



**UNITED STATES DEPARTMENT OF COMMERCE**  
**National Oceanic and Atmospheric Administration**  
NATIONAL MARINE FISHERIES SERVICE

Southeast Regional Office  
9721 Executive Center Drive North  
St. Petersburg, Florida 33702-2432

November 10, 1999

Mr. Roger Banks  
Field Supervisor  
U.S. Fish and Wildlife Service  
P.O. Box 12559  
Charleston, South Carolina 29422-2559

Dear Mr. Banks:

The National Marine Fisheries Service (NMFS) has reviewed the U.S. Fish and Wildlife Service's (FWS) October 22, 1999, report on the New Savannah Bluff Lock and Dam 316 Decommissioning Study. This addresses the FWS report and is provided in partial fulfillment of our requirement under the Fish and Wildlife Coordination Act (48 Stat. 401, as amended; 16 U.S.C. 661 et seq.) to provide comments and recommendations pertaining to fishery resource conservation.

The draft report provides a thorough and accurate description of aquatic resources, under NMFS stewardship, that inhabit the project area and would be affected by the alternatives that are under consideration. We fully concur with your determination that dam decommissioning and remedial actions that would enhance fish passage represents the most environmentally sound and prudent alternative. We also agree that failure to decommission the dam would perpetuate obstruction of anadromous fish migrations and recovery of aquatic resources that are regional, national, and international importance.

In addition to our concurrence with your report, the NMFS, through its responsibility under the Fish and Wildlife Coordination Act, requests that the recommendations you have developed be forwarded to the Corps of Engineers as joint recommendations of the FWS and the NMFS.

We appreciate the opportunity to provide these comments. Mr. David Rackley of our Charleston Office is available in the event that further assistance is needed. He may be reached at 219 Fort Johnson Road, Charleston, South Carolina 29412-9110, or at (843) 762-8574.

Sincerely,

Andreas Mager, Jr.  
Assistant Regional Administrator  
Habitat Conservation Division



# South Carolina Department of Natural Resources



November 29, 1999

Paul A. Sandifer, Ph.D.  
Director  
John V. Miglarese  
Deputy Director for  
**Marine Resources**

Mr. Steve S. Gilbert  
U.S. Fish and Wildlife Service  
P.O. Box 12559  
Charleston, South Carolina 29422-2559

Re: Fish and Wildlife Coordination Act Report on the New Savannah Bluff Lock and Dam  
216 Decommissioning Study

Dear Mr. Gilbert:

The South Carolina Department of Natural Resources (SCDNR) has received the Fish and Wildlife Coordination Act (FWCA) Report regarding the New Savannah Bluff Lock and Dam (NSBL&D) Project Section 216 Disposition Study dated October 22, 1999. We have also received an addendum to that report transmitted November 24, 1999. The SCDNR welcomes the opportunity to review these documents and provide comments.

The SCDNR agrees that the NSBL&D currently poses environmental impacts to the fish and wildlife resources surrounding the project. Of primary concern is blocking of anadromous fish passage to upstream spawning grounds. Anadromous fish species affected by the dam include American shad, hickory shad, blueback herring, striped bass, shortnose sturgeon and Atlantic sturgeon. Other concerns include effects on populations of robust redhorse and rocky shoal spider lilies, rare fish and plant species. We find discussion in the FWCA Report related to these impacts to be accurate.

The SCDNR strongly supports the findings and recommendations of the FWCA Report. We believe decommissioning of the NSBL&D is an excellent opportunity to enhance anadromous fish populations and to restore approximately 15 miles of riverine habitat in the Savannah River.

Thank you for the opportunity to review this document. SCDNR looks forward to being an active participant in future activities regarding the disposition of NSBL&D.

Sincerely,

A handwritten signature in cursive script that reads "Robert E. Duncan".

Robert E. Duncan  
Environmental Programs Director

cc: Col. Joseph Schmitt - Savannah District, USACE

# Georgia Department of Natural Resources Wildlife Resources Division

2070 U.S. Highway 278, S.E., Social Circle, Georgia 30025  
(770) 918-6400

November 12, 1999

Mr. Steven S. Gilbert  
Acting Field Supervisor  
U. S. Fish and Wildlife Service  
Post Office Box 12559  
Charleston, South Carolina 29422-2559

Dear Mr. Gilbert:

Thank you for the opportunity to comment on the Draft Fish and Wildlife Coordination Act Report on the New Savannah Bluff Lock and Dam (NSBLD) Decommissioning Study. The Georgia Wildlife Resources Division is in general concurrence with the recommendations in the draft, but we would like to see the following issues addressed in the final report.

1. The decommissioning study needs to include a discussion of the likely impacts on the robust redhorse population which has recently been documented in the shoals upstream of the NSBLD.
2. There is a significant recreational fishery in the NSBLD tailwater, primarily for American shad, redbreast sunfish, and bluegill. Boltin (1999) estimated 126,666 hours of fishing effort in this area from February through June 1999. Bank anglers alone spent 54,486 hours fishing the tailwater area. The changes to recreational fishing opportunities in the impacted area (fishery characteristics as well as access to it), including the NSBLD tailwater, need to be addressed. We would like to see specific recommendations in the final report that retain fishing access (especially to bank fishermen) to the impacted area.

The study cited above is: Boltin, W. R. 1999. New Savannah Bluff Lock and Dam Creel Survey Report, February 1, 1999 - June 30, 1999. South Carolina Department of Natural Resources, Wildlife and Freshwater Fisheries Section, Abbeville, South Carolina, 46pp.

If you have any questions about these comments, please call Russ England (770-918-6407).

Sincerely,



David Waller

DW:re



OFFICE OF THE MAYOR

BOB YOUNG, MAYOR

ROOM 806, MUNICIPAL BUILDING  
530 GREENE STREET, AUGUSTA, GA 30911  
(706) 821-1831 - FAX (706) 821-1835  
E-MAIL: MAYORYOUNG@CO.RICHMOND.GA.US

February 22, 2000

Col. Joseph Schmitt, Commanding  
Savannah District, Corps of Engineers  
P.O. Box 889  
Savannah, GA 31402-0889

Dear Colonel Schmitt:

The City of Augusta, as you are aware, strongly objects to the recommendations stated in the draft Section 216 Disposition Report on the New Savannah Bluff Lock and Dam Project.

Attached herewith are comments for your consideration, as well as a resolution recently adopted by the Augusta-Richmond County Commission. We look forward to your response.

Sincerely yours,

*[Handwritten signature of Bob Young]*

Bob Young  
Mayor

BY/akf

cc: Mr. Randy Oliver, Administrator  
Mr. Drew Goins, Assistant Director, Public Works

*Handwritten notes:*  
CF: JYM PD  
PM-CF  
NEED RESPONSE

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EXECUTIVE OFFICE

FEB 25 2000

**COMMENTS ON  
DRAFT 216 DISPOSITION REPORT OF  
NEW SAVANNAH BLUFF LOCK AND DAM  
BY THE CITY OF AUGUSTA**

**Section 1**

**1.1**

**Study Authority**

The Section 216 authorization statement includes the language "... and to report thereon to Congress with recommendations on the advisability of modifying the structures or their operation, and for improving the quality of the environment in the overall public interest."

This language indicates that a 216 Study could include recommendations for modifying the structures or their operation. This alternate does not seem to be one that has been provided. We suggest this alternate is "in the overall public interest."

**Section 2**

**1.6**

**Project Authority History**

The project authority history, fourth bullet, lists the 1965 Federal Water Project Recreation Act (Public Law 89-72).

This listing indicates Federal resources were used on this project for recreational purposes. This use of Federal resources implies that the original authorization had changed.

The use of resources prior to the enactment of the Water Resource Development Act of 1986 implies the Corps of Engineers recognized a change in the original authorization of the Lock and Dam facility. Recognizing the modified need and supporting the modified purpose with Federal resources constitutes a modified interpretation of the "sole purpose" of the original facility. That modified interpretation has been validated for a number of years prior to and after the requirement for a local "non-Federal sponsor" for reauthorization. The Corps of Engineers has in effect re-authorized the use and purpose of the original project by supporting other uses with Federal resources for a number of years.

## Section 2

### 2.2

#### Authorized Project Purpose

This section states that the NSBL & D was authorized and constructed for the sole purpose of supporting commercial navigation.....

The City of Augusta has been provided no documentation to support the statement that the project was for the "sole purpose" of supporting commercial navigation. Please provide this documentation for our review.

## Section 2

### 2.6.1

#### Recent Project Rehabilitation

This section states that...the Savannah District is responsible for maintaining the structural integrity of this project to ensure that major catastrophic failures do not occur which would affect the public safety and health.

