WHILE A SMALL PORTION OF OUR WORK IS DIRECTLY RELATED TO THE PORT, ALMOST ALL OF OUR BUSINESS IS DRIVEN BY PORT RELATED ACTIVITIES FROM OTHER BUSINESSES WHO REQUIRE THE PORTS SERVICES. I STRONGLY BELIEVE THAT IF THE SHIP IS NOT COMPETITIVE IN A TIMELY MANNER, OUR BUSINESSES WILL NOT SURVIVE. THE RIVER HAS BEEN STUDIED FOR OVER A DECADE AND I HAVE NOT SEEN ANY EVIDENCE THAT ENVIRONMENTAL IMPACTS CANNOT BE OVERCOME OR COMPENSATED. IT IS CLEAR THAT MUCH OF THE OPPOSITION ~~[illegible]~~ TO SHIP COMES FROM COMPETITORS WHO SEE AN OPPORTUNITY TO TAKE SAVANNAH'S BUSINESS. ECONOMIC DECISIONS THAT AFFECT AN ENTIRE STATE AND REGION SHOULD NOT BE LEFT TO POLITICAL WHIMS THAT WILL REDUCE COMPETITION, CAUSING MARKET PRICES TO INCREASE, WHILE CONCENTRATING ENVIRONMENTAL DISTURBANCES IN FEWER AREAS CAUSING GREATER OVERALL DAMAGE. FURTHERMORE ROADS & INFRASTRUCTURE IMPROVEMENTS THAT OTHER PORTS WILL BE REQUIRED →

#213

US Army Corps of Engineers, Savannah District

Comment on the Savannah Harbor Expansion Project

The Savannah District, U.S. Army Corps of Engineers welcomes your comments on the Savannah Harbor Expansion Project. Once completed, place the card in the "comments" box or add postage and mail it back to us. Comments can also be provided online at **CESAS-PD@usace.army.mil**.

From: (optional) Denise Neuleib, Savannah GA

Comments: I support deepening the Savannah Harbor to Georgia Ports Authority's requested 48 feet. Deepening the harbor is extremely important to the future of the port, the State of Georgia and to the many other businesses and infastructures that directly or indirectly deal with the port. With the Port of Savannah being one of the busiest ports on the east Coast, it make sense to do what we can to maintain that competitive edge. Bigger Ships that carry more Cargo can reduce costs that will benefit many. The environmental impact is always a concern but I feel that the US Army Corps of Engineers along with the Georgia Ports Authority have done and will continue to do what they can to minimize the effects on the environment and wildlife. Please consider deepening the harbor to 48 feet!

#214

US Army Corps of Engineers, Savannah District

Comment on the Savannah Harbor Expansion Project

The Savannah District, U.S. Army Corps of Engineers welcomes your comments on the Savannah Harbor Expansion Project. Once completed, place the card in the "comments" box or add postage and mail it back to us. Comments can also be provided online at **CESAS-PD@usace.army.mil**.

From: (optional) Bill Jacobs Chatham Co. Resident.

Comments: From what I've been reading in the Savannah Morning News... Georgia Ports has satisfied all environmental and cost ratio studies. Cost ratio says "Go" - GA Ports is willing to work on the mitigation cost for what little environmental impacts there will be. GPA is a good steward

The Project should move forward. The positive economical impact will reach beyond the state of Georgia's boundries.

With the ~~economy~~ present state of the economy the Savannah Harbor Expansion Project needs to be put in placed. It can only create New Jobs, stabilize the current economy and spur the S.E. US economy in a positive direction.

(BJ)

#215

US Army Corps of Engineers, Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) Susie West, Savannah, GA

Comments: I fully support the deepening of the Savannah harbor to 48'. This project will indisputably have a positive economic influence, not only in Savannah but Georgia and the whole Southeast region as well. Being confident that the environment will not be adversely affected, I see it as being crucial to the future of our state, for our children and their children.

#216

US Army Corps of Engineers• Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) Patrick Rogers

Comments: The project is extensive and well thought out. There are positive gains for both the economic and environmental benefit for the region. I am impressed with the studies and feel this project is a go!!

#217

US Army Corps of Engineers• Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) Becky Ike

Comments: I agree with the 48 ft deepening. The mitigation will leave the Harbor in better shape for the evenvironment than before the deepening. It's only 6 feet!!

#218

US Army Corps of Engineers, Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional)

Comments:

THE ECONOMIC IMPACT IS WORTH NOW AND IN THE FUTURE ANY ENVIRONMENTAL IMPACT APPEARS MINIMAL GIVEN THE TECHNOLOGY OF TODAY AND TOMORROW. 48' IS NECESSARY AND SHOULD BE PURSUED WITH AN ECONOMIC AND ENVIRONMENTAL BALANCE ACHIEVABLE.

#219

US Army Corps of Engineers, Savannah District

Comment on the Savannah Harbor Expansion Project

The Savannah District, U.S. Army Corps of Engineers welcomes your comments on the Savannah Harbor Expansion Project. Once completed, place the card in the "comments" box or add postage and mail it back to us. Comments can also be provided online at **CESAS-PD@usace.army.mil**.

From: (optional)

Comments: I am in full support of SHEP. It is vital to the continuous growth of GPA and support of companies and jobs in the Southeast region, State of Georgia and the local areas. With the necessary mitigation measures ~~for~~ implemented, the river deepening project must continue.

It is vital that growth of GPA be foremost versus that of competitors

#220

US Army Corps of Engineers, Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) Nick FARLEY · M-PACT LLC nfarley@m-pactusa.com

Comments:

Additional Comments

With all ~~[illegible]~~ bases covered on the protection of the environment and general economics, this project is vital not only to local interests but also for the State of Georgia and the national interests from employment, exports and revenue to the State coffers.

Captain N.K. Farley - Master Mariner

#221

US Army Corps of Engineers, Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) Mike Webb

Comments: From an economic position deepening the harbor is critical to balancing our trade and growing our economy locally and nationally. With environmental controls in place, the potential negative impact should be minimal - if at all.

#222

US Army Corps of Engineers• Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) Thomas Sidener

Comments: In favor of the project, I feel the study supports Savannah Harbor Expansion and the environment will be minimally impacted

#223

US Army Corps of Engineers• Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) Phyllis Myers

Comments: I understand the environmental issues but yes we need to deepen the Harbor.

#224

US Army Corps of Engineers, Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) Karl Strauch

Comments: The Savannah Harbor Expansion Project is critical to the ongoing, necessary competitive position, this community, this region, and this STATE must have to maintain and grow its economy.

I am an independent marketing consultant that specializes in Econ Dev dynamics & Brand Development. The port expansion's positive economic effects will touch everyone in the region. Our businesses depend on it. My business depends on it.

Here's a word about the environmental concerns that I have:

IRONICALLY - if we don't expand - we will lose the economic & political clout in the long term that will adversely affect our collective influence to say what we want our quality of life to be - and that includes zoning/Development/Environmental Issues -

Karl Strauch
912 454 0395

#225

US Army Corps of Engineers, Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) JASON P. BALL, PE

Comments: BIGGER VESSELS WILL LEAD TO LESS POLLUTION BECAUSE OF FEWER VESSEL CALLS.

#226

US Army Corps of Engineers, Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) Bob Shipp

Comments:

The Savannah Harbor is one of the best economic engine for the whole State of Georgia. The unique fact that exports & imports are close to equal evidences the importance of this harbor.

This is a bona fide jobs project in addition to other substantial economic benefits.

I like to fish but the benefits of this project outweigh my desire to fish in this area.

I strongly urge the GA Ports Authority to keep moving this viable project with deliberate speed.

Thank you.

Bob Shipp
27 Magnolia Crossing, Savannah, GA 31411

#227

US Army Corps of Engineers, Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) mlinder@princebush.com (Mitchell A. Linder)

Comments:

In order to keep Savannah an instrumental port on the East Coast the harbor Expansion project is vital. The city's surrounding areas rely on the port to be successful & to be able to continue to employ a number of skilled people in the work force. The new project means we keep jobs which equals growth & prosperity for the area.

#228

US Army Corps of Engineers Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) Pamela Busseret

Comments: The Savannah Harbor expansion project is a priority for the Georgia Ports Authority to continue the economic growth in Georgia and the southeastern United States. Port operations and private sector port related operations account for nearly 300,000 jobs in the state. By deepening the Savannah River to 48 feet, larger vessels will be able to call on the Port of Savannah creating and expanding jobs throughout Georgia. I completely support the harbor expansion project.

#229

US Army Corps of Engineers Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) PATRICK WINTERS - CORES TERMINALS

Comments: IF THE DEEPENING CAN BE DONE W/OUT DETRIMENT TO THE ENVIRONMENT, I SEE IT AS LUDICROUS NOT TO CONTINUE IN ORDER TO EXPAND SAV'HS ECONOMIC PROSPERITY THUS CREATING JOBS FOR OUR CHILDREN & GRANDCHILDREN.

#230

US Army Corps of Engineers, Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) Jeff Neil

Comments:

Strongly support this project and the benefits it will bring to region + the nation

#231

US Army Corps of Engineers, Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) Richard Cox

Comments:

We need to deepen the channel for the benefit of all who work, live, visit in the Savannah area.

Necessary for our continued progress at the Georgia Ports Authority

It is only 6'

It will be very beneficial to future generation,

Jobs, Jobs, Jobs

#232

US Army Corps of Engineers
Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) TERMINAL INVESTMENT CORPORATION

Comments: AS A CITIZEN OF SOUTH CAROLINA, I VIEW THIS AS A LARGER ISSUE THAN JUST ABOUT SAVANNAH. FAILURE TO REMAIN COMPETITIVE HAS BEEN RESPONSIBLE FOR DECLINES IN MANY INDUSTRIES WHICH WERE THE MAINSTAYS OF THE AMERICAN ECONOMY JUST A FEW DECADES AGO.

BECOMING AND REMAINING COMPETITIVE IS NOT JUST A MATTER FOR THE INDUSTRIES A FACTOR IT REQUIRES A COMPETITIVE INFRASTRUCTURE. THE SAVANNAH HARBOR DEEPENING PROJECT REPRESENTS ONE WAY THE STATES, ALLOETHER AND THE FEDERAL GOVERNMENT CAN ASSURE ECONOMIC PROSPERITY FOR THE SAVANNAH AREA. THAT EXAMPLE SHOULD BE REPLICATED IN ALL AREAS AND FOR ALL INDUSTRIES.

#233

US Army Corps of Engineers
Savannah District

Comment on the Savannah Harbor Expansion Project

The Savannah District, U.S. Army Corps of Engineers welcomes your comments on the Savannah Harbor Expansion Project. Once completed, place the card in the "comments" box or add postage and mail it back to us. Comments can also be provided online at **CESAS-PD@usace.army.mil**.

From: (optional) Chatham County Commissioner Patrick K. Farrell District 4

Comments: I am a firm supporter of the harbor expansion project. The well being of the community is dependent on a thriving maritime industry.
The project should go forward post haste!

Patrick K. Farrell

#234

US Army Corps of Engineers
Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) Andrew Richardson

Comments:

As an employee of a local marine contractor, I realize that the expansion of the harbor is vital to not only our company but to the City of Savannah & the entire State of Georgia. Over the past several years Georgia Ports has given our company the opportunity to bid on & complete a variety of construction projects, & given the current economic state, this has been very important for us to keep people employed. With the expansion, I would hope there would be more work to come and also lead to a bigger & better Georgia Ports & Savannah Harbor down the road. This is what the City of Savannah & the State of Georgia needs!

#235

US Army Corps of Engineers
Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) SAM USKOW suskow@remotetechnology.net

Comments:

THIS PROJECT HAS MY COMPLETE SUPPORT - THE STUDY HAS BEEN EXHAUSTIVE AND THE TIME TO MOVE AHEAD IS UPON US. DEEPER WATER

#236

US Army Corps of Engineers, Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) J. BRAD ZIELER

Comments: THE DEEPENING OF THE SAVANNAH RIVER IS ABSOLUTELY VITAL TO THE STATE OF GEORGIA AND COMPANIES ASSOCIATED WITH THE TRANSPORTATION/NAVIGATION

#237

US Army Corps of Engineers, Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) T. GLAZE

Comments: DEEPENING THE RIVER WILL ONLY INCREASE JOBS AND THE GEORGIA ECONOMY

#238

US Army Corps of Engineers, Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) Billy

Comments: The harbor deepening project would not only increase trade but provide more part time and full time jobs for Savannah and surrounding areas. It is very important to stay competitive with other ports and deepening the harbor would keep us in the game.

#239

US Army Corps of Engineers, Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) AUSTIN DENNEY

Comments: I AM EXTREMELY INTERESTED AND VESTED IN THE SHEP PROJECT COMING TO FRUITION. I AM PART OF A BUSINESS THAT IS HEAVILY IMPACTED BY PORT TRAFFIC AND ALSO MAINTAIN PRIDE IN SAVANNAH AND GEORGIA. WHILE ENVIRONMENTAL IMPACTS OF THE HARBOR DEEPENING CONCERN ME, I HAVE THE UTMOST FAITH AND CONFIDENCE THAT THE PROJECT WOULD NOT HAVE PROGRESSED TO THIS POINT IF ANY SIGNIFICANT PROBLEMS WERE LIKELY

- "IT'S NOT THE STRONGEST OF THE SPECIES THAT SURVIVES, NOR THE MOST INTELLIGENT. IT IS THE ONE MOST ADAPTABLE TO CHANGE."
- CHARLES DARWIN

BY THIS - I MEAN THE PORT MUST ADAPT IN ORDER TO KEEP PACE

#240

US Army Corps of Engineers
Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) Adam Deleanides

Comments:

The Port of Savannah is a key employer for Savannah. It also impacts companies that due business with the Port and provide services to the Port. It is a key location and with an assit of Rail Road - supplies the surrounding states with goods - and also impacts their economies. The Port would like to be a leader not a follower. This would be a proactive approach to the business of moving cargo.

#241

US Army Corps of Engineers
Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) GREG VAN BRUNT

Comments: I feel the deepening of the Savannah Harbor is important to the state of GA & the Southeast US to help further growth in the economy.

I support Expansion!

#242

US Army Corps of Engineers
Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional)

Comments: Please expan the savannah habor to help bring greater income to the area, at a time when it is desperately needed

Thank you,
(Pat Cumming)

#243

US Army Corps of Engineers
Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) Amy Schroeder

Comments: I'm in favor of the Savannah Harbor Expansion project

#244

US Army Corps of Engineers• Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) John Young, Riceboro GA

Comments: I feel that deepening the Savannah River to 48 ft to accommodate the larger vessels that call on the Georgia Ports Authority is critical not only to Savannah, GA and the Georgia Ports but to the entire southeastern region of the United States. The Ports is a strong economic engine and without it, everyone in southeast Georgia from doctors, lawyers, truck drivers, realtors, teachers, city officials etc will feel the downturn and the burden. In my conclusion, I am 100% for the SHEP project and for deepening our harbor.

#245

US Army Corps of Engineers• Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional)

Comments: The Georgia Ports Authority has to remain competitive and harbor deepening is critical. The Georgia Ports Authority is the economic engine for the State of Georgia.

#246

US Army Corps of Engineers, Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional)

Comments: THE HARBOR DEEPENING IN SAVANNAH IS A MUST FOR THE PORT TO MAINTAIN ITS MARKET SHARE IN THE CONTAINER TRADE. THE PROJECT ITSELF WILL CREATE JOBS IMMEDIATELY AND THE CURRENT BUSINESS MODEL WILL EXPAND WITH THE INCREASE IN VESSEL TRAFFIC. THE RETURN ON INVESTMENT IS HIGHER THAN NORMAL AND THE AMOUNT OF PLANNING THAT HAS GONE INTO THIS PROJECT MAKES ME FEEL THAT THE MITIGATION WILL BE SUCCESSFUL. THE TIME TO ACT IS NOW!!

#247

US Army Corps of Engineers, Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) Ron Melander, 517 Tattnall St. Savannah GA 31401

Comments:

I Am all for the Harbor Expansion Project. I hope we can get the needed funding to get this started as soon as possible. I believe it is Vital for the future of our region. My belief is that environmental issues will be well addressed as the project is completed. R. Melander

#248

US Army Corps of Engineers
Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional)

Comments: I support the SHEP project after careful consideration and study of negative impacts. I think economic impacts outweigh environmental impacts. I also think ~~enough~~ enough is being done to mitigate environmental impacts.

I am in favor of SHEP continuing to 48 feet

#249

US Army Corps of Engineers
Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) Bill Oakulsen

Comments: I support the 48 ft project for the Savannah Harbor.
1. More jobs for Georgia + the companies East of the Mississippi River,
2. Helps to meet the goal of the President to double exports in 5 yrs. This will give the shippers a world class port to export through.
3. Keep Savannah as a rapid deployment port for the Military
4. Improve the economics of the shipper
5. The project has a GREAT COST Benefit Ratio.
6. Great project working with the Environment.
7. Good for the Nation - Savannah is the fastest growing in US port over the last 15 years. There is room to grow without hurting the environment.

Do It & Get IT Done, you are 2 years late.

#252

US Army Corps of Engineers, Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) Arthur Johnson local 1414

Comments: good idea 48 feet !!!
Best think for Port
of Sav.

#253

US Army Corps of Engineers, Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) William N Barrs

Comments: Deepening the Savannah river to 48' is critical to the recovery of our nation from the recession. Providing access to Georgia and USA products to world market will greatly enhance the prosperity of the USA for generations to come. I support SHEP!

#254

US Army Corps of Engineers
Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) Jeff Felser, Savh City Council - 2ND Term, Alderman at Large (for All of Savh)

Comments: The Savh Harbor Expansion Project is A MUST and we Need it to be completed As soon As possible.

In October, 2010 I vacationed in PANAMA and was given a guided tour/update by the ACP (Panama Canal Authority) on the current expansion. The ACP is determined, focused and moving forward - on time

Savannah must deepen it harbor to be positioned to take care of the ships of the world's future. Our Port is the economic engine for our City, State and and the East Coast of the U.S. Challenges within our environment can be overcome. Technology exists to protect our nature + move forward with this project for our economic viability. Jeff Felser,

#255

US Army Corps of Engineers
Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional)

Comments: I honestly feel this would be a great idea for all parties involved. This would bring so many wonderful assets to our economy, provide many more jobs, (needed) and help to increase a more solid foundation during this recession. This is a blessing!!

#256

US Army Corps of Engineers, Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) Craig Kessler - GPA

Comments: The harbor deepening of the Sav'h River is critical to the S.E. U.S. It is clear, based on current business through GPA - Sav'h that our customers want to be doing business here. We need the 48' depth to ensure they have no reason to look elsewhere. This is an investment that can not be passed up on, base on R.O.I.

#257

US Army Corps of Engineers, Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) DAVID PORTER

Comments: LET'S COMPLETE THIS PROJECT AS SOON AS POSSIBLE.

#258

US Army Corps of Engineers• Savannah District

Comment on the Savannah Harbor Expansion Project

The Savannah District, U.S. Army Corps of Engineers welcomes your comments on the Savannah Harbor Expansion Project. Once completed, place the card in the "comments" box or add postage and mail it back to us. Comments can also be provided online at **CESAS-PD@usace.army.mil**.

From: (optional) Janice E. Rohde

Comments:

In support of this very important project to Savannah and the entire SouthEast.

#259

US Army Corps of Engineers• Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional)

Comments:

HARBOR Deepening is essential for the nation, state and region. Step promotes increase global commerce jobs and the US economy. This project is deserving of the US taxpayer's money — I strongly support.

#260

US Army Corps of Engineers, Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) Paul Mosley SR.

Comments: Deeping Savannah River is very important to the Grow of the City and also State of Georgia.

#261

US Army Corps of Engineers, Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) [illegible] Burns

Comments: The port is essential to the State of Georgia's economy and harbor deepening is necessary to accommodate larger ships.

#262

US Army Corps of Engineers
Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) Nathaniel Harvey (Ansley & Sutton CCs)

Comments: I am for the Harbor expansion project. Knowing that if it is able to happen. It would be good for the state bringing More jobs for people all around. At a time we r needing it. I have worked at GA Port for 5yrs and have seen nothing but improvement environmentally. I think it would be a good thing.

#263

US Army Corps of Engineers
Savannah District

Comment on the Savannah Harbor Expansion Project

The Savannah District, U.S. Army Corps of Engineers welcomes your comments on the Savannah Harbor Expansion Project. Once completed, place the card in the "comments" box or add postage and mail it back to us. Comments can also be provided online at **CESAS-PD@usace.army.mil**.

From: (optional) KERRY LANZER

Comments:

I AM 100% FOR THE 48 FT HARBOR EXPANSION PROJECT

#264

US Army Corps of Engineers, Savannah District

Comment on the Savannah Harbor Expansion Project

The Savannah District, U.S. Army Corps of Engineers welcomes your comments on the Savannah Harbor Expansion Project. Once completed, place the card in the "comments" box or add postage and mail it back to us. Comments can also be provided online at **CESAS-PD@usace.army.mil**.

From: (optional) Joseph T. Dutch (Ansley & Sutton)

Comments: I feel the Savannah Harbor Expansion is a wonderful idea and that with all the information at hand should take place. As a person that depends on the Harbor for so many different reasons. I hope that it will take place and soon.

#265

US Army Corps of Engineers, Savannah District

Comment on the Savannah Harbor Expansion Project

The Savannah District, U.S. Army Corps of Engineers welcomes your comments on the Savannah Harbor Expansion Project. Once completed, place the card in the "comments" box or add postage and mail it back to us. Comments can also be provided online at **CESAS-PD@usace.army.mil**.

From: (optional) Vision Waters (Ansley + Sutton Constr.

Comments: I Think The Harbor Expansion Project would be great for Savannah

#266

US Army Corps of Engineers, Savannah District

Comment on the Savannah Harbor Expansion Project

The Savannah District, U.S. Army Corps of Engineers welcomes your comments on the Savannah Harbor Expansion Project. Once completed, place the card in the "comments" box or add postage and mail it back to us. Comments can also be provided online at **CESAS-PD@usace.army.mil**.

From: (optional) Leshawn Youmans (Ansley + Sutton) I Think that
Comments: this project should be done. It would be a great opportunity to bring more jobs to Savannah.

#267

US Army Corps of Engineers, Savannah District

Comment on the Savannah Harbor Expansion Project

The Savannah District, U.S. Army Corps of Engineers welcomes your comments on the Savannah Harbor Expansion Project. Once completed, place the card in the "comments" box or add postage and mail it back to us. Comments can also be provided online at **CESAS-PD@usace.army.mil**.

From: (optional) James Jackson (Ansley + Sutton Const)
Comments: I think they should proceed with the Savannah Harbor Expansion Project. It will keep Georgia workers at work. And it could bust the economy.

#268

US Army Corps of Engineers, Savannah District

Comment on the Savannah Harbor Expansion Project

The Savannah District, U.S. Army Corps of Engineers welcomes your comments on the Savannah Harbor Expansion Project. Once completed, place the card in the "comments" box or add postage and mail it back to us. Comments can also be provided online at **CESAS-PD@usace.army.mil**.

From: (optional) Ylonda Forte, Savannah GA

Comments: As a concern citizen and an employee that will be directly impacted by this project, I would like to express my support of the SHEP project in deepening the harbor to 48 feet. It is critical that we have the river deepen to 48 feet to allow the Port of Savannah to serve larger ships traveling to the East Coast. This expansion will improve the economic growth for many business in Savannah and in the surrounding areas.

#269

US Army Corps of Engineers, Savannah District

Comment on the Savannah Harbor Expansion Project

The Savannah District, U.S. Army Corps of Engineers welcomes your comments on the Savannah Harbor Expansion Project. Once completed, place the card in the "comments" box or add postage and mail it back to us. Comments can also be provided online at **CESAS-PD@usace.army.mil**.

From: (optional) Debbie Rhodes

Comments: I support harbor deepening up to 48' because I think a vital port is key to jobs in Savannah and throughout the state.

#270

US Army Corps of Engineers
Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) RUSS ABOLT, COUNTY MANAGER

Comments: FULLY SUPPORT - LONG AWAITED

R E Abolt

15 DEC '10

#271

US Army Corps of Engineers
Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) D. Eller

Comments: Please deepen the habor to the maximum authorized depth of 48 Feet For Fatue growth.

#272

US Army Corps of Engineers, Savannah District

Comment on the Savannah Harbor Expansion Project

The Savannah District, U.S. Army Corps of Engineers welcomes your comments on the Savannah Harbor Expansion Project. Once completed, place the card in the "comments" box or add postage and mail it back to us. Comments can also be provided online at **CESAS-PD@usace.army.mil**.

From: (optional) Robert Pettigrew

Comments: For My Company D.J. Powers we have been doing business with GPA for 80 years plus and to continue to do business with our 6 offices we need the Expansion Project please move forward.

#273

US Army Corps of Engineers, Savannah District

Comment on the Savannah Harbor Expansion Project

The Savannah District, U.S. Army Corps of Engineers welcomes your comments on the Savannah Harbor Expansion Project. Once completed, place the card in the "comments" box or add postage and mail it back to us. Comments can also be provided online at **CESAS-PD@usace.army.mil**.

From: (optional) Gary Smith

Comments: This project should go forward with the state the economy is in we cannot afford to lose more jobs. This project will create numerous jobs and put many people to work who are now unemployed. This project is vital to the port and the many jobs it creates.

#274

US Army Corps of Engineers, Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional)

Comments: THE EXPANSION PROJECT IS NOT only VITAL for the long TERM ECONOMIC GROWTH of GEORGIA BUT IS ALSO VITAL TO THE ECONOMIC Recovery of the ENTIRE NATION

#275

US Army Corps of Engineers, Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) CHARLIE BRAZIL (GM OLD TOWN TROLLEY / PRESIDENT TOURISM LEADERSHIP COUNCIL)

Comments:

AS A RESIDENT, A BUSINESS OPERATOR AND AN INDUSTRY LEADER I WOULD LIKE TO COMMUNICATE MY ENTHUSIASTIC SUPPORT FOR THE HARBOR EXPANSION PROJECT. NOTHING LESS THAN SAVANNAH'S FUTURE IS AT STAKE AND THE COMPLETION OF THIS PROJECT WILL HAVE A HUGE IMPACT ON WHETHER OR NOT SAVANNAH STAYS IN ITS CURRENT PROACTIVE POSITION AS A TREND SETTING GROWTH COMMUNITY.

PLEASE MAKE THIS HAPPEN IF AT ALL POSSIBLE
I AM AT YOUR SERVICE IF I CAN BE OF ANY ASSISTANCE

912-210-2250

#276

US Army Corps of Engineers, Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional)

Comments: The deepening of the river to accomodate larger vessels is crucial to the long term survival of Savannah. The economical gain for companies that service the port is tremendous. I am all for the project and hope it gets approved soon

#277

US Army Corps of Engineers, Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) Mulberry Inn

Comments: I'm in favor of anything that may improve our local economy.
This next step is cruise ships. We need growth.

#278

US Army Corps of Engineers, Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional)

Comments: It would be very very great to see something like this to Savannah. It will open up Jobs for people so they will have means to take care of their and give them a better life and for generation to come

#279

US Army Corps of Engineers, Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) Jeanne Poenicke

Comments: I whole heartedly support deepening the Savannah harbor to a depth suitable to accommodate today's massive container vessels. The Port of Savannah has long been the single greatest engine driving the economy in Georgia and the entire Southeast. Continued economic success depends on deepening Savannah's harbor. It is imperative that this project move forward and reach fruition. The livelihoods of countless families depends on it.

#280

US Army Corps of Engineers. Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional)

Comments: The port is a critical part of the Savannah community. The industry is a major job generator for both Savannah and the state of GA. The deepening project is essential for our community and state. I am 100% in favor of the deepening project

#281

US Army Corps of Engineers. Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) Jack W. Busseret, President, Savannah Riverfront

Comments: The Savannah Harbor Expansion Project is a priority for the Georgia Ports Authority to continue the economic growth in Georgia and the Southeastern United States. By deepening the Savannah River to 48 feet, larger vessels will be able to call on the Port of Savannah creating and expanding jobs throughout Georgia. As president of the Savannah Waterfront Association (now Savannah Riverfront), I completely support the harbor expansion project.

#282

US Army Corps of Engineers
Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) Michael Foran

Comments: We need this

#283

US Army Corps of Engineers
Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) Jeffery Crawford (ILA)

Comments: I think its a good for Savh and future for the Ports of Savh please Expand for livelihood for people living condition.

#284

US Army Corps of Engineers
Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) This could be the single most important project

Comments: to ever come to the southeastern United States much less Savannah and the surrounding areas. This project is good for jobs, my family, & my generation for years to come. The impact of this project & the value of this project can't be put into words. If this project is only being debated from an economic standpoint this would be a huge mistake, this project is important to local families that rely of the people of Georgia Ports and surrounding businesses for charity & community fund raising. So please, for the sake of our economy, the economic impact on Georgia & the southeastern United States & families who rely on Georgia Ports Authority every day; make this a project we will be proud of instead of one that could devastate the future growth of Georgia Ports Authority.

JMR-GPA

#285

US Army Corps of Engineers
Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) Erin Jenkins, Savannah Riverfront

Comments:

The Savannah Riverfront Community Supports the Savannah Harbor Expansion Project.

#286

US Army Corps of Engineers
Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) Savannah Need

Comments: Expension Project

The Harbor

good For The Town

#287

US Army Corps of Engineers
Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional)

Comments: Dredging & Widening of Savannah River is needed. 48' would allow an additional 4,000 Tons of Cargo to Be loaded on an 8000 TEU Container Ship.

#288

US Army Corps of Engineers, Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) Otis S. Johnson, Mayor - Savannah, GA.

Comments: The studies have been done. It is now time to move forward with a decision to deepen the harbor.

Otis S. Johnson

#289

US Army Corps of Engineers, Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) Kerry O. Scott

Comments: The harbor expansion is much needed. The continued growth of Georgia's economy depends on it. Without the expansion our economy will suffer greatly. There will be a huge job loss throughout the State. Savannah, Atlanta & major cities will suffer. Bottom line - our State of Georgia and all that our ports effect will lose. The job chain will be broken.

#290

US Army Corps of Engineers
Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) Javon B

Comments: I believe this will be more than Great to deeping the Harbor.

#291

US Army Corps of Engineers
Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional)

Comments: The harbor deepening is needed to ensure a good economy for GA. and surrounding areas. I am in favor of the harbor deepening project.

#292

US Army Corps of Engineers
Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) Gloria Bray

Comments: The SHEP is critically important for jobs, economic sustainability, and port growth. This not only is advantageous to Ga Ports but to all of Georgia and the southeastern United States. I am very much in favor of the Expansion Project to deepen the Harbor to 48 feet

#293

US Army Corps of Engineers
Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) Willie Seymour - President Local 1414

Comments: We need the deepening of the harbor it will bring more jobs to the community this is a must.

#294

US Army Corps of Engineers
Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) BOB POTLONY - RESIDENT OF SAVANNAH

Comments: IN FAVOR OF DEEPENING. NEEDED TO KEEP OUR PORT VIBRANT. IMPACT WILL BE MINIMAL. MUST BE DONE!

Thanks.

#295

US Army Corps of Engineers
Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) Claire Gale - Stay and see Savannah.com
Double Tree Hotel

Comments: I would like to see the Harbor expansion due to the increase in Savannah's economy

#296

US Army Corps of Engineers
Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) K. Doyle StayinSavannah.com

Comments:

IT WILL BRING IN MUCH NEED BUSINESS (yes)

#297

US Army Corps of Engineers
Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) Ryan Moore Effingham County IDA

Comments:

The Savannah Harbor Expansion Project is imperative to ensure the competitiveness of the region. As such, we support this project in its entirety and the progress and prosperity of the region as a whole.

#298

US Army Corps of Engineers
Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional)

Comments: The harbor deepening with both improve the ability to handle larger ships but also the current traffic as well. The benefit to the local, State, and south ~~east~~ eastern economy is huge. In other words yes! yes to the deepening/Harbor expansion

#299

US Army Corps of Engineers
Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) Michael Johnson - Greenline architecture.

Comments: We are absolutly in support of this project. It is essential to remain competitive on the east Coast

#300

US Army Corps of Engineers
Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional)

Comments: This project is vital to local, state, and global economy. Please see this to 48' for changes that happen & keep the port vital for all. Thanks

#301

US Army Corps of Engineers
Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) Billy Stevens

Comments: I think that the Harbor deepening would be good for not just the savannah area but for the entire Southeastern United States & I stand behind the Corp of Engineers & hope that this project goes through

#302

US Army Corps of Engineers
Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) Ryan Ulada

Comments:

I think the Savannah Harbor Expansion Project is a great idea. I work in the construction industry, so this would greatly increase the amount of potential work for my company. Also, the volume of containers entering and leaving the harbor would create for jobs in Savannah, which would bring more people to Savannah. The overall impact ~~[illegible]~~ to the economy is enough to want this project to proceed.

#303

US Army Corps of Engineers
Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) T. Ryan Chandler

Comments: As a terminal equipment solutions provider with over 40 years of experience and operations in more than 20 marine terminals along the Eastern and Gulf Seaboards, TICO (Terminal Investment Corp.) supports the SHEP because of its significant national importance. While there are certainly positive state and local implications to be realized through the expansion, TICO views SHEP similar to many other programs moving forward across the Nation, as critical infrastructure investment that will enable our Country to remain competitive in the international trade scene. 2014 is fast approaching and with it comes the opening of the wider deeper more efficient Panama Canal. We must move with all deliberate speed in preparation for what we know lies ahead.

#304

US Army Corps of Engineers
Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) DEEPEN THE HARBOR - JUBE WILL COME

Comments: THE PORTS WILL LEAVE THE RIVER IN BETTER SHAPE THAN THEY FOUND IT.

#305

US Army Corps of Engineers
Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) HERB LEE

Comments: VERY MUCH IN FAVOR OF DEEPENING PROJECT

#306

US Army Corps of Engineers, Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) BILL MCKAGH

Comments: THIS IS ESSENTIAL FOR THE ECONOMIC HEALTH OF SAVANNAH, MAKE IT HAPPEN

#307

US Army Corps of Engineers, Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) Charles Fillyaw

Comments: I have heard a lot of comments on this project and I believe fully in this project. This is something that Savannah and the Southeast really needs and this will insure the economy of Georgia is very Prosperous. This project will increase the quality of life of all Southeast residence.

#308

US Army Corps of Engineers
Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) Andrew Cannon TICO / Terminal Services

Comments: I would like to see SHEP progress in order for, not just our state and local government to benefit, but so that our nation as a whole can gain more ground in global trade. We must, as a nation, keep up with the changing times and growing demand of international business and SHEP will help us meet these goals and demands.

#309

US Army Corps of Engineers
Savannah District

Comment on the Savannah Harbor Expansion Project

The Savannah District, U.S. Army Corps of Engineers welcomes your comments on the Savannah Harbor Expansion Project. Once completed, place the card in the "comments" box or add postage and mail it back to us. Comments can also be provided online at **CESAS-PD@usace.army.mil**.

From: (optional) Cheryl Woodson / GAPorts.

Comments: I think the Harbor deepening project will be a tremendous asset to the surrounding communities - this will in turn create jobs & bring more industries to the area.

310

US Army Corps of Engineers, Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional)

Comments: I am for the project It would Help everyone in savannah

311

US Army Corps of Engineers, Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) John Bloess

Comments: The SHEP plays an extremely important role in my personal livelihood as well as our overall economy. The depth required to keep the Georgia Ports competitive in global trade is essential for our entire community as well as for our future generations. Posted studies reveal that SHEP will have a five to one benefit cost ratio that will allow not only the Georgia Ports but the city, county, state, region and the entire nation to prosper. This extremely important and worthwhile project must move forward in a timely manner so that our ports and economy continue to grow. Failure to act now will jeopardize our future. Consider these comments as full support for this project.

#312

US Army Corps of Engineers, Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) TOM SCHANZE

Comments: I FULLY SUPPORT THE SHEP PROJECT FROM INCEPTION THE FOCUS HAS BEEN ON BALANCING ENVIRONMENTAL STEWARDSHIP AND THE ECONOMIC ENGINE THAT SAVANNAH HAS BECOME THE ACOE AND GPA SHOULD BE COMMENDED FOR THE THOROUGHNESS AND OPENNESS OF THE PROCESS

#313

US Army Corps of Engineers, Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) Monica Barrett, Georgia Ports Authority

Comments: The Savannah Harbor Expansion Project is an awesome development not only for Savannah or the State of Georgia but the entire South Atlantic. This will create new part-time and full time job opportunities which would lead to billions of dollars in sales and income. How awesome is that...

#314

US Army Corps of Engineers
Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) J. PETRINO

Comments: I FULLY SUPPORT THE HARBOR DEEPENING IT IS A CRITICAL PROJECT TO EXPAND U.S. EXPORTS AND IS VITAL TO THE ECONOMY OF THE SOUTHEAST + THE NATION.

#315

US Army Corps of Engineers
Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional)

Comments: I'M FOR IT AND IT WILL WORK AND WILL PROVE IT

#316

US Army Corps of Engineers
Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) Jeff Kidlighter Seaboard Const. Co. Brunswick Ga

Comments:

Please move forward with this project. This will indeed help the State of Ga move forward in commerce. Also this will benefit the coastal area of ga in both business and realestate

#317

US Army Corps of Engineers
Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) F. MANSON

Comments:

THE HARBOR EXPANSION IS CRITICAL TO IMPROVE NOT ONLY GEORGIA'S ECONOMY AND REGIONAL ECONOMY — IT IS ESSENTIAL TO OUR NATIONAL ECONOMY AND STRENGTH.

PLEASE APPROVE THE PROJECT ASAP

#318

US Army Corps of Engineers, Savannah District

Comment on the Savannah Harbor Expansion Project

The Savannah District, U.S. Army Corps of Engineers welcomes your comments on the Savannah Harbor Expansion Project. Once completed, place the card in the "comments" box or add postage and mail it back to us. Comments can also be provided online at **CESAS-PD@usace.army.mil**.

From: (optional)

Comments: The River widening project is the MOST Important project to Georgia's economy that I can think of. I strongly support it and urge it to go through.

#319

US Army Corps of Engineers, Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional)

Comments: More WORK AND JOBS FOR SAVANNAH and other STATES

#320

US Army Corps of Engineers
Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) We Need this Badly!

Comments:

#321

US Army Corps of Engineers
Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) Cindy Scott - Bluffton, South Carolina

Comments: The Savannah Harbor Expansion is critical to our state's economic future. I feel the river needs to be deepened to 48 feet or more to accommodate the larger ships that will call on the East Coast when expansion of the Panama Canal is completed in 2014. The state of Georgia will only be left behind - this project is critical to our state's economic future. Georgia maritime activities support many jobs in the state and contribute billions in income. Savannah is the nation's fastest growing and fourth largest container port, but we will not be able to hold this position without the deepening. Shippers predict a 25% uptick in East Coast cargo traffic but GPA will not get any of this cargo traffic that cargo will be loaded on larger container ships - they will not be able to come up the Savannah River if the river is not deepen.

#322

US Army Corps of Engineers
Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional)

Comments: I am for the harbor deeping. It provides economic resources to better our community

#323

US Army Corps of Engineers
Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) Roxshane Scott - GPA

Comments: This is a win-win situation for All Georgians. GPA will be Able to meet the demands of our business And capitalize on our Future And this will be a positive impact For All Georgians and international businesses.

#324

US Army Corps of Engineers
Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) BJS

Comments: I support the Harbor deepening for continued growth and prosperity for the state of Georgia. This will keep Georgia competitive with other ports.

#325

US Army Corps of Engineers
Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) Lisa Lansford

Comments: I Support the Harbor Expansion to a depth of 48 feet.

#326

US Army Corps of Engineers
Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) John D. Trent

Comments: As an employee of the Georgia Ports Authority for over 17 years, I strongly express my support for the deepening of the Savannah Harbor. The Port of Savannah has been one of our greatest economic assets since the founding of Georgia and in order to remain so, it must be deepened to 48 feet to continue to compete globally. The SHEP will allow larger, deeper draft ships to call on the Port of Savannah and is critical to the economic prosperity of our state and the future transportation infrastructure needs of our nation.

#327

US Army Corps of Engineers
Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) Betty Long

Comments: As an employee of the Georgia Ports Authority for over 35 years, I strongly express my support for the deepening of the Savannah Harbor. The Port of Savannah has been one of our greatest economic assets since the founding of Georgia and in order to remain so, it must be deepened to 48 feet to continue to compete globally. The SHEP will allow larger, deeper draft ships to call on the Port of Savannah and is critical to the economic prosperity of our state and the future transportation infrastructure needs of our nation.

#328

US Army Corps of Engineers, Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) Jack Long

Comments: As a Port Partner and a Port Logistics Cargo Handler, I strongly express my support for the deepening of the Savannah Harbor. The Port of Savannah has been one of our greatest economic assets since the founding of Georgia and in order to remain so, it must be deepened to 48 feet to continue to compete globally. The SHEP will allow larger, deeper draft ships to call on the Port of Savannah and is critical to the economic prosperity of our state and the future transportation infrastructure needs of our nation.

#329

US Army Corps of Engineers, Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional)

Comments: I am in support of the Savannah Harbor Expansion Project. The deepening of the harbor from 42 feet to 48 feet will create more jobs not only in Georgia, but throughout the nation. The completion of this project will allow Georgia to accommodate larger ships which means more business in Georgia as well as other surrounding areas. If this ~~deepening~~ deepening project is not done, the ships will find someone else to go

#330

US Army Corps of Engineers, Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) Catherine Beasley

Comments: I believe the SHEP is extremely important to the economic development of our City, State and Nation. This project has had extensive environment and economic studies. I feel these studies are proof that SHEP is more than justified and the 48 foot depth should be the recommended plan.

#331

US Army Corps of Engineers, Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) Geneva Pinkney

Comments: I support Savannah Harbor Deepening to 48'.

#332

US Army Corps of Engineers, Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) Roderick M. Cook

Comments: I support the harbor deepening to 48 feet.

#333

US Army Corps of Engineers, Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) Lisa Redmond

Comments: I very much support the Savannah Harbor Dredging Project to deepen the harbor to 48 ft. thank you.

#334

US Army Corps of Engineers
Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) Felecia F. Cook fcook@gaports.com

Comments: I support the Savannah Harbor Expansion Project to deepen the harbor to 48 feet.

Felecia F Cook
415 Rendant Ave
Savannah, Ga. 31419

#335

US Army Corps of Engineers
Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) Richard Bo Ct 912 Walthour Rd Sav Ga

Comments: I support harbor deepening to 48'

#336

US Army Corps of Engineers, Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional)

Comments: I think the Harbor should be deepened 48 FT. I think it would be very beneficial for whole state of Georgia.

#337

US Army Corps of Engineers, Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) Kevin Long

Comments: As an employee of a local company and a Port Partner handling cargo, I strongly express my support for the deepening of the Savannah Harbor. The Port of Savannah has been one of our greatest economic assets and it must be deepened to 48 feet to continue to compete globally. The SHEP will allow larger and deeper draft ships to call on the Port of Savannah and is critical to the economic prosperity of our state and the future transportation infrastructure needs of our nation.

#338

US Army Corps of Engineers
Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) Kenneth Long

Comments: As a team member of a large local company, I strongly express my support for the deepening of the Savannah Harbor. The Port of Savannah has been one of our greatest economic assets and I support the SHEP to allow larger and deeper draft ships to call on the Port of Savannah. It is critical to the economic prosperity of our state and the future transportation infrastructure needs of our nation.

#339

US Army Corps of Engineers
Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) Kaitlyn Trent

Comments: As a senior student in Savannah and a future employee of this great city, I strongly express my support for the deepening of the Savannah Harbor. The Port of Savannah has been one of our greatest economic assets and it must be deepened to 48 feet to continue to compete. I support the SHEP to allow larger and deeper draft ships to call on the Port of Savannah. It is critical to the economic prosperity of our state and the future transportation infrastructure needs of our nation.