Other sections indicate pier degradation, yet they are scheduled to remain in place under several alternatives. Will the "badly cracked spillway piers" continue their deterioration to the point of catastrophic failure if not maintained, and what is the Corps' ultimate responsibility for the piers?

The recent river draw down revealed more damage than originally anticipated. Will the Corps' position change as to the piers remaining in place?

## Section 6

### 6.3.5

#### Regional Economic Impacts From Recommended Plan

This section reports the negative impact to the River Front Marina and Augusta River Walk Marina as well as a ... significant economic impact to Augusta-Richmond County if they did not host the powerboat and rowing events.

Lower property values to public and private properties along the river due to the lowering of the pool have not been addressed.

The regional economic impact will be negative for a number of reasons as stated in this report, other written comments, and at public meetings. How can this be in the overall public interest, as stated in the 216 Study Authorization?

## Appendix

### **Draft Environmental Assessment and Finding of No Significant Impact for New Savannah Bluff Lock & Dam, Georgia and South Carolina.**

The draft environmental assessment and the findings of no significant impact need to consider and investigate the following:

The long-term exposure of large areas of silt will result if the river is permanently lowered. What will be the negative impact of the ecosystem if the silt is being washed down stream?

At least two facilities hold NPDES permits to discharge into the pool above the NSBL&D. What will be the negative impact on the ecosystem with the reduced dilution rate?

Other federally funded studies have documented polluted silt deposits in the river in the pool area. What effect will the increased velocities have on the agitation and transportation of these pollutants on the ecosystem?

It has been reported that the water levels in the Phinizy Swamp began to drop as a result of the river draw down in January. What would be the negative impact to the ecosystem in the Phinizy Swamp due to the permanent lowering of the pool elevation? Would this impact wetland?

If the Corps of Engineer's recommendation of decommission is to be considered, an all encompassing Environmental Impact Statement should be performed.

## A RESOLUTION

**WHEREAS**, the U. S. Army Corps of Engineers has recommended the decommissioning of the New Savannah Bluff Lock and Dam, citing "no Federal interest" in the project, in that the lock is no longer used for commercial navigation; and

**WHEREAS**, since the dam's construction 63 years ago, governments, industries and private individuals have made multi-million dollar investment decisions based on the character of the 12-mile pool created in the Savannah River; and

**WHEREAS**, the river is a vital source of commerce to local communities by providing raw water to one city and five industries, a venue for personal recreational activities and nationally recognized sporting events, and a vista for the downtown Riverwalk Park, a setting for two City-owned marinas; and

**WHEREAS**, the Corps of Engineers conducted a "live demonstration...to confirm the accuracy of the hydraulic modeling," and the demonstration resulted in significant erosion to the shoreline in Georgia and South Carolina, including significant damage to public and private property; and

**WHEREAS**, the demonstration revealed the reasoning behind the decommissioning alternative is based on hydraulic modeling and pre-demonstration environmental considerations that appear to be flawed, or at the very least, are incomplete;

**NOW, THEREFORE, BE IT RESOLVED**, that the Mayor and the Augusta-Richmond County Commission hereby calls on the Congress of the United States to reject the Corps of Engineers' request to decommission the New Savannah Bluff Lock and Dam, and that the Congress provide necessary funding to the Corps to accomplish the deferred maintenance on the structure, and

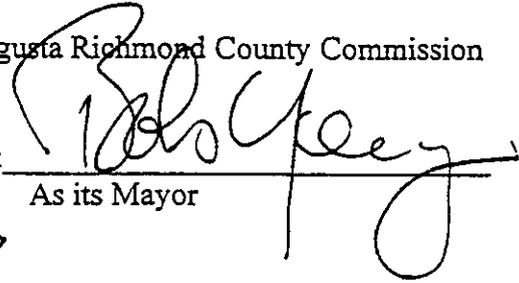
**BE IT FURTHER RESOLVED**, that the Corps of Engineers accomplish a complete and thorough Environmental Impact Statement ("EIS") on the decommissioning alternative, and that such EIS be accomplished through a public comment process which considers a broad and contemporary application of the meaning of "commerce" as it relates to the Savannah River; and

**BE IT FURTHER RESOLVED**, that the Augusta-Richmond County Commission encourages the Corps of Engineers to compensate the owners of private property damaged during the "live demonstration" to the fullest extent as provided by law; and

BE IT FURTHER RESOLVED, that a copy of this Resolution be forwarded to each Georgia Representative and Senator in the Congress of the United States.

Duly adopted by the Augusta-Richmond County Commission by a vote of 9 ayes and \_\_\_\_\_ naves, this 1<sup>st</sup> day of February, 2000.

Augusta Richmond County Commission

By: 

As its Mayor

Attest:

  
\_\_\_\_\_

*John  
and*



South Carolina Electric & Gas Company

Inter-Office Correspondence

Environmental Services

Office

Subject: Savannah Bluff Lock and Dam Drawdown

Date: January 17, 2000

To: Tom Eppink

From: David Haddon / Lynn Belger\*  
(803) 827-2552\*

The proposed decommission and removal of the Savannah River Bluff Lock and Dam by the U. S. Army Corps of Engineers, Savannah District, has a potential for negative impacts to jurisdictional wetlands in the vicinity of South Carolina Electric & Gas fossil plant Urquhart Station. There are two oxbow lakes formed by the Savannah River, one below Urquhart Station and one above. These lakes are surrounded by jurisdictional wetlands that have a direct tie to the Savannah River. In addition wetlands are found along the immediate shoreline in areas below and above Urquhart Station.

If the Savannah River is drained an estimated 7ft and maintained at this lower level, adjacent wetlands could also drain and convert to upland property. The Army Corps of Engineers has been charged by the U. S. Environmental Protection Agency to protect these wetlands. A five day test drawdown of the river scheduled for January 16-21, 2000 is hardly enough time to evaluate consequences to these adjacent wetlands. At the very least an environmental impact study of these areas should be administered prior to any extended drawdown of the Savannah River.

cc: Mullis, Keith G.  
Mahan R. R.  
Preston J. W.



DOUG BARNARD, JR.

DC PD My 25 Fe  
8: DC DE  
DX  
DP

February 19, 2000

PM-CF

Colonel Joseph Schmitt  
U. S. Army Corps of Engineers  
100 Oglethorpe  
Savannah, Georgia 31401-3604

N 2500  
CF: PD-E CB  
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In Re: New Savannah Lock & Dam

Dear Colonel Schmitt,

This letter is addressed to you personally, along with the request that it be a part of the Public Record in connection with the 216 Report recommending to Congress that the Savannah River Lock and Dam, located south of Augusta, Georgia on the Savannah River be "de-authorized".

My credentials for this comment is a sixteen year membership in the U. S. House of Representatives representing the 10<sup>th</sup> District of Georgia during the period 1977 to 1993. The 10<sup>th</sup> District of Georgia includes most of the Savannah River north of Augusta along with the Hartwell, Russell and Thurmond Dams.

My first reading of the 216 Report leads me to believe that the Corps of Engineers could not expend its appropriations to cover the projected costs of the 6.8 million dollars for repairs without additional authorization from Congress and a local sponsor. This is not in keeping with my understanding of the present authorization. Unless I am mistaken, the Corps has secondary authorization and discretionary authority for the NSL&D project that allows the Corps to cover the 6.8 million dollars of costs without a local sponsor.

Further, I understand that the Corps confirmed this secondary authorization and discretionary authority in a meeting held on January 18, 2000, attended by Mr. Jim Parker and Mr. Myron Yushishin of the Corps. Local area individuals present at the meeting included Mr. Charles Martin, Mr. Keith Mullis, Mr. Tom Eppink and Mr. Martin Becker.

It is well known that for several years the Corps through the efforts of Mr. Yushishin has tried to engage a local sponsor, without success. Now comes the 216 Report to Congress requiring a local sponsor and without it, recommending that the Savannah River Lock and Dam be "deauthorized".