#340

US Army Corps of Engineers
Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) Zachary D. Trent

Comments: As an employee of a container maintenance company in Savannah, I strongly express my support for the deepening of the Savannah Harbor. The Port of Savannah has been one of our greatest economic assets and it must be deepened to 48 feet to continue to compete. I support the SHEP to allow larger and deeper draft ships to call on the Port of Savannah. It is critical to the economic prosperity of our state and the future transportation infrastructure needs of our nation.

#341

US Army Corps of Engineers
Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) Cindy Cail-Jacobs

Comments: I encourage the Habor Expansion to 48 feet deep.

#342

US Army Corps of Engineers
Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) Bonnie Jobe

Comments: I totally support the deepening of the Savannah River to 48 ft.

#343

US Army Corps of Engineers
Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) Becky Bolt 912 Walthour Rd Sav Ga

Comments: I support harbor deepening to 48'

#344

US Army Corps of Engineers, Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional)

Comments:

I Believe the expansion would Be terrific for the Region. Adding Cruise ships and larger Freight Ships to the ports.

#345

US Army Corps of Engineers, Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) Michael King

Comments: I Look Forward to the increase in work due to This project

#346

US Army Corps of Engineers
Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional)

Comments: Deeping the river will have more work and help people.

#347

US Army Corps of Engineers
Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) Abdul B Haqq - Local - 1414

Comments: The deepening of the will boost local and National Econ.

#348

US Army Corps of Engineers, Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) _____

Comments: this could create many opportunities for job growth in this area. more jobs equal a stronger community

#349

US Army Corps of Engineers, Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) Pamela F. Clinard

Comments: The port of Savannah supports hundred of thousands of jobs not only in GA, but throughout the US and thus generates billions in personal income and tax receipts annually. And for this reason, the Savannah Harbor deepening initiative is critical to help boost Georgia's as well as the nation's economic recovery year after year. We must keep up with the demands of global transportation by accommodating the larger ships that will soon call on Savannah and the rest of the US ports.

I also see the deepening initiative as an important component of our national security. We must maintain the U.S.'s dominant position in facilitating global transportation by ensuring US control over these important services & ports of call by making them economically viable and attractive to customers. GPA & the State of Georgia are also environmentally sensitive to the possible consequences of the harbor deepening by working diligently to maintain our natural resources.

Please help ensure that the Port of Savannah remains a valual asset to our

#550

US Army Corps of Engineers, Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) Jim Williams

Comments: Please give your full support to the approval and funding of the Savannah Harbor Expansion Project (SHEP). Georgia's Ports have been a leader in the industry and an economic stimulus for Savannah, Georgia, and the United States! Georgia's Ports create hundreds of thousands of jobs and generates billions of dollars in federal, state, and local tax revenues. Thank You!!

#351

US Army Corps of Engineers, Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) Terry Fennel

Comments:

The deepening is needed in order for the Port of Savannah to remain competitive with other Ports. We must be able to accomodate larger ships that are being built. The Ports is responsible for bringing a great number of jobs to Georgia and has been able to endure hard economic times recently without any layoffs. The State needs to support in any way it can!

#352

US Army Corps of Engineers
Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) Mike Krupp Terex

Comments: The proposed project would be very positive for the region. For the Port to continue economic growth, its an essential project. The current depth does not allow the largest vessels to call on the Port in Sav. These ships can call on other Ports including the Ports in Virginia. It's even more important now with the Panama Canal expansion which will be completed in 2014. The East Coast Ports are in a position to grow at a faster rate than the US West Coast Ports. Savannah needs the deep draft to continue its growth rate and its role as a job producer.

#353

US Army Corps of Engineers
Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) Kriasi Badu-Tweneboah

Comments: The Savannah Harbor Expansion is an economically ~~at~~ viable project that can be designed and constructed to improve the economy in the S-E Engineering is NO PROBLEM. We support it!!

#354

US Army Corps of Engineers, Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) Hugh A. Loyd

Comments: I have been working in the Savannah maritime industry for 36 years and during the last several years I have sat on the Board of Directors of the Savannah Propeller Club. This organization represents all the associations in the Savannah maritime community that contribute to the operations of the port and its efficiency, safety and security. Because of my direct involvement with that industry and knowing first hand the tremendous growth the port has experienced I can confidently say that the Savannah Harbor should be deepened to 48 feet. By deepening the harbor, we will be able to take advantage of the locks and dams and infrastructure that has made Savannah the fourth largest container port in the Nation.

#355

US Army Corps of Engineers, Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional)

Comments: I support the expansion program to benefit the local economy.

#356

US Army Corps of Engineers. Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) Cathryn Bowyer

Comments: I support the expansion

#357

US Army Corps of Engineers. Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional)

Comments: I support the expansion project to help better our local economy.

#358

US Army Corps of Engineers
Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) Melanna Jaudon

Comments:

I vote 'yes' to the expansion project.

#359

US Army Corps of Engineers
Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) McLeod Reminger

Comments:

DEEPEN THE HARBOR

The economic future of the state and surrounding economies is of major concern. Our jobs + futures depend on it.

#360

US Army Corps of Engineers, Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) Lee Smith, GM of the Springhill Suites

Comments:

I support this Expansion Project!

#361

US Army Corps of Engineers, Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional)

Comments:

In this time of uncertainty (economically speaking) this project is a must. We cannot miss an opportunity to increase commerce, and if we only sustain current economic numbers then it will be a success. But future growth we be made much easier will this capacity increase.

#362

US Army Corps of Engineers
Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) Joseph Heyward 1414

Comments: I have heard everyone's concern but the benefits from this project are way to high for georgia to let go!

#363

US Army Corps of Engineers
Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) Darlene MACKEY

Comments: I think it would benefit the economy of GA & S.C. so, I think its best all around and the enviroment with less ship transports

#364

US Army Corps of Engineers, Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) Edna B Jackson - Mayor-Pro-Tem Savannah

Comments: There is a need for the deepening of the harbor in order for Savannah + Georgia to compete on a global level. This will bring more jobs and revenue to the community. It will help this regional area to expand and be considered a world harbor.

I am for the deepening. There is no other answer but for us to move toward.

#365

US Army Corps of Engineers, Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) Makinley MACKEY

Comments: I think they should widen it. There will be more ships coming better for GA. and surrounding communitys.

#366

US Army Corps of Engineers Savannah District

Comment on the Savannah Harbor Expansion Project

The Savannah District, U.S. Army Corps of Engineers welcomes your comments on the Savannah Harbor Expansion Project. Once completed, place the card in the "comments" box or add postage and mail it back to us. Comments can also be provided online at CESAS-PD@usace.army.mil.

From: (optional) William Crosby

Comments:

~~I FOND~~ I have read and studied this project exstensively, and fully support this project 110%.

As a citizen of Savannah, this state and the United States of America I recognize the importance this deeping project will play not only in global commerce, but the strong economic impact it places on our society. The jobs this project will impact on our state alone is significant enough for me to realize it's importance.

Growing up in Georgia I have family & friends all over from trucking, ILA, Stevedores, GPA, and Freight Forwarders whose lives are dependent on Savannah harbor and it's future depth.

#367

US Army Corps of Engineers Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) CHARLES WILLIAMS, DIPROCESSORS Co.

Comments:

I AM TOTALLY IN FAVOR OF THE EXPANSION. IT WILL BE GOOD FOR THE COUNTRY, ~~STATE~~, CITY, COUNTY AND PROBABLY ALLOW ME TO KEEP MY JOB.

#368

US Army Corps of Engineers
Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) Molly Dantzler - GPA

Comments:

This project is vital to the economic viability of Savannah & the State of GA on a global scale. Also vital to nearly 1,000 employees.

48" Feet!

#369

US Army Corps of Engineers
Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) Michael Collins Hydraulic Repair Services

Comments: As a employee of HRS and contractor of GPA I relie on GPA for work and look forward to the River Expansion Project and benefits from it.

#370

US Army Corps of Engineers
Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) Jeremy Jones Hydraulic Repair Services

Comments: As a ~~[illegible]~~ Employee of Hydraulic Repair Service I Rely on the work at the ports and look forward to the expansion of the River Project. I am in favor of the Plan

#371

US Army Corps of Engineers
Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) Aaron McFarlane, Hydraulic Repair Services LLC

Comments: As a sub contractor of the ports we rely on the commerce and industry of the ports. H.R.S. maintains the sediment suspension units that keep the berths clear for docking ships. The deepening project will provide urgent and future employment opportunities for our company and our community. (Favorable on industry is my vote) Also, we HRS maintain the air injection system which promotes environmental health also in the river. (Favorable on environment is my vote)"

Thanks For Considering US!

Aaron D. McFarlane

#372

US Army Corps of Engineers Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) Patricia Richardson, GPA

Comments: Please deepen to 48ft. This project is important to the stability of the community and the continuation of jobs and prosperity

#373

US Army Corps of Engineers Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional)

Comments:

Bring more Jobs to Chatham County and other areas.

#374

US Army Corps of Engineers
Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) Cynthia Powers

Comments: The deepening is desperately needed for Savannah and GA. The Corps is doing it got job!!

#375

US Army Corps of Engineers
Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional)

Comments: We definitely must have the Savannah Harbor deepened to 48 Ft before the Panama Canal Expansion project is complete in order to accomodate the larger vessels that will be calling East Coast ports. Otherwise we will not maintain current jobs nor create jobs and commerce in this region. Also the net benefit of this project will pay for itself in only a few years based on extensive safety done by Army Engineers.

#376

US Army Corps of Engineers+ Savannah District

Comment on the Savannah Harbor Expansion Project

The Savannah District, U.S. Army Corps of Engineers welcomes your comments on the Savannah Harbor Expansion Project. Once completed, place the card in the "comments" box or add postage and mail it back to us. Comments can also be provided online at **CESAS-PD@usace.army.mil**.

From: (optional) BRIANNA FORAN

Comments: This project is a gain for all of Georgia. We need it!

#377

US Army Corps of Engineers+ Savannah District

Comment on the Savannah Harbor Expansion Project

The Savannah District, U.S. Army Corps of Engineers welcomes your comments on the Savannah Harbor Expansion Project. Once completed, place the card in the "comments" box or add postage and mail it back to us. Comments can also be provided online at **CESAS-PD@usace.army.mil**.

From: (optional)

Comments: This would make to port safer.

#400

US Army Corps of Engineers, Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) LIEL WANDERS

Comments:

GREAT PROJECT + INFORMATION!

#401

US Army Corps of Engineers, Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) MICHAEL MASHBURN – COLONIAL TERMINALS

Comments:

I SUPPORT HARBOR DEEPENING. NOT ONLY WILL THIS BENEFIT CONTAINER TRAFFIC, IT WILL BENEFIT COLONIAL TERMINALS LIQUID STORAGE CUSTOMERS. WITH A DEEPER HARBOR OUR CUSTOMERS WILL BE ABLE TO ENJOY THE EFFICIENCIES OF RECEIVING LARGER CARGO QUANTITIES PER VESSEL. TANKER VESSELS WILL ALSO BE ABLE TO NAVIGATE THE HARBOR WITH MUCH MORE FREEDOM BECAUSE LARGER VESSELS WOULD HAVE MORE POWER TO STEAM AGAINST THE TIDE FLOW. THIS WOULD REDUCE OR POSSIBLY ELIMINATE DRAFT RESTRICTIONS.

M. Mashburn

#378

US Army Corps of Engineers, Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) CLARK GEORGE

Comments: I WORK FOR TIG-THE INDUSTRIAL CO. AND WE PREFORM MARINE CONSTRUCTION IN THE SAVANNAH HARBOR. THES PROJECT WOULD CREATE MANY OPORTUNITIES FOR OUR COMPANY AND OTHER CONTRACTORS IN THE AREA. THESE CONSTRUCTION PROJECTS SHOULD GIVE AN IMEDIATE -TO THE LOCAL ECONOMY AT A TIME WHEN IT IS TRULY NEEDED. THIS PROJECT WOULD ALSO PROVIDE A LONG TERM STIMULUS TO THE ECONOMY. MY AND OUR COMPANY STRONGLY SUPPORT THIS PROJECT

#379

US Army Corps of Engineers, Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) Judy Kessler (Ashland)

Comments: I support this project for our community.

Much of our livelihood depends upon effective transportation through our port.
Restriction of the harbor project may slowly erode our economy.

#380

US Army Corps of Engineers
Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) BRUCE CISNE

Comments: PLANS APPEAR TO BE VERY WELL THOUGHT OUT. THIS EXPANSION PROJECT WILL KEEP SAVANNAH AS AN INTERNATIONAL PORT AND MAINTAIN/GROW JOBS HERE. KEEP UP THE GOOD WORK.

#382

US Army Corps of Engineers
Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional)

Comments: I AM WRITING TO EXPRESS MY SUPPORT FOR THE SHEP PROJECT IN ERA/WA

#382

US Army Corps of Engineers, Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional)

Comments: Very much pro-Expansion

#383

US Army Corps of Engineers, Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional)

Comments: The GPA is the most efficient port authority in the U.S. It is a superefficient port.

The deepening project is a critical factor in keeping the port in the position of industry leader.

#384

US Army Corps of Engineers, Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) GARY DOUGLAS RICHMOND HILL GA.

Comments: FOR THE PORT OF SAVANNAH, NOT ONLY TO GROW IN THE FUTURE, BUT TO MAINTAIN CURRENT CUSTOMERS AND BUSINESS, IT IS MANDATORY THAT THE CHANNEL BE DEEPENED TO 48'.

THE GROWTH OF THE SAVANNAH PORT HAS SHOWN LOCAL, STATE AND FEDERAL ECONOMIC IMPACT. ALL THREE LEVELS HAVE SEEN IMPACTS IN JOB GROWTH, CONSTRUCTION ETC.

I WOULD BE ADVANTAGEOUS TO THE GLOBAL ECONOMY, THRU SHIPPERS USE SEAS TO THE FINAL DESTINATION OF GOODS (THE AMERICAN PURCHASER)!

#385

US Army Corps of Engineers, Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) REX BENTON - NAI SAVANNAH

Comments: I AM A COMMERCIAL REAL ESTATE broker WHO HAS worked in SAVANNAH & Atlanta. I have seen the positive economic benefits to EACH MARKET & the STATE AS A WHOLE. [redacted]

To compete w/ our NEIGHBORING STATES, we MUST dredge to 48.

If we don't, we will not see the continued growth in our local & REGIONAL ECONOMY,

If it is safe to the environment & our people, do it.

#386

US Army Corps of Engineers, Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) GERALD L BONEN

Comments: I HAVE BEEN TO ALL THE MEETINGS I BELIEVE ALMOST EVERY QUESTION HAS BEEN ASKED AND ADDRESSED I HOPE WE CAN GET THE FUNDING AND MOVE FWD IN A TIMELY MANNER (IN LINE WITH THE PANAMA CANAL EXPANSION). ALOT OF TIME AND MONEY HAS BEEN SPENT.. AND I BELIEVE IT IS IN THE BEST INTEREST FOR GA & THE COUNTRY TO GET THIS PROJECT COMPLETED.

#387

US Army Corps of Engineers, Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) Justin Redmond - DSI Distribution Services International, Inc

Comments: I fully support the proposed harbor deepening project and encourage the Corps to proceed as quickly as possible to obtain final approval and begin construction. I believe the process and result of the study are great for all stakeholders and represent a great opportunity to achieve responsible economic growth.

#388

US Army Corps of Engineers
Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) JAMES J. COLLINS

Comments: I SUPPORT THE HARBOR DEEPENING PROJECT. THE ECONOMIC IMPACT WILL BENEFIT NOT ONLY THE SAVANNAH ~~AND THE~~ AREA BUT THE SOUTHEAST AS WELL. ALL IMPACTS WILL BE MITIGATED WHICH FURTHER JUSTIFIES THIS PROJECT

#389

US Army Corps of Engineers
Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional)

Comments: This is a great project. Can't wait to see this happen.

#390

US Army Corps of Engineers, Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) M C Macdonald

Comments: The state needs this to keep up with the demand for new vessels. As economies of scale become more important, ships are growing larger. If the river is not deepened the state + the nation will suffer economically. It must be done in a sensitive way and I believe it will.

#392

US Army Corps of Engineers, Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) Neill McDonald

Comments: Deepening to the depth envisioned by the State of Georgia is an investment in our children's future that we must make.

#392

US Army Corps of Engineers
Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional)

Comments: I would like to see this expansion for the Growth of Georgia.

#393

US Army Corps of Engineers
Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional)

Comments: I'm For The Harbor Deepening

#394

US Army Corps of Engineers, Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional)

Comments: As a graduate of the US merchant marine academy and having spent the better part of my life involved in the transportation industry, I fully understand the importance of a port to the surrounding economy. I also fully understand the impact on the United States. We need to move foruard with this project.

#395

US Army Corps of Engineers, Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional)

Comments: The expansion of the savannah River provides the economic boost our country needs, along with positive benefits for the Port of Savannah and GPA. I am in full support of the project.

#396

US Army Corps of Engineers, Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) I think we need to deepend the harbor because

Comments: it going to help us to continue the growth of business in Savannah and surrounding area, along with the port.

#397

US Army Corps of Engineers, Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) Rick Hale

Comments:

I strongly support this project!

#398

US Army Corps of Engineers
Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional)

Comments: We look forward to the increase in our economy - We have a fast-large growing port - Let's cont. this process and complete the deepening -

#399

US Army Corps of Engineers
Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional)

Comments: THIS River needs to be wider Along with deeper.

#402

US Army Corps of Engineers
Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) JOHN JURGENSEN

Comments: ECONOMIC BENEFITS TO OUR CITY, STATE AND NATIONAL INTERESTS REQUIRE successful COMPLETION OF SHEP. THIS IS AN INVESTMENT WITH AN EFFECTIVE & NECESSARY RETURN

#403

US Army Corps of Engineers
Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional)

Comments: I AM IN COMPLETE SUPPORT OF THE DEEPENING TO 48 FEET. MITIGATION MEASURES SHOULD BE FULLY IMPLEMENTED AND THEIR EFFECTIVENESS MONITORED. ADDITIONAL MITIGATION WOULD CONTINUE TO BE AN OPTION IF IT IS LATER DETERMINED NECESSARY. OUR CITY, REGION, AND STATE CANNOT AFFORD NOT TO MOVE FORWARD WITH THIS PROJECT. THE BENEFITS TO THE ENTIRE REGION FAR OUTWEIGH THE ADVERSE IMPACTS.

#404

US Army Corps of Engineers, Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional)

Comments: Very critical to the US Economy that this project by the GPA / Corps be completed ASAP. It will mean a very strong boost the SE sector of the US. Without it Georgia will be in very poor condition!

#405

US Army Corps of Engineers, Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional)

Comments: let's Keep our Port on TOP.
Let's Do it.

Boyce Young
T & H Engineering Co

#406

US Army Corps of Engineers, Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) Dan Millet dan.millet@bromma.com

Comments: I am in full support of deepening the channel to the 48 foot maximum. Our participation in the global economy is vital to our economic growth. This project is in turn vital to our nation's growth. The opportunities for efficiency and job growth provided by this project will have a lasting impact on both the regional and national economy.

I believe that world class container terminals are of immense strategic importance for our economic competitiveness.

#407

US Army Corps of Engineers, Savannah District

Comment on the Savannah Harbor Expansion Project

The Savannah District, U.S. Army Corps of Engineers welcomes your comments on the Savannah Harbor Expansion Project. Once completed, place the card in the "comments" box or add postage and mail it back to us. Comments can also be provided online at **CESAS-PD@usace.army.mil**.

From: (optional) SAM MC CACHERN

Comments: IT IS TIME TO DEEPEN THE HARBOR! THE STUDIES ARE DONE, AND QUESTIONS ANSWERED. SAVANNAH'S HARBOR IS CRUCIAL TO THE AREA'S, REGION, STATE AND NATIONAL ECONOMIES. THE CORPS OF ENGINEERS SHOULD ISSUE FINAL APPROVAL SO THAT FUNDING CAN BE SECURED.

SUPPORT!

#408

US Army Corps of Engineers, Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) J. W. Downs

Comments: The Port of Savannah is the fastest growing Port in the U.S. Supporting over 280,000 jobs. Deepening the SAV Harbor will Add jobs throughout the Nation. This is (SHEP) a project that is critical to our State/Region's Future. The Savannah Harbor Expansion Project (SHEP) must happen. We need the SAV. Harbor at 48 Feet

#409

US Army Corps of Engineers, Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) Kathryn Murph

Comments: The deepening of the Savannah Harbor is absolutely vital to the SE region, and the nation, not only the state of Georgia. The completion of the Savannah Harbor Expansion Project will do more for improving the economy than many of the short term projects on which stimulus money from the federal government is being spent. The Savannah harbor must be deepened to keep up with the expansion of the Panama Canal expansion. Otherwise, the state of Georgia, the southeast region, and the nation will be negatively affected. Such an outcome is simply unacceptable.

#410

US Army Corps of Engineers
Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) Gary Wiggin

Comments: This project is a must for ~~the~~ not only the South East but the whole Country. As the Country grows, infrastructure like this is a must.

#411

US Army Corps of Engineers
Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) Murphy McLean

Comments: I am in favor of the Harbor Deepening Project! It is a must have for the Savannah and Georgia's future economic development

#412

US Army Corps of Engineers, Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional)

Comments: HARBOR EXPANSION NEEDS TO HAPPEN FOR THE ECONOMIC BENEFIT TO THE STATE THE ENVIRONMENTAL IMPACTS ARE FAR OUTWEIGHED BY THE OVERALL BENEFIT TO THE REGION

#413

US Army Corps of Engineers, Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) Bill Anderson

Comments: This project should be performed! The proper studies have been completed and it is environmentally sound.

424

US Army Corps of Engineers
Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional)

Comments:

THE SAVANNAH HARBOR DEEPENING IS CRITICAL FOR the future success of SAVANNAH, the Southeast AND the nation. IT IS ONLY 6 FT OF ADDITIONAL DEPTH. The project should be approved AND funded as soon as possible.

415

US Army Corps of Engineers
Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) Ansley + Sutton. I think if the

Comments: expansion project is forwarded it would be economic and financial growth for the georgia parts it is needed, more jobs more industry

Mr Solomon M. Smith
Supervisor
Jeff Ansley

#416

US Army Corps of Engineers, Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) Mick Johnson

Comments:

I've been involved w/ Port operations and infrastructure improvements for nearly 30yrs. and have witnessed first hand how the local & statewide businesses have grown & prospered during this time. Deepening the harbor is a no brainer when considering future growth & prosperity by maintaining a required competitive edge with other ports as GPA has done over the years. Not doing so renders our ports to bring followers instead of leaders in commerce.

#417

US Army Corps of Engineers, Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional)

Comments: Dig Baby Dig!

#418

US Army Corps of Engineers
Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) Jim Baker

Comments: All environmental impacts have been extensively studied. This project is absolutely needed and overdue.

#419

US Army Corps of Engineers
Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) Mark Garley. M-Part LLC mgarley@m-partusa.com

Comments: The Corps has done a great job with strong outreach and comprehensive investigative analysis - no stone unturned in proposing the best way forward to promote the economy and protect the environment.
The reports indicate that all bases are covered and let's go! Much needed to be in on the expert initiative on a timely basis

M Garley 12-15-10

#420

US Army Corps of Engineers
Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional)

Comments: I strongly support the deepening project for Savannah. I have been involved in the Maritime Industry for over 30 years. This project will do so many good things for job creation in the Savannah Area.

#421

US Army Corps of Engineers
Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) Tom Dolan - local resident

Comments: I support the deepening project. The economic benefit to the area will be substantial and greatly needed to the local economy.

#422

US Army Corps of Engineers Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional)

Comments:

I fully support this project.
It will bring great benefits to the economy of
this region

#423

US Army Corps of Engineers Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) Mike Jenkins

Comments:

YES we need to deepen
the Harbor.
I need a Job

#424

US Army Corps of Engineers Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional)

Comments: This project is so important to the economy of Georgia & the nation. The Corps has done a great job of mitigating potential environmental impacts. I feel they have acted in the best interest of all parties.

#425

US Army Corps of Engineers Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional)

Comments: 48 FEET. FASTEST GROWING PORT IN THE COUNTRY, HUGE ECONOMIC IMPACT. "BUILD IT AND THEY WILL COME!"

THE BENEFITS FAR OUTWEIGH ANY POTENTIAL IMPACT.

#426

US Army Corps of Engineers Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) Adam Lute

Comments: I support the SHEP project. My whole family is affected by the River commerce. We must deepen the Harbor to 48' to keep the Georgia economy.

#427

US Army Corps of Engineers Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional)

Comments: The expansion of the Savannah Harbor will do wonders for the Economy and safety of the River. Expanding our harbor will further push us into ~~[illegible]~~ one of the leaders in cargo transit. Safety is a key word in all workplaces and completing this project will make Savannah and its harbor a much safer place to live + work

#428

US Army Corps of Engineers, Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) William T Browne III

Comments:

As a river pilot on the Savannah River, I can say that without a doubt, the deepening of the Savannah River Shipping Channel would make the transit of the vessels a lot safer.

#429

US Army Corps of Engineers, Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) Alonza L. Barnes, From Savannah, GA

Comments:

I support the SHEP because it will bring more employment opportunities to Savannah and Georgia in General.

#430

US Army Corps of Engineers® Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) Ron Drop, Moran Savannah

Comments:

We support the continued growth and necessary harbor deepening for the Port of Savannah

The harbor deepening project is vital to the economic impact of this area and continued improvement.

#431

US Army Corps of Engineers® Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) Thomas + Sharon McMillan - ILA

Comments: River Help support my family and the future - my Children and Grand Children

#432

US Army Corps of Engineers, Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) JERRY FUNK

Comments:

IT'S GOOD FOR BOTH GA AND THE SOUTHEAST

GO TO 48 FT.

#433

US Army Corps of Engineers, Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) Cindy B Rushing

Comments:

This is an awesome endeavor for the state of Georgia + the impact will be felt for decades — even centuries.

thank you + let's make it 48 + not settle for 47 —— thanks to everyone for the hard work through these years of research + development.

#434

US Army Corps of Engineers, Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) DAVE MORGAN

Comments: Dredging to 43' is a MUST for the SAVANNAH RIVER. TO Continue Being AN ECONOMIC DRIVER in Georgia & Retaining CURRENT BUSINESS - THIS IS A MUST.

#435

US Army Corps of Engineers, Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional)

Comments: I (TICO) Supports SHEP because of its significant tolerance. SHEP is among many Programs moving forward to ensure our Country to Remain Competitive in the International Trade Scene. With the widening of the Panama Canal we must move forward and take advantage of what we know lies ahead. I Fully Support the SHEP Project.

#436

US Army Corps of Engineers
Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional)

Comments: IN THE INTEREST OF GETTING THE U.S. ECONOMY BACK ON TRACK IT IS IMPERATIVE THAT ALL U.S. PORTS DO WHAT THEY CAN TO PREPARE FOR THE NEW CLASS OF VESSELS (FREIGHT) THAT WILL SOON BE COMING THROUGH THE PANAMA CANAL. I SUPPORT THE SHEP AS A CRITICAL INVESTMENT THAT WILL ENABLE OUR COUNTRY TO REMAIN COMPETITIVE IN THE INTERNATIONAL TRADE SCENE. WE MUST MOVE WITH ALL RESOLVE IN PREPARATION FOR ATTRACTING FUTURE BUSINESS OPPORTUNITIES.

#437

US Army Corps of Engineers
Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional)

Comments: By being a terminal equipment provider for over four decades of experience & service in a group of terminals along the eastern & gulf seaboards, I support the Sav Harbor Expansion because of it significant national importance. I know there positive & state implications to be realized through the expansion our company views the SHEP, similar to many other programs moving forward across the country as a critical infrastructure investment that will enable our country to remain competitive in the international trade scene.

438

US Army Corps of Engineers
Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) Deborah Hincke

Comments: Given the extensive + exhaustive studies that have been conducted, and the extremely strong cost-benefit ratio, I whole-heartedly support deepening the Savannah Harbor to 48 feet. The benefit to the local, regional, and national economy cannot be ignored.

439

US Army Corps of Engineers
Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) Kremer

Comments: This project is very important for Savannah, for Georgia and for ~~[illegible]~~ whole nation. I support 48 feet deepening expansion.

#440

US Army Corps of Engineers
Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional)

Comments:

I support this project.

#441

US Army Corps of Engineers
Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) [redacted]

Comments: I support this project. It is a must for Savannah!

#442

US Army Corps of Engineers, Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) CECILIA E. RUSSO, CECILIA RUSSO MARKETING, LLC

Comments:

I SUPPORT THE SAVANNAH HARBOR EXPANSION PROJECT.

Thank you,
Cecilia

#443

US Army Corps of Engineers, Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) BOBBY SCOTT

Comments: I THINK WE NEED TO DEEPEN THE HARBOR FOR THE FAMILIES OF SAVANNAH AND THE STATE OF GEORGIA.

#444

US Army Corps of Engineers, Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) [redacted]

Comments: It's A Great thing for the Southeast area. More Jobs, better livelihood, better economy. Also better opportunities for everyone who's apart of this area. We need to go forth with the process because we are trusting God to supply all the needs that we need. We need this as a people and for our family.

#445

US Army Corps of Engineers, Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) RonGista / Simco Technologies

Comments: I support the deepening because we need to expand the potential customers to keep up with other ports. Job will follow and companies like our will grow as well. Anyone now doing business with the port will see increased sales which will result in more money being spent and a larger tax base. The long term advantage outway the minimal environmental factors.

#446

US Army Corps of Engineers
Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional)

Comments: THE INCREASE IN the CHANNEL Depth to 48 feet is a need tied directly to the future growth of the Georgia Ports Authority, the Local, regional, State, and U.S. economy. I am Strongly in favor of the project to support current JOBS, create future jobs, and give the Port & State the tools to compete in a changing shipping environment.

48 feet is a MUST to accomodate planned changes in ship design. JOBS, families, and the economic future of our country are interconnected to the success of this project.

48 feet - yes!!!

#447

US Army Corps of Engineers
Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) FRED NELSON BEASLEY JR

Comments: Yes — go to 48'. This will improve the safety of the port. It will improve our National ready deployment capacity. It will continue to improve the economic recovery for Georgia, the southeast and our nation. Move forward with good speed.

#448

US Army Corps of Engineers, Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) Herman J Brown Jr

Comments: OUR RIVER MUST BE DEEPENED TO KEEP PACE IN THE INTERNATIONAL CARGO RACE. DEEPENING MEANS ADDITIONAL JOBS FOR NOT ONLY GEORGIANS, BUT ACROSS THE NATION. WITHOUT DEEPENING, GEORGIA WILL BE FALLING BACKWARDS WITH NO FUTURE HOPE OF REGAINING ITS DOMINANCE IN THE PORT INDUSTRY

#449

US Army Corps of Engineers, Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) LTC Jose Aguilar, Garrison Commander, Hunter Army Airfield

Comments: Great project to continue to support deployment of our military forces from our strategic deployment platform. Additionally, as a temporary member of the community - this will have a tremendous positive impact on the economic empire and the SE region of the US.

#450

Page 1 of 2

US Army Corps of Engineers, Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) Rosa M. Simmons

Comments: I have been employed by Georgia Ports Authority for 34 years and I support the deepening project.

GPA is very important to the economy of the State of Georgia. This project is very important for the future of the Ports and the economy. We have over 200,000 people that depends on the Ports to support their families.

Furthermore, the deepening project will allow GPA to keep pace with the future. Lower transportation costs ~~and~~ for the vessels that can translate to lower consumer product costs, allows larger and fewer ships to call on the port. Fewer larger ships also lessen congestion in the harbor. I know that GPA will do whatever is required of them to protect the fish and wildlife. GPA is very important to the State. I support the project.

#451

Page 2 of 2

US Army Corps of Engineers, Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) Rosa M Simmons

Comments:

Georgia Ports Authority is the fastest growing port on the South east.

- We have land for expansion.
- We have a great Customer Service Dept (CRC) the only one of its kind.
- Happy Employees
- Second Best Company to work (Savannah Magazine)
- Through the hard economic – we have not had to lay off employees
- Therefore, we support the deepening projects.

All companies & port cannot say the same and our neighboring Ports are jealous of our progress, and will ~~not~~ do everything to stop us.

#452

US Army Corps of Engineers, Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) Hugh "Trip" Tollison

Comments: project is important to our ports/logistics' future. Please proceed as soon as possible with SHEP & please make sure USACE funds their 60% share of the project.

Thank you.

#453

US Army Corps of Engineers, Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional)

Comments: I'm in full support of the Shep project and believe this infrastructure improvement is vital to Georgia and the US as a whole to stay competitive on the global stage

#454

US Army Corps of Engineers
Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) Len James - CFO - John S. James Co.

Comments:

The John S. James Co. Fully supports the SHEP. Our company employs over 100 persons, 50 in Savannah alone, who rely on competitive ports to survive

#455

US Army Corps of Engineers
Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) We need 45ft!!

Comments:

#456

US Army Corps of Engineers• Savannah District

Comment on the Savannah Harbor Expansion Project

The Savannah District, U.S. Army Corps of Engineers welcomes your comments on the Savannah Harbor Expansion Project. Once completed, place the card in the "comments" box or add postage and mail it back to us. Comments can also be provided online at **CESAS-PD@usace.army.mil**.

From: (optional) [illegible]

Comments:

The city & state needs the deepening - jobs, jobs, jobs !!!

#457

US Army Corps of Engineers• Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) Robert Prassitt

Comments:

Fully support SHEP. It is vital to GPA, Savannah, Georgia, and the region, as well as the US.

#458

US Army Corps of Engineers
Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) Randy Watford

Comments:

I support the Savannah Harbor Expansion Project.
The Project is an important infrastructure improvement not only for Georgia, but for the country in order to maintain competitive facilities in the conduct of foreign trade

#459

US Army Corps of Engineers
Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) barbara Jorgenson, Terminal Investment

Comments:

SHEP is an important improvement that will keep our Country Competive with the international trade.

#460

US Army Corps of Engineers
Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) DANNY CHASE (COLLIERS NEELY DALES, LLC)

Comments: This harbor deepening is a critical piece ~~of~~ of infrastructure improvement to keep Savannah (and Georgia) competitive globally. I strongly support this project and the economic stimulus it will create at the local, state, ~~and~~ regional and national level.

If the harbor is not deep enough the cargo will go elsewhere and the region's economy will suffer as a result

DANNY E CHASE
912-604-4918
danny.chase@colliers.com

#462

US Army Corps of Engineers
Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional)

Comments: I greatly support the deepening of the Savannah harbor. The economic impact of such a project will greatly increase the commercial viability of the United States as a whole.

#462

US Army Corps of Engineers Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) Dana C Mullings

Comments: My family and I are extremely excited about all of the projections mentioned to come from this embankment. Thank you. Thank God!

#463

US Army Corps of Engineers Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) [illegible]

Comments: I have been involved for 12 yrs w/ this project + stakeholder. I 100% support deepening!!

#464

US Army Corps of Engineers
Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) [illegible] (AFA EMPLOYEE)

Comments: [illegible]

#465

US Army Corps of Engineers
Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) Bill Vinson, 2 Wexford Lane, Savannah, GA 31411

Comments:

I urge that the project to deepen the Savannah harbor and channel to 48' MLW be approved, federally funded, and completed at the earliest opportunity.

This position is based on the following:

1) All Cost/Benefit analysis clearly support the economic viability of this project.
2) Failure to improve the port through this project will have devastating impacts on citizens and shippers in the region
3) There are no viable ports in the region that can accomodate vessels calling with the completion of the Panama Canal without deepening to depths in this project.
4) Every conceivable environmental contingency has been considered and any possible exposures ~~add~~ corrected through mediation solutions committed to in this project. Overall environmental conditions

#466

US Army Corps of Engineers, Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) Ryan Macdonald

Comments:

The Savannah Harbor Expansion Project (SHEP) is the one necessary investment component that ensures the volume of international cargo, which sustains our economic model, will continue flowing into our county and region.

Without this project commerce is stifled and economic growth stunted.

SHEP is ECONOMIC RECOVERY!!

#467

US Army Corps of Engineers, Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) Jim Tait

Comments:

Great idea. Very much needed to help stimulate growth in our region.

#468

US Army Corps of Engineers
Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) LOCAL CIVIL ENGINEER

Comments: WE ARE IN FULL SUPPORT OF THE SHEP.

#469

US Army Corps of Engineers
Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) Hannah Ryan

Comments: The Port needs the deepening of the port, it is truly of great importance and has become necessary

#470

US Army Corps of Engineers
Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) CAPT CHRISTOPHER R - DESA.

Comments:

THE SAVANNAH HARBOR DEEPENING PROJECT IS CRUCIAL TO THE CONTINUED DEVELOPMENT + GROWTH OF THE SOUTHEASTERN USA AND NOT NECESSARILY ONLY SAVANNAH.
THE NAVIGATION CHANNEL NEEDS THE PROPOSED IMPROVEMENTS VIZ PASSING AREAS AND EXPANDED TURNING BASINS TO ALLOW LARGE VESSELS TO ~~[illegible]~~ TRANSIT SAFELY.
THE PROJECT DEPTH OF 48 (DEEPENING THE HARBOR TO MORE THAN 48 FT -) TO ALLOW ADEQUATE UNDERKEEL CLEARANCE TO NAVIGATE AT ANY STAGE OF THE TIDE HAS BEEN STUDIED FROM NUMEROUS ASPECTS ECONOMICAL / ENVIRONMENTAL AND MARITIME FOR WELL OVER 10 YEARS. THE E.I.S HAS ADDRESSED NEARLY ALL THE CONCERNS RAISED BY THE PUBLIC - IT IS TIME TO GET THIS PROJECT [illegible]
IT IS IMPERATIVE THAT THE HARBOR BE DEEPENED TO ACCOMODATE THE LARGE SHIPS DRAWING 48 FT DRAFT. AND ADEQUATE RESOURCES MADE AVAILABLE TO MAINTAIN THIS BY RUNTIME DREDGING
AS AN ANECDOTAL FACT. THE SAVANNAH RIVER COULD ONLY ACCOMODATE SHIPS OF 12 - 14 FT DRAFT IN THE LATE 1700'S — WHEN GEORGIA WAS FOUNDED.
AS WE GEAR UP FOR THE FUTURE — THIS HARBOR MUST BE IMPROVED TO FACILITATE SAFER AND ULTIMATELY MORE EFFICIENT MARITIME TRANSPORTATION, SO THAT THE ENORMOUS POTENTIAL OF IMPORT / EXPORT BY SEA - THROUGH THE PORT OF SAVANNAH - BENEFITS THE WHOLE USA.

#471

US Army Corps of Engineers
Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) Jessica Eovino - Maersk Line

Comments: The expansion project is vital to the success of the shipping industry. The expansion will bring more jobs to the area, increase revenue for all companies associated with the shipping terminals, + bring more business to the area (ie - large suppliers - Walmart).
Container shipping is a cost efficient means for getting goods all around the world.
Deepening the River will allow Savannah to continue to be a strong competitor on the east coast of the US.
I look forward to all of the positive outcomes that will result from SHEP.

#472

US Army Corps of Engineers
Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) Paula Kreisler

Comments:

I 100% Plus support SHEP! Savannah's area needs to stay as a solid growing economic entity. This is critical for this to happen.

#473

US Army Corps of Engineers
Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) Cathy Willis

Comments:

I support deepening the Savannah River to 48 ft. It is a great economic engine for the region servicing areas as far west as Chicago IL

There is an abundance of reasonable land & labor with good highway & train infrastructure to support growth. This is especially true if comparisons are made to ports in the northeast.

Ship traffic is currently constrained by waiting for the tide. The wait is a costly endeavor.

#474

US Army Corps of Engineers
Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional)

Comments: Deepening Savannah Harbor's shipping channel is the right decision in every respect. It will stimulate the local, regional, & state economy. Lower shipping cost which will in turn lower prices in stores, and also provide more jobs to the area. The current state of the economy is reflecting the need for this change to happen immediately. My vote is a definate YES, FOR DEEPENING THE CHANNEL!!!

#475

US Army Corps of Engineers
Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) Mark DANA Mdana@princebush.com

Comments:

The overall economic impact on not only the region, but also, the country is tremendous to say the least.

There is no question that post Panama Canal Completion will place Savannah on a "go to" or "not compliant" port list. I was pleased to hear that the environmental impact was a lot less than earlier reported. 14 years of study has been more than reasonable to determine that this is the right decission.

#476

US Army Corps of Engineers, Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional)

Comments: Dear Mr. William Bailey,

This letter is to manifestate my personal commitment and support for this project of national interest.

At this occasion, we must prepare to accommodate the larger vessels navigating the Panama Canal in 2014. This project, if correctly implemented, will assist the nation in successfully meeting the National Export Initiative created by Executive Order of the President, as well as secure the current and future statewide employment base in Georgia.

#477

US Army Corps of Engineers, Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) Miriam Thompson

Comments: As my employment is directly linked to GPA my future and security are directly linked to the continued success that GPA has in attracting the major shipping lines from around the world and the major importers & exporters to use Savannah as their entry or exit port on the East Coast. Shipping lines are very demanding and competition is strong between the East Coast Ports, the lines use this competition to their advantage and less significant things than river depth can influence the line to go to another port if possible.

The river depth is a constant topic of conversation between GPA and the lines - they are moving toward larger & larger ships trying to reduce their costs. If Savannah does not move forward with this deepening we may very well loose, Georgia as a whole will loose, significant revenue - it will shift, probably to Charleston, but possibly Jacksonville or Miami.

The "studies" have been done, large amounts of dollars spent and GPA is an environment steward - it is time to move forward - DREDGE

#478

US Army Corps of Engineers• Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) Bryan Young

Comments: Yes, Deepen the Harbor.
I'm in need of a Job.

#479

US Army Corps of Engineers• Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) THOMAS G. SWINSON (FAITHANDTOM4@COMCAST.NET)

Comments:
THE FUTURE OF SAVANNAH AS A STRATEGIC USEC GATEWAY IS AT STAKE. THE ABILITY TO COST EFFECTIVELY SERVE 44% OF US CONSUMERS COST EFFECTIVELY IS AT STAKE. THE LIVLIHOOD OF OVER 250,000 GEORGIANS, NOT INCLUDING THE SC LOW COUNTRY, IS AT STAKE. THE ABILITY TO OPEN NEWER, LARGER EXPORT MARKETS FOR U.S. EXPORTS IS AT STAKE. THIS IS NOT JUST A PROJECT OF STATE OR REGIONAL IMPORTANCE, IT IS A PROJECT OF NATIONAL IMPORTANCE. THE ONGOING MOVES, WHICH ARE VERY CALCULATED, TO DISRUPT THIS PROJECT BY SC LEADERSHIP & THE SC STATE PORT AUTHORITY IS UNWARRANTED AND NOT IN THE BEST INTERESTS OF SOUTH CAROLINIANS & THE U.S. PUBLIC. MY FAMILY DEPENDS ON A VIABLE, DEEPWATER PORT IN SAVANNAH, AS DO THOUSANDS OF OTHERS. PLEASE DO NOT PLAY POLITICS. DEEPEN THE HARBOR, DEEPEN NOW!

#480

US Army Corps of Engineers, Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) Denny Tomlin

Comments: This is important to the State + the Country!

Deepen!

Savannah is 4th largest port in the Country
2nd on the East + Gulf
1st in the South Atlantic + Gulf

#481

US Army Corps of Engineers, Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional)

Comments: THIS IS A GOOD PROJECT, Good for local area & STATE OF GA. New growth for ECONOMY, Lower US TRADE DEFICIT.

#482

US Army Corps of Engineers
Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) IT'S A PLUS TO DO THE PROJECT IN ORDER

Comments: CREAT MORE JOBS

#483

US Army Corps of Engineers
Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional)

Comments: I AM A Longshoreman and I work the dock on the port of SAVANNAH GA. For 14 years that is my life and we help people all over SAVANNAH GA and in ATLANTA GA! So please vote yes God Bless!