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EXECUTIVE OFFICE

FEB 25 2000

ARMY CORPS OF ENGINEER  
SAVANNAH DISTRICT

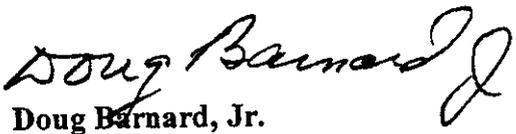
**This report, along with the "draw-down experiment" has unnecessarily created havoc in our local community, including several million dollars of damages due to the omission and/or misstatement of material facts in the 216 Report regarding the Corps' authorization.**

**I emphasize "unnecessarily" because there is a solution that is available to the Corps within its current authorities that will acquit the Corps and provide a basis for a local sponsor. I would hope you would consider the following recommendation.**

- The Corps with its discretionary authority could withdraw the 216 Report at this time, and begin a new discussion with the local community for an agreement to become the local sponsor.**
- The Corps could then use the \$2,240,000 that the Congress has already appropriated for FY 2000 for the NSL&D and seek an additional appropriation from Congress for a legitimate amount to complete the 6.8 million dollars of projected costs. The Corps would do all of the work necessary in accord with "needed" repairs for the next ten years list.**
- Allow a local sponsor to receive all income producing benefits from the NSL&D for use in covering the costs of operation and maintenance.**

**Thank you for the opportunity to add this comment to the 216 Report. Your consideration of this recommendation is most appreciated.**

**Sincerely,**

  
**Doug Barnard, Jr.**

**Georgia Department of Natural Resources**

205 Butler Street, SE, Suite 1252 East Tower, Atlanta, Georgia 30334-4100

Lonice C. Barrett, Commissioner

(404)656-3500

FAX: (404)656-0770

February 16, 2000

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MA 25 Feb

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JMM PD

Need report → PM-CF

Colonel Joseph K. Schmitt  
U. S. Army Corps of Engineers  
Post Office Box 889  
Savannah, Georgia 31402-0889

Dear Colonel Schmitt:

Enclosed is a copy of the DNR position paper concerning the issue of decommissioning the New Savannah Bluff Lock and Dam. My staff and I look forward to working closely with you on this matter as decisions are finalized in the upcoming months.

Sincerely,



Lonice C. Barrett

LCB/jlc

Attachment

cc: Board of Natural Resources

RECEIVED  
EXECUTIVE OFFICE

FEB 22 2000

U.S. ARMY CORPS OF ENGINEERS  
SAVANNAH DISTRICT

**POSITION STATEMENT REGARDING THE NEW SAVANNAH BLUFF LOCK AND  
DAM ISSUE - PROPOSED DECOMMISSIONING OF THAT STRUCTURE BY  
FEDERAL GOVERNMENT - FEBRUARY 1, 2000**

The Georgia Department of Natural Resources has been requested by members of the Augusta-Richmond County Legislative Delegation to evaluate various issues associated with the proposed decommissioning of this dam. Staff of DNR have reviewed the river and associated land based facilities and resources from several perspectives - by foot, boat and air. Staff of the Wildlife Resources Division and the Environmental Protection Division have attended meetings scheduled for the purpose of hearing from citizens and local, state, and federal officials in order to develop the clearest possible understanding of the concerns and interests of these individuals and groups.

DNR fully understands the mandates under which agencies such as the U.S. Corps of Engineers work with regard to Congressionally authorized functions and purposes of facilities such as the New Savannah Bluff Lock and Dam. The Corps of Engineers is appropriately doing its job by undertaking the study to determine the effects and feasibility of decommissioning the lock and dam. Through that process, the Corps of Engineers will study all facets of the issue in an effort to determine an appropriate course of action regarding the future of that facility and how/whether to continue its operation as a federal project.

It is the position of the Georgia Department of Natural Resources that, before any decisions are finalized concerning such decommissioning, a very comprehensive assessment of all possible alternatives be undertaken to include consideration of the following:

1. A complete assessment of all impacts related to decommissioning the lock and dam, both pro and con.
2. An assessment of the environmental effects of decommissioning this project relative to the river's ecology, fish passage, recreational fishing, water withdrawal, and waste assimilation is essential. In particular, unimpeded fish passage upstream of the lock and dam has been recognized as a resource need. However, it is not clear that the Corps of Engineers' proposed decommissioning project will allow adequate fish passage. This issue should be carefully assessed.
3. Congressional reauthorization of the project for operation of the facility for new purposes other than commercial navigation should be considered. Included among such considerations should be fish passage, water supply, recreational boating, fishing, tourism, historic preservation, aesthetics and any other factors which impact the economic vitality of downtown Augusta, Georgia and North Augusta, South Carolina as well as the public who live in the vicinity and enjoy using the river for a variety of activities.
4. Examine the feasibilities of any joint financial participation in this project by the states of Georgia and South Carolina. In the case of Georgia DNR, any final resolution of this issue should clearly not include any responsibilities for the operation of the structure given the fact that such operation is not a mandated function of this agency and is not an area of expertise possessed by staff of this agency.

In summary, the New Savannah Bluff Lock and Dam has been in place for 63 years. It is the position of DNR that during those years the use patterns of the river, the tremendous progress made by Augusta and North Augusta in orienting much of their community improvement along the bluff at River Walk, and other improvements mandate that a thorough evaluation of the impacts of the proposed decommissioning be completed, and all alternatives be considered. The Georgia Department of Natural Resources will be a willing participant in efforts to reach such a preferred goal.

South Carolina Department of  
**Natural Resources**



Paul A. Sandifer, Ph.D.  
Director

January 5, 2000

CF: DC, DE  
DX  
DP

PD-S

Colonel Joseph K. Schmitt  
U.S. Army Corps of Engineers  
Savannah District  
Post Office Box 889  
Savannah, Georgia 31402-0089

Subject: New Savannah Bluff Lock and Dam  
Section 216 Decommissioning Study

CF: PM-CF  
JAM PD

Dear Colonel Schmitt:

Thank you for your recent letter informing the Department of Natural Resources of the drawdown of the New Savannah Bluff Lock and Dam planned for January 15-21 of this year. The drawdown is part of the Savannah District's ongoing Section 216 Decommissioning Study.

Department staff will conduct an inspection of the project vicinity during the drawdown. Our objectives include assessing fish passage conditions at the dam and riverine habitat features upstream of the dam. We will also assess the North Augusta boat ramp to determine if extension of that ramp would be necessary if the dam is rendered inoperable as proposed.

The Department of Natural Resources looks forward to working with the Corps of Engineers throughout the New Savannah Bluff Lock and Dam disposition study.

Sincerely,

Paul A. Sandifer  
Director

CC: Mr. Gerrit Jöbsis  
Mr. Ed Duncan  
Mr. Freddy Vang  
Mr. Billy McTeer  
Mr. Buford Mabry

(3) We understand that costs of project deauthorization to water users in the project vicinity are now estimated to be different than those included in the Draft Report. We recommend a thorough reassessment of the economics of project deauthorization, including cost/benefit ratios. Future decisions on the disposition of the NSBL&D should be based on the most accurate economic information available.

(4) Observations during the January 2000 drawdown revealed the North Augusta boat ramp located at River Mile 202 would be inoperable if the dam were deauthorized. Deauthorization of the project should include funding to extend the North Augusta boat ramp and all other boat ramps so they are useable under all water levels.

Anadromous fish passage and recreational navigation should still be enhanced in the event that all or portions of the NSBL&D are not removed. We recommend a fish passage channel (i.e. "European Fishway") be constructed on the South Carolina side of the Savannah River to provide unimpeded fish passage. Existing anadromous fish passage at the project via the navigational lock and flood flows is not adequate. This is especially true for the Atlantic sturgeon and the State and Federally endangered shortnose sturgeon. Neither of these species are known to be able to pass the existing NSBL&D. We recommend locating the fishway on the South Carolina shore because it provides more suitable land than the Georgia side and would not interfere with the City of Augusta park. Any fishway that is constructed should be carefully designed and thoroughly evaluated. Modifications to the original fishway design may be needed to make sure fish passage objectives are met.

The SCDNR also recommends development of recreational angling and public education facilities on the South Carolina side in conjunction with a fishway. The facilities would help offset recreational angling losses. Educational facilities would concentrate on anadromous fish populations of the Savannah River to help inform the public of these valuable natural resources.

The SCDNR appreciates the opportunity to review the Draft Report. We look forward to continuing to work with the Corps and other parties on the best disposition of the NSBL&D.

Sincerely,



Robert E. Duncan

cc: Roger Banks - USFWS  
David Rackley - NMFS



DE  
**UNITED STATES DEPARTMENT OF COMMERCE**  
**National Oceanic and Atmospheric Administration**  
 NATIONAL MARINE FISHERIES SERVICE  
 Southeast Regional Office  
 9721 Executive Center Drive N.  
 St. Petersburg, Florida 33702  
 (727) 570-5317, FAX 570-5300

January 5, 2000 F/SER4:DR:am

Colonel Joseph K. Schmitt  
 District Engineer, Savannah District  
 Department of the Army, Corps of Engineers  
 P.O. Box 889  
 Savannah, Georgia 31402-0889

CF: PM-CF  
 PD-S  
 jam

DC, DE  
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 PD-E (ACTION)

Dear Colonel Schmitt:

The National Marine Fisheries Service (NMFS) has reviewed the Joint Public Notice dated December 20, 1999, which announces Availability of the Draft Environmental Impact Statement and Finding of No Significant Impact for proposed deauthorization of the New Savannah Bluff Lock and Dam (NSBLD). NMFS comments on the proposed action were provided in our letter of November 10, 1999 (copy enclosed). That letter is contained in, and endorses the U.S. Fish and Wildlife Service's (FWS) report on the project. The FWS report was provided in accordance with provisions of the Fish and Wildlife Coordination Act, and recommends project modifications that are needed to restore migration of diadromous fishes past the NSBLD.

Since providing those comments, a proposed temporary draw down of the reservoir has been scheduled to examine conditions as they might occur if the NSBLD is deauthorized. The draw down is scheduled to occur during the period January 16 - 21, 2000. Although we do not anticipate any change in our view that project deauthorization should be performed in a manner that would restore fish migrations, it is possible that the need for additional or slightly different measures may be realized after viewing the area during draw down. Based on this, the NMFS requests that we be granted an additional 30-day period to consider information from the draw down and to prepare comments. With this extension our comments would be provided no later than February 22, 2000.

We appreciate the opportunity to comment on this important undertaking. Our contact for this project is Mr. David Rackley at our Charleston Area Office. He may be reached at 219 Fort Johnson Road, Charleston, South Carolina 29412-9110, by telephone at (843) 762-8574, or at the following e-mail address: [david.rackley@noaa.gov](mailto:david.rackley@noaa.gov).

Sincerely,

Andreas Mager, Jr.  
 Assistant Regional Administrator  
 Habitat Conservation Division

Enclosure

RECEIVED EXECUTIVE OFFICE  
 RECEIVED EXECUTIVE OFFICE  
 JAN 10 1999  
 NOAA  
 NATIONAL OCEANIC AND ATMOSPHERIC ADMINISTRATION  
 U.S. ARMY CORPS OF ENGINEERS  
 SAVANNAH DISTRICT

U.S. ARMY CORPS OF ENGINEERS  
 SAVANNAH DISTRICT

cc:  
FWS, Charleston  
FWS, Atlanta  
EPA, Atlanta  
GADNR  
F/SER3  
F/SER45.



**UNITED STATES DEPARTMENT OF COMMERCE**  
**National Oceanic and Atmospheric Administration**  
 NATIONAL MARINE FISHERIES SERVICE  
 Southeast Regional Office  
 9721 Executive Center Drive N.  
 St. Petersburg, Florida 33702  
 (727) 570-5317, FAX 570-5300

January 27, 2000

F/SER4:DR:am

FEB

CF: PM-CP  
 PD

CF DC, DE  
 DX  
 DP

MA  
 2/1

PO-E

Colonel Joseph K. Schmitt  
 District Engineer, Savannah District  
 Department of the Army, Corps of Engineers  
 P.O. Box 889  
 Savannah, Georgia 31402-0889

Dear Colonel Schmitt:

By e-mail message dated January 12, 2000, from Ms. Maxine Inman, the National Marine Fisheries Service (NMFS) was granted an extension of time until February 23, 2000, to review the Draft Environmental Impact Statement and Finding of No Significant Impact for proposed deauthorization of the New Savannah Bluff Lock and Dam (NSBLD). Our request for the time extension was to allow inspection of conditions in the vicinity of the NSBLD during a trial draw down that would simulate hydrological conditions that might exist if the project is deauthorized. NMFS comments pertaining to the proposed action were provided via our letter of November 10, 1999 (copy enclosed), which was prepared prior to the planned draw down. That letter endorses the U.S. Fish and Wildlife Service's (FWS) report on the project which recommends project modifications that are needed to restore migration of diadromous fishes past the NSBLD and riverine fish habitats above the NSBLD.

A NMFS representative was able to observe river conditions during the draw down on January 18, 2000. From our observations, we conclude that natural aesthetics were not severely altered. Although no extreme conditions were observed, it was noted that surface elevations at the dam gates below the dam were such that, in the absence of substantial flows, fish would be unable to migrate upriver from locations below the dam. Although it is likely that this condition would not exist during high flow periods, which generally occur during anadromous fish migrations, a full evaluation of this situation is needed to ensure that deauthorization does not hinder these migrations. Full disclosure is also needed for your Environmental Assessment (EA) to be both factual and complete. Accordingly, we recommend that the EA be modified to fully describe related effects of deauthorization alternatives on the passage of migratory fishes, including measures to ensure that an acceptable level of fish passage is provided.

Regarding the immediate issue of project deauthorization, the NMFS continues to support such action provided that, (1) the NSBLD would be suitably modified to allow fish passage; and (2) riverine conditions upstream of the project are regulated so as to restore spawning and maturation

RECEIVED  
 REGIONAL OFFICE

JAN 31 2000

DEPARTMENT OF ENGINEERS  
 SAVANNAH DISTRICT



habitat for anadromous fishes. In view of the considerable public interest in conditions that would exist with deauthorization, we also believe that a more detailed look at needs within the overall project area is warranted. In particular, it is possible that the overall public interest might best be served through use of other authorities, such as the Corps' environmental enhancement mission, to examine conditions and needs within the zone of influence of both the NSBLD and the nearby Augusta Diversion Dam (ADD). This view considers the fact that fish passage needs exist at both facilities; the two facilities are interrelated in terms of physical influences on the river; and there are shared social, economic, and governmental considerations. With regard to governmental interests, we note that the City of Augusta, the NMFS, FWS, and the States of Georgia and South Carolina are interested in fish passage at both the NSBLD and ADD.

In addition to the preceding, we understand from your statements to the press that reauthorization of the NSBLD project would have a benefit to cost ratio of 7:1; however, a non-Federal sponsor has not been identified. We look forward to reviewing the verification and/or revision of these numbers based on information gained during draw down as it pertains to the condition of the dam and industrial water intake structures. Given this level of economic benefit, it would appear that if a reauthorization alternative were chosen, provision of a substantial level of expenditure on enhanced fish passage would be possible and still within the bounds of a favorable benefit/cost comparison. As such, we recommend that fish passage be included in your consideration of needs involved with reauthorization, and that you coordinate such matters with state and Federal natural resource agencies.

In conclusion, the NMFS maintains its view that project deauthorization must be accompanied by a plan to provide an acceptable level of fish passage. We also believe that substantial benefits could possibly be derived from a broader-scale investigation of environmental needs and benefits within the zone of influence of the NSBLD and the ADD. To this end, we recommend that the Savannah District consider expanding its investigation to include assessment of environmental needs and enhancement opportunities within the zone of influence of both dams.

Thank you for granting additional time to observe the draw down and to provide these comments. Mr. David Rackley at our Charleston Area Office is my local point of contact. He may be reached at 219 Fort Johnson Road, Charleston, South Carolina 29412-9110, by telephone at (843) 762-8574, or by e-mail at david.rackley@noaa.gov.

Sincerely,



Andreas Mager, Jr.  
Assistant Regional Administrator  
Habitat Conservation Division

Enclosure



UNITED STATES DEPARTMENT OF COMMERCE  
National Oceanic and Atmospheric Administration  
NATIONAL MARINE FISHERIES SERVICE  
Southeast Regional Office  
9721 Executive Center Dr. N.  
St. Petersburg, FL 33702  
(727)570-5312, FAX 570-5517

Mr. M. J. Yuschishin  
Chief, Planning Division  
Savannah District  
U.S. Army Corps of Engineers  
P.O. Box 889  
Savannah, Georgia 31402-0889

JAN 27 2000

CF: PM-CF  
PD-S  
JAM

31 JAW F/SER3:DMB  
RAM  
PD-EUB

Dear Mr. Yuschishin:

This is in regard to your December 20, 1999 letter and the accompanying draft Section 216 disposition report and environmental assessment for the New Savannah Bluff Lock and Dam (NSBLD) Project on the Savannah River. We are providing these comments with respect to the project's impacts on the endangered shortnose sturgeon (*Acipenser brevirostrum*) and the Federal candidate species Atlantic sturgeon (*Acipenser oxyrinchus oxyrinchus*).

We believe that the NSBLD Project offers one of the most significant opportunities for interagency sturgeon recovery actions in the Southeast, and we support the proposed alternative of deauthorizing and decommissioning NSBLD. The project is obsolete and has not supported its authorized purpose of commercial navigation in over twenty years. It has adversely affected both species of sturgeon for over sixty years by blocking their access to prime spawning and rearing habitat. Current fish passage practices at NSBLD likely provide no benefit to either species. Decommissioning the project could allow sturgeon unrestricted access to valuable restored habitat. We recommend that further study be directed at specific measures to provide for sturgeon passage at decommissioning. Since sturgeon appear unable to negotiate vertical sills, notching or complete or partial removal of dam structures may also be necessary.