#484

US Army Corps of Engineers
Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) G. BLACK GA. KAOLIN (colonial oi)

Comments: WE MUST DEEPEN. THE IMPACT IS MORE JOBS FOR THE WHOLE AREA

#485

US Army Corps of Engineers
Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) Brandi M O'Rand, Insurance Manager, GPA

Comments:

I am a supporter of the SHEP for many reasons. Firstly, I am an employee of the Georgia Ports Authority, and I depend on the Port to help support my family. We must deepen in order to remain competitive. Secondly, I support SHEP as a citizen of the State of Georgia and the United States. The GPA's impact includes hundreds of thousands of jobs + billions of dollars in taxes and income. Additionally, our port is of national importance - GPA is the 4th largest port in the nation + we have a strong export business. The export business is important for the U.S. so we do not have to depend on other countries for all of our goods; exports also keep jobs in the U.S. Not deepening the Savannah River will put GPA/State at a disadvantage as shipping lines will go elsewhere - to places that can accommodate the new generation of large ships. Lastly, I want to see the Port of Savannah continue to grow and flourish. I have a personal vested interest in this - not just because of my own career, but for decades, my family has made a living on the waterfront in many capacities - for GPA + Stevedoring companies. Please, deepen now!

#486

US Army Corps of Engineers, Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) William Kochanik

Comments:

The port is very important to our plant as we use the facility to import and export products

Our company has made decisions to bring new technology to our SAVANNAH Plant based on our access to the port.

The Harbor Expansion project is important for the growth of our plant and SAVANNAH

#487

US Army Corps of Engineers, Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) K. S.

Comments: YES, I WOULD LIKE TO SEE THE EXPANSION OF THE SAVANNAH HARBOR. IT WOULD HELP [redacted] IN THE GROWTH OF THE SOUTH EAST

488

US Army Corps of Engineers
Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) Daniel W Thompson

Comments:

I believe that it is imperative that the channel be deepened to 48 feet in order to help secure the jobs of jobs that are linked to the port of Savannah. The impact of the port is vital to the wellbeing of the local, State and regional economy.

489

US Army Corps of Engineers
Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional)

Comments: Deepening the SAVANNAH River to allow bigger, higher CAPACITY Ships is ESSENTIAL for the continued STRONG ECONOMIC health of the STATE of Georgia. The impact the SAVANNAH River Ports have had and need to continue to have on the STATE'S ECONOMY is without question the MOST IMPORTANT thing for this area. MANY people of this STATE and this LOCAL region depend on the shipment of goods through our ports and without the deeper water MANY people will have their continued employment put in jeopardy. As responsible CITIZENS we cannot allow our future or our children's future to be put at risk. The River MUST be deepened.

#490

US Army Corps of Engineers
Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) W. E. Johnson, Jr.

Comments: I am in support of the SHEP. Deepening is critical to maintaining the Port of Savannah as a Gateway of trade in the South Atlantic.

#492

US Army Corps of Engineers
Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) Teri Gates teresa.gates@Wellsfargo.com

Comments: The SHEP will benefit the infra structure and produce jobs within the savannah Port and future infra structure as well as building Sav'h economy.

#492

US Army Corps of Engineers
Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) William Sutton

Comments: I strongly support SHEP. The Savannah harbor provides commerce for all of the South East US. Due to the current depth, we already see a negative impact on the flow of cargo that negatively impacts all US consumers and producers. We must proceed with the expansion project ASAP in order to continue to support our water borne traffic.

#493

US Army Corps of Engineers
Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) Leroy Crosby, 101 Dearborn Rd Sav Ga - Citizen

Comments:

I have followed this project a long time and it good to see to this stage.

Please complete the review as soon as possible and select the 48 feet plan.

Build it sooner, not later.

Leroy Crosby

#494

US Army Corps of Engineers
Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) [redacted]

Comments: It is absolutely critical to the national economy that this project be fully funded & included in this Obama's Budget. There is absolutely no reason for it to have been delayed so long and the Corps of Engineers need's to be responsible & see this to completion. This is the only balanced port & if we are serious about increasing exports, then let's get this done already. With a $5 to $1 benefit, this is a no-brainer. Dredge to 48 feet. America need's the Corps to get this done

#495

US Army Corps of Engineers
Savannah District

Comment on the Savannah Harbor Expansion Project

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From: (optional) Billy Robinson owner Port City Logistics

Comments: As a result of the study conducted by the Corp of Engineers, I am in full support of moving forward with the proposed project for SHEP. The long term advantages to our local, State and National economy are tremendous and it will be a shame if the project is not approved by Congress. This is not just a win for Savannah and the State of Georgia but for the entire nation.

Again, I am in full support to move forward with the SHEP Project

496

US Army Corps of Engineers
Savannah District

Comment on the Savannah Harbor Expansion Project

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It must Be Done!

From: (optional) Ben Goldberg

Comments: It is my firm belief as a business owner, tax payer & citizen this project needs to go forward at an advanced pace. The economic livelihood of Savannah & GA depend on it. If this is not accomplished it will be the start to the end of our economic benefits that the port provides us. To have worked so hard to come where we are, and then throw it & the tax dollars & jobs away would truly be a shame. During the hard economic times in the United States, Savannah has done well. It is in direct association with the port, not only & commerce & jobs, but support to the firms that have been attracted to this state.

#1195

SAVANNAH HILTON HEAD INTERNATIONAL

SAVANNAH AIRPORT COMMISSION

CHAIRMAN
Sylvester C. Formey

VICE-CHAIRMAN
Stephen S. Green

COMMISSIONERS
Shirley B. James
Sheldon Tenenbaum
Lois C. Whorton

LEGAL COUNSEL
James R. Blackburn

EXECUTIVE DIRECTOR
Patrick S. Graham, A.A.E.

ASSISTANT EXECUTIVE DIRECTOR
Gregory B. Kelly, A.A.E.

December 16, 2010

Mr. William Bailey
Attn: PD, US Army Corps of Engineers
Savannah District
100 West Oglethorpe Avenue
Savannah, GA 31401-3640

Dear Mr. Bailey:

On behalf of the Board of Directors of the Savannah Economic Development Authority, the Savannah Airport Commission would like to express its strong support for the deepening of the Savannah harbor. The Port of Savannah has been one of our greatest economic assets since the founding of Georgia and, in order to remain so, it must be deepened to 48' to continue to compete globally.

This project is also important to the future transportation infrastructure needs of our nation.

Sincerely,

Patrick S. Graham
Executive Director

PSG:kjm

400 AIRWAYS AVENUE • SAVANNAH, GEORGIA 31408 • 912.964.0514 P • 912.964.0877 F • WWW.SAVANNAHAIRPORT.COM

#496

EFFINGHAM
COUNTY
CHAMBER OF COMMERCE

"History...Community...Commerce...Effingham Chamber...Cultivating Success!"

Mr. William Bailey

Attn: PD, US Army corps of Engineers, Savannah District

100 West Oglethorpe Avenue

Savannah, GA 31401-3640

Dear Mr. Bailey:

The Effingham County Chamber of Commerce would like to go on record as being fully in favor of the proposed deepening of the Savannah Harbor. Even though Effingham County is north of Savannah and the harbor area, the work of the Georgia Ports there has a great impact on the surrounding counties and cities. The state of Georgia has few economic 'engines' of this magnitude and we support this effort to not only maintain our current business at the ports, but to make a move that will enable these facilities to keep pace with innovations in the shipping industry, and thus, enabling us to maintain and even attract new business for the state and region.

Sincerely,

Randy Shearouse, President

520 West Third Street • Post Office Box 1078 • Springfield, GA 31329
Tel: (912) 754-3301 • Fax: (912) 754-1236 • www.EffinghamCounty.com

#497

December 15th, 2010

Dear Mr. Baily,

I am writing in support of the Savannah Harbor Expansion Project. This is a very significant project not only for Savannah and the state of Georgia, but also our nation. As the fourth largest port in the nation Savannah must be ready to accommodate the massive Post Panamax ships that will soon be calling on ports all over the world.

The SHEP will assist the nation in successfully meeting the National Export Initiative created by Executive Order of President Obama:

> In order to meet the NEI aimed at doubling US exports over the next five years, the port infrastructure must be in place to accommodate the export growth.
>
> The Port of Savannah handled 12% of all US containerized exports in FY2010, a total 1.14 million export TEU's (twent-foot equivalent units), with an export ration of 54%.

SHEP – one of the most important and productive civil works projects in the country – will maintain and create jobs and commerce throughout the nation, while significantly reducing transportation costs for U.S. shippers.

Thank you

Donna Piper

Donna Piper
Tybee Island, GA

#198

shippers warehouse

December 16, 2010

Mr. William Bailey
US Army Corps of Engineers, Savannah District
ATTN: PD
100 West Oglethorpe Avenue
Savannah, Georgia 31401-3640

Dear Mr. Bailey,

On behalf of the Shippers Warehouse, I (*Bill Stankiewicz*) am writing you today to express our full support of the **Savannah Harbor Expansion Project (SHEP)**. This project is critical to the continued growth of metro Atlanta, Georgia and the Southeast Region. International trade and the movement of goods are essential to our economic prosperity. Supply Chain and logistics creates more than 132,000 jobs in metro Atlanta's economy alone. Increasing the capacity of Savannah's Port will enable increased trade throughout the region, promote future growth, and create jobs for Georgia.

As you know, the Port of Savannah has been the fastest growing container port in the country over the past decade and its continued success is critical to economic recovery in Georgia and throughout the Southeast. The Savannah River Navigation Channel must now be deepened from 42 feet to as deep as 48 feet to accommodate the new generation of deep-draft vessels that will dominate trade when the expanded Panama Canal opens in 2014. The efficiency gained by these larger ships will lower transportation costs of U. S. exports and will solidify Georgia's role as a national leader in international commerce and could shift as much as 25% of ocean trade flows from west to east coast. In Georgia alone, our ports support more than 286,000 jobs, contribute some $14.9 billion in income, $3.5 billion in federal taxes, and $2.8 billion in state and local taxes each year. Most importantly, over **$6 Billion** worth of goods were shipped through Georgia's ports to counties within the Metropolitan Atlanta area. With SHEP, that will continue to grow. Alternatively, without SHEP, we will face the loss of many of our existing jobs over time.

We believe the Savannah Harbor Expansion Project (SHEP) will provide a highly cost-effective return on investment to Atlanta and the nation. This expansion represents a once-in-a-generation opportunity to significantly enhance Georgia's economic prosperity. Based on the importance and the potential long range impact of this project for metro Atlanta, Georgia and the Southeast's economy, we fully support this project.

Sincerely,

Bill Stankiewicz

Bill Stankiewicz
Vice President/General Manager
Shippers Warehouse

9250 South Main Street, Jonesboro, GA 30236 · Office: 770-961-4880 · Fax 678-364-3485
P.O. Box [illegible] Jonesboro, GA [illegible]

#499

PATTILLO
Industrial Real Estate

December 17, 2010

Mr. William Bailey
US Army Corps of Engineers, Savannah District
Attn: PD
100 West Oglethorpe Avenue
Savannah, GA 31401-3640

Re: Savannah Harbor Expansion Project (SHEP)
Letter of Support

Dear Mr. Bailey:

On behalf of Pattillo Industrial Real Estate, I wish to express my support of the **Savannah Harbor Expansion Project (SHEP)**. This project is essential to the growth of international commerce. It will create jobs and raise economic prosperity throughout Georgia and the Southeast United States.

The success of the SHEP is critical to economic recovery. The expansion of the Panama Canal creates new opportunity which we can only capture by investing in this infrastructural enhancement project. You have my full support of this project.

Sincerely,

Lawrence P. Callahan
Chief Executive Officer

LPC/jw

cc: Bob Pertierra, Metro Atlanta Chamber
Terry Lawler, Regional Business Coalition

5830 East Paces Ferry Road, Atlanta, GA 30083 Mailing Address: P.O. Box 87, Tucker, GA 30085-0087
Tel: 770.936.6366 Toll Free: 800.788.0837 Fax: 770.939.4621 Website: www.PattilloRE.com

From: Coffman, Margaret G (Meghan)
To: CESAS-PD, SAS
Cc: Humes, Christopher Eugene (Chris)
Subject: Comments on the Savannah Harbor Expansion Project General Re-Evaluation Report (GRR) and Tier II Environmental Impact Statement
Date: Friday, January 07, 2011 6:19:25 PM
Attachments: 1_7_11 Letter Re Comments on SHEP.pdf

Dear Mr. Bailey:

Attached are comments of Mr. Chris Humes, director of LNG Operations for El Paso Corporation, the owner/operator of the Southern LNG terminal located near Savannah, Georgia in support of the Savannah Harbor Expansion Project (SHEP).

Thanks,

Meghan

Margaret G. Coffman

Counsel

Southern Natural Gas Company

569 Brookwood Village, Suite 501

Birmingham, Alabama 35209

(205) 325-7424 (office)

(205) 504-1953 (mobile)

****
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****

exports over the next five years, the port infrastructure must be in place to accommodate the export growth.

o The Port of Savannah handled 12% of all U.S. containerized exports in FY2010, a total of 1.14 million export TEUs (twenty-foot equivalent units), with an export ratio of 54%.

The SHEP serves as a model for future Corps projects with significant Federal Agency collaboration throughout the study process, as well as the incorporation of adaptive management.

o The USFWS, EPA and NMFS have been involved throughout the study process since 1999 and have served as cooperating agencies in the production of the EIS since 2001.

o This project will represent the first deep-draft navigation project which incorporates adaptive management as mandated by WRDA 2007.

The Statewide Economic Impact of Georgia's Deepwater Ports (FY2009):

295,443 full and part-time jobs (7% of Georgia's total employment);
$61.7 billion in sales (9% of Georgia's total sales);
$26.8 billion in gross state product (7% of Georgia's total GSP);
$15.5 billion in income (5% of Georgia's total personal income);
$3.5 billion in federal taxes
$2.6 billion in state and local taxes

From: Gary Sanchez
To: CESAS-PD, SAS
Subject: support for the deepening of Savannah Harbor
Date: Tuesday, December 21, 2010 12:05:06 PM

I support the deepening of the Savannah Harbor. The port in Savannah has become a vital part of the Georgia economy. It is also vital to the surrounding states of South Carolina, Florida, Tennessee and Alabama who all benefit from the vitality of the port in Savannah. This deepening is a key aspect of the ongoing success of the port and the continued recovery or our economy.

Thank you for your consideration.

Gary Sanchez.

From: Chuck Mitchell
To: CESAS-PD, SAS
Subject: Savannah Harbor Expansion Project
Date: Tuesday, December 21, 2010 1:40:21 PM

TO: The US Army Corps of Engineers

SUBJECT: Savannah Harbor Expansion Project Comments

The purpose of this comment is to wholeheartedly support the dredging of the Savannah River to 48' to accommodate the larger draft post-Panamax container ships, which will be coming through the expanded Panama Canal starting in 2014.

As background, I have lived in Savannah for the past 26 years – all of them in the real estate business. During that time, I have had the privilege of working on some of the largest real estate developments in the entire region through my work with Branigar/Union Camp and Crescent Resources/Duke Energy. In my roles with those companies, I was given the opportunity to play a key role in the development of The Landings on Skidaway Island and be the driving force behind Godley Station near the airport, the Buckwalter Tract in Bluffton, the Schultz Tract in Bluffton (now Bluffton Park), Palmetto Bluff, the Argent Tract, the Hardeeville Tract, and a residential project called Oldfield. So, I believe I can speak with some credibility on the Greater Savannah/Bluffton/Hilton Head/Hardeeville region.

To that end, I have watched in amazement as two forces re-shaped Savannah – the Savannah College of Art & Design (SCAD) and the Port.

SCAD saved downtown – end of story.

The Port has driven an industrial/warehouse/distribution boom unique in almost the entire country. This has in turn has supported outstanding residential and commercial development – turning a once sleepy Savannah into one of the most desirable places in the country to both live, work, play, and retire.

Not granting the Port the permit to dredge the river effectively stops this growth. The old mantra is if you are not growing, you are dying. This will be especially true for Savannah. With not enough depth to handle the newer and larger container ships coming through the canal and calling on the East Coast, Savannah's loss will be other East Coast port's gain. This business cannot and will not be replaced – and will mark the end of the growth story in Savannah and the start of a decline and all the negatives that brings. Take a look at Detroit for a glimpse into a no-permit future.

For perhaps the best understanding of the role the Port plays in this region, let me share a call I received from a client in Chicago last week. This extremely successful entrepreneur called me to say he wished to make a substantial real estate investment in Savannah. When I inquired as to the reason why, he stated that he believed that if Savannah was successful in getting the river deepened, it would outperform any other area on the East Coast, and he wanted to be sure he was in on that. He then asked about the status of the permit.

So, after the most-studied issue in the already long history of Savannah – you guys have done one hell of a job on that -- let's stop the analysis, reviews, commenting, etc. and get on with the real work and real benefit of dredging the river to 48' – NOTHING could be better for the entire region.

Thanks so much for providing the opportunity to comment.

MMD COMMERCIAL PROPERTIES

Chuck Mitchell

13 Saltwind Circle

Savannah, GA 31411

Office: (912) 232-4646

Mobile: (912) 660-3098

Email: cmitchell@mmdcommercial.com <mailto:cmitchell@mmdcommercial.com>

Please visit our web site at: www.mmdcommercial.com <http://www.mmdcommercial.com/>

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From: Bill Edgy
To: CESAS-PD_SAS
Cc: Brian StJohn; Monte Johnson
Subject: Support for SHEP
Date: Tuesday, December 21, 2010 1:45:26 PM

Mr. Bailey,

I am writing in response to your e-mail regarding the deepening of the Savannah Harbor. My company, Southeast Industrial Equipment, is a provider of Forklift Trucks and other material handling equipment to The Georgia Ports Authority. In addition, we supply equipment to many of the Stevedore companies and a majority of the Third-Party Logistics companies that are supported by the shipping industry through the ports of Savannah.

I don't have to tell you that competing with the Ports of Charleston and Jacksonville has been hard for The Georgia Ports Authority. I feel that deepening the harbor will allow the GPA to continue to attract new customers that will provide business opportunities in our area. Over the last 5 years, the port of Savannah has become home to new businesses such as Target, IKEA and Heineken USA just to name a few. Deepening the Savannah Harbor will allow the GPA to continue with a progressive approach to the global logistics pipeline and will help to keep Savannah at the forefront of the global shipping industry. The growth of the shipping industry in Savannah will, in my opinion, lead to a stimulated economy, by providing new jobs as well as both income and tax dollars to Georgia. What does this mean to Southeast Industrial Equipment? It means the potential for increased sales, and with that comes a larger market presence, a stable, secure workforce and increased profits.

I would like to thank you for providing this forum for small businesses to express their opinions and for your efforts in SHEP. I will be anxiously awaiting word on this monumental issue concerning our community, our state and our businesses.

Sincerely,

Bill Edgy

Territory Manager

Southeast Industrial Equipment

(912) 965-9191 - Office

(912) 965-9292 - Fax

(912) 414-1294 - Cell

bedgy@sielift.com <mailto:bedgy@sielift.com> - E-Mail Address

From: Parrish Smith
To: CESAS-PD_SAS
Cc: Stephanie Smith; Phillip Burrows; Naomi Wobb; Marteha Stewart; Lorraine Hill; littlebirdie9@hotmail.com; kenneth patterson; Kalaya; Jessica Savage; JAMES BROWN; mighti_usmc@yahoo.com; Hutchinson, Samantha; george craver; Elizabeth Bridger; TELESHIA; Tyrone Love; dadyeze@yahoo.com; bobskir513@yahoo.com; joneslashanda@yahoo.com
Subject: The Savannah Harbor Expansion Project
Date: Tuesday, December 21, 2010 2:54:39 PM
Importance: High

Friends & Family

We all need to support the Savannah Harbor Expansion Project (SHEP) so the National Export Initiative can be met. Imagine if the Savannah, Georgia Ports Authority was the largest container port in the country. All the statistics that the GPA generate will triple or quaruple. Included in these statistics are Jobs & Income. Much of what is needed all around the country. Savannah has an unemployment rate of 7.7%, compared the national average of 6.9%. This project bring economic developent to the state of Georgia along with major logistical needs to our nation.

Pass this along to all your friends & family so we can support the US Army Corps of Engineers, Savannah District. Please send all comments to CESAS-PD@usace.army.mil & CC/BCC your friends & family.

Respectfully,

Parrish Smith, US Army Veteran

About the SHEP.....

The Savannah Harbor Expansion Project (SHEP)

The Savannah Harbor Expansion Project is a project of national significance.

o The Port of Savannah is responsible for moving 8.3% of all US containerized cargo and more than 18% of all East Coast trade.

o As the fourth largest container port in the country, the Port of Savannah serves approximately 21,000 companies in all 50 states, over 75% of which are headquartered outside of Georgia.

o The SHEP will allow larger, deeper draft ships to call on the Port of Savannah, the import/export gateway to 44% of the US population. The economies of scale offered by Post Panamax ships will result in an average of 17% cost savings to US exporters and importers when compared to the operating costs of Panamax vessels.

The SHEP will assist the nation in successfully meeting the National Export Initiative created by Executive Order of President Obama.

o In order to meet the National Export Initiative aimed at doubling US exports over the next five years, the port infrastructure must be in place to accommodate the export growth.

o The Port of Savannah handled 12% of all U.S. containerized exports in FY2010, a total of 1.14 million export TEUs (twenty-foot equivalent units), with an export ratio of 54%.

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$26.8 billion in gross state product (7% of Georgia's total GSP);
$15.5 billion in income (5% of Georgia's total personal income);
$3.5 billion in federal taxes
$2.6 billion in state and local taxes

From: Parrish Smith
To: CESAS-PD, SAS
Cc: Larry Bing; Charles Davis; Keisha Sanders; David Vance; Gerald Gaines; James Mincey
Subject: The Savannah Harbor Expansion Project (SHEP)
Date: Tuesday, December 21, 2010 2:56:41 PM

Friends & Family

We all need to support the Savannah Harbor Expansion Project (SHEP) so the National Export Initiative can be met. Imagine if the Savannah, Georgia Ports Authority was the largest container port in the country. All the statistics that the GPA generate will triple or quaruple. Included in these statistics are Jobs & Income. Much of what is needed all around the country. Savannah has an unemployment rate of 7.7%, compared the national average of 6.9%. This project bring economic developent to the state of Georgia along with major logistical needs to our nation.

Pass this along to all your friends & family so we can support the US Army Corps of Engineers, Savannah District. Please send all comments to CESAS-PD@usace.army.mil & CC/BCC your friends & family.

Respectfully,

Parrish Smith

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The SHEP will assist the nation in successfully meeting the National Export Initiative created by Executive Order of President Obama.

o In order to meet the National Export Initiative aimed at doubling US

CSX CORPORATION
CLARENCE W. GOODEN
Executive Vice President
Chief Commercial Officer

500 West Bay Street
Suite 1120
Jacksonville, FL 32202
(904) 359-1000
Fax (904) 359-3426

January 17, 2011

Mr. William Bailey
US Army Corps of Engineers – Savannah District
100 West Oglethorpe Avenue
Savannah, GA. 31401-3640

VIA E-MAIL: CESAS-PD@SAC.ARMY.MIL

Dear Mr. Bailey,

CSX Transportation (CSXT) is a Class 1 railroad serving the eastern United States with connecting service to Western US, Canada and Mexico. CSXT serves both domestic and international customers. We market our service as a logistics solution which offers environmental benefits and helps to reduce highway congestion.

CSXT would like to provide its support for the Savannah Harbor Expansion Project (SHEP) and encourage the USACE to approve this endeavor. As you know, the Port of Savannah is the second largest container port by volume on the East Coast serving a rapidly growing Southeast market. This region relies on the efficiency and cost effectiveness of the Port of Savannah to help meet consumer demand. CSXT moved over 100,000 containers in 2010 between the Port of Savannah and several points in the Southeast and we expect that volume to continue to grow in 2011 and beyond.

The Georgia Port Authority has made significant investments in its port, distribution and transportation infrastructure over the last 10 years to meet today's demand and tomorrow's growth. However, with the $5.2 billion Panama Canal expansion on schedule for a 2014 completion, the Georgia Ports Authority now needs your approval for the Savannah Harbor Expansion Project so it can handle the new generation of larger vessels that are becoming predominant in the maritime industry.

It is vital that the USACE deepen the draft at the Port of Savannah for the efficient movement of goods to and from the Southeast region and to allow for continued economic growth and job creation that the Port of Savannah creates.

Thank you for your consideration.

Sincerely,

Clarence Gooden

From: Tim Blumentritt
To: CESAS-PD, SAS
Subject: Letter of Support - Savannah Harbor Deepening Project (SHEP)
Date: Wednesday, December 22, 2010 10:37:08 AM
Importance: High

December 17, 2010

Mr. William Bailey
US Army Corps of Engineers, Savannah District
ATTN: PD
100 West Oglethorpe Avenue
Savannah, GA 31401-3640

Dear Mr. Bailey,

In conjunction with the Metro Atlanta Chamber and our more than 4,000 members, I am writing you today to express our full support of the Savannah Harbor Expansion Project (SHEP). This project is critical to the continued growth of metro Atlanta, Georgia and the Southeast Region. International trade and the movement of goods are essential to our economic prosperity. Increasing the capacity of Savannah's Port will enable increased trade throughout the region, promote future growth, and create jobs for Georgia.

As you know, the Port of Savannah has been the fastest growing container port in the country over the past decade and its continued success is critical to economic recovery in Georgia and throughout the Southeast. The Savannah River Navigation Channel must now be deepened from 42 feet to as deep as 48 feet to accommodate the new generation of deep-draft vessels that will dominate trade when the expanded Panama Canal opens in 2014. The efficiency gained by these larger ships will lower transportation costs of U. S. exports and will solidify Georgia's role as a national leader in international commerce and could shift as much as 25% of ocean trade flows from west to east coast. In Georgia alone, our ports support more than 286,000 jobs, contribute some $14.9 billion in income, $3.5 billion in federal taxes, and $2.8 billion in state and local taxes each year. Most importantly, over $6 Billion worth of goods were shipped through Georgia's ports to counties within the Metropolitan Atlanta area. With SHEP, that will continue to grow. Alternatively, without SHEP, we will face the loss of many of our existing jobs over time.

We believe the Savannah Harbor Expansion Project (SHEP) will provide a highly cost-effective return on investment to Georgia and the federal government. This expansion represents a once-in-a-generation opportunity to significantly enhance Georgia's economic prosperity. Based on the importance and the potential long range impact of this project for metro Atlanta, Georgia and the Southeast's economy, we fully support this project.

The Metro Atlanta Chamber brings the best together to help Atlanta thrive. We mobilize and connect the business community to drive economic development and public policies that promote sustainable growth. Our board draws from Atlanta's top business leaders. We have a professional staff of 90 and serve 4,000 member companies who employ nearly a million workers. In Economic Development, our project managers attract the best companies and the best jobs. In Public Policy, we tackle crisis issues and critical quality-of-life challenges such as transportation, water and education. For our members, we offer 150+ events and activities each year to help them connect and make business contacts. In 2009, the Chamber celebrated 150 years of bringing Atlanta leaders together.

Sincerely,
Tim Blumentritt

From: SSTAGNITTO@gaports.com
To: CESAS-PD, SAS
Subject: Savannah Harbor Expansion Project
Date: Wednesday, December 22, 2010 4:31:22 PM

The studies and research have been done and the obstacles and issues addressed. Savannah and Georgia need the deepening of the river to accommodate these great ships. We need to continue to bring and maintain the jobs in our area and state and to continue the economic viability of our region. There should be no more delay in this important issue.

Thank you for your time.

Susan Stagnitto RN BSN COHN/S
Workers' Compensation Manager
Risk Management
Georgia Ports Authority
P.O.Box 2406
Savannah, Georgia 31402
(912) 963-5418
(912) 966-3609 fax
sstagnitto@gaports.com

From: Kathleen Clifton
To: CESAS-PD, SAS
Subject: Savannah Harbor Expansion Project
Date: Thursday, December 23, 2010 8:59:15 AM

Mr. Bailey:

I support the widening and deepening of the Savannah Harbor. This is most important for Georgia's job market and economic development of east Georgia.

Sincerely,

Kathy Clifton

From: Gene Henry
To: CESAS-PD_SAS
Subject: S.H.E.P. Project / Savannah
Date: Monday, December 27, 2010 12:44:45 PM

The Statewide Economic Impact of Georgia's Deepwater Ports (FY2009):

295,443 full and part-time jobs (7% of Georgia's total employment);
$61.7 billion in sales (9% of Georgia's total sales);
$26.8 billion in gross state product (7% of Georgia's total GSP);
$15.5 billion in income (5% of Georgia's total personal income);
$3.5 billion in federal taxes
$2.6 billion in state and local taxes

I believe the numbers above should be more than sufficient impetus to make all parties strong supporters of this project, That being said, all investment in infrastructure is an investment in the future for the country as a whole, it is indeed a "Global Economy", and this project will serve to make the globe smaller, and our GDP larger. Without the ability to handle the new, larger fleet of coming "Super-ships", fully laden, this port will fall behind, and actually lose ground, it all comes down to economics, exporters and importers will make their decisions based on their bottom lines, not on geography, not on loyalty, and what may seem like common-sense, is often not the dollars and cents reality, if this project does not go through, it may even open the door for more manufacturers to seek an offshore / outsource option if the lack of modern export facilities cause undue financial burden to their operations. We must be efficient, and cost effective, and we must have built in equipment compatibility, deepening the Port of Savannahs' waterways will acheive this compatability.

Sincerely, Gene Henry

Gene Henry
Site Manager / S.D.S. / Savannah
office # 912-963-9949
cell # 912-228-6021
fax # 912-963-9950

From: Larry Bingi
To: CESAS-PD_SAS
Subject: Savannah Harbor Deepening
Date: Monday, December 27, 2010 1:29:39 PM

I think that this project is very important to the economy of Chatham county and all surrounding county. It will increase jobs in the area and stimulate growth in the area. Also it is a plus for new company that are looking at this area.

From: David Vance
To: CESAS-PD, SAS
Subject: Savannah Harbor Deepening Project
Date: Monday, December 27, 2010 7:36:01 PM

After reviewing the harbor deepening project initiatives and goals, I would be proud to say I fully support this project. Not only would the succession of this project benefit federal, state, and local governments, but it would also benefit each and every citizen of Georgia and other participating states in general. The cry for employment would be greatly reduced by all the opportunities this project would open up, from construction work to truck drivers and even port personnel. The nations companies and corporations would have a positive impact from the project as well, thus creating vast employment opportunities in every state. The positive outcomes in the completion of this project would surpass any negative reprocutions that would effect the environmental state of surrounding Savannah. This project would also serve as a giant step forward for our nations suffering economy, any improvement at this point is a blessing.

Sincerely, David Vance.

From:	Deutsch, Doris J SAS
To:	Bailey, William G SAS
Cc:	Hall, Jeffrey M COL SAS; London, David T LTC SAS; Peters, Terry G SAS; Oddi, Peter A SAS; Garrett, Thomas A SAS
Subject:	FW: SMA SHEP Comments (UNCLASSIFIED)
Date:	Wednesday, December 29, 2010 1:04:47 PM
Attachments:	SMA SHEP Ltr to USACE Dec 2010.pdf

Classification: UNCLASSIFIED
Caveats: FOUO

Doris J. Deutsch
Executive Assistant
Savannah District, US Army Corps of Engineers.
(912)652-5122, fax (912)652-5222.

-----Original Message-----
From: Charlie Sutlive [mailto:sma_1@bellsouth.net]
Sent: Wednesday, December 29, 2010 11:56 AM
To: Secretary SMA
Subject: SMA SHEP Comments

SMA,

Savannah Maritime Association's comments to USACE concerning the Savannah Harbor Expansion Project are attached and posted at http://www.savannahmaritime.com/.

The project information is posted at http://www.sas.usace.army.mil/shexpan/Home.html. Information concerning GA Ports' SHEP communications and support network is at http://www.gaports.com/shep/.

The USCG MSSB for New Years Eve Fireworks is posted at http://www.savannahmaritime.com/index_files/Page269.htm.

USCG Local Notice to Mariners 52/10 listed changes to the following navigation aids in the SMA area:

Medway River Daybeacon 2

Skidaway Narrows Daybeacon 73

South Channel Lighted Buoy 1

Happy New Year,

Charlie

Charlie Sutlive
Savannah Maritime Association
912-233-0415

Classification: UNCLASSIFIED
Caveats: FOUO

From: dexter@autoexpertsllc.com
To: CESAS-PD, SAS
Subject: Harbor Work At Savannah, Georgia
Date: Friday, January 14, 2011 3:21:25 PM

This work must be preformed for the well being of our economic base, at a time when we are losing jobs by the thousands we can not afford to hender our ability to export. Dexter E Elliott

From: Denton Stone
To: CESAS-PD, SAS
Subject: Savannah Harbor Deepening
Date: Friday, January 14, 2011 2:37:59 PM

Dear Sirs,

As a company who builds many structures supporting the logistics industry here in Savannah and surrounding areas, we are wholly supportive of deepening the Savannah Harbor. Please know that the impact this project will have will be felt directly by my company, its employees, and our affiliated subcontractors.

With Warmest Regards,

Denton Stone

Stone Construction Services, LLC

LIBERTY DEVELOPMENT

• Grow •

January 4, 2011

Mr. Williams Bailey
ATTN: PD, US Army Corps of Engineers, Savannah District
100 West Oglethorpe Avenue
Savannah, GA 31401-3640

RE: Savannah Harbor Expansion Project

Dear Mr. Bailey:

On behalf of the board of directors of the Liberty County Development Authority (LCDA), it is my pleasure to support the Savannah Harbor Expansion Project (SHEP). The deepening of the Savannah Harbor to 48 feet is critical for the Port of Savannah to continue to compete in the global economy.

The Port of Savannah is one of our region and state's largest economic engines. Specifically, Liberty County and our existing industries greatly benefit from the Port of Savannah.

Liberty County's proximity to the Port of Savannah continues to be one of our most valuable incentives for locating companies and creating new jobs. Companies, both foreign and domestic, continue to select Liberty County, because they see the community as a place where they can grow globally due in large part to the Port of Savannah.

In Liberty County, 70% of the existing industry employment is tied to companies headquartered overseas. In addition, Liberty County's existing industries export to over 70 countries throughout the world with the majority of the exports going through the Port of Savannah.

The SHEP will help Liberty County, the state of Georgia, and the United States as we continue to recruit and retain industry. The project is imperative as we try to grow jobs.

Thank you for the opportunity to submit a support letter. Please do not hesitate to contact me if you have any questions or need any additional information.

Sincerely,

Allen Brown
Chairman

lcda.com
425 W. Oglethorpe Highway | Hinesville, GA 31313 | USA | p. +1 912.368.3356 | f. +1 912.368.5585

#552

Metro Atlanta Chamber

December 21, 2010

Mr. William Bailey
US Army Corps of Engineers, Savannah District
ATTN: PD
100 West Oglethorpe Avenue
Savannah, GA 31401-3640

Dear Mr. Bailey,

On behalf of the Metro Atlanta Chamber **Global Commerce Council** and our more than 200 member organizations, including companies like Siemens, Crawford & Company, Delta Air Lines, Georgia Power, and Georgia-Pacific, I am writing you today to express our full support of the **Savannah Harbor Expansion Project (SHEP)**. This project is critical to the continued growth of metro Atlanta, Georgia and the Southeast region. International trade and the movement of goods are essential to our economic prosperity. Global commerce creates more than 160,000 jobs in metro Atlanta's economy alone. Increasing the capacity of Savannah's Port will enable increased trade throughout the region, promote future growth, and create jobs for Georgia.

As you know, the Port of Savannah has been the fastest growing container port in the country over the past decade and its continued success is critical to economic recovery in Georgia and throughout the Southeast. The Savannah River Navigation Channel must now be deepened from 42 feet to as deep as 48 feet to accommodate the new generation of deep-draft vessels that will dominate trade when the expanded Panama Canal opens in 2014. The efficiency gained by these larger ships will lower transportation costs of U. S. exports and will solidify Georgia's role as a national leader in international commerce and could shift as much as 25% of ocean trade flows from west to east coast. In Georgia alone, our ports support more than 286,000 jobs, contribute some $14.9 billion in income, $3.5 billion in federal taxes, and $2.8 billion in state and local taxes each year. Most importantly, over **$6 Billion** worth of goods were shipped through Georgia's ports to counties within the metropolitan Atlanta area. With SHEP, that will continue to grow. Alternatively, without SHEP, we will face the loss of many of our existing jobs over time.

We believe the Savannah Harbor Expansion Project (SHEP) will provide a highly cost-effective return on investment to Atlanta and the nation. This expansion represents a once-in-a-generation opportunity to significantly enhance Georgia's economic prosperity. Based on the importance and the potential long range impact of this project for metro Atlanta, Georgia and the Southeast's economy, we fully support this project.

The Metro Atlanta Chamber brings the best together to help Atlanta thrive. We mobilize and connect the business community to drive economic development and public policies that promote sustainable growth. Our board draws from Atlanta's top business leaders. We have a professional staff of 90 and serve 4,000 member companies who employ nearly a million workers (www.metroatlantachamber.com).

Sincerely,

Christian Fischer
Chairman, Metro Atlanta Chamber Global Commerce Council
Executive Vice President, Georgia-Pacific

Bringing the best together to help Atlanta thrive.

235 Andrew Young International Blvd., NW | Atlanta, Ga. 30303 | 404.880.9000 | www.MetroAtlantaChamber.com

SNF HOLDING COMPANY

#553

Mr. William Bailey
ATTN: PD, U.S. Army Corps of Engineers, Savannah District
100 West Oglethorpe Highway
Savannah, GA 31401-3640

Dear Mr. Bailey,

I am writing to you on behalf of SNF Holding Company in support of the Savannah Harbor Expansion Project. SNF Holding Company is based in Riceboro Georgia. We are the world's largest producer of polyacrylamide flocculants and related monomers. We are the largest industrial employer in Liberty County Georgia, with more than 1000 people, including employees and contractors, employed at our site. More than 40% of the products we make are exported, mostly through the Port of Savannah, and we also import many of our raw materials through the port.

The continued viability and competitiveness of the Savannah port is critical to our business. We compete on a global basis and our products must be competitively priced. The port expansion project is vital to maintaining this competitiveness.

In addition, SNF Holding Company has recently started construction of a new polymer manufacturing plant in Plaquemine LA. At the current time this plant is not intended to reduce employment at our Riceboro site. However, the Plaquemine plant will compete with the Riceboro plant for future investment by the company, and any reduction in the competitive advantages of the local area could have a negative effect on future employment at this site.

We believe the Savannah Harbor Expansion Project is essential to sustaining and growing our business. Please let me know if you have any questions.

Yours truly,

David J. Kaye
VP Manufacturing SNF Chemtall Inc.

P.O. Box 250 • Riceboro, GA 31323 USA • Tel 912-884-3366 • Fax 912-884-5031 • www.snf.us

#554

GREATER MEMPHIS CHAMBER

December 21, 2010

Mr. William Bailey
ATTN: PD, US Army Corps of Engineers, Savannah District
100 West Oglethorpe Avenue
Savannah, GA 31401-3640

Dear Mr. Bailey:

The Greater Memphis Chamber is pleased to write this letter of support for the Savannah Harbor Expansion Project. With the assistance of the international consulting firm, IHS Global Insight, we have recently completed the Memphis Regional Freight Infrastructure Plan which identifies Savannah as a very important East Coast Gateway Port for Memphis. This harbor improvement is of great strategic importance to Memphis because major CSX and Norfolk Southern rail terminals are located at the Savannah Port. These two Class 1 railroads also have significant logistics facilities in Memphis. The CSX expanded its intermodal terminal in conjunction with the CN Railroad several years ago and the Norfolk Southern Railroad is in the process of building a new $129 million intermodal terminal and logistics park as part of the Crescent Corridor Project.

The improved deep water harbor with direct connection between Savannah and Memphis is not only of regional but of national importance. U. S. Department of Commerce Secretary Locke was in Memphis recently espousing the benefits of the President's Export Initiative to double export within five years. Memphis is 28th among the top 368 metro areas for exporting and we believe that the linkage to Savannah will enhance exporting and benefit the balance of trade for our country.

The Savannah Harbor Expansion Project is significant because it makes time sensitive goods movement even more efficient and provides reduced time-to-market cost. Because of this unique connection between Memphis and the Port of Savannah, the Greater Memphis Chamber encourages the timely completion of the Savannah Harbor Expansion Project.

Thank you for your consideration in this matter. If you need additional information, please contact me.

Sincerely,

Dexter Muller, Sr. V. P.
Community Development

From: David Buck
To: CESAS-PD, SAS
Subject: Support for SHEP
Date: Saturday, January 15, 2011 11:59:04 AM

Please allow me to lend my voice of support for SHEP. This project is critical to Savannah and the entire southeast. The port is a cornerstone of our economy and a key to our future.

Thank you,

—

David Buck
Weichert - Pursuit Real Estate Group
Synergy Designer Homes
912-352-0134 office
912-352-0136 fax
843-540-2667 cell

#555

J. Kevin Fletcher
Vice President
Community and
Economic Development

241 Ralph McGill Boulevard NE
Atlanta, Georgia 30308-3374

Tel 404 506 4721
Fax 404 506 1875
jkfletch@southernco.com

GEORGIA POWER
A SOUTHERN COMPANY

December 17, 2010

Mr. William Bailey
US Army Corps of Engineers, Savannah District
ATTN: PD
100 West Oglethorpe Avenue
Savannah, Georgia 31401-3640

Dear Mr. Bailey,

On behalf of the Metro Atlanta Chamber's, **Economic Development Committee** and our more than 100 member companies and business leaders I am writing you today to express our full support of the **Savannah Harbor Expansion Project (SHEP)**. This project is critical to the continued growth of metro Atlanta, Georgia and the Southeast Region. International trade and the movement of goods are essential to our economic prosperity. Increasing the capacity of Savannah's Port will enable increased trade throughout the region, promote future growth, and create jobs for Georgia.

As you know, the Port of Savannah has been the fastest growing container port in the country over the past decade and its continued success is critical to economic recovery in Georgia and throughout the Southeast. The Savannah River Navigation Channel must now be deepened from 42 feet to as deep as 48 feet to accommodate the new generation of deep-draft vessels that will dominate trade when the expanded Panama Canal opens in 2014. The efficiency gained by these larger ships will lower transportation costs of U. S. exports and will solidify Georgia's role as a national leader in international commerce and could shift as much as 25% of ocean trade flows from west to east coast. In Georgia alone, our ports support more than 286,000 jobs, contribute some $14.9 billion in income, $3.5 billion in federal taxes, and $2.8 billion in state and local taxes each year. Most importantly, over **$6 Billion** worth of goods were shipped through Georgia's ports to counties within the Metropolitan Atlanta area. With SHEP, that will continue to grow. Alternatively, without SHEP, we will face the loss of many of our existing jobs over time.

We believe the Savannah Harbor Expansion Project (SHEP) will provide a highly cost-effective return on investment to Atlanta and the nation. This expansion represents a once-in-a-generation opportunity to significantly enhance Georgia's economic prosperity. Based on the importance and the potential long range impact of this project for metro Atlanta, Georgia and the Southeast's economy, we fully support this project.

The Metro Atlanta Chamber brings the best together to help Atlanta thrive. We mobilize and connect the business community to drive economic development and public policies that promote sustainable growth. Our board draws from Atlanta's top business leaders. We have a professional staff of 90 and serve 4,000 member companies who employ nearly a million workers (www.metroatlantachamber.com).

Sincerely,

Kevin Fletcher

#556

ORTEC

ORTEC International USA, Inc.
3003 Summit Blvd NE
Suite 1500
Atlanta, GA 30319
United States

Phone (404) 460-5245
Fax (404) 460-4070
www.ortec.com

Dec 16, 2010

Mr. William Bailey
US Army Corps of Engineers, Savannah District
ATTN: PD
100 West Oglethorpe Avenue
Savannah, Georgia 31401-3640

Dear Mr. Bailey,

On behalf of ORTEC, I am writing you today to express our full support of the **Savannah Harbor Expansion Project (SHEP)**. This project is critical to the continued growth of metro Atlanta, Georgia and the Southeast Region. International trade and the movement of goods are essential to our economic prosperity. Increasing the capacity of Savannah's Port will enable increased trade throughout the region, promote future growth, and create jobs for Georgia.

As you know, the Port of Savannah has been the fastest growing container port in the country over the past decade and its continued success is critical to economic recovery in Georgia and throughout the Southeast. The Savannah River Navigation Channel must now be deepened from 42 feet to as deep as 48 feet to accommodate the new generation of deep-draft vessels that will dominate trade when the expanded Panama Canal opens in 2014. The efficiency gained by these larger ships will lower transportation costs of U. S. exports and will solidify Georgia's role as a national leader in international commerce and could shift as much as 25% of ocean trade flows from west to east coast. In Georgia alone, our ports support more than 286,000 jobs, contribute some $14.9 billion in income, $3.5 billion in federal taxes, and $2.8 billion in state and local taxes each year. Most importantly, over **$6 Billion** worth of goods were shipped through Georgia's ports to counties within the Metropolitan Atlanta area. With SHEP, that will continue to grow. Alternatively, without SHEP, we will face the loss of many of our existing jobs over time.
We believe the Savannah Harbor Expansion Project (SHEP) will provide a highly cost-effective return on investment to Georgia and the federal government. This expansion represents a once-in-a-generation opportunity to significantly enhance Georgia's economic prosperity. Based on the importance and the potential long range impact of this project for metro Atlanta, Georgia and the Southeast's economy, we fully support this project.

Sincerely,

Cornel Aantjes
President ORTEC Americas

PROFESSIONALS

US Army Corps of Engineers
Savannah District

#560

Comment on the Savannah Harbor Expansion Project

The Savannah District, U.S. Army Corps of Engineers welcomes your comments on the Savannah Harbor Expansion Project. Once completed, place the card in the "comments" box or add postage and mail it back to us. Comments can also be provided online at **CESAS-PD@usace.army.mil**.

From: (optional) KATHY GREEN - TH SERVICES

Comments:

I MANAGE THE CLEANING COMPANY AT THE GEORGIA PORTS AND AM 100% FOR THE HARBOR DEEPENING FOR INCREASED BUSINESS AND REVENUE FOR THE ECONOMY

US Army Corps of Engineers
Savannah District

#561

Comment on the Savannah Harbor Expansion Project

The Savannah District, U.S. Army Corps of Engineers welcomes your comments on the Savannah Harbor Expansion Project. Once completed, place the card in the "comments" box or add postage and mail it back to us. Comments can also be provided online at **CESAS-PD@usace.army.mil**

From: (optional) Daniel Butterswoth - Truck Driver

Comments:

I am 100% For The Harbor Deeping so it will bring more ~~BUS~~ Business For Everyone

S Army Corps
f Engineers.
avannah District

#562

Comment on the Savannah Harbor Expansion Project

The Savannah District, U.S. Army Corps of Engineers welcomes your comments on the Savannah Harbor Expansion Project. Once completed, place the card in the "comments" box or add postage and mail it back to us. Comments can also be provided online at **CESAS-PD@usace.army.mil**.

From: (optional) STEVEN BOYCE - PORT WENTWORTH, GA

Comments:

THE PROJECT IS ABSOLUTELY NECESSARY TO CONTINUE OUR GROWTH AND POSITIONING IN THE WORLD-WIDE MARKET.

Thank you!

US Army Corps
of Engineers.
Savannah District

#563

Comment on the Savannah Harbor Expansion Project

The Savannah District, U.S. Army Corps of Engineers welcomes your comments on the Savannah Harbor Expansion Project. Once completed, place the card in the "comments" box or add postage and mail it back to us. Comments can also be provided online at **CESAS-PD@usace.army.mil**.

From: (optional) Pertory A. Smith

Comments:

I am very much in favor of any project that will help our city to grow and bring more revenue to our area.

#564

US Army Corps of Engineers
Savannah District

Comment on the Savannah Harbor Expansion Project

The Savannah District, U.S. Army Corps of Engineers welcomes your comments on the Savannah Harbor Expansion Project. Once completed, place the card in the "comments" box or add postage and mail it back to us. Comments can also be provided online at CESAS-PD@usace.army.mil

From: (optional) Brandon Long Lewis-Goetz & Co.

Comments: The Savannah Harbor dredging project will benefit everyone in the adjacent area. Please allow this project to be completed for all our sakes

CMA CGM

January 6, 2011

Mr. William Bailey
US Army Corps of Engineers – Savannah District
100 West Oglethorpe Avenue
Savannah, Georgia 31401-3640

Via e-mail: CESAS-PD@usace.army.mil

Dear Mr. Bailey,

I am clarifying the importance of the Savannah Harbor Expansion Project to CMA CGM.

Our company is one of the largest container carriers calling on the Port of Savannah and, provided adequate infrastructure is available, we plan to continue to grow our trade through the port for many years to come. In fact, we brought in the largest vessel ever to call Savannah, the 8,500 TEU vessel "CMA CGM Figaro," which is featured on the 3Q cover of the Georgia Ports Authority magazine, "AnchorAge." However, the current 42-foot mean low water depth of the Savannah River is no longer sufficient to accommodate the post-Panamax vessels we have in service today. With the designed maximum draft of the Figaro at 49 feet, we actually could not load all the freight available in Savannah, and had to leave loads behind.

As you know, the newer post-Panamax vessels offer greater economic and environmental efficiencies that make their use both a preference as well as a priority to older generation vessels. The additional depth provided by the canal will not only allow CMA CGM to better utilize these ships, but it will also provide a more cost effective means of shipping United States exports to markets throughout the world, particularly to Asia. Simply put, each additional foot of water draft available at the Port of Savannah improves the operating efficiencies and lowers the per unit operating costs of our vessels.

CMA CGM (America) LLC
5701 Lake Wright Drive - Norfolk, VA 23502-1868 - Tel: (757) 961-2100 - Fax: (757) 961-2151
www.cma-cgm.com - 1-877-556-6308

Mr. William Bailey
Page 2

It is imperative that the Savannah Harbor be deepened to 48 feet at mean low water and that this project be completed as quickly as possible. Our business and that of other shipping lines, as well as United States exporters and importers, is depending on it.

Sincerely,

Joel Haka
Sr. Vice President & COO

cc: Curtis Foltz, GPA
Cliff Pyron, GPA
Frank Baragona, CMA CGM

CMA CGM (America) LLC
5701 Lake Wright Drive - Norfolk, VA 23502-1868 - Tel: (757) 961-2100 - Fax: (757) 961-2151
www.cma-cgm.com - 1-877-556-6308

From: acetank@aol.com
To: CESAS-PD, SAS
Subject: SHEP Comments
Date: Wednesday, January 19, 2011 10:13:34 AM

Dear Mr Bailey

As someone who has attended and participated in numerous SEG meetings from the very beginning, almost 12 / 13 years ago, I wish to commend the Corps for doing an outstanding job of preparing the GRR and Draft Tier II EIS as well as confirm my support for this project.

This harbor deepening project is absolutely vital to the continued success,growth and well being the entire South East United States as well as the country at large.

This project is perhaps THE most studied, ever with perhaps several million dollars (around $40 million plus), with numerous man hours of volunteer as well as paid personnel time expended to identifying and addressing areas of concern / reasonable mitigation plans.

When Savannah was founded in 1733, the navigable portions of the river was barely 14 feet deep ..... currently we have a 42 ft project depth channel.

It is very important the public at large recognizes and is also made fully aware of the fact, that deepening the river to a project depth of 48 feet has more significant and much needed improvements to the navigational channel and increases overall safety of vessels currently making inbound and outbound transits.

The realignment of the navigational channel and inclusion of new and much needed passing areas is perhaps the most critical safety improvement that is long overdue and absolutely necessary.

The realigned channel with the proposed new project depth of 48 feet, will not only enhance safer navigation and piloting of vessels transiting the river but enable these wider (Post Panamax) and larger vessels to have a larger tidal window in which to operate.

Perhaps in the final EIS, please consider expanding and defining the project depth of 48 FT ..... so that it becomes clear that vessels with a draft of 48 FT could use the river in the future as compared to the current 42 FT limitation.

Yours Truly

Capt, Christopher R Desa

Savannah GA

From: Nick Bruce
To: CESAS-PD, SAS
Subject: Savannah Harbor Expansion
Date: Sunday, January 02, 2011 12:39:09 PM

As a citizen of Savannah, I fully support the expansion. It is crucial in my opinion the the continued growth of Georgia's economy, and without it there will be a further increase in prices nationwide for the goods and products we use daily.

Nick Bruce

From: Crawford, Ralph
To: CESAS-PD, SAS
Subject: SAV Harbor Deepening Project
Date: Tuesday, January 04, 2011 1:44:55 PM

Hello Mr. Bailey,

I recommend the harbor be deepened to 48 feet.

The future trend is to larger ships, and Savannah must have her harbor ready for them BEFORE they start appearing and companies change trade patterns to deeper ports.

Savannah's intermodal transportation capabilities would multiply the effects of the increased shipping.

I am a Savannah native and resident employed 12 years by a global shipping company with a large presence in Savannah and Brunswick, but this is my personal opinion.

Best Regards,

Ralph Crawford

Equipment Management

Cargo Quality, Region Americas
Wallenius Wilhelmsen Logistics
Savannah, GA, United States
Phone: +1 912 965 7467
Mobile: +1 912 655 3662
Fax: +1 912 965 7459
E-mail: ralph.crawford@2wglobal.com <mailto:ralph.crawford@2wglobal.com>
Internet: www.2wglobal.com <http://www.2wglobal.com/>

CONFIDENTIALITY AND DISCLAIMER NOTICE
"This message is for the sole use of the intended recipients and may contain confidential information. If you are not an intended recipient, you are requested to notify the sender by reply e-mail and destroy all copies of the original message. Any unauthorized review, use, disclosure or distribution is prohibited. While the sender has taken reasonable precautions to minimize the risk of viruses, we cannot warrant the absence of, or accept liability for, any such viruses in this message or any attachment."

From: Gigis, Paul
To: CESAS-PD, SAS
Subject: Savannah Harbor Expansion Project
Date: Wednesday, January 05, 2011 11:26:49 AM

Mr. Bailey,

I hope all is well. I am e-mailing you in support of the Savannah Harbor Expansion Project to deepen to 48' feet. My job as well as close to 300,000 Georgia jobs are directly related to the success of The Georgia Ports Authority. Allowing larger ships to access our port will give us a distinct advantage and will also allow President Obama to achieve his goal of doubling U. S. exports in the next 5 years. Georgia has the distinct advantage of being a port that has a large export base not only from our state but also from our neighboring states. The economic impact will include Tennessee, Alabama, South Carolina, North Carolina, and Mid-Western States railing commodities into our area.

I appreciate you taking the time to read my correspondence. I can be reached at my numbers below if needed.

Best Regards,

Paul Gigis
General Manager Sales
Bridge Terminal Transport
300 O'Leary Road
Port Wentworth, GA 31407
912-480-4426 office
912-659-7359 cell

This e-mail is intended exclusively for the addressee. If you are not the addressee you must not read, copy, use or disclose the e-mail nor the content; please notify us immediately [by clicking 'Reply'] and delete this e-mail.

From: JTATOM@gaports.com
To: CESAS-PD, SAS
Subject: Support for the Savannah Harbor Expansion Project
Date: Thursday, January 06, 2011 8:51:09 AM

Mr. William Bailey
ATTN: PD, US Army Corps of Engineers, Savannah District
100 West Oglethorpe Avenue
Savannah, GA 31401-3640

Dear Mr. Bailey,

I want to express my full support for the Savannah Harbor Expansion Project. Not only is it essential to deepen the river from 42 feet to 48 feet for the Port of Savannah to remain competitive once the Panama Canal expansion is complete in 2014 and larger ships begin calling the U.S. East Coast, it is vital to the economic health of the Coastal region, the entire state, and at a national level. My job is directly effected by SHEP, but so are those at the distribution centers in Atlanta and the exporters in Memphis. Without the deepening, ocean carriers simply won't call the Port of Savannah. Cargo will move through less efficient ports further from the population centers served by Savannah, increasing overall costs and pollution.

The infrastructure serving the Port of Savannah, two major interstate highways (I-16 and I-95) and two major class I railroads (CSX and Norfolk Southern) with intermodal container transfer facilities on-terminal, is one-of-a-kind. It is the largest single terminal container terminal in the U.S. The Port should not suffer from a lack of harbor depth. It is imperative Savannah Harbor Expansion Project be approved and completed in a timely manner.

Thank you for your consideration.

Sincerely,

Jennifer Tatom
Economic Research Analyst
Georgia Ports Authority
P. O. Box 2406
Savannah, GA 31402
Phone: (912) 964-3821
Email: jtatom@gaports.com

From: Dan Sullivan
To: CESAS-PD_SAS
Subject: Comments on GPA Savannah Harbor Expansion Project
Date: Thursday, January 06, 2011 10:18:38 AM

I wish to comment on SHEP, which is reported to deepen the Savannah Port channel to 48 feet. This is a necessary project and one that will allow the new larger vessels to reach the marine terminal facilities at Garden City Terminal. The construction of larger, more efficient vessels, and the expansion of locks in the Panama Canal make the expansion project for the Savannah Harbor the next logical step.

Dan Sullivan
Director, International Logistics
Mohawk Home

From: Tom Sheedy
To: CESAS-PD, SAS
Subject: SHEP
Date: Friday, January 07, 2011 10:22:32 AM

We at Keen Transport in Pooler, Ga. are supporters of this project. We see this as a great opportunity to increase our business in this area. This project will benefit our entire South East Region. Please consider our position as future decisions are made.

Tom Sheedy
S.E. Regional Manager
912-748-3999 x3010
731-676-3955 cell
tom.sheedy@keentransport.com
All of Keen Services can be viewed at www.keentransport.com

From: Rick Lee
To: CESAS-PD, SAS
Subject: SHEP Project
Date: Friday, January 07, 2011 1:33:27 PM

Mr. William Bailey

ATTN: PD, US Army Corps of Engineers,

Savannah District, 100 West Oglethorpe Avenue,

Savannah, Georgia 31401-3640

Good Day Mr. Bailey,

My name is Rick Lee and I am the President of Cargo Group, LLC (CGL). CGL is involved in warehousing and logistics serving the Port of Savannah, Ga. We are locally owned and have been in business since 1987. We started as a small rented facility with only 3 employees and have grown to a moderate size of 255,000 sf2 of owned warehouse space on 21 acres only 3 miles from the Georgia Ports Authority. We now employ close to 30 people on a full time basis. I was actually the fourth employee CGL hired and started out as a 19 year old college kid working a part time job driving a forklift and handling cartons in containers. This business is very personal to me as a great man my stepdad, Richard Carter was the financial backing for the company. After I graduated college, he mentored me in how to run a company.

The SHEP project is very much needed for the Port of Savannah and the Southeast United States. I am sure the GPA has offered numerous reasons financially for the expansion project. What I want to offer is my support from a family viewpoint. When I started with this company there were very few families involved. With the added growth of the ports over the years we have added about 30 families that CGL thru direct port related activity supports. I have three children to put thru college that will work at CGL part time during their schooling. I have had numerous employees who like me started out throwing boxes that now are involved in doing the rigging to lift machinery and crates that weight up to 100,000#. There is an educational factor involved that when you see boys grow to men is more rewarding than any financial return. My oldest son is ten, when he is seventeen and legally of age he will be working in the warehouse. By the time he graduates from college like many of my other part time college employees already have, he will have learned crane rigging, inventory control, carpentry work, and how to secure freight properly for transport across the world. He will in some aspects receive more of a hands on education than a college can offer. He will encounter real life problems that need solutions by direct interaction. I have already witnessed this several times in other employees children and it is very rewarding to think you are enhancing a young minds future.

Cargo Group, LLC is just one company out of thousands in the Southeast united States that the SHEP project will benefit to grow future men and leaders of tomorrows business world. Strong minds build strong countries and without the promise and aspiration of hope and prosperity especially in today's hard economic times then cities, states and economies will crumble. SHEP is needed to insure future prosperity for generations to come.

Sincerely,

Rick Lee, President

Cargo Group, LLC

6232 GA HWY 21

Port Wentworth, GA 31407

Phone: 912.966.2066

From: Burt, Ashley
To: CESAS-PD, SAS
Subject: SHEP support
Date: Monday, January 17, 2011 8:54:09 AM

Mr. Bailey,

Good morning. Please consider this e-mail as our support for the Savannah Harbor Expansion Project. TTi and its US business units, utilize the Port of Savannah for a large number of our inbound containers. As most of our product is imported from Asia, the Panama Canal expansion will be a benefit to our company's supply chain. As you know, once the construction is complete, the Panama Canal will be able to handle larger vessels.

Aside from the economic benefit to US importers through lower transportation costs, there will be a significant environmental impact as well. This will be achieved though the reduction of ships necessary to transport containers to the east coast thus reducing the steamship lines carbon footprint.

However, the economic and environmental benefits to the United States will not be fully realized unless the Port of Savannah is able to handle these larger ships. As such, I feel strongly that the SHEP imitative needs to be implemented without delay.

Sincerely,

Ashley Burt
Sr. Director of Transportation
One World Technologies, Inc / TTi

Office: 864-332-5542

From: McLeod Rominger
To: CESAS-PD, SAS
Subject: SHEP support
Date: Monday, January 17, 2011 9:03:08 AM

Please add this endorsement to the list of supporters for the deepening of Savannah Harbor. The Savannah Harbor Expansion provides overall benefits to the United States East Coast trade and distribution network as well as contributing to the continued viability of the United States' trade market in the world economy. The US East Coast Trade Ports become more of a point of national significance as the developing world increases their participation in global trade. If we are not prepared to meet demand, there are plenty of other countries and ports that will make the necessary adjustments to harbor that business. Good day.

McLeod Rominger
Sales & Service Manager

TICO
TERMINAL INVESTMENT CORPORATION

office (912) 964-7142
fax (912) 966-0160
cell (912) 604-0233
mrominger@ticocorp.com

Please see us at:
www.TICOcorp.com

75 Brampton Rd.
Garden City, GA 3108
PO Box 1434
Savannah, GA 31402

From: LIZ HARN
To: CESAS-PD, SAS
Date: Monday, January 17, 2011 10:38:57 AM

I support the deepening of the Savannah, Ga Port. This is money well spend and will not only produce many jobs in our area but will help boost our entire economy.
Sincerely,
Liz Harn
Sav-on Travel
6205 Abercorn Street Suite 101C
Savannah, Georgia 31405
(912) 354-1709
savontravel@bellsouth.net

From: Rich W. Neal
To: CESAS-PD, SAS
Subject: Port Deepening
Date: Monday, January 17, 2011 8:11:29 AM

Please accept this letter as a vote of support for the Savannah Harbor Deepening Project, based on the assumption that the final reports environmental impact analysis is accurate.

Rich Neal
Integrated Network Solutions, Inc

From: Mollie Jasper
To: CESAS-PD, SAS
Subject: Support Savannah Harbor Expansion Project
Date: Monday, January 17, 2011 3:49:22 PM

The state of Georgia and especially the city of Savannah need this expansion project to become a reality. Georgia's welfare and growth depend on this project.

Please ensure this expansion project is signed by the U.S. Government.

The Georgia community will experience rippling effects in the coming years if this is ignored.

Thank you for your attention to this matter.

Concerned citizen,
Mollie Jasper

From: Bill Dempsey
To: CESAS-PD, SAS
Subject: Savannah Harbor
Date: Tuesday, January 18, 2011 8:37:39 AM

Please appropriate the funds necessary to deepen the water at Savannah's port.
-Bill Dempsey

From: Christopher Cay
To: CESAS-PD, SAS
Subject: Savannah River deepening
Date: Tuesday, January 18, 2011 10:36:01 AM

Please take this e-mail as my 100% support for the deepening of the Savannah River. The economic impact along with the very mild environmental impact of this action make it a great thing for Georgia and the people of the surrounding area. It will do much to increase jobs and prosperity in this time in which it is badly needed. Thank you.

Christopher Cay
Cay Insurance Services
2 East Bryan Street
Suite 400
Savannah GA 31401

Tel: 912-238-0098
Fax: 912-232-6564
ccay@cayinsurance.com
www.cayinsurance.com

From: Kaleb Wynn
To: CESAS-PD, SAS
Date: Tuesday, January 18, 2011 2:53:18 PM

The deepening of the harbor will help the economy tremendously due to the new amount of larger ships that will be able to access the port. This will allow the port to be busier producing more revenue and profit for all of Georgia. It will also bring more jobs to the area lowering the unemployment rate for our area. The positive aspects of harbor deepening outweigh the negative aspects easily. It will make the area more productive in every way.

From: davidschaller@comcast.net
To: CESAS-PD, SAS
Subject: Savannah Harbor Expansion Project
Date: Tuesday, January 18, 2011 5:40:51 PM

Please consider the following comments with regard to the proposed Savannah Harbor Expansion Project (SHEP).

The SHEP is the most studied and scrutinized project of its kind in the United States. More field data and been collected, analyzed and modeled in order to identify potential impacts than in any previous study.

As a result of this comprehensive effort, a very thorough mitigation plan has been developed to address all issues relating to the project. More importantly, an adaptive management plan has been prepared and is included in the project to monitor results of the expansion work for an extended period of time and to immediately implement corrective action when and if called for.

From a historical perspective, the last expansion missed the mark with ultra-conservative estimates of the world fleet, the Savannah fleet and the economic benefits projected to result from that deepening. With a fifty (50) year project life, the estimates for the SHEP appear conservative again. The forty eight (48) foot project depth shows the highest gross benefits and except for the very conservative economic assumptions used by the Corps, 48 feet should be the NED depth. 48 feet is required in order to retain the tremendous economic benefits currently produced as a direct result of the deep draft commercial commerce conducted via the Port of Savannah.

Every aspect of the project to date has been subject to public review and comment. A Stakeholders Evaluation Group (SEG) was assembled early in the study phase and has been closely engaged in the work effort every step of the way. The involvement of numerous environmental groups, not to mention the cooperation and critical input of state and federal resource agencies (including South Carolina) has greatly benefited the project. Every issue, both large and small, has

been identified and addressed as a result of this uncommon yet very effective collaboration.

The project is essential at 48 feet and it will produce wide-ranging economic benefits for the nation. Failure to implement this critical project will negatively impact the capacity and capability of the United States deep draft transportation system and result in higher transportation costs and increased consumer costs at the retail level. With exceedingly thorough study and evaluation and the inclusion of a comprehensive mitigation plan and adaptive management program, as well as significant economic benefits to be produced, the 48 foot expansion project should be implemented as soon as possible.

Thank you.

David Schaller

From: Jane Stout
To: CESAS-PD, SAS
Subject: support Savannah Harbor
Date: Tuesday, January 18, 2011 5:40:17 PM

Dear Mr. Bailey,

On behalf of my company and its employees, I am hereby submitting my support of the proposed deepening of the Savannah Harbor.

By increasing the Savannah River's channel depth to 48 feet, the Savannah Harbor Expansion Project (SHEP) will provide U.S. exporters and importers the infrastructure required to efficiently accommodate global commercial demands. The SHEP will allow access to the new generation of larger container vessels, using the expanded Panama Canal beginning in 2014. In turn, this will provide my company and others cost savings and efficiencies in ocean commerce that are essential to create new jobs for the American people. This is an important national priority because the Port of Savannah serves more than 44 percent of the U.S. population and is the fastest growing container port in the nation and the second largest on the East Coast. Furthermore, Savannah handles 12 percent of all U.S. containerized exports.

In this challenging economic environment, it is important for our government to make the investments required to support job growth in the United States. With a nearly 5-to-1 benefit-to-cost ratio, America cannot afford to pass up the opportunity for economic growth created by this important project.

Again, I appreciate your time and efforts towards the successful completion of this nationally significant project.

Sincerely,

Jane Stout

Jane Stout
Senior Vice President
COOKERLY PUBLIC RELATIONS
3500 Lenox Road, Suite 510
Atlanta, GA 30326
e-mail: **jane@cookerly.com** - phone: **(404) 816-2037** fax: **(404) 816-3037** - mobile: **(404) 323-9516**
www.cookerly.com • Blog • Facebook • Twitter
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U.S. ARMY CORPS OF ENGINEERS

SAVANNAH HARBOR EXPANSION PROJECT

PUBLIC WORKSHOP

DECEMBER 15, 2010

SAVANNAH CIVIC CENTER

1 PUBLIC COMMENTS

2 #589 MS. SPRAGUE: My name is Mary Ellen
3 Sprague. I'm an Alderman with the City of
4 Savannah District 4, and I just wanted to
5 state that I am very much in favor of the
6 deepening. We very much need it, the sooner
7 the better, that economically I think the
8 economic benefits outweigh the environmental
9 concerns.
10 I trust the Corps will mitigate properly,
11 as they have in the past, and I just wanted to
12 let everyone know my district, the fourth
13 district, is very much behind this project.
14 *****
15 #590 MR. WALLER: Charles Waller, that's me.
16 I own a marina. I want to put in a comment, a
17 word for the dredging project. I'm President
18 of Isle of Hope Marina. I strongly support
19 the harbor dredging project. We believe it's
20 critical to not only the economy of the
21 region, but then economy of the marina
22 businesses in this area, not necessarily just
23 the ones that are on the Savannah River.
24 I'm also the President of the Georgia
25 Marina Business Association, which includes

PUBLIC COMMENTS

almost every major marina in Coastal Georgia.

We strongly support the harbor dredging project and feel that it is critical to -- really just to say the same thing -- critical to the future health of all of our businesses and the marine businesses on the coast. That's pretty much it.

*****

#591 MR. SEYMORE: Willie Seymore, President Local 1414. This has been a good run, as far as Washington, D.C., Atlanta Georgia, and just coming back here. I mean we had several forums, education and I've been able to just stay involved with this great project.

This project means to me, I guess, more than most people might can imagine. Because my father worked on the river many years and could not read or write, to have his son rise to the President of this great Local 1414, and now enjoy the ships that come up and down this river.

The Port Director, Curtis Foltz and his team, the ILA three locals, Kerry Scott, Ricky DeLoach, the three of us have put

PUBLIC COMMENTS

together a team that we work all in one.

I've always said no one of us is as great as all of us. In this community we stand the 295,000 jobs throughout the State of Georgia. This region right there, we stand.

It's extremely important because of what it does for the northern regions of Georgia. There'll be no more Atlanta, Macon, Bainbridge -- not Savannah and those rivers and those ships come up the river.

We have been blessed and very fortunate to have been able to work the ships. And I just thank my membership, and the port personnel, and the Maritime Association all working together as one to make this project become a reality.

*****

#191 MS. RICHARDSON: Patricia Richardson, and I work for Georgia Ports Authority as Assistant Manager Commercial communications. I've been there 21, going on 22 years. I actually started with the Harbor Deepening Project, when it started almost 15 years ago with all the studies.

PUBLIC COMMENTS

I grew up in the maritime community. I'm what they would consider to be a river brat, as I grew up in a neighborhood surrounded by 1414 people.

The people that work the riverfront are people who look out for each other. If one family don't eat, then we all come together and we feed each other. So we have never -- have never seen people starve, never seen people have really true hardships.

The deepening of the Savannah River is important to the entire community. It's not just bringing new businesses to Savannah. It's for the stability of the community, for keeping jobs here, for seeing new jobs come here, for seeing jobs come throughout the entire state, the surrounding counties and even South Carolina, because there are a lot of people in the surrounding South Carolina counties that actually come over to work here as well for the Georgia Ports Authority.

Even though my family members and a lot of friends work within 1414, I chose to go with the Georgia Ports Authority.

PUBLIC COMMENTS

I've actually watched Georgia Ports Authority go from being ranked at number 20 something in the United States to being the 4th largest port in the United States. To me, that's been a great accomplishment.

*****

#593 MR. WILLIAMS: Shagari Williams. I'm in favor of the river dredging because I got a future and right along with me, Shagari Williams, Jr., and it's a great thing. I'm a second generation longshoreman. My daddy was a longshoreman, started in 1935 and retired in 1976.

It's the best thing going. Let's keep this thing going by dredging this, so I can tell my son it's the best thing. He can have a great life supporting his family and passing it on to his son.

*****

#594 MR. ESKEW: Sam Eskew. This harbor deepening needs to happen, the sooner the better -- 48 feet. That's all that needed to be said.

*****

PUBLIC COMMENTS

#595 MR. FERGUSON: Richard Ferguson out of the Port of Savannah, Georgia, Longshoreman Officer. I'm sergeant-at-arms, just reelected as an officer, and I work on the docks. We need that river to be deepened. We have a lot of people that do whole lot for the City of Savannah and also the City of Atlanta.

We send -- we export, import, move a lot of cargo. We're going on being the number one port in Savannah and we're depending on a lot of people getting jobs at the harbor, more jobs we can supply.

I want to appreciate that. I hope y'all deepen the river for what we really need. Thank you.

*****

#510a MR. JONES: In fact, I would like to have myself quoted. Robert L. Jones, and I live at 631 Rose Dhu Road, D-H-U, Savannah, Georgia, 31419-3323. My comment is first, in general, it is a matter of the tail wagging the head. I am opposed to deepening the Savannah River as presently proposed for the following reasons; one, inadequate explanation has yet

PUBLIC COMMENTS

feasible, then the damages that arose, aquifer namely and environment another, will long since have been lost and difficult to gain, making generally the local area in a very difficult circumstance. Those are my comments.

*****

#596 MR. MASHBURN: Michael Mashburn, M-A-S-H-B-U-R-N. I work with Colonial Terminals and one thing -- my comment would be not only would this harbor deepening positively affect the container traffic in the port, but it's also going to greatly, positively affect the liquid tanker traffic in the port.

By that I mean that our customers, our terminal customers are going to have a efficiencies, because they're going to be able to get bigger cargoes in.

The movement of their tankers are going to be less restricted, because a lot of the draft restrictions will be gone, which could result in less inventories, run-outs in the terminal, which would otherwise prevent other

PUBLIC COMMENTS

industries like trucking and rail traffic to stop.

That would continue going and that's it really. That's the biggest comment, I should say.

*****

#597 MR. SUMMERS: Pratt Summers, P-R-A-T-T, S-U-M-M-E-R-S. I'm with the Colonial Group, and my comments are more of an economic nature, I guess. I've seen so much money poured into the Port of Savannah to make the Port of Savannah an efficient port.

I see all that in jeopardy if we don't expand or deepen harbor here to receive the larger vessels.

Everybody knows that freight economics favor the larger vessels, and the larger container lines are going to go the larger vessels.

There are already -- post-Panamax vessels are already being built. So if Savannah cannot host these post-Panamax vessels, then the larger container lines are going to go where the economics are.

PUBLIC COMMENTS

When the larger container lines leave, then slowly the smaller container lines will leave with them. That's my feeling. When Savannah can't be a full-service port anymore, then it will start to lose marketshare.

I think the southeast as a whole, certainly the State of Georgia will suffer, but I think the Southeast as a whole.

We have seen the Port of Savannah grow to where it is the third largest port in the United States.

It's the fastest growing port, and it's because they put forward such an initiative on growth, technology and expansion.

They have stolen a lot of marketshare from Charleston, which incidentally doesn't need to do this dredging, but I think they've stolen marketshare from Charleston because Charleston hasn't been willing to grow.

The container ships come here because they can get through the Port of Savannah, through town and to the interstate system into the United States faster through Savannah than they can through Charleston.

PUBLIC COMMENTS

So when I look at this as a national issue, to me it favors the Port of Savannah, because the Port of Savannah is more efficient as -- what's the word I'm looking for -- as shown by the growth it has achieved now.

It can still expand, and we've shown the willingness to expand where the Port of Charleston hasn't.

I think we need to favor the more efficient port and deepen the harbor in order to support national economy in the Southeast.

*****

#599 MR. KIRCHHEVEL: My name is Darrell Kirchhevel, D-A-R-R-E-L-L, K-I-R-C-H-H-E-V-E-L. I'm a resident of Savannah, Georgia, and I've been looking at the economic projections for the future if the deepening project is put into effect.

I noted that if the Savannah River is deepened to 47 feet that it will be the least costly way to bring in much larger ships, which will be an enormous fuel savings to the shipping companies which access the Georgia ports.

1 PUBLIC COMMENTS

2 I've also noted that if the deepening
3 project goes to the 48 feet depth, that the
4 extra 40 some million dollars that will be
5 spent on the project to deepen the Savannah
6 River to that depth would have a major impact
7 on the local area, to all the local business
8 residents' benefit.
9 Let me brainstorm for a minute. I guess
10 although the additional funds would benefit me
11 personally, along with millions of other
12 people in the local area, I would be most
13 concerned with the overall benefit for the
14 State of Georgia, and for the shipping
15 companies who are the major job providers, and
16 this will ultimately benefit more Georgians in
17 the long run. Thank you.
18 *****
19 E-99 MR. DAVISSON: Adam Davisson,
20 D-A-V-I-S-S-O-N. I basically support the
21 harbor deepening, basically for survivability
22 of the ports, you know, job creation is the
23 headlines that not receiving this definitely a
24 lot of jobs will be lost.
25 It's proven to be economically viable,

1 PUBLIC COMMENTS
2 and just a lot of people I know and me
3 personally depend on the port for their
4 livelihood.
5 We want to see this go forward so we can
6 see the port expand and keep growing as they
7 intend to do.
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1
2
3 C E R T I F I C A T E
4 G E O R G I A :
5 CHATHAM COUNTY :
6
7 I hereby certify that the foregoing
8 transcript was taken down, as stated in the
9 caption, and the comments thereto were reduced to
10 typewriting under my direction; that the foregoing
11 pages 1 through 14 represent a true and correct
12 transcript of the comments given upon said
13 hearing, and I further certify that I am not of
14 kin or counsel to the parties in the case; am not
15 in the regular employ of counsel for any of said
16 parties; nor am I in anywise interested in the
17 result of said case.
18 This the 29th day of December, 2010.
19
20 _____
21 Kathleen Dore, Certified Court
22 Reporter, B-2041
23
24
25

PHILLIPS - VAN HEUSEN CORPORATION

1001 FRONTIER ROAD • BRIDGEWATER, NJ 08807 • (908) 685-0050

January 7, 2011

Mr. William Bailey
US Army Corps of Engineers - Savannah District
100 West Oglethorpe Avenue
Savannah, Georgia 31401-3640

Via e-mail: CESAS-PD@usace.army.mil

Dear Mr. Bailey,

I am writing to state, for the record, the importance of the Savannah Harbor Expansion Project to Phillips-Van Heusen Corporation.

Our company currently utilizes the Port of Savannah as a major east coast gateway for importing our products. As long as adequate infrastructure is available, we plan to continue to grow our trade through the port for many years to come. However, the current -42 foot mean low water depth of the Savannah River is no longer sufficient to accommodate the post-Panamax vessels that we rely on today to transport our goods. This deficiency will be more significant in the future as we expect larger containerships to be introduced by carriers serving the US east coast upon completion of the Panama Canal expansion.

As you know, the newer post-Panamax vessels offer greater economic and environmental efficiencies that make their use both a preference as well as a priority to older generation vessels. SHEP is critical so that we are able to continue to maintain cost-effectiveness of our business and our ability to create jobs throughout the region. Furthermore, ready access to the newer larger vessels at the Port of Savannah will enable us to manage our supply chain more efficiently and further support our corporate social responsibility and environment initiatives.

It is imperative that the Savannah Harbor be deepened to -48 feet at mean low water and that this project is completed as quickly as possible. Our business and that of other United States importers, is depending on it.

Sincerely,

Jason Evanchik

Group Vice President Transportation

Phillips-Van Heusen Corporation

January 7, 2011

Mr. William Bailey
US Army Corps of Engineers - Savannah District
100 West Oglethorpe Avenue
Savannah, Georgia 31401-3640

Via e-mail; CESAS-PD@usace.army.mil
Dear Mr. Bailey,

I am writing to state, for the record, the importance of the Savannah Harbor Expansion Project to ensure that the port continues to have the ability to provide their service as the technology and size of the container ships increase. We need to plan for the inevitable need for the deepening now to ensure we remain as competitive as the other eastern ports.

As you know, the current -42 foot mean low water depth of the Savannah River is no longer sufficient to accommodate the post-Panamax vessels we rely on today to transport our goods. This deficiency will be more significant in the future as we expect larger containerships to be introduced by carriers serving the US east coast upon completion of the Panama Canal expansion.

Additionally, the newer post-Panamax vessels offer greater economic and environmental efficiencies that make their use both a preference as well as a priority to older generation vessels. SHEP is critical to the continued cost-effectiveness of our business and our ability to create jobs and reduce costs to U.S. consumers. By being able to load more boxes on fewer ships, our transportation costs are significantly decreased. Furthermore, ready access to the newer larger vessels at the Port of Savannah will avoid the higher financial and environmental costs of trucking our products to/from ports that are further from our markets and distribution network."

It is imperative that the Savannah Harbor be deepened to -48 feet at mean low water and that this project is completed as quickly as possible. Our business and that of other United States exporters and importers, is depending on it.

Sincerely,

Rob Sparks

From: Meagan Dugan
To: CESAS-PD_SAS
Subject: SHEP
Date: Wednesday, January 19, 2011 3:01:04 PM

To whom it may concern,

I wanted to take a moment to voice my support for SHEP. The local economy has already taken a huge hit and would hit to see it get worse. From my research, this project will be a tremendous asset to Georgia.

Best regards,

Meagan Dugan

Administrative Assistant

Property Administrators, Inc.

4454 Bluffton Park Crescent

Suite 107

Bluffton, SC 29910

Office (843) 815-7133

Fax (843) 815-7134

www.paihhi.com

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#641

WALLENIUS WILHELMSEN LOGISTICS

January 6, 2011

Mr. William Bailey
US Army Corps of Engineers – Savannah District
100 West Oglethorpe Avenue
Savannah, GA 31401 – 3640

Dear Mr. Bailey,

I am writing to state, for the record, the importance of the Savannah Harbor Expansion Project to Wallenius Wilhelmsen Logistics.

Our company is the largest Roll On-Roll Off carrier calling the Port of Savannah and, provided adequate infrastructure is available, we plan to continue to grow our trade through the port for many years to come. However, the current 42 foot mean low water depth of the Savannah River does not support the safe navigation of our larger vessels. Furthermore, we plan to introduce more and larger ships to the East Coast market quickly upon completion of the Panama Canal expansion.

As you know, the newer post-Panamax vessels offer greater economic and environmental efficiencies that make their use both a preference as well as a priority to older generation vessels. The additional depth provided by the Canal will not only allow Wallenius Wilhelmsen Logistics to better utilize these ships, but it will also provide a more cost effective means of shipping United States exports to markets throughout the world, particularly to Asia. Simply put, each additional foot of water draft available at the Port of Savannah improves the operating efficiencies and lowers the per unit operating costs of our vessels.

It is imperative that the Savannah Harbor be deepened to 48 feet at mean low water and that this project is completed as quickly as possible. Our business and that of other Shipping Lines, as well as United States exporters and importers, is depending on it.

Sincerely,

WALLENIUS WILHELMSEN LOGISTICS AMERICAS, LLC

BOARD OF REGENTS OF
THE UNIVERSITY SYSTEM OF GEORGIA

CHANCELLOR ERROLL B. DAVIS, JR.
270 WASHINGTON STREET, S.W.
ATLANTA, GEORGIA 30334

PHONE (404) 656-2202
FAX (404) 657-6979
EMAIL CHANCELLOR@USG.EDU

January 20, 2011

Mr. William Bailey
ATTN: PD, US Army Corps of Engineers,
Savannah District
100 West Oglethorpe Avenue
Savannah, GA 31401-3640

Dear Mr. Bailey,

As Chancellor of the University System of Georgia, I consider it an honor to safeguard the investment that our State has made in Georgia's 35 public colleges and universities. In a similar way, our nation's investment in the Savannah Harbor must be protected through the Savannah Harbor Expansion Project (SHEP). As the fastest growing container port in the nation and the second largest on the East Coast, the capacity of the Savannah Harbor is a critical factor in the capacity of our logistics infrastructure. The potential return for the U.S. from this valuable asset would be greatly diminished without SHEP, which is necessary to meet the changing demands of an evolving global economy.

The University System committed funds in 2007 for a project in which Georgia Tech faculty and graduate students built a computer model of the Port of Savannah so that changes to procedures and facilities could be simulated, and those effects modeled. The Georgia Logistics Simulator platform was shared with the University System's logistics programs, including Georgia Southern University, Clayton State University, Armstrong Atlanta State University, Columbus State University, and Georgia Tech. Georgia technical colleges also were able to use the platform in teaching logistics, and it was made available to other State agencies, such as the Georgia Department of Transportation's Freight & Logistics Division.

Our State continues to invest in logistics research, and educational programs that prepare tomorrow's logistics workforce through University System institutions. The University System prepares Georgians for the requirements of a global economy. The Savannah Harbor Expansion Project will provide U.S. businesses with the necessary infrastructure to meet the demands of global commerce.

Thank you for your work toward this important project.

Warmest regards,

Erroll B. Davis, Jr.
Chancellor

"Creating A More Educated Georgia"
www.usg.edu

January 20, 2011

Mr. William Bailey
US Army Corps of Engineers - Savannah District
100 West Oglethorpe Avenue
Savannah, Georgia 31401-3640

Via e-mail: CESAS-PD@usace.army.mil

Dear Mr. Bailey,

I am writing to state, for the record, the importance of the Savannah Harbor Expansion Project to Schneider Logistics and its current customers (Wal Mart, Kohl's, Family Dollar, TJ Maxx, Cracker Barrel, Electrolux, Bi Silque, Fiji Water).

Our company currently utilizes the Port of Savannah as a major east coast gateway for import/exporting our products and provided adequate infrastructure is available, we plan to continue to grow our trade through the port for many years to come. However, the current -42 foot mean low water depth of the Savannah River is no longer sufficient to accommodate the post-Panamax vessels we rely on today to transport our goods. This deficiency will be more significant in the future as we expect larger containerships to be introduced by carriers serving the US east coast upon completion of the Panama Canal expansion.

As you know, the newer post-Panamax vessels offer greater economic and environmental efficiencies that make their use both a preference as well as a priority to older generation vessels. SHEP is critical to the continued cost-effectiveness of our business and our ability to create jobs and reduce costs to U.S. consumers. By being able to load more boxes on fewer ships, our transportation costs are significantly decreased. Furthermore, ready access to the newer larger vessels at the Port of Savannah will avoid the higher financial and environmental costs of trucking our products to/from ports that are further from our markets and distribution network."

It is imperative that the Savannah Harbor be deepened to -48 feet at mean low water and that this project is completed as quickly as possible. Our business and that of other United States exporters and importers, is depending on it.

Sincerely,

John Edwards

Schneider Logistics
Director Business Support
912 965 2034 Office (direct)
912 313 3052 Cell
edwardsj@schneider.com
www.schneider.com
PO Box 193
Savannah, GA 31402

Willis

Telephone: (912) 239 9000
Toll Free: (800) 284 2788
Fax: (912) 238 2732
Website: www.willis.com

January 20, 2011

Mr. William Bailey
ATTN: PD, US Army Corps of Engineers, Savannah District
100 West Oglethorpe Avenue
Savannah, GA 31401-3640
CESAS-PD@usace.army.mil

RE: USACE Draft Tier II Environmental Impact Statement and Draft General Reevaluation Report for improvements and continued maintenance of the Savannah Harbor Federal Navigation Project, Chatham County, Georgia and Jasper County, South Carolina.