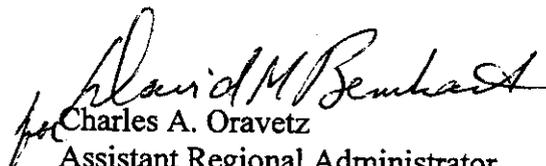
We believe that the no action alternative or project reauthorization would continue to adversely affect sturgeon in the Savannah River. Nevertheless, reauthorization of the project could provide an excellent opportunity to improve sturgeon recovery if it incorporates a fish passage solution that would be effective for all sturgeon life stages. A European fishway design bypassing the dam is the only current technology likely to meet this requirement. Even if this technology is implemented, however, the available, impounded habitat for sturgeon will be far less valuable than the natural habitat that would be restored under the decommissioning alternative. The economic analyses of the various dam preservation alternatives should include the additional costs of building effective fish passage, and the decommissioning alternative should consider the positive economic benefits of sturgeon recovery from increased commercial and recreational fishing opportunities and reduced listed species conflicts with other Federal projects, such as the proposed Savannah Harbor Deepening Project.



We recognize that decommissioning NSBLD would require current, incidental users of the river impoundment to adjust their activities to the new river level. Based on your Section 216 Report, however, the environmental benefits and lower Federal costs are so strongly in favor of decommissioning that maintaining NSBLD is not justifiable. We recommend that the Corps use its technical expertise and potentially seek additional congressional funding to develop solutions for these individual users. At the Quaker Neck Dam in North Carolina, the Corps was able to find a creative solution that avoided impacts to industry and allowed for dam removal and environmental restoration. A win-win situation is possible with NSBLD as well, if the Corps commits to seeking such a solution. NMFS looks forward to continued cooperation with the Corps and other partner agencies during the NSBLD Project Decommissioning Study.

Thank you for the opportunity to review and comment on the draft disposition report. Please contact David Bernhart of the Protected Resources Division for any future coordination efforts, further consultation, or if you have specific questions about our comments.

Sincerely yours,

  
for Charles A. Oravetz  
Assistant Regional Administrator  
for Protected Resources

cc: F/SER45 - Brownell  
FWS, Charleston - Gilbert  
File: 1514-22f1 Ga.



29155 KJ  
**UNITED STATES DEPARTMENT OF COMMERCE**  
**National Oceanic and Atmospheric Administration**  
NATIONAL MARINE FISHERIES SERVICE

Southeast Regional Office  
9721 Executive Center Drive North  
St. Petersburg, Florida 33702-2432

February 24, 2000

CF  
PM-CF  
PO-S  
PO

PO-E

Mr. M. J. Yuschishin  
Chief, Planning Division  
Savannah District  
U.S. Army Corps of Engineers  
P.O. Box 889  
Savannah, Georgia 31402-0889

Dear Mr. Yuschishin:

On February 15, 2000, the National Marine Fisheries Service (NMFS) participated in a meeting with Mr. William Bailey and others from your Planning Division. The purpose of the meeting was to discuss fishery related impacts associated with deauthorization of New Savannah Bluff Lock and Dam (NSBLD). Representatives from the U.S. Fish and Wildlife Service (FWS), the Georgia Department of Natural Resources, and the South Carolina Department of Natural Resources also participated.

The NMFS supports NSBLD deauthorization with provision of reliable and adequate passage of diadromous fishes. At the meeting we were informed that while every reasonable effort would be made to accommodate fish passage, it is possible that engineering, cost, and other considerations could affect the final level of fish passage that is provided.

Because the NSBLD is the first of a series of dams that impede fish migrations, the consequence of failing to provide adequate fish passage here would threaten ongoing cooperative efforts by state and Federal agencies to restore fish populations on the Savannah River. This is no small matter since the species involved (American shad, blueback herring, American eel, and striped bass) have considerable commercial, recreational, food chain, and ecological value. The actual monetary value of the fishery involved is difficult to assess, but is likely to be substantial -- particularly when considered from a perpetual production standpoint. These factors lead us to conclude that project deauthorization without adequate provision for fish migrations is not acceptable and, if effectuated, would cause significant and adverse environmental harm. This view is further heightened by determination by our Protected Resources Division that providing passage and access to upstream reaches could foster recovery of the Federally-listed endangered shortnose sturgeon (see enclosed letter).

In response to state and Federal agency views that a meaningful level of fish passage is needed, several alternatives were discussed at the meeting. These alternatives considered several scenarios with regard to the future of the NSBLD. Viable alternatives, from our perspective, include:

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ON FEB 25 2000



- Removal of all or a sufficient portion of the dam to allow unrestricted fish passage and navigation, and
- Construction of a natural channel bypass or "European style" fish passage device on the South Carolina side of the river.

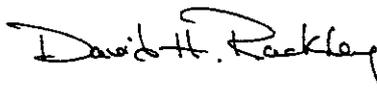
All of the other alternatives involve varying levels of structural modification and operation of the existing facility, and are problematic in that they are unreliable in terms of their capacity to pass fish and/or they would not accommodate certain targeted species such as shortnose sturgeon, Atlantic sturgeon and robust redhorse. These alternatives include minor dam modification; modification of the navigation lock; continued operation (for fish passage) of the navigation lock; and water level manipulation at the dam via controlled releases from upstream reservoirs that are operated by the Savannah District.

The NMFS continues to favor deauthorization with complete or major removal of portions of the NSBLD. Repair and continued operation of the NSBLD, with addition of a European style fish passageway would provide a suitable alternative that might balance a number of needs and interests. These include preservation of existing navigation and recreation opportunities, environmental protection, and possible improvement and expansion of habitat that is used by rare and endangered species. If properly designed, the NMFS would be supportive of this approach.

In addition to the preceding, recommendation by the FWS that you expand your study to incorporate environmental restoration and other needs at the Augusta Diversion Dam (ADD) has considerable merit. The City of Augusta and Richmond County are currently involved in Federal Energy Regulatory Commission licensing studies that could lead to a requirement to provide fish passage at that facility. It is possible that a combined NSBLD/ADD study and project could result in considerable cost savings and greater levels of environmental protection and restoration.

We appreciate the opportunity to provide these comments. Mr. David Rackley at our Charleston Area Office is my local point of contact. He may be reached at 219 Fort Johnson Road, Charleston, South Carolina 29412-9110, by telephone at (843) 762-8574, or by e-mail at [david.rackley@noaa.gov](mailto:david.rackley@noaa.gov).

Sincerely,



Andreas Mager, Jr.  
Assistant Regional Administrator  
Habitat Conservation Division

Enclosure



**BRIER CREEK**  
**SOIL AND WATER CONSERVATION DISTRICT**  
P. O. BOX 463  
LOUISVILLE, GA 30434  
(912) 625-7851

February 4, 2000

Mr. Jeff Morris, Planner  
US Army Corps of Engineers  
P. O. Box 889  
Savannah, Georgia 31402-0889

Dear Mr. Morris:

The Brier Creek Soil & Water Conservation District has worked on conservation and preservation in the Savannah River Basin, including the construction of the seawall at Goodale Landing. We would like to see continued efforts in protecting the Savannah River for all uses.

The environment in this area has adapted to the conditions of the river over the past 62 years since the New Savannah Bluff Lock and Dam were constructed. The District is concerned there would be adverse environmental affects if the miter gates on the lock and vertical lift gates on the dam were removed.

The Brier Creek Soil & Water Conservation District would like to request that the Army Corps of Engineers conduct a study of projected environmental impact that dismantling the project would have on the area.

Sincerely,

Pete Fulcher  
District Supervisor

cc: Randy Oliver, Administrator  
Richmond County Board of Commissioners

Received 4 Feb 00

2147 Riverside Plantation Rd.  
Jackson, SC 29831  
January 31, 2000

Report Comments: Pg 2.

Attention: Jeff Morris (PD-S)  
US Army Corps of Engineers  
Savannah District  
PO Box 889  
Savannah, GA 31402

Dear Mr. Morris,

As residents of the Riverside Plantation neighborhood near Beech Island, SC we witnessed the devastating effects of what is referred to as a "congressionally mandated experiment." The Corps of Engineers drawdown of the river has left damage not only to personal property but also to wildlife habitat. In a few short days, human decisions have destroyed 60+ years of nature's adaptation to the addition of the New Savannah Bluff Lock and Dam.

Over the years, nature has changed the riverbed, banks, and depths because of the construction of the dam. During the drawdown what had been navigable water became sandbars and dangerously low water levels. Previously submerged debris was exposed. The riverbanks crumbled and became frightening mudslides. The news media had warned that river levels would drop 5-6 feet so we felt cautiously safe since our dock was floating in what had previously been about 13 feet of water. What we saw was both amazing and appalling. Our dock was mired in mud and surrounded by the remains of the riverbanks, which collapsed. We were lucky. Other docks in our area were destroyed.