Dear Mr. Bailey,

Willis Insurance Services Inc. (Savannah and Atlanta offices) with support from our parent corporation, The Willis Group (210 offices in US), strongly support deepening the current Savannah River Channel from 42 feet to 48 feet with associated turn widening and meeting lanes.

As the largest global marine insurance broker representing numerous domestic and international clients in the marine industry including: terminal operators, third party logistics, vessel fleets, freight forwarders, etc. we can firmly state that the failure to expand the channel will have a dramatic adverse impact on port traffic and all those employed to support it's commerce.

While we were unable to attend the recent public hearing on the SHEP project, we have been pleased with extensive studies performed to ensure the project does not adversely affect our local environment. We commend the Corps of Engineers for your leadership and believe all issues or potential issues have been adequately addressed.

The State of Georgia and Southeast region of the United States could not be better positioned for this exciting opportunity given the vision of GPA in Savannah and Brunswick as well as support from respective logistics partners, such as warehousing, trucking, rail, etc.

Sincerely,

David M. Statinsky, CPCU, ARM
Vice President

Cc: Brian Morgan, CEO, Willis of Georgia

Willis Insurance Services of Georgia, Inc.
7 East Congress Street, Suite 1002
Savannah, GA 31401

From: Billy Robinson
To: CESAS-PD, SAS
Subject: SHEP
Date: Thursday, January 20, 2011 11:24:29 PM

My name is Billy Robinson. I am a business owner in Savannah, GA and I understand the importance of having the Savannah harbor deepened. I am in full favor of having this project approved. It is vital not only for our city and state but for the whole United States. I hope SHEP is approved immediately.

Thank you,

Billy Robinson
Port City Logistics, Inc.

Sent from my iPad

From: William Fogarty Jr
To: CESAS-PD, SAS
Subject: SHEP Comment
Date: Thursday, January 20, 2011 5:18:25 PM

Dear Sir,

I am writing to express my support for deepening the Savannah harbor to forty-eight feet. I have read much of the literature published recently by the U.S. Army Corp of Engineers about the SHEP. I understand the concerns about loss of freshwater tidal marsh at the Savannah NWR, the impact on several species of fish in the river, the affect on dissolved oxygen content in the river, the concerns about the impact on the upper Floridan aquifer, the concerns about increased salinity in Abercorn creek at Savannah's freshwater intake point, and more. I believe that in the twelve years of this project all parties had opportunities to raise points of concern and that these points were examined in detail. Where needed, the mitigation steps described in your report will address the vast majority of undesirable effects that will come with the deepening.

I recognize there will be considerable costs to the citizens of the United States for this work, probably more than four hundred million dollars in all. I think this money will be well spent. Deepening the harbor to forty-eight feet is needed to keep pace with the increase in size of large container vessels currently in use and those under construction. It is needed to meet the needs of the larger vessels that will be able to pass through the Panama Canal in 2014. It is needed because the steamship line services that use these larger vessels at Savannah, at other ports on the east coast of the U.S., and at foreign ports, already have harbors deeper than Savannah's at their other ports of call. If imports and exports are to be traded seamlessly through these services then the harbor must be deepened to reduce tide constraints and reduce the light-loading of vessels here. The port of Savannah serves a large portion of the southeastern U.S., an area that continues to see significant increases in population. Efficient operation of these container services is needed to import goods to this growing population and export goods produced in economies that support these same people. The impact of Georgia's two deep-water ports on the state's economy was recently shown to directly affect more than 295,000 full and part-time jobs here. Port business also generates considerable revenue for the federal government, and for the state. The benefit to cost ratio of 4.8:1 makes it clear that funding this project is a good investment.

The state of Georgia, and the GPA, have firmly committed to pay their portion of the cost of the SHEP. They have already spent hundreds of millions of dollars on improvements at the Garden City Terminal (GCT), and will invest more than one billion dollars in additional capital improvements at GPA facilities. The number one state road project for all of Georgia is an extension of a parkway to provide direct access to the GCT from Interstate 95. Clearly, the state of Georgia is willing to invest heavily to ensure the current and future success of the Georgia Ports Authority.

I understand that federal funds for projects such as this are allocated in a variety of ways. I do not attempt to say how money should be allocated here. I only say that it should be made available in order for the work to proceed.

I believe that this project is good for the international trade of goods for our nation; it is good for the economy of the region and of the state. To their credit, the GPA has tried to be a

responsible entity in this process by including all concerned parties in the discussion. Collectively, their work has produced a body of information that will allow for an informed decision. It is my opinion that this decision should be to deepen the Savannah harbor to forty-eight feet.

Sincerely,

William (Bill) L. Fogarty, Jr.

From: Lavne Bell
To: CESAS-PD, SAS
Subject: Savannah Harbor Expansion Project
Date: Thursday, January 20, 2011 10:11:28 PM

Mr. William Bailey, My name is Donald Bell Jr. I am an officer with International Longshoremen's Association Local #1475 Savannah, GA. I have worked in the port of Savannah for the past 36 years. The transportation industry is one of the most competitive business in the world. I think the Corp has done a remarkable job of compiling facts and reaching the point of proceeding with this long overdue project. I think that there are many people who would use any means possible to stop this project cold, not on the merits of fact but for their own benefit. Some groups are related to business interest in other ports who feel that they would reap the cargo that our port would loose if the harbor is not deepened to 48 foot. I think that there are enviromental groups who were disappointed when the facts did not support their concerns and continue to oppose this project. This project should proceed to completion based on the facts that were researched and confirmed by the many professionals who worked for the past 10 years. Thank you, Donald Bell

From: Patrick Grone
To: CESAS-PD, SAS
Subject: SHEP
Date: Thursday, January 20, 2011 2:49:35 PM

Dear Mr. Bailey:

Please add my name to the list in support of the Harbor deepening to -48 feet MLW. I believe it is instrumental to the future growth of the Savannah and the state of Georgia.

Thank you

Patrick Grone
Savannah, GA

GEORGIA CHAMBER

January 20, 2011

Mr. William Bailey
ATTN: PD, US Army Corps of Engineers, Savannah District
100 West Oglethorpe Avenue
Savannah, GA 31401-3640

Dear Mr. Bailey,

Thank you for the opportunity to submit comments on account of the proposed deepening of the Savannah Harbor. The Georgia Chamber is proud to support this effort on behalf of our employees and members.

As the state's largest business advocacy organization, the Georgia Chamber of Commerce represents a diverse cross-section of industry and commerce. The Port of Savannah is one of Georgia's most important assets - responsible for 286,000 jobs, $52.6 billion in cargo, and $2.8 billion in state and local taxes each year. As shipping vessels grow larger, it is critical that the port be able to grow accordingly.

By increasing the Savannah River's channel depth to 48 feet, the Savannah Harbor Expansion Project (SHEP) will provide U.S. exporters and importers the infrastructure required to efficiently accommodate global commercial demands. The SHEP will allow access to the new generation of larger container vessels, using the expanded Panama Canal beginning in 2014. In turn, this will provide my company and others cost savings and efficiencies in ocean commerce that are essential to create new jobs for the American people. This is an important national priority because the Port of Savannah serves more than 44 percent of the U.S. population and is the fastest growing container port in the nation and the second largest on the East Coast. Furthermore, Savannah handles 12 percent of all U.S. containerized exports.

In this challenging economic environment, it is important for our government to make the investments required to support job growth in the United States. With a nearly 5-to-1 benefit-to-cost ratio, America cannot afford to pass up the opportunity for economic growth created by this important project.

I appreciate your time and efforts towards the successful completion of this nationally significant project.

Respectfully,

Chris Clark
President & CEO

Doug Carter
2011 Chair

Chris Clark
President & CEO

www.gachamber.com

233 Peachtree Street NE, Suite 2000 Atlanta, Georgia 30303-1564 Phone 404.223.2264 Fax 404.223.2280

From: Will Coley
To: CESAS-PD, SAS
Subject: SHEP Comments
Date: Friday, January 21, 2011 3:11:53 PM
Attachments: SHEP-Port Comparisons VS New Vessel Drafts.pdf
Importance: High

I would like to offer a few comments regarding the necessity of the timely completion of the Savannah Harbor Expansion Project. We have all seen the % of cargo now moving through the Port of Savannah. We have also seen the dollar amount split between the Federal Government and the Georgia State Government. Should Georgia pay to deepen the Harbor from 46' to 48' ? There sometimes seems to be more questions than answers.

The attached two graphs (issued by the Corp of Engineers) showing (1) the current major trading Port depths and (2) the Panama Canal Expansion Project clearly show that the newer vessels will be forced to by-pass the Port of Savannah upon completion of the Panama Project.

This lost of container business at the GPA will be devastating to not only Savannah Warehouse Services, the employees of the GPA, Chatham County and the State of Georgia but to the Southeastern United States as a whole.

Respectfully submitted,

J. William Coley
CEO
Savannah Warehouse Services, LLC
Savannah Transportation Services, LLC
Tel: (912) 963-0859 Ext: 108
Fax: (912) 963-0865
Mobile: (912) 661-4234

SWS SAVANNAH WAREHOUSE SERVICES
STS SAVANNAH TRANSPORTATION SERVICES

savannahwarehouseservices.com
savannahtransportationservices.com

From: Glenda Brown
To: CESAS-PD, SAS
Date: Friday, January 21, 2011 5:08:09 PM
Importance: Low

This is written in support of The Savannah Harbor Expansion Project. It is the belief of our association this deepening to 48 feet is crucial to the future of our port and the state of Georgia. As you know, The Savannah River provides and supports numerous companies, manufacturers, transportation and thousands of jobs. This improvement will assure that the port of Savannah remains competitive in the future.

We also feel these improvements will provide a safer transit, with less restrictions, for the larger and deeper vessels to come. The post Panamax vessels have been coming to Savannah for several years, operating with limited drafts. The improvements will allow vessels to carry deeper drafts with less restrictions and also provide channel improvements for passing.

The Savannah Pilots have maintained one of the safest records in the country and it is our intention to maintain this safety record.

Tommy Browne, Master Pilot

Savannah Pilots Association

P.O. Box 9267

Savannah, Georgia 31412

(912) 236-0226

(912) 236-6571 fax

From: Robert Dowd
To: CESAS-PD, SAS
Subject: Get The Deepening Done!
Date: Friday, January 21, 2011 4:55:46 PM

Just a note to say we need to get started on the deepening so the jobs and the freight can flow.

Sent from my iPhone

From: Alan Zipperer
To: CESAS-PD, SAS
Subject: Harbor deepening
Date: Friday, January 21, 2011 2:39:27 PM

The port is the economic engine that drives this area and it also provides revenue to most of the counties in our region. I FEEL STRONGLY THAT WE NEED TO DEEPEN THE SAVANNAH RIVER TO KEEP THE PORT A DRIVING FACTOR IN OUR ECONOMY

Alan Zipperer
(please note new email address azipperer@diamondcp.biz)

P. O. Box 1370
Rincon, GA 31326
912-728-9485 office
912-313-8716 cell
912-728-9510 fax

From: Cheri Sale
To: CESAS-PD, SAS
Subject: SHEP Expansion Project
Date: Friday, January 21, 2011 2:34:25 PM

Mr. Bill Bailey
U.S. Army Corps of Engineers
Savannah District
Savannah, GA

I am writing to you in support of the SHEP Expansion Project. As a citizen of Savannah, I see the SHEP Expansion Project as a logical progression in our city's growth. Further, Savannah is in desperate need of jobs and the SHEP Expansion Project will provide a venue for this to occur.

Please register my comment as a citizen in favor of the SHEP Expansion Project.

Thank you.

Cheri Sale
114 Pine Lakes Avenue
Savannah, GA 31405
Day: 912-629-1425

From: David Karpowicz
To: CESAS-PD_SAS
Subject: Savannah Harbor Deepening Project
Date: Friday, January 21, 2011 10:43:49 AM

I am in favor of this project.

David Karpowicz
Parts Manager
Industrial Tractor Co.
Savannah, GA.
912-964-7370

From: kenny miller
To: CESAS-PD, SAS
Subject: SHEP
Date: Friday, January 21, 2011 10:27:56 AM

To whom it may concern,

As a local business owner in Savannah, I want to register my support in favor of the Savannah Harbor Expansion Project. This project is vital to the entire southeastern section of the country. Economically, it will keep us on pace with other major ports and will have major reverberating positive effects throughout the region at a time when the country needs it most. Not only will it expand the capacity at the ports, it will create jobs in industries that are in dire need of work.

Sincerely,

Kenny Miller

Sitework Construction, LLC
- Clearing, Grading, Paving,
& Underground utilities
Please see us at: www.siteworkconstruction.com

Email: kmiller@siteworkconstruction.com
Office: 912-234-6220
Fax: 912-234-6997
Mobile: 912-665-2860

Mailing Address:
PO Box 15386
Savannah, GA 31416

Physical Address:
2830A Tremont Rd.
Savannah, GA 31405

From: John Moore
To: CESAS-PD, SAS
Subject: SHEP Harbor Project
Date: Friday, January 21, 2011 10:14:49 AM

I would like to see this project awarded.

John Moore

Phone: 912.354.4626
FAX: 912.352.1692
E-Mail: jmoore@hgbd.com
Web: www.hgbd.com
FTP: files.hgbd.com

Hussey, Gay, Bell & DeYoung
Post Office Box 14247 * Savannah, GA * 31416

From: Emily Zirpola
To: CESAS-PD, SAS
Subject: Savannah Harbor Deepening Project
Date: Friday, January 21, 2011 9:47:19 AM

Good morning,

I would like to communicate to you my support of the Savannah Harbor deepening project. I am certain that the deepening is instrumental in the growth of Savannah and the entire state of Georgia.

Thank you.

Emily K. Zirpola

Charleston/Savannah Area Sales Office

Text Me/Mobile: 912-272-9122
Phone: 843-735-5001
Email: emily.zirpola@hilton.com

Visiting Savannah, GA: www.hamptonsavannah.com
Group Quote On Demand: www.hiltonfamilyeevents.com/planner/
Facebook With Us: www.facebook.com/charlestonsavannahhotels
Dine With Us: www.holycityhospitality.com

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From: Frances Helmey
To: CESAS-PD, SAS
Subject: SHEP Harbor Deepening Project
Date: Friday, January 21, 2011 10:10:13 AM

I am **for** this project.

Frances Helmey

HGBD
A Bell Company
Engineers
Architects

Phone: 912.354.4626
FAX: 912.354.6754
E-Mail: fhelmey@hgbd.com
Web: www.hgbd.com
FTP: files.hgbd.com

Hussey, Gay, Bell & DeYoung
Post Office Box 14247 • Savannah, GA • 31416

From: Steve Waters
To: CESAS-PD, SAS
Subject: Harbor Deepening
Date: Friday, January 21, 2011 9:37:36 AM

This is not an "if, when and how" question as to the deepening of the Savannah River basin to accommodate the larger vessels
which will be arriving in a few years. This is a "YES, RIGHT NOW and MAKE the FUNDS AVAILABLE NOW statement by all Georgians
who are for jobs, growth and a path out of this terrible economy. We need this AND we need the Jasper Ports project to go forward.

Steve R. Waters, RLS

HGBD
A Bell Company
Engineers
Architects

Phone: 912.354.4626
FAX: 912.354.8617
E-Mail: swaters@hgbd.com
Web: www.hgbd.com
FTP: files.hgbd.com

Hussey, Gay, Bell & DeYoung
Post Office Box 14247 • Savannah, GA • 31416

From: Margaret Johnson
To: CESAS-PD_SAS
Subject: Savannah Harbor project
Date: Friday, January 21, 2011 9:35:57 AM

Good morning,

I would like to communicate to you my support of the Savannah Harbor deepening project. I am certain that the deepening is instrumental in the growth of Savannah and the entire state of Georgia.

Thank you.

Margaret Johnson
General Manager
Hampton Inn & Suites
Savannah Historic District
912-721-1600(phone)
912-721-1610(fax)

Margaret.Johnson@hilton.com

www.hamptonsavannah.com

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From: Angela Lightsey
To: CESAS-PD, SAS
Subject: SHEP Project
Date: Friday, January 21, 2011 9:31:25 AM

Good morning,

I would like to communicate to you my support of the Savannah Harbor deepening project. I am certain that the deepening is instrumental in the growth of Savannah and the entire state of Georgia.

Thank you.

Angela Lightsey
Director of Sales
Hampton Inn & Suites Savannah Historic District
201 Martin Luther King Jr. Blvd
(912) 721-1603 direct
(912) 721- 1610 fax
(912) 508-9814 mobile
Savannah, GA 31401
Angela.Lightsey@hilton.com

Check out our website at: www.hamptonsavannah.com

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From: McLeod Rominger
To: CESAS-PD, SAS
Subject: SHEP Savannah Deepening
Date: Friday, January 21, 2011 8:57:04 AM

Please register this comment in support of the deepening to 48' MLW. The vitality of the Georgia economy is at stake and the position of South Eastern United States Global trade is dependent on remaining at the forefront of shipping capability. This has national and global implications for the future of our economy. Please deepen. Thank you.

McLeod Rominger
Sales & Service Manager

TICO
TERMINAL INVESTMENT CORPORATION

office (912) 964-7142
fax (912) 966-0160
cell (912) 604-0233
mrominger@ticocorp.com

www.TICOcorp.com / 1-800-BUY-TICO

75 Brampton Rd.
Garden City, GA 3108
PO Box 1434
Savannah, GA 31402

From: Chuck Heimes
To: CESAS-PD, SAS
Subject: The Savannah Harbor Expansion (SHEP)
Date: Friday, January 21, 2011 8:33:59 AM

To Mr. William Bailey,

As a small company located near the port of Savannah, we have witnessed the growth of the port for the last 30 years. The port is a vital source of income for many of the small companies nearby. That being said, we support the deepening of the harbor.

Best Regards,

Chuck Heimes
Port City Industrial & Marine Supply
1250 West Bay Street
Savannah, GA 31402
Tel: 912.232.0722
Fax:912.232.6118
www.portcityindustrial.com

From: Chris W. Waters
To: CESAS-PD, SAS
Subject: Comment on Savannah River Deepening
Date: Friday, January 21, 2011 9:08:26 AM

Gentlemen:

I think you have put together a very well thought out plan to deepen the river and protect the local environment.
This project will not only give a major boost to Georgia and South Carolina that is desperately needed, but will
create huge savings for many millions of Americans. Let's get this project going, our Country needs it.

Chris W. Waters
Lanyard Development, Inc.
1000 Towne Center Blvd., Suite 706
Pooler, Georgia 31322
Phone 912-330-8351
Fax 912-330-9160
Cell 912-657-4761
Website www.lanyarddevelopment.com
Email chris@lanyarddevelopment.com
Alternate cwwaters@bulloch.net

THE HUBACH GROUP
PO Box 249
Rincon, GA 31326

January 19, 2011

Mr. William Bailey
US Army Corps of Engineers - Savannah District
100 West Oglethorpe Avenue
Savannah, Georgia 31401-3640

Via e-mail: CESAS-PD@usace.army.mil

Dear Mr. Bailey:

I am writing to state, for the record, the importance of the Savannah Harbor Expansion Project to The Hubach Group, Inc. We are a Savannah based transportation provider and the Port of Savannah is critical to our business.

Our customers currently utilize the Port of Savannah as a major east coast gateway for importing/exporting products. Provided adequate infrastructure is available, our customers plan to continue to grow their businesses through the port for many years to come. However, the current -42 foot mean low water depth of the Savannah River is no longer sufficient to accommodate the post-Panamax vessels our customers rely on to transport their goods. This deficiency will be more significant in the future as larger containerships will be introduced by carriers serving the US east coast upon completion of the Panama Canal expansion.

As you know, the newer post-Panamax vessels offer greater economic and environmental efficiencies that make their use both a preference as well as a priority to older generation vessels. SHEP is critical to the continued cost-effectiveness of our customers business. By being able to load more boxes on fewer ships, our customer's shipping costs are significantly decreased. Furthermore, ready access to the newer larger vessels at the Port of Savannah will avoid the higher financial and environmental costs of trucking products to/from ports that are further from their markets and distribution network.

It is imperative that the Savannah Harbor be deepened to -48 feet at mean low water and that this project is completed as quickly as possible. Savannah is one of the fastest growing ports in the country. Failure to implement SHEP will negatively effect this growth and will pose a risk to our business.

Sincerely,

Gerald F. Hubach

Gerald F. Hubach
Vice President/General Manager

OglethorpePower

Oglethorpe Power Corporation
2100 East Exchange Place
Tucker, GA 30084-5336
phone: 770-270-7600
fax: 770-270-7872
www.oglethorpepower.com

January 21, 2011

Mr. William Bailey
ATTN: PD, US Army Corps of Engineers, Savannah District
100 West Oglethorpe Avenue
Savannah, GA 31401-3640

Dear Mr. Bailey,

On behalf of my company and its employees, I am hereby submitting my support of the proposed deepening of the Savannah Harbor.

By increasing the Savannah River's channel depth to 48 feet, the Savannah Harbor Expansion Project (SHEP) will provide U.S. exporters and importers the infrastructure required to efficiently accommodate global commercial demands. The SHEP will allow access to the new generation of larger container vessels, using the expanded Panama Canal beginning in 2014. In turn, this will provide my company and others cost savings and efficiencies in ocean commerce that are essential to create new jobs for the American people. This is an important national priority because the Port of Savannah serves more than 44 percent of the U.S. population and is the fastest growing container port in the nation and the second largest on the East Coast. Furthermore, Savannah handles 12 percent of all U.S. containerized exports.

In this challenging economic environment, it is important for our government to make the investments required to support job growth in the United States. With a nearly 5-to-1 benefit-to-cost ratio, America cannot afford to pass up the opportunity for economic growth created by this important project.

Again, I appreciate your time and efforts towards the successful completion of this nationally significant project.

Sincerely,

W. Clay Robbins
Senior Vice President
Governmental Affairs

WCR:jw

#058

Franklin SPORTS

January 7, 2011

Mr. William Bailey
US Army Corps of Engineers - Savannah District
100 West Oglethorpe Avenue
Savannah, Georgia 31401-3640

Via e-mail: CESAS-PD@usace.army.mil
Dear Mr. Bailey,

I am writing to state, for the record, the importance of the Savannah Harbor Expansion Project.

Our company currently utilizes the Port of Savannah as a major east coast gateway for import/exporting our products and provided adequate infrastructure is available, we plan to continue to grow our trade through the port for many years to come. However, the current -42 foot mean low water depth of the Savannah River is no longer sufficient to accommodate the post-Panamax vessels we rely on today to transport our goods. This deficiency will be more significant in the future as we expect larger containerships to be introduced by carriers serving the US east coast upon completion of the Panama Canal expansion.

As you know, the newer post-Panamax vessels offer greater economic and environmental efficiencies that make their use both a preference as well as a priority to older generation vessels. SHEP is critical to the continued cost-effectiveness of our business and our ability to create jobs and reduce costs to U.S. consumers. By being able to load more boxes on fewer ships, our transportation costs are significantly decreased. Furthermore, ready access to the newer larger vessels at the Port of Savannah will avoid the higher financial and environmental costs of trucking our products to/from ports that are further from our markets and distribution network."

It is imperative that the Savannah Harbor be deepened to -48 feet at mean low water and that this project is completed as quickly as possible. Our business and that of other United States exporters and importers, is depending on it.

Sincerely,

Joseph W O'Connor

Director Intl Logistics

Franklin Sports Inc. 17 Campanellli Parkway Stoughton, MA 02072-0508

#659

David Sink

From:	David Sink
Sent:	Monday, January 10, 2011 4:39 PM
To:	'CESAS-PD@usaca.army.mil'
Cc:	John Neely; Cliff Dales; Danny Chase; 'Ashley W Smith' (Ashley.Smith@Colliers.com); Maxwell Penn; Hilary Bel; Sherri Stroud; Ellen Lynes
Subject:	Savannah Harbor Expansion Project

Dear Mr. Bailey:

Please accept this note as our firm's support of the Savannah Harbor Expansion Project (SHEP). Our company, formerly known as Neely/Dales, LLC, is fortunate to have been involved in a majority of the larger industrial real estate transactions that have occurred in the Savannah market over the past 25+ years. We interact on a regular basis with key decision makers within companies that are analyzing the strengths and weaknesses of the various east coast port markets. Our clients include many of the largest occupiers and developers of industrial warehouse facilities in the region, which gives us a unique perspective on the market and the SHEP. This project is of great importance, not only to the Savannah industrial market, but also to the surrounding counties in Georgia and South Carolina, the I-95 corridor, the I-16 corridor, the Atlanta industrial market, and beyond.

Thank you for your work on this essential project.

Best regards,

David Sink

David J. Sink, SIOR
Principal
Dir +1 912 233 7111 x 102
Main +1 912 233 7111 | Fax +1 912 236 1200
david.sink@colliers.com

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#610

DEVELOPMENT Associates

1/15/2011

Mr. William Bailey
ATTN: PD, US Army Corps of Engineers, Savannah District
100 West Oglethorpe Avenue
Savannah, GA 31401-3640

RE: Savannah Harbor Expansion Project (SHEP)

I am a businessman in Savannah and I would like to express my appreciation to the USACE for its dedication and the allocation of resources that it took to complete the 12-year-long study that was completed in 2010. The USACE report makes it clear that the environmental impacts will be minimal and the economic impacts will be HUGE. It is ABSOLUTELY NECESSARY to deepen our port if we want to continue to compete for global trade. I am aware that if we don't get this project approved and funded THIS YEAR, we will lose business to other East Coast ports that are already deep enough to handle the Post Panamax ships which will be calling on all East Coast ports beginning sometime in 2014. As you know, we will not have the ability to receive this new fleet of oceanic carriers unless we deepen the waters of our port from 42 to 48 feet. Furthermore, if we do not accomplish this by 2015 (which is already a year too late, but not a deal killer), many of the shipping and logistics companies that currently do business in Savannah and the state of Georgia will pull out and move their operations to other ports along the East Coast. **Once this happens, these companies will likely NEVER RETURN TO SAVANNAH,** or at least not for decades. Many of the ports that would be competing for our lost business are inefficient (Savannah has been one of the most efficient ports in the U.S. for over a decade, which is why we have been the fastest growing port for many years), use millions of gallons of diesel to operate their port (Savannah has become mostly electrified, which is better for the environment), and cannot strategically serve the Southeast in the same way that Savannah can through our complex and efficient logistics partners.

The SHEP will have a positive influence on virtually every business and industry in the State of Georgia. The impact of the 4th busiest port in the country – the Port of Savannah – has a rippling effect throughout the entire Southeast. It starts with the supply chain and ends on the shelves of our retail stores. **The deepening of the Savannah Port is CRITICAL to our economic livelihood.**

The State of Georgia has already committed their share of the funds necessary for the deepening, which as you know is scheduled to begin later this year. It is critical that we ensure our Federal Government commits their share of funds as well. Given our current Federal Budget deficits and accumulating national debt, the word "earmark" has recently attracted a lot of negative sentiment across the country. However, there are enormous differences between a project such as the SHEP, which affects **44% of the U.S. population** and **7% of Georgia's total employment**, and a program to study butterfly migration patterns. We need to make sure our lawmakers who vote on the appropriations of our tax dollars fully understand this difference. There are literally tens of thousands of jobs at stake pending the decision to fund this project NOW. If we miss our window, the opportunity will be lost forever as these ships will form long term agreements elsewhere. Please let me know if there is anything I can do to help to make that happen.

Sincerely,

Guy P. Davidson
G.Davidson@DAI-Development.com
912.944.4410

P.O. Box 16176, Savannah, GA 31416
Phone: 912.921.0481 Fax: 912.921.0879
DAI-Development.com

BRENNAN
& COMPANY

January 22, 2011

Mr. William Bailey
Attn: PD, US Army Corps of Engineers, Savannah District
100 West Oglethorpe Avenue
Savannah, GA 31401-3640

Re: Comments on:
USACE Draft Tier II Environmental Impact Statement / Draft General Reevaluation Report
Report for improvements & maintenance of Savannah Harbor Federal Navigation Project

Dear Mr. Bailey:

The purpose of this letter is to express my very strong support for the deepening of the Savannah Harbor to forty-eight (48) feet.

All data, including ship calls, tonnage figures, etc., show Savannah is a growing port that will continue to grow well into the future. The growth of the Port of Savannah has great beneficial economic impact on the entire southeast region of the United States. It is especially important to note a high percentage of the port's cargo movements are exports out of the country. A more efficient port will serve to facilitate the exporting of more goods and improve our balance of trade with other countries.

A deeper channel and harbor will serve to alleviate ship congestion on the river caused by current tidal restrictions. Deepening the harbor to 48 feet will reduce congestion and increase efficiency at the port.

As a marine insurance broker, I make my living serving businesses on the waterfront by protecting their assets and their employees. It is important for the safety of the port that more ships are able to sail without tidal restrictions and that the sailing window for larger ships is expanded.

In my opinion, nothing will serve to reduce the perils associated with ship congestion and improve safety at the Port of Savannah more than deepening the harbor to 48 feet.

Thank you for reviewing my comments.

Very truly yours,

Edward T. Brennan, Jr.

BRENNAN & CO, LLC : 102 East Liberty Street, Suite 303, Savannah, Georgia 31401 T 912.650.3980 F 912.650.3981

#644

December 10, 2010

Mr. William Bailey
PD, US Army Corp of Engineers, Savannah District
100 West Oglethorpe Avenue
Savannah, GA 31401-3640

Dear Mr. Bailey:

RE: SHEP

I greatly support the SHEP project to deepen the Savannah River.

This important project is absolutely crucial for the port of Savannah to remain competitive – even relevant – in post-PANAMAX transport world.

Failure to do so would result in the decline in transportation jobs in region, one of our few growth industries.

Your support will be greatly appreciated.

Sincerely,

Jeffrey Waters
260 St. Catherines Court
Richmond Hill, GA 31324
912/880-8024

#645

December 8, 2010

7 Lake View Drive
Guyton, GA 31312

Mr. William Bailey
ATTN: PD, US Army Corps of Engineers, Savannah District
100 West Oglethorpe Avenue
Savannah, GA 31401-3640

RE: Savannah Harbor Expansion Project

Dear Mr. Bailey,

We would like to offer this letter in support of the Savannah Harbor Expansion Project and ask for your sustaining endorsement to deepen the Savannah River channel to 48 feet.

This project has become increasingly significant, not only to Georgia and the South East, but more importantly to the Nation. The inclusion of Georgia's Ports as a viable competitor in world shipping and developing markets is critical to promote healthy commerce well beyond the borders of our State. It is a sound investment in the future of our local, regional and national economies. Harbor deepening can provide a surety to the fulfillment of our obligations to improve the quality of life for thousands of Americans who will directly benefit now and well into the distant future.

We believe we have a vital national duty to develop partnerships of shared trust and responsibility to maximize our ability to provide increased economic opportunities and growth for our Country.

Together, our unified focus in supporting the Savannah Harbor Expansion Project will promote prosperity and democracy as well as strengthen national security for commercial navigation as well as improve shipping channel maintenance and emergency responses to both manmade and natural disasters.

This project is paramount to bolstering our Nation's economic and contingency operations during a perilous time in which our national economic system has been targeted as part of a continuing and intensifying worldwide conflict.

Thank you,

Frank Manson

Jodie Manson

From: Charlie Sullive
To: CESAS-PD, SAS
Subject: SHEP GRR DEIS Comments
Date: Saturday, January 22, 2011 5:40:45 AM

January 21, 2011

Mr. William Bailey
ATTN: PD, US Army Corps of Engineers, Savannah District
100 West Oglethorpe Avenue
Savannah, GA 31401-3640

SUBJECT: Comments on the USACE Draft Tier II Environmental Impact Statement and Draft General Reevaluation Report for improvements and continued maintenance of the Savannah Harbor Federal Navigation Project, Chatham County, Georgia and Jasper County, South Carolina.

Dear Mr. Bailey;

The Savannah Harbor Safety and Navigation Committee recommends that the Savannah Harbor be expanded as described in the subject documents to a depth of 48 ft with all the associated turn widening and meeting lanes. The Savannah Harbor expansion will make the river safer for arriving and departing vessels and provide a safer workplace for the people working on the ships and associated piers.

Deepening the channel to 48 ft will reduce the number of vessels that are tide-constrained, providing larger windows, flexibility and safe passage at high tide and throughout the tide cycle.

The changes to access and flow between the middle and back rivers with the Savannah River will improve the ability to establish and maintain safety/security zones for and around commercial facilities on the Savannah River.

The environmental mitigation does not just maintain the current environment. The project improves many environmental areas and makes the Savannah River a better place.

Project justification is based on economic evaluation in the tier II reports. Safety

should also be considered. The proposed changes will improve the overall safety of the Savannah River.

Sincerely,

Charles E. Sutlive

Chairman

Savannah Harbor Safety and Navigation Committee

From: Jack
To: CESAS-PD, SAS
Subject: Harbor dredging
Date: Sunday, January 23, 2011 9:42:38 PM

I vote yes.This is very vital for the future growth of Savannahs Port.Each time the harbor has been dredged in the last fifty years to accommodate larger ships the same argument has been put forward by the same groups who have been proven wrong in their objections

Jack Meyer

From: Jim Frederick
To: CESAS-PD, SAS
Date: Sunday, January 23, 2011 8:33:52 PM

---

yes to support Savannah Harbor expansion

From: Maxc1942@aol.com
To: CESAS-PD, SAS
Subject: Harbor Expansion
Date: Sunday, January 23, 2011 8:29:35 PM

I support the harbor expansion
Max C. Duncan

From: Scott H. Rasplicka
To: CESAS-PD_SAS
Subject: SHEP
Date: Sunday, January 23, 2011 7:31:20 PM

Dear Mr. Bailey,

I am writing in support of the river deepening. My business will probably cease to be a going concern if the harbor is not improved allowing continued growth of the port. I am a fervent believer in preserving the environment; but, it appears that you have exhausted every possible effort to ensure the environment is properly protected and preserved. The economics are clear. The only question I have is why the COE does not recommend funding the deepening all the way to 48'.

Please continue to push for harbor deepening at the fastest possible speed.

Regards,

Scott H. Rasplicka

125 E. 44th Street cell: (912) 667-4337
Savannah, GA 31405 fax: (912) 233-6350
srasplicka@Comcast.net

From: davidbreithaupt
To: CESAS-PD, SAS
Subject: Savannah Harbor Deepening
Date: Sunday, January 23, 2011 5:08:10 PM

Sir: As residents of Savannah, my wife and I are very much in favor of proceeding on the deepening of the harbor. The project is critical to the continued positive development of Savannah that has occurred in the past 10-15 years. Inter-state political battles should not be permitted to detract from development in Savannah. My sense is that the environmental impacts can be minimized.

Sincerely,

David and Caren Breithaupt

David E. Breithaupt
dbreithaupt@aya.yale.edu
912.598.8552

From: Robert Gephart
To: CESAS-PD, SAS
Subject: Yes to Support SHEP
Date: Sunday, January 23, 2011 5:05:26 PM

I do support the Savannah Harbor Expansion Project.

Robert J Gephart
207 Hampshire Road
Savannah, GA 31410

From: Al Nash
To: CESAS-PD, SAS
Subject: Deepening of the Savannah Harbor
Date: Sunday, January 23, 2011 1:40:36 PM

Dear Mr. Bailey,

I am writing to you on behalf of my company and its employees, I am hereby submitting my support of the proposed deepening of the Savannah Harbor.

By increasing the Savannah River's channel depth to 48 feet, the Savannah Harbor Expansion Project (SHEP) will provide U.S. exporters and importers the infrastructure required to efficiently accommodate global commercial demands. The SHEP will allow access to the new generation of larger container vessels, using the expanded Panama Canal beginning in 2014. In turn, this will provide my company and others cost savings and efficiencies in ocean commerce that are essential to create new jobs for the American people. This is an important national priority because the Port of Savannah serves more than 44 per cent of the U.S. population and is the fastest growing container port in the nation and is the second largest on the East Coast. Furthermore, Savannah handles 12 per cent of all U.S. containerized exports.

In this challenging economic environment it is important for our government to make the investments required to support job growth in the United States. With nearly 5-to-1 benefit-to cost-ration, America cannot afford to pass up the opportunity for economic growth created by this important project.

Again, I appreciate your time and efforts towards the successful completion of this nationally significant project.

Sincerely,

Mr. Alvin "AL" P. Nash
Parallax Advisory Group, LLC
404-867-8287
anash@parallaxadvisorygroup.com
www.parallaxadvisorygroup.com

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Alpharetta, GA

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Southeastern Minerals Inc.
Macon, GA

DEANEY H. POWELL
L.L. Powell & Son, Inc.
Rossville, GA

ANDY STANTON
The Mandell Group
Kennesaw, GA

TOMMY STARR
Threadgill Seed Inc.
Madison, GA

DENE SUTHERLAND
Sutherland Farms Inc.
Forest Park, GA

JOE TYSON
Fruitland Nursery
Sandersville, GA

BILL VERNER
Georgia Electric Membership Corporation
Atlanta, GA

FRED C. HOLTZCLAW
West Fraser Inc.
Columbus, GA

Director Emeritus
BILL FATLAT
Wendy Farms
Dublin, TN

Director Emeritus
LINDER P. CORN
W.C. Bradley Co.
Columbus, GA

Educational Liaison
DR. RICHARD N. WOODRUM
University of Georgia
Athens, GA

Economic Advisor
JOHNNY MOLSON
University of Georgia
Athens, GA

GEORGIA AGRIBUSINESS COUNCIL

COUNCIL VISSION: "To advance the business of agriculture through economic development, environmental stewardship and education to improve the quality of life for all Georgians."

January 24, 2011

Mr. William Bailey
ATTN: PD, US Army Corps of Engineers, Savannah District
100 West Oglethorpe Avenue
Savannah, GA 31401-3640

Dear Mr. Bailey,

On behalf of the Georgia Agribusiness Council and our more than 700 member companies, I am pleased to submit this letter of support for the proposed deepening of the Savannah Harbor. Agriculture is not only Georgia's largest industry, it is her first industry. While agriculture has a great story to tell regarding the history of Georgia's economy, it is our future that holds much promise as our production capacity has never been stronger. The opportunity to increase the exportation of our crops, livestock, equipment and other products, has this state, especially the rural areas, poised for economic growth. The Savannah Harbor Expansion Project (SHEP) is key to opening up these opportunities for Georgia and the U.S.

By increasing the Savannah River's channel depth to 48 feet, the SHEP will provide U.S. exporters and importers the infrastructure required to efficiently accommodate global commercial demands. It will allow access to the new generation of larger container vessels, using the expanded Panama Canal beginning in 2014. In turn, this will provide our member companies, which include farmers, processors, equipment manufacturers and producers of agricultural inputs, the increased convenience, cost savings and efficiencies in ocean commerce that are essential to create new jobs for the American people. This is an important national priority because the Port of Savannah serves more than 44 percent of the U.S. population and is the fastest growing container port in the nation.

There is not a more worthy "shovel ready" project in this nation than the SHEP and it is important for our government to make the necessary investments to support job growth in the United States. Georgia products are valuable here at home and all across the world. As our nation's top producer of poultry, peanuts, pecans, and rye, as well as the popularity of our Vidalia sweet onions, the diversity of turf grasses and our plentiful biomass, Georgia has a lot to offer the world. The SHEP is critical to providing the most cost effective and local method to the global access that is sorely needed.

Again, I appreciate your time and efforts towards the successful completion of this nationally significant project.

Respectfully,

Bryan R. Tolar
President

P.O. BOX 119 • 1865 SOUTH ELM STREET • COMMERCE, GA 30529 • 706/336-6830 • 800/726-2474 • FAX 706/336-6898

From: Jennifer Abshire
To: CESAS-PD, SAS
Subject: We support Savannah Harbor deepening
Date: Monday, January 24, 2011 10:35:10 PM

Please make this happen. Thank you.

Jennifer Abshire Patterson

Sent from my iPhone

From: jc
To: CESAS-PD_SAS
Subject: Harbor Deepening
Date: Monday, January 24, 2011 1:13:13 PM

Subject: Comment on the USCE proposed harbor deepening project

To Whom It May Concern:

I am a resident of Chatham County and the State of Georgia.

I would like to go on record as being strongly in favor of the proposed harbor deepening project to a depth of 48 feet.

Thank you.

James C. Rosssiter, Jr
Patricia R. Rossiter
James C. Rossiter, III
Angela A. Rossiter

From: Tom Colasanto
To: CESAS-PD, SAS
Subject: River dredging
Date: Monday, January 24, 2011 1:06:55 PM

To Whom It May Concern:

I am a resident of Chatham County and the State of Georgia.

I would like to go on record as being strongly in favor of the proposed harbor deepening project to a depth of 48 feet.

Thank you,

Tom Colasanto
419 East Congress St.
Savannah, GA
912-272-6557

Name: _____

From: Tom Colasanto
To: CESAS-PD, SAS
Subject: River deepening
Date: Monday, January 24, 2011 1:05:52 PM

If you dig, they will come!

So dig it!
Tom Colasanto
419 East Congress St.
Savannah, GA
912-272-6557

From: D F
To: CESAS-PD, SAS
Subject: Comment on the USCE proposed harbor deepening project
Date: Monday, January 24, 2011 1:04:26 PM

Subject: Comment on the USCE proposed harbor deepening project

To Whom It May Concern:

I am a resident of Chatham County and the State of Georgia .

I would like to go on record as being strongly in favor of the proposed harbor deepening project to a depth of 48 feet.

Thank you,

Name: Darrell Farringer

From: Jeffrey Hardin
To: CESAS-PD, SAS
Subject: Harbor Deepening Project
Date: Monday, January 24, 2011 12:32:28 PM

There is no doubt the economy is in shambles right now. This would be a huge project and a huge boost for the national economy. Not only will it impact southeast ga. but it will have a ripple affect nation wide. This project definetly needs to move forward and happen with a accelerated schedule. I am from southeast ga. and my dad, before he retired, worked at the GPA for 38 years. We must create more long term jobs like that in our area.

So, deeping the harbour needs to happen ASAP!

Thanks,
Jeffrey L. Hardin

From: Jamie Hamrick
To: CESAS-PD, SAS
Subject: Comment on the USCE proposed harbor deepening project
Date: Monday, January 24, 2011 12:19:33 PM

To Whom It May Concern:

I would like to go on record as being strongly in favor of the proposed harbor deepening project to a depth of 48 feet. This project will pay dividends to our city for many years. Thank you for your consideration.

Best regards,
Jamie Hamrick

James C. Hamrick, AAI
President - Thomas J. Sheehan Insurance, Inc
(912) 650-2811 -Direct Office
(912) 650-2831 - Direct Fax
jamie@tjsheehanins.com

144 Habersham Street
Savannah, Georgia 31401

P.O. Box 10205
Savannah, Georgia 31412

How is our service? Please let us know at **info@tjsheehanins.com**

From: Mcchesney, Michael R
To: CESAS-PD, SAS
Subject: Harbor Deepening Project.
Date: Monday, January 24, 2011 12:05:38 PM

Subject: Comment on the USCE proposed harbor deepening project

To Whom It May Concern:

I am a resident of Chatham County and the State of Georgia.

I would like to go on record as being strongly in favor of the proposed harbor deepening project to a depth of 48 feet.

Thank you,

Name: Michael R. McChesney

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From: Cathy Colasanto
To: CESAS-PD, SAS
Subject: Harbor Project
Date: Monday, January 24, 2011 11:48:50 AM

Subject: Comment on the USCE proposed harbor deepening project

To Whom It May Concern:

I am a resident of Chatham County and the State of Georgia.

I would like to go on record as being strongly in favor of the proposed harbor deepening project to a depth of 48 feet.

Thank you,

Cathy Colasanto
419 East Congress Street
Savannah GA 31401

From: Megan Cox
To: CESAS-PD, SAS
Subject: Comment on the USCE proposed harbor deepening project
Date: Monday, January 24, 2011 11:45:37 AM

To Whom It May Concern:

I am a resident of Chatham County and the State of Georgia.

I would like to go on record as being strongly in favor of the proposed harbor deepening project to a depth of 48 feet.

Thank you.

Megan Cox
Director of Sales
The Pirates' House Restaurant
20 East Broad Street
Savannah, GA 31401
P: (912) 233-2225
F: (912) 234-1212
megan@thepirateshouse.com

From: Roberts, Dave
To: CESAS-PD, SAS
Cc: "hoganin@aol.com"
Date: Monday, January 24, 2011 11:44:27 AM

To Whom It May Concern:

I am a resident of Chatham County and the State of Georgia.

I would like to go on record as being strongly in favor of the proposed harbor deepening project to a depth of 48 feet.

Thank you,

Name: _Dave Roberts_____

Dave Roberts
Sales Manager Savannah/Brunswick
Georgia Crown Distributing
(912) 695-0630 Cell
(912) 352-0908 Fax

From: Daniel Mahfet
To: CESAS-PD, SAS
Subject: Comment on the USCE proposed harbor deepening project
Date: Monday, January 24, 2011 11:35:29 AM

To Whom It May Concern:

I am a resident of Chatham County and the State of Georgia .

I would like to go on record as being strongly in favor of the proposed harbor deepening project to a depth of 48 feet.

Thank you,

Daniel J. Mahfet

From: ASHAFFER@gaports.com
To: CESAS-PD_SAS
Subject: Savannah Harbor Expansion Project - 48 feet!!!
Date: Monday, January 24, 2011 11:30:45 AM

Every corner of the state relies upon Georgia's deepwater ports. Imports and exports alike fuel small and large businesses and help make Georgia the transportation and logistics hub of the Southeast. Georgia's ports continue to maintain and create jobs as one of the state's strongest economic engines, fostering the development of virtually every industry. Even during periods of extreme economic and financial stress, Georgia's ports not only generate substantial economic impacts, adding jobs in the most challenging times experienced in several generations.

The Savannah Harbor Expansion Project not only will benefit Georgia, but it is also a project of national significance. With more than 1.1 million TEUs of containerized freight exported through the Port of Savannah, the GPA handled 12 percent of all U.S. containerized exports and 8.3 percent of the total U.S. containerized cargo volume for FY2010. The Port of Savannah's balanced export-to-import ratio promotes efficiency for its customers and has helped to drive economic recovery throughout the state of Georgia and the entire Southeast.

In order to more efficiently accommodate the larger vessels already calling on the U.S. East Coast, the Savannah Harbor Expansion Project **must deepen the river from to 48 feet.** This project - one of the mot important and productive civil works projects in the country - will maintain and create jobs and commerce throughout the nation, while significantly reducing transportation costs for U.S. shippers.

As the Southeast's gateway to the world, Savannah's harbor must be able to accommodate larger vessels in order to more efficiently serve global commercial demands.

Amy Shaffer, APR
Manager of Communications
Georgia Ports Authority
(912) 964-3806

From: Cliff Ducey
To: CESAS-PD_SAS
Subject: Subject: Comment on the USCE proposed harbor deepening project
Date: Monday, January 24, 2011 11:23:18 AM

To Whom It May Concern:

I am a resident of Chatham County and the State of Georgia.

I would like to go on record as being strongly in favor of the proposed harbor deepening project to a depth of 48 feet.

Thank you.

Cliff M. Ducey

From: Jimkeller29@aol.com
To: CESAS-PD, SAS
Subject: Fwd: Savannah Harbor Federal Navigation Project
Date: Monday, January 24, 2011 11:22:51 AM

Subj: Savannah Harbor Federal Navigation Project

Mr. William Bailey, ATTN: PD, US Army Corps of Engineers, Savannah District, 100 West Oglethorpe Avenue, Savannah, Georgia 31401-3640 or by e-mail to CESAS-PD@usace.army.mil

YES!!

I cast my vote **in support** of the pending **Savannah Harbor Federal Navigation Project.**

James W. Keller
Past President
Savannah Council
Navy League of the United States

From: Billy Bremer
To: CESAS-PD_SAS
Cc: Jerry Hogan
Subject: SAVANNAH RIVER HARBOR DEEPENING
Date: Monday, January 24, 2011 11:20:57 AM

Subject: Comment on the USCE proposed harbor deepening project

To Whom It May Concern:

I am a resident of Chatham County and the State of Georgia.

I would like to go on record as being strongly in favor of the proposed harbor deepening project to a depth of 48 feet.

Thank you.

William J. Bremer III

220 Debra Road
Savannah, GA 31410
912-313-6334 Fax - 912-897-0594

rbbb3721@hotmail.com

From: laurelire@comcast.net
To: CESAS-PD, SAS
Subject: Subject: Comment on the USCE proposed harbor deepening project
Date: Monday, January 24, 2011 11:18:00 AM

Subject: Comment on the USCE proposed harbor deepening project

To Whom It May Concern:

I am a resident of Chatham County and the State of Georgia.

I would like to go on record as being strongly in favor of the proposed harbor deepening project to a depth of 48 feet.

Thank you,

Name: Laurel Ireland_____

From: DTKELLER29@aol.com
To: CESAS-PD, SAS
Subject: Savannah Harbor Federal Navigation Project
Date: Monday, January 24, 2011 11:17:34 AM

Mr. William Bailey, ATTN: PD, US Army Corps of Engineers, Savannah District, 100 West Oglethorpe Avenue, Savannah, Georgia 31401-3640 or by e-mail to CESAS-PD@usace.army.mil

YES!!

I cast my vote **in support** of the pending **Savannah Harbor Federal Navigation Project.**

Deborah T. Keller
Member, Savannah Council
Navy League of the United States

From: James Vandenburg
To: CESAS-PD, SAS
Subject: support of Savannah Harbor Widening
Date: Monday, January 24, 2011 10:59:32 AM

We support the widening of the Savannah Harbor which will allow the new larger Panama Canal Ships to have access to our port and create more jobs in our area.
Mr.& Dr.James J. Vandenburg Jr. , Tybee Island Ga

From: mjhoganinc@comcast.net
To: CESAS-PD_SAS
Subject: Comment on the USCE proposed harbor deepening project
Date: Monday, January 24, 2011 10:37:39 AM

To Whom It May Concern:

I am a resident of Chatham County and the State of Georgia.

I would like to go on record as being strongly in favor of the proposed harbor deepening project to a depth of 48 feet.

Thank you.

Monica Stroud
M.J. Hogan & Company, Inc
PO Box 30277
Savannah, GA 31410

Office: 912-897-2008
Fax: 912-897-0701

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From: jerryhogan01@comcast.net
To: CESAS-PD, SAS
Subject: Comment on the USCE proposed harbor deepening project
Date: Monday, January 24, 2011 10:33:17 AM

To Whom It May Concern:

I am a resident of Chatham County and the State of Georgia.

I would like to go on record as being strongly in favor of the proposed harbor deepening project to a depth of 48 feet.

Thank you,

Michael J. (Jerry) Hogan, Jr.

Michael J. (Jerry) Hogan, Jr.
209 Winchester Drive
Savannah, Georgia 31410

Home: 912-897-6798
Office: 912-897-2008
Fax: 912-897-0701
Cell: 912-631-3088

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From: Jim Myrick
To: CESAS-PD, SAS
Subject: I am in Favor of this project.
Date: Monday, January 24, 2011 9:30:22 AM

I think after reading all the information and looking at the overall impact this harbor has on the community and the state of Georgia. This project needs to be completed and must be done to keep the US and the Southeast competitive with the rest of the world. We cannot afford to be without a deeper river and the project must go forward. The cost is much higher to the US if we do not complete this project.

Sincerely,

Capt. J. Robert Myrick, Jr. "Jim"
Vice President
Myrick Marine Contracting Corp.
Mailing Address:
P.O. Box 60697
Savannah, GA 31420
Email: Jim@myrickmarine.com
Main Office: 912-9640711
Direct Line: 912-964-0712 ext. 100
Cell: 912-313-3347
Fax: 912-964-0771
Website: www.MyrickMarine.com
Shipping Address Only:
107 Prosperity Drive
Garden City, GA 31408

MYRICK MARINE CONTRACTING CORPORATION
SAVANNAH, GEORGIA

From: Llewellyn, Jonathan F (Contractor)
To: CESAS-PD, SAS
Subject: Savannah Harbor Expansion Project - Support for Project
Date: Monday, January 24, 2011 9:20:05 AM

Gentlemen:

Please register my support for the project to deepen the Savannah Harbor.

Regards,

Jon Llewellyn

****
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****

From: Bob Myrick
To: CESAS-PD, SAS
Subject: Harbor Deepening
Date: Monday, January 24, 2011 2:47:14 PM

The ship channel must be deepened to allow the newer more efficient ships to call the Port of Savannah. The lack of depth would make Savannah less competitive and cost many jobs in the Southeastern United States. The port must be allowed to increase the depth in the interest of National Security if in the event of closure of other large East coast ports due to act of war or terrorism.
The benefit to jobs, security, competitiveness, growth, and safety far out way the cost of the project and annual maintenance costs to the taxpayers.

Respectfully Submitted,

Bob Myrick
President
Myrick Marine Contracting Corp.
Post Office Box 60697
Savannah, GA 31420
P:912-964-0711
C:912-313-3346
F:912-964-0771
Email: Bob@myrickmarine.com
Website: www.myrickmarine.com

MYRICK MARINE CONTRACTING CORPORATION
SAVANNAH, GEORGIA

From: Tim Evans
To: CESAS-PD, SAS
Subject: Public Comment in Support of the Savannah Harbor Expansion Project
Date: Monday, January 24, 2011 2:33:33 PM
Attachments: Tim Evans (tim@ghcc.com).vcf

To Whom It May Concern:

The Nation desperately needs the harbor deepening of the Savannah Port to accommodate the next generation of post-Panamax class ships. These larger ships will serve the needs of industry and consumers throughout the US. Gainesville-Hall County, Georgia and the US will benefit from increased volume of trade as a result of the deepening of the Savannah River from 42 to 48 feet. This project has strong bipartisan support in Georgia.

We support this project.

Thank you,

Tim Evans, CEcD
VP Economic Development
Greater Hall Chamber of Commerce

tim@ghcc.com
Ph: 770-532-6206 ext. 107
Mobile: 678-644-1864

P.O. Box 374
Gainesville, Georgia 30503
USA

www.greaterhallchamber.com

www.greatstorytotell.com

New: Watch the 4-minute version of Why Gainesville-Hall County: http://www.youtube.com/watch?v=lSavl_nJcin4

From: rdemott@gmail.com on behalf of Ray DeMott
To: CESAS-PD, SAS
Subject: Harbor Deepening
Date: Monday, January 24, 2011 2:25:50 PM

Subject: Comment on the USCE proposed harbor deepening project

To Whom It May Concern:

I am a resident of Chatham County and the State of Georgia.

I would like to go on record as being strongly in favor of the proposed harbor deepening project to a depth of 48 feet.

Thank you.

Name: _____

Thanks and Best Regards
Ray DeMott

From: John Forbes
To: CESAS-PD, SAS
Date: Monday, January 24, 2011 2:01:03 PM

Subject: Comment on the USCE proposed harbor deepening project

To Whom It May Concern:

I am a resident of Chatham County and the State of Georgia .

I would like to go on record as being strongly in favor of the proposed harbor deepening project to a depth of 48 feet.

Thank you,

Name: _John P. Forbes_____

From: Jack Dressel
To: CESAS-PD, SAS
Subject: Harbor
Date: Monday, January 24, 2011 1:50:26 PM

Subject: Comment on the USCE proposed harbor deepening project

To Whom It May Concern:

I am a resident of Chatham County and the State of Georgia.

I would like to go on record as being strongly in favor of the proposed harbor deepening project to a depth of 48 feet.

Thank you.

John P. Dressel

From: Tom Wright
To: CESAS-PD, SAS
Subject: SHEP GRR & DEIS Comments
Date: Monday, January 24, 2011 8:48:14 AM

USACE Savannah District Planning
Mr. Bill Bailey;

The Savannah Harbor Expansion Project should be approved and funded as soon as possible.

SHEP benefits all areas of our community, from commercial to environmental. The benefits cover the southeast, include exports and spread across the country. The port will be safer and more efficient when the project recommendations are accomplished.

The Stakeholders Evaluation Group provided a dynamic and effect forum for all the community participants, both regulatory and environmental. All issues brought to the SEG have been addressed.

Although the results are all positive, the planning process has taken too long. Recent delays were due to changes in economic evaluation. These changes reduced the return on investment estimates by half and failed to provide any benefits for safety and exports. The end result was still a strong, positive program with benefits for all.

Thank you for all your USACE work to bring this project to conclusion.

Tom Wright
710 Bradley Point Rd
Savannah, GA 31410
O/C-912-429-3350
H-912-897-1582

From: Don Billet
To: CESAS-PD, SAS
Subject: Savannah River Deepening
Date: Monday, January 24, 2011 8:48:25 AM

COMMENT
It makes common sense to proceed and be ready to accommodate the larger ships.

Don Billet, PE

HGBD
A Bell Company
Engineers
Architects

Phone: 912.354.4626
FAX: 912.354.6754
E-Mail: dbillet@hgbd.com
Web: www.hgbd.com
FTP: files.hgbd.com

Hussey, Gay, Bell & DeYoung
Post Office Box 14247 • Savannah, GA • 31416

From: Brian Diefenbach
To: CESAS-PD, SAS
Subject: Port of Savannah Harbor Deepening
Date: Monday, January 24, 2011 11:26:03 PM

To Whom it May Concern,

I am writing in support of the harbor deepening in Savannah, Ga. As a resident of Bulloch County and an avid fisherman who uses the Savannah River to access inter costal and deep sea fishing I am in avid support of this for the economic impact it will have on our coastal region. Please approve this so our community can move forward in step with the type of ships who will be calling on the Port of Savannah in future years.

Thanks in Advance,

Brian D. Diefenbach

REGIONAL
RBC
BUSINESS
COALITION

January 24, 2011

Mr. William Bailey
U.S. Army Corps of Engineers
Savannah District
Attention: PD
100 West Oglethorpe Avenue
Savannah, Georgia 31401

Dear Mr. Bailey,

As the executive director of the Regional Business Coalition of Metropolitan Atlanta (RBC), I want to express our total support for the Savannah Harbor Expansion Project (SHEP).

The RBC believes that the in-depth study you have completed assures that deepening the Savannah River from forty-two feet to forty-eight feet is performed in such a manner as to maximize the national economic benefits while minimizing any harm to the environment.

The RBC recognizes the significant economic impact that the deepening project will generate not only for the Savannah community but also the state of Georgia and communities served by the port. The over 15,000 businesses who make up the membership of the RBC know that the improvements proposed by SHEP will lower the cost of shipping and receiving products to and from foreign ports, provide new opportunities for expansion and job creation in Georgia and other states served by the Savannah port and will provide more and better access to world markets.

The RBC believes there is no other single project that can offer such a significant increase in jobs and economic growth for all regions of our state and the southeastern United States than SHEP. Indeed, we have included support for the necessary state funds for SHEP in our 2011 legislative policy statement. Please know that the RBC chambers, their companies and employees they represent support your work and the completion of SHEP.

Sincerely,

Terry D. Lawler
Executive Director
Regional Business Coalition of Metropolitan Atlanta

The Regional Business Coalition of Metropolitan Atlanta (RBC) is an organization of over a dozen local Chambers of Commerce throughout the metro Atlanta region. RBC member chambers represent over 15,000 member companies who employ over 3 million metro Atlanta residents. The RBC's primary goal is to represent the interests of RBC Chamber members on regional public policy issues impacting our transportation, water and air quality and to advocate for solutions that improve metro Atlanta's quality of life and economic vitality. RBC member chambers include Central Atlanta Progress, Cherokee County Chamber, Clayton County Chamber, Cobb County Chamber, Covington-Newton County Chamber, DeKalb County Chamber, Douglas County Chamber, Fayette County Chamber, Greater Hall County Chamber, Greater North Fulton Chamber, Gwinnett County Chamber, Henry County Chamber, Metro Atlanta Chamber, Newnan-Coweta County Chamber, Paulding County Chamber and the South Fulton County Chamber of Commerce.

From: louissharpe@comcast.net
To: CESAS-PD, SAS
Subject: Deepening Harbor
Date: Monday, January 24, 2011 3:47:15 PM

Subject: Comment on the USCE proposed harbor deepening project

To Whom It May Concern:

I am a resident of Chatham County and the State of Georgia.

I would like to go on record as being strongly in favor of the proposed harbor deepening project to a depth of 48 feet.

Thank you,

name Louis Sharpe

From: hollyroelkel@hotmail.com
To: CESAS-PD, SAS
Subject: Savannah harbor deepening
Date: Monday, January 24, 2011 5:04:09 PM

I would like to express my personal approval for the deepening of the savannah river. As someone that can see everyday the impact of what will happen if it is not, I can only say that it will be devastating to myself, my family, my co-workers and their families, and to the entire region. This is very important for not only the livelihood but the economic survival of the state. Thank you for your time.
Connected by DROID on Verizon Wireleiss

From: Joe Hardin
To: CESAS-PD, SAS
Subject: harbor deeping
Date: Monday, January 24, 2011 6:20:33 PM

The deepening of the Savannah harbor is an important project for the Port of Savannah. It will keep an already economy booster to this area and to Georgia. This project needs to move forward as fast as possible.

Howard Hardin
retired GPA

From: annieem57@aol.com
To: CESAS-PD, SAS
Subject: Savannah Harbor Expansion Project
Date: Monday, January 24, 2011 5:30:28 PM

Dear Sir/Madam:

As an employee of the Georgia Ports Authority (GPA) for 23 years, I have seen incredible growth and productivity gains at the Port. The regional distribution centers, with better paying jobs, are not only located around Savannah but follow Interstates 95 and 16 to afford more work opportunities to the underemployed and unemployed in other counties.

Additionally, many workers employed by the GPA and other non-GPA personnel working or conducting business on the terminals (ILA, truckers, vendors, etc.) travel from other counties and states which includes a significant number residing across the Savannah River in South Carolina

The Georgia Ports Authority has a regional impact as the fourth largest container port in the nation with GPA exports greater than imports helping to offset the trade imbalance. There are 295,000+ jobs related to the Georgia Ports Authority and associated Federal taxes are $3.5 billion along with state & local taxes of $2.6 billion.

Please deepen the harbor to 48 feet; it has been studied in excess of ten years. The Panama Canal is slated for completion in 2014 and this deeper harbor is needed to accomodate the larger ships that will be passing through it

Cathy Willis

From: chris rice
To: CESAS-PD, SAS
Subject: SHEP comments
Date: Monday, January 24, 2011 5:43:44 PM

Dear Mr. William Bailey:

It is important that the Savannah Harbor be expanded to 48 ft, as this expansion is vital to the growth, and success of Georgia, United States, and to maritime partners around the globe. The proposed project depth of 48 feet will improve safer navigation for deep draft vessels, and will allow vessels a deeper draft with an unconstrained transit. In addition, it will enhance the queuing of vessels, minimize impacts to deeper draft vessels, and with the realignment of the channel for passing areas will improve safer navigable transit for deep draft vessels.

The expansion is critical to all vessel traffic using the Savannah River, and by having 48 feet you allow for more hours in a tide window for vessel with more capacity to arrive and depart without causing delays to other vessels not tidally constrained and allows for safer conditions for pilotage, asset management, and vessel transit. The expansion will equally enhance and adequately support the vessel movements for two-way traffic in Savannah River.

The documents and information supports harbor expansion from the economics, the engineering, and evaluation to maintain and improve the environmental mitigation of the Savannah River, and it is clear that justification for 6 more feet speaks volumes to deepening this harbor to 48 feet.

Respectfully,

Chris Rice

From: Robin Rutherford
To: CESAS-PD_SAS
Cc: tadl@mindspring.com; Robin Rutherford
Subject: Savannah Harbor Expansion Project (SHEP)
Date: Monday, January 24, 2011 5:48:03 PM
Importance: High

Dear Mr. William Bailey,

The Atlanta Regional Commission (ARC) is the state designated regional planning agency for the 10-county metropolitan Atlanta region. Our organization is composed of the local elected leadership of the 10-counties and the City of Atlanta.

ARC supports the widening and deepening of the Savannah Harbor to a maximum of 48 feet. This project is critical not only to the State of Georgia, but also to the southeastern U.S.

The Port of Savannah is one of the fastest growing ports in the country and it is absolutely essential that the deepening project move forward in a timely manner so the Port can accommodate the larger container ships that will be moving through the Panama Canal in the future.

Respectfully,

Tad Leithead
Chair
Atlanta Regional Commission
40 Courtland Street, NE
Atlanta, GA 30303
Phone: 404.463.3100 | Fax: 404.463.3205
E-mail: tadl@mindspring.com
Visit ARC's Website at: www.atlantaregional.com

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From: Carolyn Roush
To: CESAS-PD, SAS
Subject: harbor deepening project
Date: Monday, January 24, 2011 10:00:37 PM

Subject: Comment on the USCE proposed harbor deepening project

To Whom It May Concern:

I am a resident of Chatham County and the State of Georgia.

I would like to go on record as being strongly in favor of the proposed harbor deepening project to a depth of 48 feet.

Thank you,

Name: **Michael W. Roush, Sr.**

From: Angela Hendrix
To: CESAS-PD, SAS
Subject: In support of harbor deepening!
Date: Monday, January 24, 2011 10:00:40 PM

Angela Hendrix
AMH Communications
912.856.7329
468 Kingston Circle
Richmond Hill, Ga. 31324
angela@amhcommunications.net

From: BStep28991@aol.com
To: CESAS-PD, SAS
Subject: Harbor Project
Date: Monday, January 24, 2011 10:01:18 PM

I am in favor of deepening the Harbor to 48 FT

Byron A Stephens SR
22 Vista Point Dr
Savannah,Ga 31406

From: Carolyn Roush
To: CESAS-PD, SAS
Subject: harbor deepening project
Date: Monday, January 24, 2011 10:02:15 PM

Subject: Comment on the USCE proposed harbor deepening project

To Whom It May Concern:

I am a resident of Chatham County and the State of Georgia.

I would like to go on record as being strongly in favor of the proposed harbor deepening project to a depth of 48 feet.

Thank you,

Name: **Carolyn A. Roush**

From: Carolyn Roush
To: CESAS-PD, SAS
Subject: harbor deepening project
Date: Monday, January 24, 2011 10:02:15 PM

Subject: Comment on the USCE proposed harbor deepening project

To Whom It May Concern:

I am a resident of Chatham County and the State of Georgia.

I would like to go on record as being strongly in favor of the proposed harbor deepening project to a depth of 48 feet.

Thank you,

Name: **Michael W. Roush, Jr.**

From: Dee Herb
To: CESAS-PD, SAS
Subject: Harbor Deepening
Date: Monday, January 24, 2011 10:02:50 PM

To whom it may concern - I am a resident of Tybee Island in the county of Chatham - I fully support the deepening of the Savannah Harbor to 48ft .

Regards, Dee Herb

Dee Herb
Coastal Territory Manager
Quality Wine & Spirits
2279 Defoor Hills Road
Atlanta, GA 30318-220
912-695-0147 cell
dherb@qwine.com
www.qwine.com

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From: Tim
To: CESAS-PD, SAS
Date: Monday, January 24, 2011 10:35:01 PM

The Savannah harbor MUST be deepened in order for our region to continue to compete globally. If we do not do this, the consequences could be dire. We deal with this or we deal with increased poverty and all if its ripple effects.

Tim Feathers

From: Fred Beason
To: CESAS-PD, SAS
Subject: SHEP comment
Date: Tuesday, January 25, 2011 7:34:43 AM

As a State Pilotage Commissioner, local business owner, member of the

US Coast Guard - Marine Safety Unit (USCG-MSU) Safety Committee, participant in the long running Sake Holders Evaluation Group (SEG), member of the Savannah Maritime Community I would like to express an enthusiastic approval for the proposed Savannah Harbor Expansion Proposal!

The improvements in the Savannah Harbor will increase safety for vessels presently transiting the existing harbor. The improved under keel clearance would reduce the opportunity for damage to vessels hulls as they transit the commercial areas by providing requested depths for vessels transiting the harbor with out utilizing tidal lift. Under the current system the deep draft vessels need to be scheduled for arrival or departure with the tide cycle. If there is a natural hurdle (i.e. fog) or mechanical hurdle the vessel is restricted in its safe passage. These occurrences not only present environmental hazards they always result with higher operational costs that compute to increases consumer costs. The review of the proposed improvements in the harbor by the scientific and engineering parties provide non bias documentation to not only support these improvements but also include improvement safety valves for unexpected negative impacts while providing improvements in the system for past changes that have now been identified as environmental over sights.

There is documented evidence the existing harbor is a national asset for the expeditious deployment of our local military forces. Facts confirm the existing harbor has a proven positive impact of the local, state, region and national economy that will increase with the harbor expansion! I support the harbor improvement.

With best of regards,

Fred N. Beason, Jr.

Fred@BottomLineEcho.com

Georgia Poultry Federation

January 24, 2011

Mr. William Bailey
ATTN: PD, US Army Corps of Engineers, Savannah District
100 West Oglethorpe Avenue
Savannah, GA 31401-3640

Dear Mr. Bailey:

The Georgia Poultry Federation supports the proposed Savannah Harbor Expansion Project. The Federation is a trade association which represents the poultry industry in Georgia, the nation's leading poultry producing state.

The poultry industry is the largest segment of agriculture and agribusiness in Georgia, accounting for over $20 billion in economic impact annually according to a recent study conducted by the University of Georgia. The jobs of nearly 100,000 Georgians depend on the poultry industry either directly or indirectly.

Exports are vitally important to Georgia poultry producers today, but more importantly, the future economic viability of Georgia's poultry industry depends on maintaining our competitive position compared to other poultry producing nations. We must accomplish this by retaining our current international customers to the extent possible, while penetrating new markets in the future. The Port of Savannah has been a key factor in maintaining the competitive advantage for poultry producers in Georgia and the southeastern United States. In fact, poultry products valued at nearly $700 million were shipped through the Port of Savannah in 2010 alone.

The balance of imports and exports which exists through the Port of Savannah today provides an indicator of the tremendous potential for agricultural exports in the future -- agriculture is a significant part of this trade balance. Some experts predict that the demand for food in the world will double or triple by 2050. We believe that Georgia and the southeast are poised to benefit from this increased demand. An efficient and competitive port is a critical piece of the infrastructure that will enable agricultural producers in Georgia and the southeast to take advantage of this opportunity.

We believe that the Port of Savannah must be deepened if we are to remain competitive in the post Panama Canal expansion era. We also believe that the Corps' extensive analysis of the alternatives, environmental impacts, and costs and benefits demonstrates that the harbor deepening is based on a sound plan, environmentally and economically.

Thank you for the opportunity to provide comments in support of the Savannah Harbor Expansion Project.

Sincerely yours,

Mike Giles

Mike Giles, President

P.O. Box 763
Gainesville, Georgia 30503

518 South Enota Drive
Gainesville, Georgia 30501
email: mike@gapf.org

770-532-0473
Fax: 770-532-7543

#742

W. Paul Bowers
President and
Chief Executive Officer

Bin 10240
241 Ralph McGill Boulevard NE
Atlanta, Georgia 30308-3374

Tel 404.506.5355
Fax 404.506.7985
wpbowers@southernco.com

GEORGIA POWER
A SOUTHERN COMPANY

January 19, 2011

Mr. William Bailey
US Army Corps of Engineer, Savannah District
ATTN: PD
100 West Oglethorpe Avenue
Savannah, GA 31401-3640

Dear Mr. Bailey,

On behalf of Georgia Power, one of the largest employers in Georgia, I am writing to express our full support of the Savannah Harbor Expansion Project (SHEP).

Georgia Power has a long history of aligning with state and community leadership to ensure Georgia remains a growth engine in the Southeast as well as the nation. The company's motto of being "a citizen where we serve," speaks to its commitment to engage community, regional and state partners to facilitate smart growth and simply, lend its leadership expertise and resources to promote Georgia's success. Georgia Power takes this responsibility very seriously. The company's reach around the state is vast. In fact, it is difficult to find an area of leadership that does not have a key company representative around the table.

We believe there has not been a project where leadership from around the state have been more closer united in agreement than the subject of the vital importance of the Savannah port deepening project. The deepening of the port and expansion of existing capabilities to receive larger ships coming from the Panama Canal expansion is essential for Georgia and Southeast commerce as well for the interest of the nation. Although numbers are yet to be fully realized, it is estimated that as much as 25 % of ocean trade flows could shift from the west to east coast of the United States due to the Panama Canal expansion. Savannah, the second busiest port on the East Coast after the Port of New York/New Jersey and the fastest-growing, is a critical U.S. hub to accommodate this world shift in commerce, once the deepening is accomplished.

We know from our 80 years of experience in community and economic development, and especially in business recruitment, the value the ports bring to attracting companies to Georgia, largely in manufacturing and logistics. Many of the companies we assisted cited the Savannah port as its reason for locating in Georgia.

One of Georgia's largest and fastest-growing industries is transportation and logistics. Georgia's ports are instrumental in attracting these types of companies. The Atlanta metro area is the nation's fifth largest transportation and logistics cluster and the largest in the Southeast, according to the Harvard Cluster Mapping Project 2011. Of the companies Georgia Power's Community & Economic Development group assisted in locating in the last five years, 23% were in warehousing and transportation, creating 11,500 jobs and $2.9 billion in capital investment. Supporting port deepening will allow our state and the Southeast to continue to be successful in attracting these companies and continue the export-import engine that the Savannah port has quickly become.

We believe supporting the Savannah Harbor Expansion Project (SHEP) will provide a highly cost-effective return on investment for Georgia and the nation. Georgia's historical economic success and beginnings have always been tied to its success in moving product and people. Georgia is home to the world's busiest airport because of its commitment to efficiency and superior geographic location, and it is positioned to efficiently move world commerce just the same. For this reason, Georgia Power stands firmly behind SHEP with local, regional and state leaders.

Sincerely,

#743

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DOUGLAS H. PAYNE
GEORGE WEDER
J. BLAKE YOUNG

January 18, 2011

William Bailey
ATTN: PD, U.S. Army Corps of Engineers
Savannah District
100 West Oglethorpe Ave.
Savannah, GA 31401-3640

Re: Savannah Harbor Expansion Project

Dear Mr. Bailey:

The Kiwanis Club of Atlanta is a diverse organization of 250 civic and business leaders in Metro Atlanta. Since 1918, the club has had a positive impact on our city and state.

The Garden City Terminal at Savannah Harbor is currently the second largest container port in the United States east coast and the fourth largest in the country. It services more than 50 container ship services, which call weekly on a fixed day schedule. However, the Savannah Harbor also has the shallowest controlling depth for a major port.

We strongly support the deepening the Savannah Harbor from its current 42-foot depth to 47 or 48 feet deep from the Harbor Entrance Channel to the Garden City Terminal, channel widening and deepening of the Kings Island Turning Basin and channel widening at three bends.

At the present time there is inefficient operation of container ships in the channel at the Savannah Harbor which affect our country's international trade transportation costs. We understand that existing ships are experiencing problems associated with turning capabilities and overall maneuverability in the inner harbor. These problems will increase as vessel sizes increase.

The Savannah Harbor Expansion Project will reduce the transportation cost of import and export trade through the Savannah Harbor and contribute to increases in the national net income. It will also dovetail with the rapidly expanding cargo capabilities at the Hartsfield Jackson Atlanta International Airport.

Sincerely,

Kathy Kite

Kathy Kite
President

Suite 804 • 100 Edgewood Avenue • Atlanta, Georgia 30303 • (404) 521-1443 • Fax (404) 521-1444
www.kiwanisatlanta.org • kiwanisatlanta@gmail.com

#744

Badcock
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January 7, 2011

Mr. William Bailey
US Army Corps of Engineers - Savannah District
100 West Oglethorpe Avenue
Savannah, Georgia 31401-3640

Via e-mail: CESAS-PD@usace.army.mil

Dear Mr. Bailey,

I am writing to state, for the record, the importance of the Savannah Harbor Expansion Project to the WS Badcock Corporation.

Our company currently utilizes the Port of Savannah as a major east coast gateway for importing our products and provided adequate infrastructure is available, we plan to continue to grow our trade through the port for many years to come. However, the current -42 foot mean low water depth of the Savannah River is no longer sufficient to accommodate the post-Panamax vessels we rely on today to transport our goods. This deficiency will be more significant in the future as we expect larger containerships to be introduced by carriers serving the US east coast upon completion of the Panama Canal expansion.

As you know, the newer post-Panamax vessels offer greater economic and environmental efficiencies that make their use both a preference as well as a priority to older generation vessels. SHEP is critical to the continued cost-effectiveness of our business and our ability to create jobs and reduce costs to U.S. consumers. By being able to load more boxes on fewer ships, our transportation costs are significantly decreased. Furthermore, ready access to the newer larger vessels at the Port of Savannah will avoid the higher financial and environmental costs of trucking our products to/from ports that are further from our markets and distribution network."

It is imperative that the Savannah Harbor be deepened to -48 feet at mean low water and that this project is completed as quickly as possible. Our business and that of other United States exporters and importers, is depending on it.

Sincerely,

Greg Brinkman

VP Supply Chain
WS Badcock Corp.
PO Box 497
Mulberry, FL 33860

cc: Wogan Badcock III

W.S. Badcock Corporation
P.O. Box 497 Mulberry, Florida 33860 863/425-4921 www.badcock.com

#746

P.O. Box 151
Sandersville, GA 31082

800-342-6462
FAX 478-552-0384

Savannah, GA
800-762-3042

Charleston, S.C.
800-443-0928

Sylacauga, AL
800-335-9947

January 19, 2011

Mr. William Bailey
Attn: PD, US Army Corps of Engineers, Savannah District
100 West Oglethorpe Avenue
Savannah, GA 31401-3640

Dear Mr. Bailey:

On behalf of B-H Transfer Co. and its 167 employees and 194 independent contractors, I am hereby submitting my support of the proposed deepening of the Savannah Harbor. B-H Transfer Co. is one of the largest motor carriers serving the Port of Savannah.

By increasing the Savannah River's channel depth to 48 feet, the Savannah Harbor Expansion project (SHEP) will provide U.S. exporters and importers the infrastructure required to efficiently accommodate global commercial demands. The SHEP will allow access to the new generation of larger container vessels, using the expanded Panama Canal beginning in 2014. In turn, this will provide my company and others cost savings and efficiencies in ocean commerce that are essential to create new jobs for Georgians. This is an important national priority because the Port of Savannah serves more than 44 percent of the U.S. population and is the fastest growing container port in the nation and the second largest on the East Coast. Furthermore, Savannah handles 12 percent of all U.S. containerized exports of which my company is heavily engaged.

In this challenging economic environment, it is important for our government to make the investments required to support job growth in the United States. With a nearly 5-to- 1 benefit-to-cost ratio, America cannot afford to pass up the opportunity for economic growth created by this important project.

Again, I appreciate your time and efforts towards the successful completion of this nationally significant project.

Sincerely,

Frank L. Young Jr

Frank L. Young, Jr.
President

jd

cc: Hugh M. Tarbutton
Ben Tarbutton, Jr.

#747

January 19, 2011

Mr. William Bailey
United States Army Corps of Engineers
Savannah District
100 West Oglethorpe Avenue
Savannah, Georgia 31401

Dear Mr. Bailey:

On behalf of our 2,100 business members representing over 77,000 employees in our area, we strongly encourage the U.S. Army Corps of Engineers to proceed with the Savannah Harbor Expansion Project.

The Savannah Harbor serves as the fourth largest and fastest growing container port in the United States handling 8 percent of all U.S. containerized cargo and more than 18% of all East Coast trade. Georgia's ports also represent 300,000 jobs and $2.6 billion in state and local taxes. The shipping/logistical sector is a major economic driver in our region, supports our expanding industrial base and provides numerous other substantial benefits to other sectors of our economy.

Deepening the harbor and channel to reflect a depth of 48 feet at mean low water will further enhance our port's ability to serve global commerce and meet the demands set forth in the National Export Initiative.

The Georgia Ports Authority, private terminal operators and numerous other stakeholder groups have been studying and reviewing this project for the last 12 years. We feel confident that the project is ready to be funded which will hopefully lead to a construction start date in the first quarter of 2012.

Thank you for your assistance and support of the Savannah Harbor Expansion Project. We look forward to your final report in the coming months.

Sincerely,

Patrick Graham
2011 Chamber Chairman

William W. Hubbard
President & CEO

101 East Bay Street | Savannah, GA 31401 | P.O. Box 1628 (31402-1628) | SavannahChamber.com | 912.644.6400

We clearly see the proposed deepening of the harbor as substantially enhancing the safety of our port. The entire Board of Pilotage Commissioners strongly supports the proposed expansion of the Savannah Harbor to 48 ft.

Very Truly Yours,

Sylvester C. Formey, Chairman

cc: Mr. Edward Brennan, Jr.
Mr. Benjamin S. Bryan
Mr. Christopher Desa
Mr. Fred N. Beason, Jr.
Mr. Robert S. Creech, III
Mr. Joseph Cetti
Mr. James Blackburn
Mr. James Pannell

Environmental Affairs
Bin 10221
241 Ralph McGill Boulevard NE
Atlanta, Georgia 30308-3374
Tel 404.506.7063

GEORGIA POWER
A SOUTHERN COMPANY

Via Electronic Mail

January 25, 2011

Mr. William Bailey
Attn: PD, US Army Corps of Engineers, Savannah District
100 West Oglethorpe Avenue
Savannah, Georgia 31401-3640

Re: Comments of Georgia Power Company on the Draft General Re-evaluation Report (GRR) and the Draft Tier II Environmental Impact Statement (EIS) for the Savannah Harbor Expansion Project

Dear Mr. Bailey:

Georgia Power Company ("Georgia Power" or the "Company") appreciates the opportunity to comment on the above-referenced EIS and GRR. Based on our review of these documents, the Savannah District U.S. Army Corps of Engineers (the "Corps") has conducted an extensive examination of the proposed project, its alternatives, affected environment, environmental impacts (direct and cumulative), and economic impacts. Importantly, we believe the EIS and GRR contain a reasonably thorough discussion of the significant aspects of the probable environmental consequences of the proposed project. In addition, the Corps has proposed adequate mitigation measures where needed. Based on the Corps' examination of the proposed project's environmental and economic impacts and the Corps' proposed mitigation plan, the Corps has satisfied the requirements of the National Environmental Policy Act ("NEPA"), as well as the Water Resources Development Act of 1999 ("WRDA"). Accordingly, the Company supports the Savannah Harbor Expansion Project.

Below, Georgia Power discusses the Corps' compliance with NEPA and WRDA, and provides some supporting comments highlighting the public participation aspect of the process and certain environmental issues. In a separate letter, the Company addresses the significance of the proposed project to Georgia's economy.

A. NEPA and WRDA Compliance

The two primary legal authorities driving the development of the EIS and the GRR are NEPA and WRDA. NEPA requires the responsible federal agency to prepare an environmental impact statement for major federal actions significantly affecting the quality of the human environment. An environmental impact statement is expected to "provide full and fair discussion of significant environmental impacts and shall inform decision makers and the public of the reasonable alternatives which avoid or minimize adverse impacts or enhance the quality of the human environment." See 40 C.F.R. §1502.1. In carrying out this mandate, courts have characterized this

obligation as requiring a reasonably thorough discussion of the significant aspects of the probable environmental consequences of a particular project. Stated another way, the federal agency preparing the EIS must take a "hard look" at the potential environmental consequences of the proposed action. The EIS and GRR together assemble the information and analysis required by NEPA.

In 1999, under the WRDA, Congress conditionally authorized deepening the Savannah Harbor Navigation Project to a maximum controlling depth of 48 feet within the river channel contingent upon the completion of a GRR and a Tier II EIS, a mitigation plan, and an incremental analysis of the channel depths from 42 to 48 feet. The above-referenced GRR and the accompanying Tier II EIS have been developed to fulfill the conditions of the conditional authorization Congress granted. Together, the GRR and EIS provide documentation of the analyses conducted in developing a recommended plan for navigation improvement and environmental mitigation, including an assessment of mitigation plans for alternative channel depths. Thus, the Corps has met its NEPA and WRDA obligations.

While the EIS and the GRR address numerous issues, below Georgia Power provides specific comments regarding the public participation process and certain environmental issues to highlight, by way of examples, the comprehensive effort the Corps has undertaken regarding the proposed project.

B. <u>Public Involvement</u>

Georgia Power applauds the extensive public input that the Corps facilitated throughout the process of developing the EIS and the GRR. In addition to the other federal agencies involved in the proposed project, the Corps coordinated with numerous state and local agencies, interested and affected groups, and individuals. The Corps consulted with state and local agencies such as the South Carolina Department of Health and Environmental Control, the Georgia Department of Natural Resources (DNR) Coastal Resources Division, Georgia DNR Wildlife Resources Division, Georgia DNR Environmental Protection Division, and the City of Savannah throughout the process and in preparation of the environmental analyses.

Furthermore, a Stakeholder Evaluation Group (SEG), which includes concerned members of the general public and agency officials, was also formed specifically to provide input to help the process. The first SEG meeting occurred on January 12, 1999. Since then, at least 65 SEG meetings have been held. SEG was instrumental in identifying potential environmental impacts, appropriate impact assessment tools and techniques, and mitigation measures.

In addition to SEG, the Corps used other methods to involve the public. On February 21, 2002, the Corps held a scoping meeting to discuss the project and seek input. The public has also been made aware of the project through the distribution of brochures and through discussion of the proposed project at various professional and community groups and public meetings. In the process of conducting numerous meetings and analyses spanning over a decade, the Corps responded to concerns from interested parties with additional studies and, with those concerns in mind, structured its proposed mitigation plan.

C. Environmental Issues

The Corps took the required "hard look" at the environmental impacts and potential mitigation actions related to the proposed project. By way of examples, the Corps closely examined the affected fisheries and protected species (including endangered shortnose sturgeon habitat, striped bass spawning and nursery areas), salinity with particular focus on its impact on wetlands, and levels of dissolved oxygen in the harbor. Furthermore, the EIS and GRR have been produced consistent with current regulatory policy in that they ensure that project-related adverse environmental impacts have been avoided or minimized to the extent practicable, and that remaining unavoidable significant adverse impacts are mitigated.

1. Fisheries and Protected Species

The Corps and involved agencies engaged in a substantial effort to conduct and coordinate evaluation of potential negative effects of the proposed project on striped bass habitat, state and federally-protected species and their habitats, and the federally-listed shortnose sturgeon. This effort resulted in plans to mitigate those potential effects. The Corps proposes to offset sturgeon lifecycle habitat impacts by restoring access to historic spawning areas. In addition, the Corps proposes to offset striped bass lifecycle habitat impacts by increasing annual stocking.

2. Wetlands Mitigation

The Corps followed standard practice for wetland mitigation planning by systematically considering avoidance of impacts, reduction of impacts, and finally replacement or compensation for unavoidable impacts. These impacts are largely related to salinity intrusion. As is standard practice, where unavoidable impacts must be mitigated, priority-ranked consideration was given to ways to mitigate by enhancement, creation, preservation, or compensation. The Corps' evaluation of ways to reduce wetlands impacts generated a broad range of direct and indirect conceptual mitigation actions.

3. Adequacy of the Wetland Mitigation Alternatives Analysis

The Corps demonstrated procedural and technical due diligence by following current regulatory standard operating procedures as steered by reviewing agencies, and consulting with stakeholders in an attempt to identify sites where freshwater wetlands could be restored, enhanced or created within the basin as in-kind mitigation. The EIS indicates that numerous means were taken to avoid and/or minimize adverse wetland impacts. The Corps' current wetland mitigation plan would result in an excess of wetland credits to be available as "advance mitigation" for the existing Savannah Harbor Navigation Project.