The Corps of Engineers saw and the news media reported the washout at the Lock and Dam Park. This same destruction was seen on private property, in neighbors' yards, when the water level dropped. We have placed riprap barriers along the riverbank to protect the land from erosion during normal and high water levels; however, no one ever expected or could have prepared for NO water level. Many of the barriers simply sank as the banks slid into the river.

A Corps spokesperson said that if we live in a flood plain we should expect fluctuations due to nature. We do. We obtained all the necessary federal and state permits to construct our dock. We conformed to all requirements for flood plain construction of our home. We incurred enormous additional expense to enjoy this beautiful river in our back yard. We had subsoil analysis completed and based on that study hired a structural engineer to design the foundation of our home so it would withstand the possibility of high water. We had pilings brought from Jacksonville and a pile driver from Savannah. The pilings were driven 25 feet deep and reinforced with cross bracing above ground. The house is elevated about 13 feet to accommodate the 100 year flood plain elevation. We did all we could structurally to protect ourselves from natural disasters. We could not

have predicted or protected ourselves from this MANMADE disaster. This drawdown paralleled nothing we would ever see naturally. The sudden and drastic drop in water levels would not have occurred in a long period of natural drought.

The "Section 216 Disposition Report" prepared by the Corps (which we did not receive until after their experimental drawdown) makes no mention of the **residential use** of the riverfront. It characterizes the area as farmland and industrial. Perhaps they overlooked the hundreds of people who live in homes and houseboats up and down the river... not just in Augusta... our neighborhood is miles below the city in rural Aiken County, SC. A Corps representative said they did not know we were here until their flyover in a helicopter to look at the damage after their experiment. Don't they have boats? Shouldn't they have checked **before** their experiment?

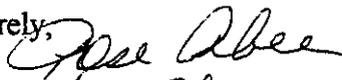
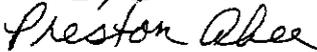
The Corps report also ignores the areas of significant wetlands within this "project area." On page EA-12 the report says "There would be no direct impacts to wetlands from the removal of the lock and dam." The Phinizy Swamp in Georgia and the Gum Swamp in South Carolina will surely dry up. The wildlife inhabiting these wetlands will most certainly be effected negatively. If a private citizen or industry wanted to drain the wetlands, the environmental protection authorities would obviously stop such an action.

Some say simplistically that the river should be returned to its original state. That is no longer possible. The Corps has constructed dams at Clarks Hill, Lake Russell, and Lake Hartwell, which have impacted the river upstream. Below the lock and dam facility they have made dozens of cuts to change the river channels. The changes, to most people, are seen as signs of positive progress.

We have seen the effects of the short-term drop in the river. We have no way to predict how much damage a long-term or permanent drop of the river level would create. Any scientist, researcher, or other person conducting experiments must test their hypothesis and study the results. This experiment known as a drawdown obviously failed. The report says in Enclosure A that the proposed action will not significantly affect the human environment. We witnessed the failure of that hypothesis as well.

We ask the federal, state, and locally elected officials, the Corps of Engineers, and other relevant agencies to find a way to prevent a reoccurrence of this recent disaster.

Sincerely,

  
  
Preston and Rose Abee

Mason's Master Turf, Inc.  
905 Sand Bar Ferry Rd.  
Beech Island, S.C. 29841

CF-PAI-CF  
PAI-03  
JMM

3. Jan  
PAI  
PO-5

U.S. Army Corps. of Engineer  
Col. Joseph Schmitt  
P.O.Box 889  
Savannah, Ga. 31402-0889

January 27, 2000

I own Mason's Master Turf ( formerly Mason's Tree & Turf ) at 905 Sand Bar Ferry Rd. Beech Island, SC. We have been in the turf business here for over 30 years. Everything we have accomplished here including instillation of irrigation pumps, erosion control, turf planting, tree planting and buildings has been done with a controlled water level from the lower locks in mind.

When the Corp of Engineers lowered the river last week it was devastating to see what we had on the river. All of our irrigation pumps were left high and dry, including the one in Horse Creek. From Highway 28 ( Sand Bar Ferry Bridge ) to Horse Creek was a mass of sand bars. This was a result of dragging the river and pumping sand to the SC side. From Horse Creek up river approximately 3500 feet channel is on SC side of river. When water was lowered the banks sluffed down into the channel.

This will cause trees holding the bank to be undermined for years to come. If the locks were done away with, it would be devastating to us as we would not have the resources to re-locate pumps due to sand bars for Irrigation's.

We are a small business that would be hurt but the impact this river has on Georgia and South Carolina is enormous. The Industry and Businesses up and down the river, Sports Events and Recreation, Tourist and Housing and Beauty of the river has made both sides of the river a very viable place to live and enjoy. Most of all the things that Augusta and North Augusta has would be lost if the lower locks were taken out.

Please take in consideration what this river means to progress in the both states. We the people of Georgia and South Carolina ask for your help in keeping the Savannah Power Locks in place as it has been since the 30's.

Sincerely,  


RECEIVED BY OP-F  
ON JAN 31 2000



## Alabama Department of Economic And Community Affairs

DON SIEGELMAN  
GOVERNOR

DEWAYNE FREEMAN  
DIRECTOR

January 10, 2000

Ms. Maxine Inman  
Environmental Resources Branch  
Planning Division  
U.S. Army Corps of Engineers  
P.O. Box 889  
100 W. Oglethorpe Avenue  
Savannah, Georgia 31402

Re: Request for Information  
Draft EA and FONSI  
New Savannah Bluff Lock and Dam

Dear Ms. Inman:

Please forward copies of the draft Environmental Assessment (EA) and Findings of No Significant Impact (FONSI) for the proposed deauthorization of the New Savannah Bluff Lock and Dam (NSBL&D) to the following address:

Alabama Department of Economic and Community Affairs  
Office of Water Resources  
P.O. Box 5690  
Montgomery, Alabama 36103-5690

Thank you for your prompt attention to this request. If you need any additional information from my office to satisfy this request, please let me know as soon as possible at (334) 242-4991.

Sincerely,

A handwritten signature in cursive script that reads "Walter B. Stevenson, Jr." followed by the word "for".

Walter B. Stevenson, Jr. Chief  
Office of Water Resources

December 29, 1999

District Engineer  
USACE, Savannah District  
ATTN: Maxine Inman, PD-E  
P.O. Box 889  
Savannah, GA 31402-0889

Re: NSBL&D Deactivation

Ms. Inman:

Please consider this letter a vote of support for the deactivation of the New Savannah Bluff Lock & Dam.

This project will undoubtedly benefit native anadromous fish species and other riverine system biota. More lock and dam removals are needed throughout this and other regions in order to restore native riverine ecosystems to their natural states.

Sincerely,



Phillip A. West  
1317 Sharon Avenue  
Albany, GA 31707

12/29/99



**Cranston, Robertson & Whitehurst, P.C.**

ENGINEERS PLANNERS SURVEYORS

OLD ENGINE COMPANY NO. 1  
452 ELLIS STREET

POST OFFICE BOX 2546  
AUGUSTA, GEORGIA 30903-2546

TELEPHONE (706) 722-1588  
TELECOPIER (706) 722-8379  
E-MAIL CRWPC@CRWPC.COM

J. CRAIG CRANSTON, P.E., R.L.S.  
THOMAS H. ROBERTSON, P.E., R.L.S.  
ELDRIDGE A. WHITEHURST, JR., P.E.  
JAMES B. CRANFORD, JR., P.E.  
DENNIS J. WELCH, P.E.

January 10, 2000

JOHN T. ATTAWAY, R.L.S.  
WAYNE SWANN, R.L.S.  
MICHAEL S. BERGLUND  
STEVEN M. BRYANT  
DWIGHT E. FUNDERBUREK, II  
PATRICK W. HUTTO  
KEITH A. LAWRENCE  
KELVIN G. OGLESBY

U. S Army Corps of Engineers, Planning Division  
Environmental Resources Branch  
P.O. Box 889  
100 West Oglethorpe Avenue  
Savannah, Georgia 31402

ATTN: Ms. Maxine Inman

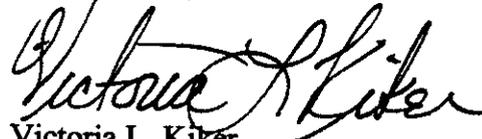
Gentlemen:

We would like to obtain copies of the draft Environmental Assessment (EA) and Findings of No Significant Impact (FONSI) for the proposed deauthorization of the New Savannah Bluff Lock and Dam (NSBL&D) as advertised in your Joint Public Notice of December 20, 1999.

Your attention to this request will be appreciated.

Sincerely,

CRANSTON, ROBERTSON & WHITEHURST, P.C.