4. Adequacy of Dissolved Oxygen Analysis

Dissolved oxygen is a critical resource in the harbor that experiences low levels during the warm summer months. The states of Georgia and South Carolina are working cooperatively with the U.S. Environmental Protection Agency to implement a dissolved oxygen Total Maximum Daily Load. Dissolved oxygen studies previously conducted for the Savannah Harbor Ecosystem

Restoration Study were incorporated into the EIS. After examining numerous methods of improving oxygen levels in the Savannah Harbor, the Corps proposes flow-altering plans and oxygen injection as the most cost effective method for raising dissolved oxygen in the harbor.

D. Conclusion

The Company recognizes that the EIS and the GRR are the culmination of substantial iterative, collaborative efforts made by the Corps to conduct and coordinate evaluation of potential environmental effects from the proposed Savannah Harbor Expansion Project. Evaluations included that of various experts (such as wetlands, water quality, and fisheries experts) within the federal and state natural resource agencies and stakeholder organizations. Also, the EIS clearly shows that public involvement has been a major part of the process, and the collaborative effort to date produced the best information that could reasonably be developed to identify changes that could be expected from the proposed project. Impacts are either avoided or minimized to the maximum extent possible in the proposed action. Mitigation is proposed for unavoidable impacts to significant resources such as the loss of freshwater tidal marsh within the Savannah National Wildlife Refuge, reduced dissolved oxygen within the inner harbor, and loss of habitat for the shortnose sturgeon and striped bass. Georgia Power offers no objection to mitigation plans featured in the EIS and GRR.

As discussed above, the Corps has demonstrated the requisite "hard look" by performing exhaustive studies over numerous years, soliciting and accommodating input from stakeholders, and thoroughly re-analyzing areas of particular concern. In light of the Corps' comprehensive effort, Georgia Power supports the proposed project.

Sincerely,

Ronald Shipman

Ronald Shipman
Vice President Environmental Affairs

From: Tom & Helen Shantz
To: CESAS-PD, SAS
Subject: SAVANNAH HARBOR
Date: Tuesday, January 25, 2011 12:04:22 PM

AS A RESIDENT AT 3 BUCKTHORN LANE I APPROVE OF THE PLANNED EVSPANSION OF THE SAVANNAH HARBOR. TOM SHANTZ

From: Fred Beason
To: CESAS-PD, SAS
Subject: SHEP
Date: Tuesday, January 25, 2011 7:41:49 AM

I would like to support the Savannah Harbor Expansion. The improvements in the harbor improve safe passage of vessels. The increased draft provides for the continued ready deployment of military from our port, improved national and inter national economic competitiveness of our port!

All point to the expeditious implementation of these proposed depths of 48' MLLW

Regards,
Carole B. Beason
Carole@BottomLineEcho.com

Savannah
PORT TOURS

Mr. William Bailey
U.S. Army Corps of Engineers, Savannah District
100 West Oglethorpe Ave.
Savannah, Ga. 31401-3640

01/25/2011

Re: Harbor Deepening

Mr. Bailey,

As the owner of several businesses person and a lifelong resident of Savannah I wanted to put my two-cents in about the deepening (or lack of) project. I can draw some distinct parallels between the quality of the Savannah River now and what it used to be like. I can remember growing up and skiing in front of the Sugar Refinery and remembering how dirty the water was. We had industries dumping everything from process water from the Paper Mills (I retired from IP in 2000) to orange discharges from American Cyanamid which was orange in color. I point this out in how good we have become stewards of the river since the 60's and 70's before we started cleaning up the environment. I have a tour company and provide high end tours for business and professionals in the river. I am amazed how people are impressed by the river and its tributaries and also the high air quality that is maintained here. I say this because most industry here since that time has grown and still maintained an equal or even better quality of life for the residents of Savannah and Chatham County. I am not going to go into the details of the study or results. But I will say the study has passed all the criteria from environmental to a return on investment. This deepening is not just about GPA but many other terminals (Petroleum , Military ships, etc) that are located here that in the future may also take advantage of the deeper harbor to bring in ships that are more cost effective. I ask on behalf of myself and the other 300,000 Georgians that this port impacts and ask the Corps of Engineers to move ahead with this project. I also ask that it be put on a fast track in order to let Savannah's Port deliver the cost advantages that the GPA has spent time and money implementing in a timely manner. In closing I think we can do the deepening and still protect the environment.

There has to be a balance reached and I know that it can be done. Please don't hesitate in calling me should you have any questions regarding this or any other matters. Just do it!!!!!.

Regards,

Mikell F. Cates
www.savannahporttours.com
www.savannahportjournal.com
www.savannahcams.com
Savannah Yacht Enterprises, LLC.

Just do it!!!!!!!!!

From: michael pilgrimII
To: CESAS-PD, SAS
Subject: SAVANNAH HARBOR DEEPTH CHANGES
Date: Tuesday, January 25, 2011 9:06:22 AM

As a retired Trucker, I have realized the importance of making Savannah competitive in the import business. many containers are offloaded and sent to distribution companies here in savannah for breakdown and reshipping by truck to the ultimate end users throughout the usa and canada. if we do not deepen all aspects of our port/harbor accesses then we fail to continue to compete in this economic distribution process and allow other areas to flourish from the economic gain as we wither on the vine. With the project to enlarge the panama canal, we need to keep pace. new york and new jersey and deleware are 'keeping up with the joneses' and we should too. The ports in virginia have become the home port/base for several new businesses that are flourishing in this economy. when you read the packaging info, you can see which states/cities are doing their part in keeping their ports competitive. thank you for this opportunity to make my views known. mike pilgrim(retired trucker of 40 years over the road) i hauled meat and produce east and then hauled imports west.m

From: drhodes@gaports.com
To: CESAS-PD, SAS
Subject: Harbor deepening
Date: Tuesday, January 25, 2011 9:28:47 AM

Every corner of the state relies upon Georgia's deepwater ports. Imports and exports alike fuel small and large businesses and help make Georgia the transportation and logistics hub of the Southeast. Georgia's ports continue to maintain and create jobs as one of the state's strongest economic engines, fostering the development of virtually every industry. Even during periods of extreme economic and financial stress, Georgia's ports not only generate substantial economic impacts, adding jobs in the most challenging times experienced in several generations.

The Savannah Harbor Expansion Project not only will benefit Georgia, but it is also a project of national significance. With more than 1.1 million TEUs of containerized freight exported through the Port of Savannah, the GPA handled 12 percent of all U.S. containerized exports and 8.3 percent of the total U.S. containerized cargo volume for FY2010. The Port of Savannah's balanced export-to-import ratio promotes efficiency for its customers and has helped to drive economic recovery throughout the state of Georgia and the entire Southeast.

In order to more efficiently accommodate the larger vessels already calling on the U.S. East Coast, the Savannah Harbor Expansion Project **must deepen the river to 48 feet.** This project - one of the mot important and productive civil works projects in the country - will maintain and create jobs and commerce throughout the nation, while significantly reducing transportation costs for U.S. shippers.

As the Southeast's gateway to the world, Savannah's harbor must be able to accommodate larger vessels in order to more efficiently serve global commercial demands.

Debbie Rhodes
External Affairs
Georgia Ports Authority
(912) 964-3855 office
(912) 964-3921 fax

From: 3Groover18@aol.com
To: CESAS-PD, SAS
Subject: SAVANNAH RIVER DEEPENING
Date: Tuesday, January 25, 2011 10:51:13 PM

January 25, 2011

Mr. William Bailey
Attn: PD, US Army Corps of Engineers, Savannah District
100 West Oglethorpe Avenue
Savannah, GA 31401-3640

Re: Comments on USACE Draft Tier II Environmental Impact Statement and Draft General Reevaluation Report for improvements and continued maintenance of the Savannah Harbor Federal Navigation Project, Chatham County, GA and Jasper County, SC

Mr. Bailey:

I am writing as a concerned citizen on the deepening of the Savannah River to 48 feet. As a wife of a Savannah River Pilot, I have seen how the shipping industry affects Savannah and the entire southeast.

I have watch the ship traffic increase and the port flourish over the last 20 years. With this prosperity comes the concern of safety with the number and size of the vessels at the current river depth. Throughout these years, Savannah has grown into a respectable port and should pride itself with its business transactions and safety record. Without this deepening I'm afraid Savannah will lose its opportunity to stay competitive with the other ports in the southeast.

Thank you for the opportunity to participate in the opinions of this study.

Sincerely,

Jodi R. Groover

From: tanderson@hipage.com
To: CESAS-PD, SAS
Date: Tuesday, January 25, 2011 9:45:07 AM

Subject: Comment on the USCE proposed harbor deepening project

To Whom It May Concern:

I am a resident of Chatham County and the State of Georgia.

I would like to go on record as being strongly in favor of the proposed harbor deepening project to a depth of 48 feet.

Thank you,

Name: Tricia Anderson

From: Savpilot18@aol.com
To: CESAS-PD, SAS
Subject: SAVANNAH RIVER DEEPENING
Date: Tuesday, January 25, 2011 10:20:46 PM

January 25, 2011

Mr. William Bailey
Attn: PD, US Army Corps of Engineers, Savannah District
100 West Oglethorpe Avenue
Savannah, GA 31401-3640

Re: Comments on USACE Draft Tier II Environmental Impact Statement and Draft General Reevaluation Report for improvements and continued maintenance of the Savannah Harbor Federal Navigation Project, Chatham County, GA and Jasper County, SC

Mr. Bailey:

As Vice President of the Savannah Pilot Association and active River Pilot on the Savannah River, I support and encourage the deepening of the Savannah River to 48 feet as described in the Impact Study.

Deepening the river to 48 feet will greatly increase the safety for the next generation for ships on the horizon to a port that already prides itself with an incredible safety record. In fact I have had the opportunity to handle some of these vessels already. In my position, I have seen first hand what the impact of the Savannah River shipping commerce has had, not only on Georgia, but on the entire southeastern United States. The effect of this deepening will only enhance transit in and out of the Savannah River.

Sincerely,

Capt. J. Nicholas Groover

From: Kilduff, Melinda
To: CESAS-PD, SAS
Subject: Savannah Port Expansion
Date: Tuesday, January 25, 2011 5:11:06 PM

Dear Mr. Bailey,

I am writing to state, for the record, the importance of the Savannah Harbor Expansion Project to Carter's Inc.

Our company currently utilizes the Port of Savannah as a major east coast gateway for importing our products and provided adequate infrastructure is available, we plan to continue to grow our trade through the port for many years to come. However, the current -42 foot mean low water depth of the Savannah River is no longer sufficient to accommodate the post-Panamax vessels we rely on today to transport our goods. This deficiency will be more significant in the future as we expect larger containerships to be introduced by carriers serving the US east coast upon completion of the Panama Canal expansion.

As you know, the newer post-Panamax vessels offer greater economic and environmental efficiencies that make their use both a preference as well as a priority to older generation vessels. SHEP is critical to the continued cost-effectiveness of our business and our ability to create jobs and reduce costs to U.S. consumers. By being able to load more boxes on fewer ships, our transportation costs are significantly decreased. Furthermore, ready access to the newer larger vessels at the Port of Savannah will avoid the higher financial and environmental costs of trucking our products to/from ports that are further from our markets and distribution network."

It is imperative that the Savannah Harbor be deepened to -48 feet at mean low water and that this project is completed as quickly as possible. Our business and that of other United States exporters and importers, is depending on it.

Regards,

Melinda Kilduff

Melinda Kilduff

Carter's Inc.

Import Compliance Manager

770-389-6328

From: SANKARAN LAKSHMAN
To: CESAS-PD_SAS
Subject: SHEP Comment
Date: Tuesday, January 25, 2011 4:56:30 PM

It is important that the Savannah Harbor be expanded to 48 ft, as this expansion is vital to the growth, and success of Georgia, United States, and to maritime partners around the globe. The proposed project depth of 48 ft will improve safer navigation for deep draft vessels, and will allow vessels a deeper draft with an unconstrained transit. In addition, it will enhance the queuing of vessels, minimize impacts to deeper draft vessels, and with the realignment of the channel for passing areas will improve safer navigable transit for deep draft vessels.

The expansion is critical to all vessel traffic using the Savannah River, and by having 48 ft you allow for more hours in a tide window for vessel with more capacity to arrive and depart without causing delays to other vessels not tidally constrained and allows for safer conditions for pilotage, asset management, and vessel transit. The expansion will equally enhance and adequately support the vessel movements for two-way traffic in Savannah River.

The documents and information supports harbor expansion from the economics, the engineering, and evaluation to maintain and improve the environmental mitigation of the Savannah River, and it is clear that justification for 6 more feet speaks volumes to deepening this harbor to 48 feet.

Respectfully,

Capt. S. Lakshman
Colonial Marine Industries
Savannah, GA 31412
912 231 2273 W
912 313 1577 C

From: Clark, Hays
To: CESAS-PD, SAS
Subject: Savannah harbor Expansion Project
Date: Tuesday, January 25, 2011 4:15:40 PM

Good day Sir/Madam.

The port of Savannah must be prepared to handle the demand of global shipping once the Panama Canal Expansion is completed in 2014 at which time larger vessels will be calling east coast ports. Deepening of the Savannah harbor to 48' will certainly help maintain and create jobs and commerce throughout the region. The deepening will also provide more than $100 annually in net benefits per extensive study done by the US Corp of Engineers.

My vote is to please move forward with this project as soon as possible.

Hays Clark
Crescent Towing Savannah

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From: Mindy Klauss
To: CESAS-PD, SAS
Date: Tuesday, January 25, 2011 3:42:49 PM

Good morning,

I would like to communicate to you my support of the Savannah Harbor deepening project. I am certain that the deepening is instrumental in the growth of Savannah and the entire state of Georgia.

Thank you.

Mindy Klauss
Sales Manager
Hampton Inn and Suites Historic Savannah
201 Martin Luther King Jr. Blvd
Savannah, Ga 31401
Phone 912-721-1604
Fax 912-721-1610

mindy.klauss@hilton.com
www.hamptonsavannah.com

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From: smuirray33@comcast.net
To: CESAS-PD_SAS
Subject: Subject: Comment on the USCE proposed harbor deepening project
Date: Tuesday, January 25, 2011 3:17:56 PM

Subject: Comment on the USCE proposed harbor deepening project

To Whom It May Concern:

I am a resident of Chatham County and the State of Georgia.

I would like to go on record as being strongly in favor of the proposed harbor deepening project to a depth of 48 feet.

Thank you,

name: Stuart Murray

From: PTrickey@ymmc.yamaha-motor.com
To: CESAS-PD_SAS
Subject: Savannah Harbor Expansion
Date: Tuesday, January 25, 2011 2:26:38 PM

Mr. William Bailey
ATTN: PD, US Army Corps of Engineers, Savannah District
100 West Oglethorpe Avenue
Savannah, GA 31401-3640

Dear Mr. Bailey:

I want to make you aware of Yamaha's support for the Savannah Harbor Expansion Project (SHEP).

Yamaha Motor Manufacturing Corporation of America assembles and manufactures Personal Watercraft, All Terrain Vehicles and Golf Cars in its facility located in Newnan, Georgia. Yamaha operates a foreign trade sub-zone and combines imported components with domestic parts to produce finished goods that are in turn shipped all over the world. Yamaha has over 1,000 full time associates, and we hope to continue to grow our production as the economy continues its recovery (in 2007 we had 1,700 associates).

Yamaha brings in approx. 70% of its import cargo and exports 80% of its cargo through the port in Savannah. We transitioned from the west coast several years ago to take advantage of the reliable ocean cargo schedules compared with the fluxuations related to inland delivery from the west coast.

We are anxious to see the Savannah Port expand and grow in order to be able to cost effectively continue to serve the local manufacturing and distribution needs.

We are confident that proceeding with the Savannah Harbor Expansion Project is the right thing to do.

We are in full support of the SHEP and deepening the harbor from 42ft to 48ft.

Thank you for your kind attention.

Sincerely,

(signed) Philip W. Trickey

Yamaha Motor Manufacturing Corporation of America

Vice President - Finance and Administration

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<http://www.websense.com/>

From: Walter Barelka
To: CESAS-PD, SAS
Subject: SHEP Comments
Date: Tuesday, January 25, 2011 2:10:24 PM

Mr. Bailey,

The harbor deepening is vital to the economy of the Savannah area and has impact on the entire Southeast US. It sets the infrastructure for our country to maintain a strong export trade. This region is definitely on the map of the global economy. The harbor deepening is absolutely necessary to keep us in the forefront into the future.

Harbor deepening is a huge, complex undertaking, no matter how you measure it. This project can serve as a model for "how to do it right" ... to make the decisions to get the most benefits to the most citizens.

I wholeheartedly support SHEP.

Walter Barelka

1223 Ralph Rahn Rd

Rincon, GA 31326

From: Glenda Brown
To: CESAS-PD, SAS
Subject: RE: Savannah Harbor Expansion Project
Date: Tuesday, January 25, 2011 1:10:57 PM
Importance: High

This is written in support of The Savannah Harbor Expansion Project. It is the belief of our association this deepening to 48 feet is crucial to the future of our port and the state of Georgia. As you know, The Savannah River provides and supports numerous companies, manufacturers, transportation and thousands of jobs. This improvement will assure that the port of Savannah remains competitive in the future.

We also feel these improvements will provide a safer transit, with less restrictions, for the larger and deeper vessels to come. The post Panamax vessels have been coming to Savannah for several years, operating with limited drafts. The improvements will allow vessels to carry deeper drafts with less restrictions and also provide channel improvements for passing.

The Savannah Pilots have maintained one of the safest records in the country and it is our intention to maintain this safety record.

This will supplement our earlier comments in support of the Savannah Harbor Expansion Project

- **The members of the Savannah Pilots Association regularly handle 8500 TEU vesssels and 48' will allow for safe and adequate movement of these vessels.**
- **A depth of 48' will allow for improved maneuverability of vessels in the harbor.**
- **The Project will support 2 way traffic.**
- **Passing lanes are important to permit proper queuing of vessels.**
- **The entrance relocation is adequate; it supports 2 way traffic; and the entrance relocation was made with input from members of our Association.**

Thank you for your favorable consideration of our comments.

Tommy Browne

Master Pilot

Savannah Pilots Association
P.O. Box 9267
Savannah, Georgia 31412
(912) 236-0226
(912) 236-6571 fax

From: SUBU SUBRAMANIAM
To: CESAS-PD, SAS
Subject: Savnnah Harbor deepening
Date: Tuesday, January 25, 2011 12:30:42 PM

Sir,

The captioned harbor deepening is a "must-do" project and will have a positive impact all around the low country hinterland and on both sides of the river. Deepening the harbor will further enhance the port of Savannah's ability to efficiently cope with the modern trend in increased draft vessels. Dredging to deeper drafts is the only way to keep the maritime industry afloat in this region; failure to do so will only result in a similar fate such as that experienced by US Shipyards, who failed to modernize their equipment while third world countries raced past us.

JUST DO IT should be the motto!!

Thanks.

Subu Subramaniam
Technical Manager
Chatham Towing Company, Inc.
Cell: 912-313-6000

From: Hoag Pat
To: CESAS-PD, SAS
Subject: Support for the Savannah Harbor Expansion Project
Date: Tuesday, January 25, 2011 12:11:21 PM

Mr. William Bailey
ATTN: PD, US Army Corps of Engineers, Savannah District
100 West Oglethorpe Avenue
Savannah, GA 31401-3640

Dear Mr. Bailey,

I want to express my full support for the Savannah Harbor Expansion Project. Not only is it essential to deepen the river from 42 feet to 48 feet for the Port of Savannah to remain competitive once the Panama Canal expansion is complete in 2014 and larger ships begin calling the U.S. East Coast, it is vital to the economic health of the Coastal region, the entire state, and at a national level. My job is directly effected by SHEP, but so are those at the distribution centers in Atlanta and the exporters in Memphis. Without the deepening, ocean carriers simply won't call the Port of Savannah. Cargo will move through less efficient ports further from the population centers served by Savannah, increasing overall costs and pollution.

The infrastructure serving the Port of Savannah, two major interstate highways (I-16 and I-95) and two major class I railroads (CSX and Norfolk Southern) with intermodal container transfer facilities on-terminal, is one-of-a-kind. It is the largest single terminal container terminal in the U.S. The Port should not suffer from a lack of harbor depth. It is imperative Savannah Harbor Expansion Project be approved and completed in a timely manner.

Thank you for your consideration.

Best Regards,

Pat Hoag, Customer Service Manager
17 Park of Commerce Blvd., Ste.300, Savannah, GA 31405
Tel: 912-964-3106; **Fax:** 912-964-3158
hoag.pat@us.zim.com www.zim.com

ZIM GLOBAL REACH LOCAL TOUCH
Integrated Shipping Services LLC

From: Lee Grimes
To: CESAS-PD, SAS
Subject: Savannah Harbor Deepening
Date: Tuesday, January 25, 2011 12:06:06 PM

I urge the Corp to move forward with the deepening of the Savannah River harbor. The Port of Savannah is a tremendous economic driver for our region as well as the State of Georgia. Let's give it the tools to be competitive into the future.

Lee I. Grimes
Director, Established Business Initiatives
Savannah Economic Development Authority
P. O. Box 128
Savannah, GA 31402
912-447-9715 (direct)
912-447-8450 x16 (main line)
912-447-8455 (fax)
lgrimes@seda.org
For more information visit www.SEDA.org

From: SCOLLUM@gaports.com
To: CESAS-PD_SAS
Subject: Port of Savannah Harbor Deepening
Date: Tuesday, January 25, 2011 9:57:45 AM

To Whom it may Concern,

I have been an employee of the Georgia Ports Authority for almost 39 years. I have seen it grow from a one container crane port to what it is now. Along the way we have had to make many changes to grow the way we have. It is absolutely crucial that the Port of Savannah's river be deepened to the 48 feet needed to accommodate the super post panamax vessels that are being built and are presently calling ports around the globe. What we have is many different shipping lines that own many different sized vessels. When these lines negotiate contracts with the choice ports of call, they negotiate their rates based on volumes. The more volume, the better rates they are able to get. If Savannah is to remain competitive with other ports on the east coast, it must be able to accommodate the line's largest vessels. If we can't accommodate the biggest vessels, they will surely take the larger and smaller ones else-where. There are many jobs throughout the state that depend on the volumes generated by the Port of Savannah. These jobs include fork-lift drivers, crane operators, brokers, sales people, truck drivers, and rail employees. The list goes on and on. It is imperative that this project moves on as all of Georgia has something at stake and will benefit long term.

Thanks for Your Time,

Steve Collum

Steve Collum
Manager, Crane Operations
Georgia Ports Authority
Phone 912.963.6911
Fax 912.963.6912
Cell 912.658.4205

From: bnhusk@gmail.com on behalf of Brian Huskey
To: CESAS-PD, SAS
Subject: Savannah River Project
Date: Tuesday, January 25, 2011 10:14:58 AM

I am a business owner on the corner of Bay St and Habersham. We are supporting the deeping project because we are in business for the long term and desire Savannah and the Coastal Empire to grow. We are excited to have Savannah as a cruise ship destination and want to see the economic impact of the deeping project by elevating our port to facilitate the larger ships. This seems to be a vital move for our city along with the South East part of the country.

--
Brian Huskey
B Matthews Eatery
Blowin Smoke BBQ
912-655-5749

From: Mary Kathryn Farrahar
To: CESAS-PD, SAS
Subject: Harbor Deepening
Date: Tuesday, January 25, 2011 11:16:32 AM

Subject: Comment on the USCE proposed harbor deepening project

To Whom It May Concern:

I am a resident and a business owner in Chatham County and the State of Georgia.

I would like to go on record as being strongly in favor of the proposed harbor deepening project to a depth of 48 feet.

Thank you.

Mary Kathryn Farrahar

And The Dan J. Sheehan Company

Mary Kathryn Farrahar
DAN J. SHEEHAN COMPANY
SPECIALTY CONTRACTORS
912.236.4423
800.297.1996
912.234.8310 F
912.547.5429 Cell

From: Brynn Grant
To: CESAS-PD, SAS
Subject: SHEP Support
Date: Tuesday, January 25, 2011 11:30:52 AM
Importance: High

We must deepen the Savannah harbor. There will be impacts that will require responses but none greater than the impact of NOT deepening the port. We must do this for the greater good of the entire Southeastern region of the US.

Brynn Grant

From: BOB AND MARIE KRAFT
To: CESAS-PD, SAS
Subject: Savannah River Depth
Date: Wednesday, January 26, 2011 12:35:48 AM

We support the 48 ft depth project which is vital to the future economic development of our area and to Georgia and South Carolina.
Robert E. Kraft & Marie E. Kraft
11 Gray Heron Retreat
Savannah, GA 31411

From: Edwin McCuen
To: CESAS-PD, SAS
Subject: Savannah Harbor Deepening
Date: Wednesday, January 26, 2011 12:26:05 AM

Sir, this is just a brief message to relay my full support of the deepening of the Savannah harbor. I feel this project is vital to the economic viability of not only Georgia, but the entire southeast. Furthermore, as an avid outdoorsman in the Savannah area I am aware of the potential enviromental side consequences of this project. However; I feel the financial consequences in this fragile economic enviroment have to override those concerns.

Sincerely,

Edwin J. McCuen, Jr.

From: ldowd804@comcast.net
To: CESAS-PD, SAS
Subject: Savannah Port Expansion
Date: Thursday, May 05, 2011 7:51:07 AM

To Whom It May Concern,

My name is Leslie M. Belin. I teach at West Chatham Elementary. As a teacher in Pooler, Georgia, I have been directly affected by the lost tax revenue in our state. Our local school system is facing an $12-$13M shortfall this year. So far, this means the loss of up to 100 teaching jobs in Chatham, and at least 3 furlough days for the remaining teachers who haven't had raises of any kind for the last 3 years. Sadly, our insurance continues to rise, and Governor Deal has instituted another change in insurance that will cause it to rise another 20% next year. Unfortunately, I am also a casualty of the state's failure to follow through with funding of Georgia's Pre-K Program. Our program was once a leader in the country, but Georgia evidentally does not take education as seriously as the rest of the country. I went to New York in 2003, and I was told they thought I was coming to visit barefoot, in overalls, and chewing hayseed. That is the kind of reputation Georgia has in the eyes of the rest of the country. The saddest part of that is if the cuts continue, we could very well be left without very many options, and our children will be so uneducated they won't be far from that very image. How can the state continue to cut education and expect to ever recover?

Our profession has taken a beating, and I am sick of it. Not only do I have to watch the quality of education continue to get worse as the years go by with increased class sizes, very little money for classroom supplies, and a general lack of caring by teachers who are tired of politicians thinking they should teach out of the kindness of their hearts, but I also have very little say in financial decisions that directly affect me and my family. Last night, my husband, Josh, brought to my attention that there just might be a way out of this hopeless situation. My husband has been saying things here and there about the deepening of the ports, all along. He reads the newspaper and shouts random things about the articles he reads concerning issues that are holding up the progress. I've been trying to persuade him to write to the newspaper if he believes in the importance of the deepening so passionately, to no avail. I believed in the expansion, but really never took the time to educate myself on the importance the deepening means to our state. Last night, during the news story pertaining to the teacher cuts, he said, "That is one more reason they should expand the ports! It will increase state and local tax revenue, which will hopefully help to improve the education shortfalls in Georgia." I always knew he was smart, I had no idea he was a genius! Now, I have a reason to write!

I will continue to educate myself with the project, but I truly believe that the deepening is the only project big enough to improve the economy in Georgia. I need the economy to improve. I have 3 children, whom I am not able to afford private school for them to attend, but if the education system continues it's downward spiral, I won't be able to afford not to send them. Please know that I have many more reasons the state is in desperate need for this expansion, but a limited time in which to write. I hope that Georgia will not take this magnificent opportunity to help dig itself out of this massive economic hole and allow it to fizzle out like it's done with it's once shining Pre-K Program.

Sincerely,

Leslie M. Belin

#611

careerbuilder.com®

William Bailey
US Army Corp of Engineers, Savannah District
Attn: PD
100 West Oglethorpe Avenue
Savannah, GA 31401

Dear Mr. Bailey,

I am writing in support of the Savannah Harbor Expansion Project and the deepening of the Savannah Harbor by the required 48 feet. Not only will the project provide a much needed expansion of the Harbor, but will also provide many needed jobs in the state and region in the immediate timeframe. Additionally, the potential increase of as much as 25% of current trade flows will help grow the regions employment base through organic job growth, as well as provide a significant incentive to global companies who are viewing the state and region for potential future operations.

As an added benefit to the region, by creating a more robust port in the southeast region our heavy dependence on ground transportation may be alleviated by the anticipated upgrades to rail and air trade flows from the port. This will not only improve our economic outlook but our quality of life with potentially fewer trucks on the ground to transport large amounts of goods across the region.

I look forward to your decision in support of proceeding with the Savannah Harbor Expansion Project.

Regards,

Dan Latka

5550-A Peachtree Parkway, Suite 200, Norcross, GA 30092 Phone: 770.349.2400 | Fax: 770.576.3098

careerbuilder.com®

William Bailey
US Army Corp of Engineers, Savannah District
Attn: PD
100 West Oglethorpe Avenue
Savannah, GA 31401

Dear Mr. Bailey,

I am writing in support of the Savannah Harbor Expansion Project and the deepening of the Savannah Harbor by the required 48 feet. Not only will the project provide a much needed expansion of the Harbor, but will also provide many needed jobs in the state and region in the immediate timeframe. Additionally, the potential increase of as much as 25% of current trade flows will help grow the regions employment base through organic job growth, as well as provide a significant incentive to global companies who are viewing the state and region for potential future operations.

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I look forward to your decision in support of proceeding with the Savannah Harbor Expansion Project.

Regards,

Jim Goff

5550-A Peachtree Parkway, Suite 200, Norcross, GA 30092 Phone: 770.349.2400 Fax: 770.576.3098

#611

careerbuilder.com®

William Bailey
US Army Corp of Engineers, Savannah District
Attn: PD
100 West Oglethorpe Avenue
Savannah, GA 31401

Dear Mr. Bailey,

I am writing in support of the Savannah Harbor Expansion Project and the deepening of the Savannah Harbor by the required 48 feet. Not only will the project provide a much needed expansion of the Harbor, but will also provide many needed jobs in the state and region in the immediate timeframe. Additionally, the potential increase of as much as 25% of current trade flows will help grow the regions employment base through organic job growth, as well as provide a significant incentive to global companies who are viewing the state and region for potential future operations.

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I look forward to your decision in support of proceeding with the Savannah Harbor Expansion Project.

Regards,

Jim Johnston

5550-A Peachtree Parkway, Suite 200, Norcross, GA 30092 Phone: 770.349.2400 Fax: 770.576.3098

F211

careerbuilder.com®

William Bailey
US Army Corp of Engineers, Savannah District
Attn: PD
100 West Oglethorpe Avenue
Savannah, GA 31401

Dear Mr. Bailey,

I am writing in support of the Savannah Harbor Expansion Project and the deepening of the Savannah Harbor by the required 48 feet. Not only will the project provide a much needed expansion of the Harbor, but will also provide many needed jobs in the state and region in the immediate timeframe. Additionally, the potential increase of as much as 25% of current trade flows will help grow the regions employment base through organic job growth, as well as provide a significant incentive to global companies who are viewing the state and region for potential future operations.

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I look forward to your decision in support of proceeding with the Savannah Harbor Expansion Project.

Regards,

Kelsy Pofahl

5550-A Peachtree Parkway, Suite 200, Norcross, GA 30092 Phone: 770.349.2400 Fax: 770.576.3098

careerbuilder.com®

William Bailey
US Army Corp of Engineers, Savannah District
Attn: PD
100 West Oglethorpe Avenue
Savannah, GA 31401

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I look forward to your decision in support of proceeding with the Savannah Harbor Expansion Project.

Regards,

Craig Hoffmann

6550-A Peachtree Parkway, Suite 200, Norcross, GA 30092 Phone: 770.349.2400 Fax: 770.576.3098

#619

careerbuilder.com®

William Bailey
US Army Corp of Engineers, Savannah District
Attn: PD
100 West Oglethorpe Avenue
Savannah, GA 31401

Dear Mr. Bailey,

I am writing in support of the Savannah Harbor Expansion Project and the deepening of the Savannah Harbor by the required 48 feet. Not only will the project provide a much needed expansion of the Harbor, but will also provide many needed jobs in the state and region in the immediate timeframe. Additionally, the potential increase of as much as 25% of current trade flows will help grow the regions employment base through organic job growth, as well as provide a significant incentive to global companies who are viewing the state and region for potential future operations.

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I look forward to your decision in support of proceeding with the Savannah Harbor Expansion Project.

Regards,

Timothy Engram

5550-A Peachtree Parkway, Suite 200, Norcross, GA 30092 Phone: 770.349.2400 Fax: 770.576.3098

#820

careerbuilder.com®

William Bailey
US Army Corp of Engineers, Savannah District
Attn: PD
100 West Oglethorpe Avenue
Savannah, GA 31401

Dear Mr. Bailey,

I am writing in support of the Savannah Harbor Expansion Project and the deepening of the Savannah Harbor by the required 48 feet. Not only will the project provide a much needed expansion of the Harbor, but will also provide many needed jobs in the state and region in the immediate timeframe. Additionally, the potential increase of as much as 25% of current trade flows will help grow the regions employment base through organic job growth, as well as provide a significant incentive to global companies who are viewing the state and region for potential future operations.

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I look forward to your decision in support of proceeding with the Savannah Harbor Expansion Project.

Regards,

Lauren Rancilio

5550-A Peachtree Parkway, Suite 200, Norcross, GA 30092 Phone: 770.349.2400 Fax: 770.576.3098

careerbuilder.com®

William Bailey
US Army Corp of Engineers, Savannah District
Attn: PD
100 West Oglethorpe Avenue
Savannah, GA 31401

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I look forward to your decision in support of proceeding with the Savannah Harbor Expansion Project.

Regards,

Sarah Whittaker

Sarah Whittaker

5550-A Peachtree Parkway, Suite 200, Norcross, GA 30092 Phone: 770.349.2400 Fax: 770.576.3098

#911

careerbuilder.com®

William Bailey
US Army Corp of Engineers, Savannah District
Attn: PD
100 West Oglethorpe Avenue
Savannah, GA 31401

Dear Mr. Bailey,

I am writing in support of the Savannah Harbor Expansion Project and the deepening of the Savannah Harbor by the required 48 feet. Not only will the project provide a much needed expansion of the Harbor, but will also provide many needed jobs in the state and region in the immediate timeframe. Additionally, the potential increase of as much as 25% of current trade flows will help grow the regions employment base through organic job growth, as well as provide a significant incentive to global companies who are viewing the state and region for potential future operations.

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I look forward to your decision in support of proceeding with the Savannah Harbor Expansion Project.

Regards,

Patty Urban

5550-A Peachtree Parkway, Suite 200, Norcross, GA 30092 Phone: 770.349.2400 Fax: 770.576.3098

#865

careerbuilder.com®

William Bailey
US Army Corp of Engineers, Savannah District
Attn: PD
100 West Oglethorpe Avenue
Savannah, GA 31401

Dear Mr. Bailey,

I am writing in support of the Savannah Harbor Expansion Project and the deepening of the Savannah Harbor by the required 48 feet. Not only will the project provide a much needed expansion of the Harbor, but will also provide many needed jobs in the state and region in the immediate timeframe. Additionally, the potential increase of as much as 25% of current trade flows will help grow the regions employment base through organic job growth, as well as provide a significant incentive to global companies who are viewing the state and region for potential future operations.

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I look forward to your decision in support of proceeding with the Savannah Harbor Expansion Project.

Regards,

Frank Holt

Frank Holt

5550-A Peachtree Parkway, Suite 200, Norcross, GA 30092 Phone: 770.349.2400 Fax: 770.576.3098

#204

careerbuilder.com®

William Bailey
US Army Corp of Engineers, Savannah District
Attn: PD
100 West Oglethorpe Avenue
Savannah, GA 31401

Dear Mr. Bailey,

I am writing in support of the Savannah Harbor Expansion Project and the deepening of the Savannah Harbor by the required 48 feet. Not only will the project provide a much needed expansion of the Harbor, but will also provide many needed jobs in the state and region in the immediate timeframe. Additionally, the potential increase of as much as 25% of current trade flows will help grow the regions employment base through organic job growth, as well as provide a significant incentive to global companies who are viewing the state and region for potential future operations.

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I look forward to your decision in support of proceeding with the Savannah Harbor Expansion Project.

Regards,

Dustin Dolatowski

5550-A Peachtree Parkway, Suite 200, Norcross, GA 30092 Phone: 770.349.2400 Fax: 770.576.3098

careerbuilder.com®

William Bailey
US Army Corp of Engineers, Savannah District
Attn: PD
100 West Oglethorpe Avenue
Savannah, GA 31401

Dear Mr. Bailey,

I am writing in support of the Savannah Harbor Expansion Project and the deepening of the Savannah Harbor by the required 48 feet. Not only will the project provide a much needed expansion of the Harbor, but will also provide many needed jobs in the state and region in the immediate timeframe. Additionally, the potential increase of as much as 25% of current trade flows will help grow the regions employment base through organic job growth, as well as provide a significant incentive to global companies who are viewing the state and region for potential future operations.

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I look forward to your decision in support of proceeding with the Savannah Harbor Expansion Project.

Regards,

Jon Friesen

5550-A Peachtree Parkway, Suite 200, Norcross, GA 30092 Phone: 770.349.2400 Fax: 770.576.3098

#97L

careerbuilder.com®

William Bailey
US Army Corp of Engineers, Savannah District
Attn: PD
100 West Oglethorpe Avenue
Savannah, GA 31401

Dear Mr. Bailey,

I am writing in support of the Savannah Harbor Expansion Project and the deepening of the Savannah Harbor by the required 48 feet. Not only will the project provide a much needed expansion of the Harbor, but will also provide many needed jobs in the state and region in the immediate timeframe. Additionally, the potential increase of as much as 25% of current trade flows will help grow the regions employment base through organic job growth, as well as provide a significant incentive to global companies who are viewing the state and region for potential future operations.

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I look forward to your decision in support of proceeding with the Savannah Harbor Expansion Project.

Regards,

Earl Austin

5680-A Peachtree Parkway, Suite 200, Norcross, GA 30092 Phone: 770.349.2400 Fax: 770.576.3098

#7

careerbuilder.com®

William Bailey
US Army Corp of Engineers, Savannah District
Attn: PD
100 West Oglethorpe Avenue
Savannah, GA 31401

Dear Mr. Bailey,

I am writing in support of the Savannah Harbor Expansion Project and the deepening of the Savannah Harbor by the required 48 feet. Not only will the project provide a much needed expansion of the Harbor, but will also provide many needed jobs in the state and region in the immediate timeframe. Additionally, the potential increase of as much as 25% of current trade flows will help grow the regions employment base through organic job growth, as well as provide a significant incentive to global companies who are viewing the state and region for potential future operations.

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I look forward to your decision in support of proceeding with the Savannah Harbor Expansion Project.

Regards,

Jason Lucking

5550-A Peachtree Parkway, Suite 200, Norcross, GA 30092 Phone: 770.349.2400 Fax: 770.576.3098

TARGET

January 31, 2011

Mr. William Bailey
US Army Corps of Engineers - Savannah District
100 West Oglethorpe Avenue
Savannah, Georgia 31401-3640
Via e-mail: CESAS-PD@usace.army.mil

Dear Mr. Bailey:
I am writing on behalf of Target Corporation to express our support for the Savannah Harbor Expansion Project (SHEP).

The Port of Savannah is a major gateway for our products. Target utilizes the port for importing product and employs approximately 250 people who work in relation to movement of our containers from the port, as well as operating an Import Warehouse. In addition, Target has a Distribution Center within 50 miles of the Port in Midway, Georgia.

Target supports the deepening project as the current -42 foot mean low water depth of the Savannah River is no longer sufficient to accommodate the post-Panamax vessels that we rely on today to transport goods. The newer post-Panamax vessels offer greater economic and environmental efficiencies that make their use both a preference as well as a priority to older generation vessels. SHEP is critical to the continued cost-effectiveness of our business. Ready access to the newer larger vessels will avoid the higher financial and environmental costs of trucking our products to and from ports that are further from our markets and distribution network.

Target is committed to the communities where our guests and team members live and work. We are also mindful of the potential impact increased goods movement could have in our communities. Target was one of the founding members of the Coalition for Responsible Transportation, a clean trucking initiative which seeks to lessen the environmental impact by using low emitting and fuel efficient drayage trucks for goods movement surrounding the ports. Several ports have adopted this program across the nation and we shared these success stories with the Port of Savannah. We are hopeful these types of efforts will complement expansion.

In closing, I want to reiterate Target Corporation's support for the deepening of the Savannah Harbor. Thank you for your consideration.
Sincerely,

Rick Gabrielson
Director of Import Transportation

33 South 6th Street, Minneapolis, MN, 55402

#1122

MACTEC

engineering and constructing a better tomorrow

ALLEN KIBLER
President

January 21, 2011

Mr. William Bailey
ATTN: PD, US Army Corps of Engineers, Savannah District
100 West Oglethorpe Avenue
Savannah, GA 31401-3640

Dear Mr. Bailey,

On behalf of my company and its employees, I am hereby submitting my support of the proposed deepening of the Savannah Harbor.

By increasing the Savannah River's channel depth to 48 feet, the Savannah Harbor Expansion Project (SHEP) will provide U.S. exporters and importers the infrastructure required to efficiently accommodate global commercial demands. The SHEP will allow access to the new generation of larger container vessels, using the expanded Panama Canal beginning in 2014. In turn, this will provide my company and others cost savings and efficiencies in ocean commerce that are essential to create new jobs for the American people. This is an important national priority because the Port of Savannah serves more than 44 percent of the U.S. population and is the fastest growing container port in the nation and the second largest on the East Coast. Furthermore, Savannah handles 12 percent of all U.S. containerized exports.

In this challenging economic environment, it is important for our government to make the investments required to support job growth in the United States. With a nearly 5-to-1 benefit-to-cost ratio, America cannot afford to pass up the opportunity for economic growth created by this important project.

Again, I appreciate your time and efforts towards the successful completion of this nationally significant project.

Sincerely,
MACTEC Engineering and Consulting, Inc.

J. Allen Kibler, Jr.
President

MACTEC Engineering and Consulting, Inc.
1105 Lakewood Parkway, Suite 300 • Alpharetta, GA 30004 • Phone: 770.360.0743 • Fax: 866.334.4383
www.mactec.com

#1123

GEORGIA MINING ASSOCIATION

Dear Mr. Bailey,

On behalf of my company and its employees, I am hereby submitting my support of the proposed deepening of the Savannah Harbor.

By increasing the Savannah River's channel depth to 48 feet, the Savannah Harbor Expansion Project (SHEP) will provide U.S. exporters and importers the infrastructure required to efficiently accommodate global commercial demands. The SHEP will allow access to the new generation of larger container vessels, using the expanded Panama Canal beginning in 2014. In turn, this will provide my company and others cost savings and efficiencies in ocean commerce that are essential to create new jobs for the American people. This is an important national priority because the Port of Savannah serves more than 44 percent of the U.S. population and is the fastest growing container port in the nation and the second largest on the East Coast. Furthermore, Savannah handles 12 percent of all U.S. containerized exports.

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Again, I appreciate your time and efforts towards the successful completion of this nationally significant project.

Sincerely,

Executive Vice Pres

113 Arkwright Landing • Macon, Georgia 31210 • (478) 757-1211 • FAX (478) 757-1949
http://www.georgiamining.org • E-mail: info@georgiamining.org

#1150

DOLLAR TREE

DOLLAR TREE STORES, INC.

February 11, 2011

Mr. William Bailey
US Army Corps of Engineers - Savannah District
100 West Oglethorpe Avenue
Savannah, Georgia 31401-3640

Dear Mr. Bailey,

This letter is written in support of the Savannah Harbor Expansion Project. The expansion of the harbor draft from 42' to 48' would have a very positive long term impact on Dollar Tree's business and our continued success in Savannah.

Dollar Tree currently utilizes the Port of Savannah as one of three east coast gateways for importing products. We recently made a decision to expand our existing Savannah distribution center from 603,000 square feet to 1,013,000 square feet. This expansion will increase the number of ocean containers and associate staffing at the Dollar Tree Savannah facility. For reference, below are expected growth numbers for our Savannah operation.

Ocean Containers

Year	2010	2011	2012	2013	2014
20' Containers	8,000	9,200	10,580	12,168	13,992

Associates

Year	2010	2011	2012	2013
Associate Count	247	283	302	315

The current 42 foot mean low water depth of the Savannah River is a long term concern to Dollar Tree. Once the Panama Canal expansion is completed, the 42 foot draft will not support the post-Panamax vessels. Larger containerships will eventually be introduced into this trade lane and if the Port of Savannah is not able to physically accommodate the larger vessels, ocean carriers might opt to skip the Port of Savannah. This would limit Dollar Tree's service options and potentially deter future growth.

CORPORATE HEADQUARTERS
500 Volvo Parkway Chesapeake, Virginia 23320 Tel 757-321-5000 Fax 757-321-5203 www.dollartree.com
Celebrating 20 Years 1986 - 2006

Again, Dollar Tree supports the Savannah Harbor 48 foot draft project. This expansion would ensure that Dollar Tree remains competitive and we encourage the immediate approval of this project. The Savannah Harbor expansion needs to be completed as soon as possible to be in position to leverage the future larger vessel rotations as a result of the Panama Canal expansion.

Sincerely,

Stephen White
Chief Logistics Officer
Dollar Tree, Inc.

JACKSON
ELECTRIC MEMBERSHIP CORPORATION

P.O. Box 38 • Jefferson, GA • 30549-0038

(706) 367-5281
(706) 367-6102 Fax
www.jacksonemc.com

February 23, 2011

Mr. William Bailey
ATTN: PD, US Army Corps of Engineers, Savannah District
100 West Oglethorpe Avenue
Savannah, GA 31401-3640

Dear Mr. Bailey:

On behalf of my company and its employees, I am hereby submitting my support of the proposed deepening of the Savannah Harbor.

By increasing the Savannah River's channel depth to 48 feet, the Savannah Harbor Expansion Project (SHEP) will provide U.S. exporters and importers the infrastructure required to efficiently accommodate global commercial demands. The SHEP will allow access to the new generation of larger container vessels, using the expanded Panama Canal beginning in 2014. In turn, this will provide many customers of Jackson Electric Membership Corporation and others cost savings and efficiencies in ocean commerce that are essential to creating new jobs for the American people. This is an important national priority because the Port of Savannah serves more than 44 percent of the U.S. population and is the fastest growing container port in the nation and the second largest on the East Coast. Furthermore, Savannah handles 12 percent of all U.S. containerized exports.

In this challenging economic environment, it is important for our government to make the investments required to support job growth in the United States. With a nearly five-to-one benefit-to-cost ratio, America cannot afford to pass up the opportunity for economic growth created by this important project.

Again, I appreciate your time and efforts towards the successful completion of this nationally significant project.

Sincerely,

Randall Pugh
President/CEO

Requests for an extension to the comment period for the Savannah Harbor Expansion Project Draft EIS and GRR were received from the following:

- **Attorney General of South Carolina**
- **South Carolina Department of Health and Environmental Control**
- **South Carolina Department of Health and Environmental Control – Office of Coastal Resource Management**
- **South Carolina Department of Natural Resources**
- **The Senate of South Carolina Transportation Committee, Review and Oversight on the South Carolina State Ports Authority**
- **The Senate of South Carolina Agriculture and Natural Resource Committee**
- **Office of the Jasper County Administrator**
- **Charleston Metro Chamber of Commerce**
- **Savannah River Maritime Commission**
- **Georgia Department of Natural Resources, Coastal Resources Division**
- **Georgia Chapter of the Sierra Club**
- **The Georgia Conservancy**
- **Southern Environmental Law Center**
- **United States Department of the Interior**
- **Keck School of Medicine, University of Southern California**
- **Savannah Riverkeeper**
- **Harambee House**

Response: The public notice announcing the availability of the Draft Environmental Impact Statement (EIS) and the General Reevaluation Report (GRR) for the Savannah Harbor Expansion Project (SHEP) was published on November 17, 2010. As required by the National Environmental Policy Act, a 45-day review period was provided with the comment-due date set at December 30, 2010. However, the District received numerous requests for a time extension. Most requests were based on the amount/complexity of material involved, together with difficulties in reviewing the EIS over the Christmas and New Year's holidays. In response, the District Commander extended the public comment period until January 25, 2011. The District received some comments after the end of the extended comment period. They were accepted for several months and considered in the Final EIS preparation.

#20 DE
PD
Y: DE
DP
DX
PW-C

HENRY MCMASTER
ATTORNEY GENERAL

December 10, 2010

Jeffery M. Hall, Colonel, US Army, Commanding
US Army Corps of Engineers, Savannah District
100 West Oglethorpe Avenue
Savannah, Georgia, 31401

Re: Duration of Comment Period, SHEP

Dear Colonel Hall:

The purpose of this letter is to request that the Corps of Engineers extend the comment period for the Savannah Harbor Expansion Project Draft Environmental Impact Statement from 45 days to 120 days.

This extension is requested for the following reasons:

1. This is an extremely complex project with significant implications for Southeastern South Carolina and the State as a whole. It will directly affect lands and waters of the State and it is imperative that South Carolina have the opportunity to adequately evaluate and consider its implications. Given this complexity and the sheer volume of the documents that must be reviewed, 45 days is not sufficient time to complete the needed evaluations.

2. This DEIS is being released during the Holiday Season. During the 45 days from the middle of November to the end of December, nearly three weeks are effectively lost because of legal holidays and staff vacations. The 45 day period is thus reduced to a practical 30 days.

REMBERT C. DENNIS BUILDING · POST OFFICE BOX 11549 · COLUMBIA, S.C. 29211-1549 · TELEPHONE: 803-734-3970 · FACSIMILE: 803-253-6283

3. This project and its DEIS has been under development by the Corps and the Georgia State Ports Authority for nearly ten years. The documentation resulting from numerous ancillary studies and investigations is voluminous and can only be thoroughly reviewed by extending the comment period significantly.

I appreciate your consideration of this important request.

Very truly yours,

Henry McMaster

cc: William D. "Dean" Moss, Jr., Chairman

HMCM:tph

BOARD:
Paul C. Aughtry, III
Chairman
Edwin H. Cooper, III
Vice Chairman
Steven G. Kisner
Secretary

D H E C
PROMOTE PROTECT PROSPER
C. Earl Hunter, Commissioner
Promoting and protecting the health of the public and the environment

#18

BOARD:
Henry C. Sanz
M. David Mitchell, MD
Glenn A. McCall
Coleman F. Buckhouse, MD

~~DE~~
PD
DE
LP
DX

December 3, 2010

Jeffrey M. Hall, Colonel, US Army, Commanding
US Army Corps of Engineers, Savannah District
100 West Oglethorpe Avenue
Savannah, Georgia 31401

Dear Colonel Hall:

The South Carolina Department of Health and Environmental Control (Department) is in receipt of the Joint Public Notice issued by the Savannah District on November 15, 2010, regarding the Notice of Availability of the Draft Environmental Impact Statement for the improvements and continued maintenance of the Savannah Harbor Federal Navigational Project. This notice announces that authorization is required from the Department in accordance with the South Carolina Coastal Zone Management Program and Section 401 of the Clean Water Act. The notice further provides for comment periods of 45 days for individuals interested in commenting on the Coastal Zone Management Consistency Certification and 60 days for commenting on the 401 Water Quality Certification respectively. It is also understood based on your November 4, 2010 letter to the Department, that these certifications will be required from the Department at the end of these public comment periods.

As the Department explained in our prior correspondence of September 29, 2010, this is an extremely complex project with significant implications for the State of South Carolina and we do not believe that this short period of time will allow us adequate time to receive public comment and review the application and all supporting documents. As you are aware, Section 401 of the Clean Water Act allows the State a reasonable period of time not to exceed one year to act upon an application for a 401 Water Quality Certification and the Department has determined that one full year is needed. Furthermore, the Federal Coastal Zone Management Act in 930.41(a) allows for 60 days for State concurrence and an additional 15 days pursuant to 930.41(b) if requested by the State in writing. Please take this letter as the Department's formal request under 930.41(b) for additional time to review this project. Furthermore, the Department has concerns about the appropriateness of a federal agency deeming an activity consistent with our Coastal Zone Management program based on a Draft EIS.

Please note that the Department would be required to deny these certifications if adequate time is not provided for complete review of this project.

Sincerely,

Earl Hunter

Earl Hunter, Commissioner
SC Department of Health and Environmental Control

CC: Robert (Bob) King, Deputy Commissioner, EQC
Carolyn Boltin-Kelly, Deputy Commissioner, OCRM
David Wilson, Chief, EQC Bureau of Water

SOUTH CAROLINA DEPARTMENT OF HEALTH AND ENVIRONMENTAL CONTROL
2600 Bull Street • Columbia, SC 29201 • Phone: (803) 898-3432 • www.scdhec.gov

D H E C
PROMOTE PROTECT PROSPER
C. Earl Hunter, Commissioner
Promoting and protecting the health of the public and the environment

January 21, 2011

Jeffrey M. Hall, Colonel, US Army, Commanding
US Army Corps of Engineers, Savannah District
100 West Oglethorpe Avenue
Savannah, Georgia 31401

Re: Savannah Harbor Expansion Project (SHEP)

Dear Colonel Hall:

I am writing you to determine whether the Department of the Army, Savannah District, Corps of Engineers letter dated, January 13, 2011, allows the South Carolina Department of Health and Environmental Control Office of Ocean and Coastal Resource Management (SCDHEC OCRM) additional time to review the SHEP DEIS for consistency with the South Carolina Coastal Zone Management Program. The Savannah District - COE response allows for SCDHEC to have until November 2011 to conduct its review as allowed by the Clean Water Act. Does this timeframe also apply to the concurrence of the consistency determination by SCDHEC OCRM?

If the consistency review is not included, I am requesting that you allow more time for SCDHEC OCRM to conduct a thorough review of the DEIS pursuant to Federal Regulation Part 930.42(b). Specifically, this regulation states "In considering whether a longer or additional extension period is appropriate, the Federal agency should consider the magnitude and complexity of the information contained in the consistency determination." Given the complexity and the magnitude of the documentation provided in the DEIS, the SCDHEC OCRM feels that 75 days (60 + 15 day extension previously requested in a December 3, 2010, letter to you) is not a sufficient amount of time to review the document. SCDHEC OCRM requests that you offer the same amount of time for review of the DEIS for consistency with the South Carolina Coastal Zone Management Program as you have allowed for the review for DHEC's water quality Certification program.

I look forward to your response. If you would like to discuss this issue or have any questions, please contact Blair Williams of my staff at (843) 953-0232.

Sincerely,

Carolyn Boltin-Kelly

Carolyn Boltin-Kelly, Deputy Commissioner
Office of Ocean and Coastal Resource Management

cc: William G. Bailey, Corps of Engineers, Savannah District
Heather Preston, SCDHEC BOW

SOUTH CAROLINA DEPARTMENT OF HEALTH AND ENVIRONMENTAL CONTROL
Ocean and Coastal Resource Management
Charleston Office • 1362 McMillan Avenue • Suite 400 • Charleston, SC 29405 • Phone: (843) 953-0200 • Fax: (843) 953-0201 • www.scdhec.gov

#9 PD

South Carolina Department of
Natural Resources
DNR

John E. Frampton
Director

November 18, 2010

Col. Jeffery M. Hall
Commander, Savannah District
US Army Corps of Engineers
Post Office Box 889
Savannah, Georgia 31402-0889

PM-S

REFERENCE: Formal Request for Extension of Comment Period for the Draft Tier II Environmental Impact Statement and Draft General Reevaluation Report for the Savannah Harbor Expansion Project

Dear Colonel Hall,

The South Carolina Department of Natural Resources (DNR) has received the Joint Public Notice (JPN) for the above referenced project dated November 15, 2010 and issued by US Army Corps of Engineers, Savannah District, Georgia Department of Natural Resources and the South Carolina Department of Health and Environmental Control. The JPN indicates the comment period for the important review of these documents is 45 calendar days closing at noon on December 30, 2010.

As the Director of DNR, I am writing to formally request the Savannah District Corps of Engineers, as the lead federal agency, extend the comment period for the Savannah Harbor Expansion Project (SHEP) Draft Environmental Impact Statement (DEIS) and Draft General Reevaluation Report (DGRR) from 45 days to 120 days. This extension is requested for the following reasons:

1. This proposed project is extremely complex and potentially will impact land and water resources of the State of South Carolina. It is imperative that the agencies and general public have the opportunity to adequately evaluate and consider the implications of the proposed project. Given this complexity and the sheer volume of the documents that must be reviewed, 45 days is not sufficient time to complete the needed evaluations.

2. The SHEP DEIS and DGRR have been released at the beginning of the Thanksgiving and Christmas holiday seasons. The JPN comment deadline places a significant hardship on agency employees by requiring the review of these complex documents during a period that is effectively reduced to a practical 30 days, or less given on-going responsibilities. Due to economic downturn and resulting staff reductions without replacement, DNR currently is operating with fewer staff available for review and comment on proposed projects such as this.

3. The proposed project and its DEIS and DGRR have been under development by the Savannah District Corps of Engineers and the Georgia State Ports Authority for nearly 10 years. The documentation resulting from numerous ancillary studies and investigations is voluminous and can only be thoroughly reviewed by extending the comment period by an additional 90 days.

DNR has participated fully in the SHEP Stakeholder Evaluation process since its inception by providing hundreds of staff days to attend meetings, review preliminary assessments and produce follow-up assignments. I believe my staff, and the staff of the other agencies, have proven to be of value in assisting your staff and many others during the long process that has brought us to this point. In my opinion, the request for the extension is a deserved matter of comity and reciprocity for the substantial efforts of the many agencies and stakeholders over a very long period of time. Thank you in advance for your kind and favorable consideration of this important request.

Very truly yours,

John E. Frampton
Director

c: Hon. Mark Sanford, Governor
Hon. Henry McMaster, Attorney General
C. Earl Hunter, Commissioner, SC DHEC
Dean Moss, Chairman, Savannah River Maritime Commission
DNR Board Members
Bob Perry, DNR

#10
PD

Transportation Committee

LAWRENCE K. GROOMS
CHAIRMAN

DAVID J. OWENS
[illegible]

LILY GOGDILL
[illegible]

THE SENATE OF SOUTH CAROLINA
SUITE 203 GRESSETTE OFFICE BUILDING
P.O. BOX 142
COLUMBIA, SOUTH CAROLINA 29202-0142
(803) 212-6400

November 18, 2010

Colonel Jeffery M. Hall, US Army, Commanding
US Army Corps of Engineers, Savannah District
100 West Oglethorpe Avenue
Savannah, Georgia, 31401

Re: Extension of SHEP Comment Period

Dear Colonel Hall:

I write to ask that the Corps of Engineers extend the comment period for the Savannah Harbor Expansion Project Draft Environmental Impact Statement from 45 days to 120 days. Because of the scope and complexity of this project, and because it has highly significant economic and environmental impacts, 45 days is an unreasonable amount of time.

I make this request as Chairman of the Senate Transportation Committee and as Chairman of the Review and Oversight Commission on the South Carolina State Ports Authority.
The extension should be granted for the following reasons:

First, this complex project will have significant implications for South Carolinians. It will directly affect the people, lands and waters of the State and it is imperative that South Carolinians have sufficient opportunity to carefully review and consider these implications. Given this complexity and the volume of documentation that must be reviewed, 45 days is not sufficient time.

Secondly, the Thanksgiving and Christmas holidays are upon us. Nearly three weeks are effectively lost because of legal holidays and staff vacations during the 45 days from the middle of November to the end of December. This effectively reduces these 45 calendar days to only 30, and means stakeholders have a little more than 20 business days for review.

Finally, this project and its DEIS have been under development by the Corps and the Georgia State Ports Authority for nearly ten years. Numerous ancillary studies and investigations have resulted in voluminous material that can only be thoroughly reviewed by extending the comment period.

I appreciate your consideration, and reiterate my request that the review period be extended from 24 days to 120 days. If you have any questions, please do not hesitate to contact me.

Sincerely

Lawrence K. Grooms

#11

Review & Oversight Commission
On the South Carolina State Ports Authority

SENATOR LAWRENCE K. GROOMS
Chairman
REP. HARRY F. CATO
Vice Chairman

SENATOR HUGH K. LEATHERMAN, SR.
SENATOR ROBERT FORD
SENATOR TOM DAVIS
SENATOR PHILLIP SHOOPMAN
REP. JAMES H. HARRISON
REP. WILLIAM E. SANDIFER
REP. JAMES H. MERRILL
REP. J. DAVID WEEKS

POST OFFICE BOX 142
COLUMBIA, SOUTH CAROLINA 29202-0142
(803) 212-6400

DAVID J. OWENS
SENATE STAFF
KENNETH M. MOFFITT
COUNSEL
PATRICK DENNIS
HOUSE JUDICIARY COUNSEL
ANDY FIFFICK
HOUSE LEG COUNSEL
LILY COGDILL
EXECUTIVE ASSISTANT

November 18, 2010

Colonel Jeffery M. Hall, US Army, Commanding
US Army Corps of Engineers, Savannah District
100 West Oglethorpe Avenue
Savannah, Georgia, 31401

Re: Extension of SHEP Comment Period

Dear Colonel Hall:

I write to ask that the Corps of Engineers extend the comment period for the Savannah Harbor Expansion Project Draft Environmental Impact Statement from 45 days to 120 days. Because of the scope and complexity of this project, and because it has highly significant economic and environmental impacts, 45 days is an unreasonable amount of time.

I make this request as Chairman of the Senate Transportation Committee and as Chairman of the Review and Oversight Commission on the South Carolina State Ports Authority.
The extension should be granted for the following reasons:

First, this complex project will have significant implications for South Carolinians. It will directly affect the people, lands and waters of the State and it is imperative that South Carolinians have sufficient opportunity to carefully review and consider these implications. Given this complexity and the volume of documentation that must be reviewed, 45 days is not sufficient time.

Secondly, the Thanksgiving and Christmas holidays are upon us. Nearly three weeks are effectively lost because of legal holidays and staff vacations during the 45 days from the middle of November to the end of December. This effectively reduces these 45 calendar days to only 30, and means stakeholders have a little more than 20 business days for review.

Finally, this project and its DEIS have been under development by the Corps and the Georgia State Ports Authority for nearly ten years. Numerous ancillary studies and investigations have resulted in voluminous material that can only be thoroughly reviewed by extending the comment period.

I appreciate your consideration, and reiterate my request that the review period be extended from 24 days to 120 days. If you have any questions, please do not hesitate to contact me.

Sincerely,

Lawrence K. Grooms

#12 AE
PD

OFFICE OF THE JASPER COUNTY ADMINISTRATOR

358 Third Avenue – Courthouse Square – Post Office Box 1149
Ridgeland, South Carolina 29936 – 843-717-3690 – Fax 726-7800 – TDD 726-7519

Andrew P. Fulghum
County Administrator

afulghum@jaspercountysc.gov

JX
PM-C

23 November 2010

Jeffrey M. Hall, Colonel, US Army, Commanding
US Army Corps of Engineers, Savannah District
100 West Oglethorpe Avenue
Savannah, Georgia 31401

RE: Savannah Harbor Expansion Project Draft Environmental Impact Statement

Dear Colonel Hall:

I am writing this letter in my capacity as County Administrator for Jasper County, South Carolina. Jasper County borders the Savannah River for the entire nineteen and one-half miles of the river channel of the proposed Savannah Harbor Expansion Project. As such, the potential impact of this project on the County is extraordinary.

We have recently received the Savannah Harbor Expansion Project Draft Environmental Impact Statement. As I am sure you are aware, the draft EIS with its appendices and the draft General Re-evaluation Report contain well over 2000 pages. The draft EIS, by its shear volume, is a comment upon the complexity of the issues. In order for our County, with its limited resources, to examine and comment upon this document, even focusing only on areas of our particular interest and expertise, we will need well over the forty-five days which have been provided. While Jasper County does not wish to prolong the comment period, we would request that you extend that period to one hundred twenty days.

Jasper County is a relatively small governmental unit with limited staff and financial resources. Indeed, just to illustrate, the budget for this draft EIS could pay the entire administrative costs of Jasper County for almost two years. As a practical matter, in order for Jasper County to have an opportunity to comment in a meaningful way even an extension to one hundred twenty days will strain our resources.

We very much appreciate the work of the Corps and the benefits of your efforts that accrue to all of us. Please allow me to thank you for your careful consideration of this request.

Yours very truly,

Andrew P. Fulghum
Jasper County Administrator

cc: Members, Jasper County Council
Honorable William D. Moss, Jr., Chairman Savannah River Maritime Comm.
Marvin C. Jones, Jasper County Attorney

713 PD

Agriculture and Natural Resources Committee

DANIEL B. VERDIN, III
CHAIRMAN

GENE HOGAN
RESEARCH DIRECTOR

VIVIAN McDOWELL
ADMINISTRATIVE ASSISTANT

THE SENATE OF SOUTH CAROLINA
SUITE 404, GRESSETTE OFFICE BUILDING
P. O. BOX 142
COLUMBIA, SOUTH CAROLINA 29202-0142
(803) 212-6230

November 23, 2010

Colonel Jeffery M. Hall, US Army, Commanding
US Army Corps of Engineers, Savannah District
100 West Oglethorpe Avenue
Savannah, Georgia, 31401

Re: Savannah Harbor Expansion Project Comment Period

Dear Colonel Hall:

This letter is sent to you concerning the comment period for the Savannah Harbor Expansion Project Draft Environmental Impact Statement. Due to the nature of this project, being not only significant in terms of economic development, but also in regard to environmental impact, I feel that an extension of the comment period from 45 days to 120 days would be highly beneficial.

I bring this request to the Corps of Engineers for a couple of reasons. The first of these has to do with the enormous volume of data that must be considered in relation to this project. This includes an impact statement which took ten years to develop in addition to other related studies that are worthy of consideration. Because of South Carolina's proximity to the area under study, these proceedings are of great importance to our state. 45 days seems inadequate considering these factors.

Secondly, the aforementioned circumstances are compounded by the season in which they occur. Legal holidays, as well as staff vacation days taken in connection with Thanksgiving and Christmas, effectively minimize the comment period further. The holidays also limit opportunities for study and comment by the various stakeholders.

Again, I believe an extension to 120 days could only be helpful in this process. This is a complex and critical issue and deserves a thorough analysis. Thank you for your time and consideration in this matter.

Sincerely,

Danny Verdin
SC Senate, Dist. 9
Greenville & Laurens Counties

CHARLESTON METRO
CHAMBER OF COMMERCE

P.O. Box 975
Charleston, SC 29402-0975
843.577.2510
843.723.4883 fax
www.charlestonchamber.net

November 24, 2010

Col. Jeffery M. Hall
Commanding Officer
US Army Corps of Engineers
PO Box 889
Savannah, GA 31402- 0889

Dear Colonel Hall:

We are writing to urge you to extend the comment period on the Draft General Re-evaluation Report (GRR) and Environmental Impact Statement (EIS) on a proposal to deepen the Savannah Harbor from its current depth of 42 feet up to a maximum depth of 48 feet. The current public comment period on the proposals for 45 days which ends on January 10, 2011, provides an insufficient amount of time to thoroughly digest the draft report and make adequate comments. With the holidays and end of the year included in the current public comment period, it exacerbates the ability to make adequate and accurate comments due to leave requests by staff during this time period.

We urge you to extend the comment period from 45 days to a minimum of 180 days. A project of this magnitude deserves an adequate amount of time for the various agencies and organizations involved and impacted to be able to study the draft report and make comment.

Please call me at 843-805-3043 if you have any questions.

Sincerely,

Mary Graham, CCR, IOM, CCE
Senior Vice President
Public Policy/Regional Advancement

c/o BEAUFORT-JASPER WATER & SEWER AUTHORITY
6 SNAKE ROAD, OKATIE, SC 29909-3739
Phone 843.987.9211 FAX 843.987.9293
Direct Line 843.987.9210
deanm@bjwsa.org

WILLIAM D. "DEAN" MOSS, JR., CHAIRMAN

DE
PM-C

SAVANNAH RIVER MARITIME COMMISSION

S: DE
DP
DX

November 17, 2010

Jeffrey M. Hall, Colonel, US Army, Commanding
US Army Corps of Engineers, Savannah District
100 West Oglethorpe Avenue
Savannah, Georgia, 31401

S: 31 Dec 10

Re: Duration of Comment Period, SHEP

Dear Colonel Hall:

The purpose of this letter is to resubmit my request that the Corps of Engineers extend the comment period for the Savannah Harbor Expansion Project Draft Environmental Impact Statement from 45 days to 120 days. The DEIS was released on November 15, 2010 with a due date for comments of December 30, 2010.

I have attached my October 29th letter formally requesting the extension.

I make this request as Chairman of the Savannah River Maritime Commission, the entity charged by the South Carolina General Assembly to represent the State's interests in this matter.

I appreciate your consideration of this important request.

Sincerely

William D. Moss, Jr.
Chairman

WILLIAM D. "DEAN" MOSS, JR., CHAIRMAN
HON. LAWRENCE K. "LARRY" GROOMS
HENRY "HANK" SCOTT
COLDEN BATTEY, ESQ
ROBERT L. WALDREP, JR., ESQ
CATHERINE CEIPS
W.D. "BILL" WORKMAN

c/o BEAUFORT-JASPER WATER & SEWER AUTHORITY
6 SNAKE ROAD, OKATIE, SC 29909-3739
Phone 843.987.9211 FAX 843.987.9293
Direct Line 843.987.9210
deanm@bjws.org

WILLIAM D. "DEAN" MOSS, JR., CHAIRMAN

SAVANNAH RIVER MARITIME COMMISSION

October 29, 2010

Jeffery M. Hall, Colonel, US Army, Commanding
US Army Corps of Engineers, Savannah District
100 West Oglethorpe Avenue
Savannah, Georgia, 31401

Re: Duration of Comment Period, SHEP

Dear Colonel Hall:

The purpose of this letter is to request that the Corps of Engineers extend the comment period for the Savannah Harbor Expansion Project Draft Environmental Impact Statement from 45 days to 120 days. It is my understanding that the DEIS will be released for public comment during November.

I make this request as Chairman of the Savannah River Maritime Commission, the entity charged by the South Carolina General Assembly to represent the State's interests in this matter. I have attached for your information a copy of the statute creating the Commission.

This extension is requested for the following reasons:

1. This is an extremely complex project with significant implications for Southeastern South Carolina and the State as a whole. It will directly affect lands and waters of the State and it is imperative that South Carolina have the opportunity to adequately evaluate and consider its implications. Given this complexity and the sheer volume of the documents that must be reviewed, 45 days is not sufficient time to complete the needed evaluations.

2. This DEIS is being released at the beginning of the Thanksgiving and Christmas holiday seasons. During the 45 days from the middle of November to the end of December, nearly three weeks are effectively lost because of legal holidays and staff vacations. The 45 day period is thus reduced to a practical 30 days.

3. This project and its DEIS has been under development by the Corps and the Georgia State Ports Authority for nearly ten years. The documentation resulting from numerous ancillary studies and investigations is voluminous and can only be thoroughly reviewed by extending the comment period by an additional 90 days.

WILLIAM D. "DEAN" MOSS, JR., CHAIRMAN
MICHAEL G. McSHANE
HENRY "HANK" SCOTT
COLDEN BATTEY, ESQ
REP. JAMES H. MERRILL
ROBERT L. WALDREP, JR., ESQ.
CATHERINE CEIPS
MARTY SAULS
W.D. "BILL" WORKMAN

I appreciate your consideration of this important request.

Sincerely

William D. Moss, Jr.
Chairman

Copies to: Members, SRMC
Governor Mark Sanford
Attorney General Henry McMaster
Glen F. McConnell, President *Pro Tempore*, S.C. Senate
Robert W. Harrell, Jr.,Speaker, S.C. House of Representatives
South Carolina Congressional Delegation
Executive Director, Georgia State Ports Authority

GEORGIA
DEPARTMENT OF NATURAL RESOURCES
COASTAL RESOURCES DIVISION

MARK WILLIAMS
COMMISSIONER

A.G. "SPUD" WOODWARD
DIRECTOR

December 13, 2010

Mr. William Bailey
ATTN: PD, US Army Corps of Engineers
Savannah District
100 West Oglethorpe Avenue
Savannah, Georgia 31401-3640

RE: Consistency Determination for Tier II DEIS & DGRR for SHEP, Savannah River, Chatham County, Georgia

Dear Mr. Bailey:

Staff of the Georgia Coastal Management Program has reviewed your November 15, 2010 letter and attached Tier II Draft Environmental Impact Statement (EIS) and Draft General Reevaluation Report for the Savannah Harbor Expansion Project (SHEP). The Corps of Engineers must allow the State 60 days to respond to the consistency determination before they may presume concurrence [15 CFR §930.14(a)], rather than the 45 days listed in your letter.

The Program intends to submit their findings by midnight January 15, 2011, rather than by noon December 30, 2010. By this letter, the DNR requests that the official comment period for all parties be extended to midnight, January 15, 2011.

Please feel free to contact Brad Gane, Coastal Resources Division's Assistant Director (912-262-3130), if you have questions regarding this matter.

Sincerely,

A.G. "Spud" Woodward
Director

SW/km

cc: Todd Holbrook, GaDNR Deputy Commissioner
Dan Forster, Wildlife Resources Division Director
Allen Barnes, Environmental Protection Division Director

ONE CONSERVATION WAY | BRUNSWICK, GEORGIA 31520-8686
912.264.7218 | FAX 912.262.3143 | WWW.COASTALGADNR.ORG

From: judyjennings
To: Bailey, William G SAS; Bailey, William G SAS
Subject: Comment extension on SHEP
Date: Tuesday, December 14, 2010 3:15:26 PM

Mr. Bill Bailey
U.S. Army Corps of Engineers
Savannah District
Savannah, GA

Bill, On behalf of Georgia Chapter Sierra Club, I request an extension of the comment period on the DEIS and GRR for the SHEP.

I appreciate the Corps releasing the documents in a timely manner. But, on the calendar, that timing was right before and during the holiday season when many of us are engaged with guests, travel, and the seemingly unavoidable colds/flu.

I am a volunteer, and so are the other Sierrans who might assist me in reviewing the documents. We are devoted to a healthy environment for Savannah and the Savannah River, but as I alluded previously, this time of the year is packed with other commitments.

I don't know if there is a legally prescribed amount of time which you could allow, but as many days in January that could be allotted for public comment would be greatly appreciated. I believe the Corps has brought diligence to the many years devoted to the DEIS and GRR, and I also believe you want the most valuable comments possible from the public. Time to study the book and comment with best intentions can be aided by more time on the comment deadline. I am not asking for time that would slow down the process, but just an appropriate amount of consideration given the document's timing coincides with an already very busy time for the public.

Sincerely,
Judy Jennings
Harbor Issue Leader, Georgia Chapter Sierra Club
7609 La Roche Avenue
Savannah, GA 31406
912-352-0122 home
912-655-6574 cell
912-356-3070 fax
judyjennings@comcast.net

From: Will Berson
To: Bailey, William G SAS; McIntosh, Margarett (Mackie) SAS
Cc: hmoloney@savports.com
Subject: Request for 15 Day Comment Extension
Date: Tuesday, November 16, 2010 2:05:24 PM

Bill and Mackie,

It is my understanding that there is a provision for a 15-day extension to the 45-day comment period for the Corps Notice.

As a long-standing member of the Stakeholder Evaluation Group (SEG), the Georgia Conservancy formally requests the 15-day extension. We firmly believe extending the deadline from Thursday, December 30, 2010 to Friday, January 14, 2011 is appropriate given the complexity of the information covered by the Public Notice (including some information not yet reviewed by the SEG), as well as the time constraints posed by the end of the calendar year

Thank you for considering this request. Please let me know if a more formal effort is required.

http://georgiaconservancy.org/images/issueImages/2004_GC_Logo1.gif
<http://georgiaconservancy.org/Home/Home.asp>

Will Berson

Interim Director, Coastal Office

428 Bull Street, Suite 201

Savannah, GA 31401

(912) 447-5910

(912) 447-0704 facsimile

wberson@gaconservancy.org <mailto:wberson@gaconservancy.org>

www.georgiaconservancy.org <http://www.georgiaconservancy.org>

twitter.com/GaConservancy

facebook.com/georgiaconservancy

SOUTHERN ENVIRONMENTAL LAW CENTER

Telephone 843-720-5270 | 63 BROAD STREET, SUITE 300 CHARLESTON, SC 29401-3051 | Facsimile 843-720-5240

November 19, 2010

VIA E-MAIL AND U.S. MAIL

Jeffrey M. Hall, Colonel, US Army, Commanding
US Army Corps of Engineers, Savannah District
100 West Oglethorpe Avenue
Savannah, Georgia, 31401
CESAS-DE@usace.army.mil

Re: Notice of Availability of a Draft Tier II Environmental Impact Statement and Draft General Reevaluation Report for Savannah Harbor Federal Navigation Project, Chatham County, GA and Jasper County, SC

Dear Colonel Hall:

We are in receipt of the Joint Public Notice ("JPN") relating to the above-referenced project. According to the JPN, written comments regarding the draft environmental impact statement ("Draft EIS") and the draft general reevaluation report ("Draft GRR") will be received by the Savannah District of the U.S. Army Corps of Engineers ("Corps") until noon on December 30, 2010. For the reasons provided below, we respectfully request that the Corps extend the comment period by an additional 90 days.

The deepening of the Savannah Harbor is a project that involves a number of potentially significant and wide-ranging impacts in South Carolina and Georgia, including, but not limited to, impacts to the Savannah National Wildlife Refuge, federally-protected species, fisheries, benthic communities, birds, marine mammals, wetlands, water quality, air quality, environmental justice, historic properties, and potable surface and groundwater resources. Evaluating the extent to which the proposed project will impact many of these resources involves a very complicated and technical inquiry. In fact, due to the variety of substantial and complex issues associated with this project, the Draft EIS and Draft GRR comprise three large binders and compacts discs, which include hundreds of pages of material. According to the shipping invoice that accompanied these studies, the Draft EIS and Draft GRR together weigh about 29 lbs. By any measure, this is a very large volume of material, and it would be difficult for any interested member of the public to digest this information and offer meaningful comments within the 45-day comment period as set forth in the JPN, especially in light of the upcoming Thanksgiving and Christmas holidays. For these reasons, we believe the extension we have proposed is necessary in order to allow for a sufficient opportunity for public comment.

Thank you for considering this request.

Sincerely

Christopher K. DeScherer

Christopher K. DeScherer

cc (via email and US mail):

William G. Bailey, U.S. Army Corps of Engineers
Andrea Malloy, Coastal Conservation League
David Kyler, Center for a Sustainable Coast
Ben Gregg, South Carolina Wildlife Federation
Jim Murphy, National Wildlife Federation
Bill Sapp, SELC

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United States Department of the Interior

OFFICE OF THE SECRETARY
Washington, D.C. 20240

DEC - 7 2010

Colonel Jeffrey M. Hall
U.S. Army Corps of Engineers
Savannah District
100 W. Oglethorpe Avenue
Savannah, Georgia 31401-3640

Dear Colonel Hall:

The Department of the Interior respectfully requests an extension to January 28, 2011 (an additional 18 days), of the comment period for the Corps' Savannah Harbor Federal Navigation Project General Reevaluation Report (GRR) and Draft Tier II Environmental Impact Statement (DEIS). The Corp's Federal Register Notice dated November 26, 2010 (75 FR 72823), announced a 45-day comment period closing January 10, 2011 for these documents, which is the minimum public review time for a DEIS under federal regulations (40 CFR §1506.10). The Corps' regulations provide District Commanders the discretion to extend comment periods based in part on the requesting agency's prior involvement in the proposed action, and the action's scope and complexity (33 CFR §230.19).

Several of the Department's bureaus (Fish and Wildlife Service, National Park Service, Geological Survey) have been actively engaged for many years in the studies and planning efforts associated with the Project. The nature of the potential impacts to federal trust resources of the Department and the broad range of options explored to mitigate those impacts make the Project one of the most complex and challenging civil works projects that our agencies have handled. An extension of the comment period to not sooner than January 28, 2011, will give us enough time to prepare comments that will adequately inform your plan selection and also our Secretary's determination under the Water Resources Development Act of 1999 (Public Law 106-53, Section 102(b)(9)(B)(ii)) as to whether the selected plan and associated mitigation plan adequately address the potential environmental impacts of the Project.

We appreciate your cooperation with our request.

Sincerely,

Vijai N. Rai

Vijai N. Rai, Ph.D.
Team Leader, Natural Resources Management
Office of Environmental Policy and Compliance

From: Andrea Hricko
To: CESAS-PD, SAS
Cc: Holland, Robert G SAD
Subject: Savannah DEIS - conflict in comment period dates & request for extension
Date: Saturday, December 18, 2010 1:27:34 PM

Dear Mr. William Bailey: First, thank you for "unlocking" the posted .pdf of the Savannah River DEIS, making it easier for the public to comment. That is appreciated.

I have several questions.

Your deadline for comments on the "Draft Tier II Environmental Impact Statement and Draft General Reevaluation Report is stated as "Noon on December 30, 2010." http://www.sas.usace.army.mil/shexpan/Home.html#ColHall

The following notice, however, is posted in the (legally authoritative) Federal Register:

EIS No. 20100453, Draft EIS, USACE, 00, Savannah Harbor Expansion Project, Navigation Improvement to the Federal Navigation Channel, Chatham County, GA and Jasper County, SC, Comment Period Ends: 01/10/2011, Contact: William G. Bailey 912-652-5781.

http://www.federalregister.gov/articles/2010/11/26/2010-29827/environmental-impact-statements-notice-of-availability#p-10

Can we therefore assume that the deadline for comments is formally January 10, 2011 as opposed to NOON on December 30, 2010?

Please note that with the weekends and holidays since the official start of the comment period which is November 26, 2010, the business days that are included in the comment period of December 30th are somewhere between 19-23. For most persons, that means a total of 19 days to comment, since many offices are closed between Christmas Day and New Year's Day. Even if the comment period is extended to January 10th, this would provide only 6 more work days to comment -- for a total of 30 days.

Such a short period for commenting is completely unacceptable, in my opinion, for a project with such serious environmental implications. The Joint Port Authority for the San Pedro Bay Ports has already committed to a 90-day comment period for a set of DEIS's coming out in 2011 that pertain to rail yards, because of the community interest in, and importance of, the projects.

I hereby respectfully request that the comment period be extended until March 1, 2011, to allow those in the public health community (and certainly community residents and organizations) additional time to comment on a document and environmental evaluation that is more than 1000 pages long and which the Army Corps of Engineers describes in a press release as having cost more than $40 million to produce.

Please advise if we can EMAIL comments to your attention at this address: CESAS-PD@usace.army.mil as opposed to sending them.

Thank you for your consideration of my request. Sincerely yours, Andrea Hricko, USC

Andrea M. Hricko
Prof of Prev Med
Keck School of Med, USC &
Director, Community Outreach and Education
Southern CA Env Health Sciences Ctr
1540 Alcazar Street CHP 236
L.A. CA 90033
323-442-3077

-----Original Message-----
From: Holland, Robert G SAD [mailto:Robert.G.Holland@usace.army.mil]
Sent: Wednesday, December 15, 2010 1:02 PM
To: Andrea Hricko
Subject: RE: Urgent request to unlock .pdf of Savannah DEIR

They are working this in our Savannah District, but it will take a little time. Will let you know when it is unlocked.

-----Original Message-----
From: Andrea Hricko [mailto:ahricko@usc.edu]
Sent: Tuesday, December 14, 2010 6:04 PM
To: Holland, Robert G SAD
Subject: Urgent request to unlock .pdf of Savannah DEIR

Dear Mr. Holland: I am writing to ask if you can request the ACE to "unlock"
the .pdf for the Savannah River dredging project. It is impossible to write comments when you cannot "copy and paste" parts of the report into the comment letter.

Please let me know how quickly this will be possible. I urge you to have the
ACE unlock the .pdf so that community, environmental and public health organizations can more effectively write comments. Thank you. Andrea Hricko

Andrea M. Hricko

Prof of Prev Med

Keck School of Med, USC &

Director, Community Outreach and Education

Southern CA Env Health Sciences Ctr

1540 Alcazar Street CHP 236

L.A. CA 90033

323-442-3077

From: tbonitatibus@gmail.com on behalf of Tonya Bonitatibus
To: CESAS-PD, SAS
Subject: Request for extension of EIS public comment
Date: Tuesday, January 18, 2011 10:39:36 AM

Dear Mr. Bailey,

I would like to request an extention on the Savannah Harbor Environmental Impact Statement public comment period. As you have heard from South Carolina DHEC, and from representatives of the environmental community such as Southern Environmental Law Center,t adequate time is not being permitted for those trying to digest this massive document. I would venture to say that S**outh Carolina's DHEC stating that they don't have enough time to review the document adequately, despite their significantly larger staff, should be a clear message to the Corps of Engineers that adequate review time has not been provided for stakeholders.**

The Corps of Engineers has not provided all of the materials needed to properly assess the document. An example of this is the lack of documentation provided to properly review the hydrodynamic salinity model. If we are not properly provided with the materials needed to adequately review documents, we can not provide thoughtful and educated comments. Is that the purpose of this comment period, to not allow for thoughtful and meaningful public comment?

I would like to request the public comment period be extended at least 15 days, but preferably 30 days. The corps of engineers has had over 5 years (11 for the entire project) to develop this document, and we should in turn be provided with at least 90 days to absorb and comment on such a significant document. This project is expected to cause significant damage to the Savannah River, and proper review is a must. We must also be provided with appropriate documentation in a timely manner to make comments.

Thank you for your consideration and understanding. Our concerns are made only to ensure the best possible solution for the Savannah River and the over 1.4 million people who rely on her fresh drinking water daily. TB

Tonya Bonitatibus
Riverkeeper/ Executive Director
Savannah Riverkeeper
O: 706 826-8991
C: 706 755-4839
www.savannahriverkeeper.org

It's Your River, Protect it!

US Army Corps of Engineers, Savannah District

Comment on the Savannah Harbor Expansion Project

The Savannah District, U.S. Army Corps of Engineers welcomes your comments on the Savannah Harbor Expansion Project. Once completed, place the card in the "comments" box or add postage and mail it back to us. Comments can also be provided online at **CESAS-PD@usace.army.mil**.

From: (optional) Rev Verrell Cutter [Harambee House, Inc]

Comments:

On your notice of Availability of a Draft Tier II Environmental Impact Statement (EIS) closing comments are said to end on Dec. 30th. However, on your News Release it is stated that closing comment is Jan. 10th.

Which date is correct?

FOR CONTINUATION OF HOUSE DOCUMENT 112-153

SAVANNAH HARBOR EXPANSION PROJECT
CHATMAN CO., GEORGIA & JASPER CO., S. CAROLINA:
FINAL GENERAL RE-EVALUATION REPORT AND
ENVIRONMENTAL IMPACT STATEMENT

SEE PART 13