  
Victoria L. Kiker

CF: 90-15  
MJD  
3 Jan  
[Signature]

GEORGIA STATE CLEARINGHOUSE MEMORANDUM  
EXECUTIVE ORDER 12372 REVIEW PROCESS

TO: Mr. Nicholas Ogden  
Chief Regulatory Branch  
Savannah District, Corps of Engineers  
P.O. Box 889  
Savannah, GA 31402

FROM: Georgia State Clearinghouse

DATE: 12/22/99

SUBJECT: Executive Order 12372 Review

APPLICANT: US Corps of Engineers, Savannah Dist.

PROJECT: EA: Savannah Bluff lock & dam project

FEDERAL ID:

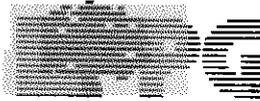
STATE ID: GA991222009

A copy of the Public Notice Permit Request, Environmental Information, or Direct Federal Development project was received by the Georgia State Clearinghouse on 12/22/99. The review has been initiated and every effort is being made to ensure prompt action. The review will focus on the projects compatibility with those state or regional goals, policies, plans, criteria for Developments of Regional Impact (DRI), environmental impacts, or inconsistencies with federal executive orders, acts and/or rules and regulations administered by the state and local units of government. The initial review process should be completed by (date 28 days later).

If the Clearinghouse has not contacted you by that date your proposal may be considered consistent. In that event, make this receipt part of the federal record for this project.

In future correspondence regarding this project, please include the State Application Identifier shown above. If you have questions regarding this project, please contact us at (404) 656-3855.

Form SV-1  
January 1995



ENVIRONMENTAL & PERMITTING SERVICES, INC.

December 27, 1999

Ms. Maxine Inman  
U.S. Army Corps of Engineers, Savannah District  
Planning Division, Environmental Resources Branch  
P.O. Box 889  
100 West Oglethorpe Avenue  
Savannah, GA 31402

**SUBJECT: Requested Copy of the Draft EA and FONSI for the Proposed  
Deauthorization of the New Savannah Bluff Lock and Dam**

Dear Ms. Inman,

In response to your agency's Joint Public Notice, dated December 20, 1999, I would like to request a copy of the draft EA and FONSI for the above-referenced project. Please send the documents to my attention at the following address.

LPG Environmental and Permitting Services, Inc.  
1536 Kingsley Avenue, Suite 117  
Orange Park, FL 32073

Thank you for your assistance.

Sincerely,

Kelly N. Rice  
Senior Environmental Scientist

KNR/



December 27, 1999

Ms. Maxine Inman  
Savannah District, Corps of Engineers  
P. O. Box 889  
100 W. Oglethorpe Ave.  
Savannah, GA 31402

Dear Ms. Inman:

Please send copies of the Environmental Assessment and FONSI drafts for  
"Proposed Deauthorization of the New Savannah Bluff Lock and Dam."

Please send to the address below:

George McDavid  
Johnson, Laschober and Associates  
P. O. Box 2103  
Augusta, GA 30903

Sincerely,

JOHNSON, LASCHOBER AND ASSOCIATES

A handwritten signature in cursive script that reads "George McDavid".

GEORGE MCDAVID, CPESC  
Civil Planner and Designer

**TONY L. CARR, SR. & ASSOCIATES**

**TIER A**

LAND SURVEYING & LAND PLANNING  
SOUTH CAROLINA LICENSE #5493-B

1828 ORIOLE AVENUE  
TEL. (803) 279-5770 / (803) 279-6406

SUBDIVISION - TOPOGRAPHIC - INDUSTRIAL  
BOUNDARY - CONSTRUCTION  
TIER B SITE DESIGN

SINCE 1968

**TIER B**

LAND DRAINAGE & DESIGN  
GEORGIA LICENSE #195

NORTH AUGUSTA, S.C. 29841  
FAX (803) 278-502

24 Dec 99

Ms Maxine Finman,

Please Forward me a copy of  
the EA draft of Fousi of  
the deauthorize of the  
New Savannah Bluff Lock and Dam  
On the Savannah River just  
south of Augusta, Ga.

Thanking you in advance

Jay L. Carr

PD

**GEORGIA STATE CLEARINGHOUSE MEMORANDUM  
EXECUTIVE ORDER 12372 REVIEW PROCESS**

**TO: Mr. Nicholas Ogden  
Chief Regulatory Branch  
Savannah District, Corps of Engineers  
P.O. Box 889  
Savannah, GA 31402**

**FROM: Georgia State Clearinghouse**

**DATE: 12/30/99**

**SUBJECT: Executive Order 12372 Review**

**APPLICANT: US Corps of Engineers**

**PROJECT: JPN/FONSI:Deauthorization of Savan. Bluff & Lock**

**FEDERAL ID:**

**STATE ID: GA991230001**

A copy of the Public Notice Permit Request, Environmental Information, or Direct Federal Development project was received by the Georgia State Clearinghouse on 12/30/99. The review has been initiated and every effort is being made to ensure prompt action. The review will focus on the projects compatibility with those state or regional goals, policies, plans, criteria for Developments of Regional Impact (DRI), environmental impacts, or inconsistencies with federal executive orders, acts and/or rules and regulations administered by the state and local units of government. The initial review process should be completed by (date 28 days later).

If the Clearinghouse has not contacted you by that date your proposal may be considered consistent. In that event, make this receipt part of the federal record for this project.

In future correspondence regarding this project, please include the State Application Identifier shown above. If you have questions regarding this project, please contact us at (404) 656-3855.

Form SV-1  
January 1995

**RECEIVED BY OP-F  
ON JAN 06 2000**

Westinghouse  
Savannah River Company  
Aiken, SC 29808



January 17, 2000

ESH-CGP-2000-00011

Ms. Maxine Inman  
Savannah District, U.S. Army Corps of Engineers  
Planning Division, Environmental Resources Branch  
P.O. Box 889  
100 W. Oglethorpe Avenue  
Savannah, Georgia 31402

Dear Ms. Inman:

**DRAFT ENVIRONMENTAL ASSESSMENT (EA) AND FINDING OF NO  
SIGNIFICANT IMPACT (FONSI) FOR THE PROPOSED DEAUTHORIZATION OF  
THE NEW SAVANNAH BLUFF LOCK AND DAM (NSBL&D)**

---

Please provide me two (2) copies of the subject EA and FONSI.

Should desire additional information, you may contact me at (803) 725-3886.

Yours very truly,

A handwritten signature in cursive script, appearing to read 'K. W. Dyer'.

K. W. Dyer, Principal Scientist  
CERCLA, Geological, and Permitting Section  
Environmental Protection Department  
Westinghouse Savannah River Company LLC

kwd/aeo

c: S. A. Dyer, 730-2B  
D. V. Osteen, 742-A  
EPD File, 742-A

# *Georgia Cooperative Fish & Wildlife Research Unit*

---

---

D.B. Warnell School of Forest Resources  
University of Georgia

January 24, 2000

Maxine Inman (PD-E)  
U.S. Army Corps of Engineers  
Savannah District  
P.O. Box 889  
Savannah, Georgia 31402-0889

Dear Ms. Inman;

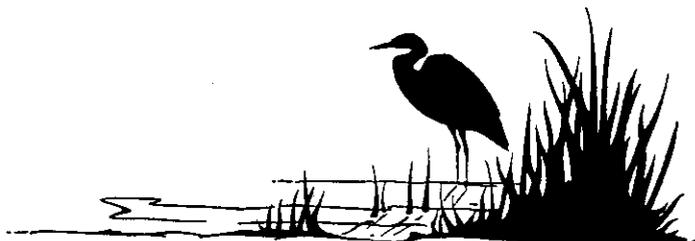
As requested by Myron Yuschishin, I have reviewed the "New Savannah Bluff Lock and Dam Project, Savannah River, Georgia and South Carolina, Section 219 Disposition Report." I found the report to be thorough and complete, and I do not have any specific comments regarding methods or conclusions. I would like to state that I agree with the recommendations of the U.S. Fish & Wildlife Service regarding post-project monitoring and remedial work to restore riparian habitat. Post-project monitoring of fish movements would determine if the remaining structure continues to impede upriver migrations.

Thank you for the opportunity to review this document. I hope my comments are helpful and if you have any questions, do not hesitate to contact me.

Sincerely,

*Thomas R. Reinert*

Thomas R. Reinert



5 FEBRUARY 2000

TO: Jeffery Morris, United States Army Corp of Engineers

FROM: Bobby W. Tuttle, 812 Riverfront Dr., Augusta, GA 30901

SUBJECT: Comments on SECTION 216 DISPOSITION REPORT for the New Savannah Bluff Lock and Dam Dated December 1999

My comments will be divided into general comments and comments for specific sections of the report.

General comments are as follows:

1 The United States Army Corp of Engineers (USACE) has a primary responsibility to protect and prevent loss of wetlands. WETLANDS ARE NOT MENTIONED IN THIS REPORT. I find this odd in light of the fact that many acres of wetlands will be lost. Nautical Chart 11515, Savannah River, Brier Creek to Augusta indicates long stretches where the river depth is 1 to 5 feet. These wetlands will all be lost if the dam is decommissioned. The Corp will not allow landowners to drain wetlands. Several landowners along the coast of North Carolina are now being required by the Corp to reflood wetland that they thought could be legally drained. The latest extension of Bobby Jones Expressway required extensive studies at significant cost to preserve and protect these wetlands near the river. Why should the Corp not be required to justify the loss of any wetlands and demonstrate that wetlands near the river will not be harmed? Would any less be required of industry or private enterprise?

2 Augusta, Ga. is a designated an evacuation area when hurricanes are projected to strike the Georgia or nearby coastal areas. This report does not address the consequences of losing the Augusta Riverwalk Marina as a safe port during threats or actual hurricane strikes. Surely this should require some discussion or evaluation.

3 The 216 report does not address effluent discharges. However, the appended Environmental Assessment section does mention that it would have an impact. This needs further study. Mixing zones could be lost which could result in local degradation of river water quality.

4 The final general comment is on the drawdown test. This test ignored the USACE own expertise regarding stream drawdown. I refer the project team and their commander to USACE publication entitled Streambank Protection Guidelines...For Landowners and Local Government. On pages 13 & 14 it vividly describes what happens during rapid drawdown. Why was this information, which is readily available and should be known by the most novice personnel, not

utilized. Was it because the project team and their commander wanted the test over with before any effect could be noticed in the nearby wetlands? Did the project team and their commander believe that there would be NO damage to private and Public property? If so, they (project team and commander) are incompetent. If they knew there would be damage, they should be held accountable for destroying public and private property.

Specific Comments:

Sec. 1.6 Project History---Why was the 1922 Rivers and Harbors Act not included in the project history? Was not the NSBL&D established by this act by providing a channel of greater depth and dependability and constructing one lock with movable dam?

Sec. 2.2 Authorized Project Purpose---The first sentence of this section is contradicted in the Environmental Assessment section 1.2 Purpose and in section 1.5 Project History. The third sentence in sec 1.2 states that the NSBL&D was constructed and acquired by the Federal Government primarily in the interest of commercial navigation. Section 1.5 gives direct quotes from the 1922 and 1930 River and Harbors Act. The quote from the 1930 Rivers and Harbors Act states "the sole reason for an increase in depth is for traffic between Augusta and points beyond Savannah requiring use of the open ocean." How does this translate into commercial navigation?

Sec. 2.4 Incidental Project Use- 2nd paragraph, 1st sentence---Does not the reregulation of flow significantly impact and prevent failure and erosion of river bank adjacent to the lock and dam park? Since I have been in Augusta (33+ years), this area has been flooded on many occasions and the corp has minimized damage by controlling flood run off. I also refer you to USACE publication entitled Streambank Protection Guidelines.

Sec 3 Problems and Opportunities-1st paragraph, 2nd sentence--Does not the Federal Government (in this case the USACE) have an interest in performing primary duties such as protecting and preventing loss of wetlands, protecting property both public and private, and protecting water quality of the river? Also does not the Federal Government have an interest in carrying out the authorizations of 1944 (Public Law 78-534) and 1965 (Public Law 89-72)? Does the USACE feel that it can forget these duties?

Same section 2nd paragraph 2nd sentence---Does not this pool also provide wetlands? Does not this pool raise the ground water table along side the river which mitigates draining of wetlands along both sides of the river?

Same section 3rd paragraph 1st sentence-- Was not the project authority modified by Public Laws 78-534 and 89-72?

Sec 4 Formulation of Alternatives 1st paragraph 2nd sentence--This

sentence is not true. The NSBL&D was authorized in 1944 and in 1965. Are not these authorizations still in effect? I find no evidence that they have been revoked and this report does not document that they have been revoked/revoked.

Sec 5.1.1 Base Condition ("No Action Alternative") 2nd paragraph-- This whole paragraph is biased and misleading. The very same consequences of failure that are so vividly described are the same results that will happen with deauthorization. This is conspicuously absent in sec. 5.1.2 A catastrophic structural failure will be the same in either case. Failure of spillway gates or miter gates is the same as Corp removing them in the deauthorization alternative.

Sec 5.3.2.1 General Recreation and Fishing--Did the study take into account the poor and or minorities living in the general area of the lock and dam that may not have the opportunity or means available to travel one (1) hour to fish?

Sec 5.3.2.2 Specialized Recreation 6th sentence---Since the Corp feels that these special events will likely be transferred to an alternate site with some difficulty; What are the difficulties and how likely will this be accomplished?

Sec 5.3.5 Summary of Project Benefits/Economic Cost----last sentence--How much passage will be hindered and why? This appears to be a negative for deauthorization and a contradiction to other statements.

Sec 5.5 Regional Economic Impacts 1st paragraph next to last sentence---Why were the 44,400 spectators not considered in the economic impact? These dollars roll over several times and the economic impact is significant.

Sec 3.3.1 Water Supply 1st sentence---There is no mention of potential consequences from the significant reduction of water surface elevation on ground water flow, river bank failure and or erosion. Other USACE publications indicate an increase in erosion and streambank failure. This will not improve water quality.

Sec 6.3.3.2 Specialized recreation on page 29 2nd paragraph 1st sentence---Does Lake Thurmond have enough business in jet skiing, canoeing, and pontoon rides/rentals to support these transferred businesses? I think the sentence should read that it is highly UNlikely.

Sec 6.3.4 Summary of benefits/....1st paragraph 1st sentence---This sentence is misleading and probably untrue. Deauthorization of NSBL&D will not save the Federal Government one dime. The USACE will simply spend the monies someplace else. This may be a book saving at the local level. For it to be a real saving, the USACE will have to return the significant dollars to the Federal Government. Has the Corp ever done this in its history?

Sec 6.3.4 2nd paragraph 4th sentence---Sentence is not truthful. How likely is it that powerboat and rowing races would be transferred to a substitute site as suggested in last paragraph of sec 6.3.5. If Augusta-Richmond County will not spend 2.5 million to operate the lock and dam, Why do you think it is likely that Augusta-Richmond County will spend 10.5 million to develop the Merry Brickyard Ponds? How likely is it that the Corp and other environmental groups will support development in this wetland area? What will happen to migratory birds and other species that call these ponds home?

The appended Environmental Assessment is vague, biased, shallow, inadequate, and contradictory. My belief is that if this EA had been submitted by industry or private individuals/developers; the Corp would have had a good laugh and returned the EA as completely unacceptable.

Sec 2.1 page EA-5 last sentence--- The NSBL&D was authorized by the 1944 Flood Control Act. If the project cannot provide any flood control benefits, why was it authorized by The 44 Flood Control Act?

Sec 2.2 Alternative 1 No Action---In the second action and consequence, if structural failure could adversely impact fish and wildlife habitat, water supply, and recreation; why would not the same be true when the gates are removed for deauthorization? Would not removal be as complete a failure as one can achieve?

Sec 2.2 Alternative 2 Deauthorization of NSBL&D---It states that industrial discharges will be impacted. I am sure this is an adverse impact. Why is it not stated as an adverse impact? Bias? Impact on recreation is minimized by stating powerboat and rowing is expected to transfer to an alternate site. Where is this site and what cost will be involved?

Sec 4.2.3 Wetlands---I am surprised that the USACE did not demand a thorough study detailing LOSS of all wetlands caused by deauthorization and a detailed discussions on any negative impact. Instead all the Corp required was a one paragraph discussion consisting of four sentences and 107 words with the first two sentences contradicting each other. The first sentence flatly states no impact. The second sentence indicates a likely impact according to hydrologic models. This has to be an oversight for the Corp is very diligent in protecting wetlands when dealing with local governing bodies and coastal developers. I sure the Corp does NOT have a double set of standards and a thorough study and evaluation of wetlands will be conducted.

The final comment concerns Appendix B page BATES-8 Robust Redhorse This section states that only two populations are known to exist, one of which is in the Savannah River near Augusta, GA. It further states that the robust redhorse inhabits Piedmont Plateau and upper

Coastal Plain rivers. Piedmont reaches are characterized by rock shoals, outcrops, and pools particularly along the fall line. It goes on talking about the preferred habitat of shoals, gravel bars and networks of swamps, oxbows and flood plains. The NSBL&D is located below the Fall Line. My question is how will eliminating the pool which eliminates water around woody debris and fallen trees which the adult robust redhorse apparently likes and more than doubling the velocity or flow rate of water going to benefit this fish. I am not trained in this area but common sense tell me that the Corp is destroying everything this fish likes by deauthorizing the NSBL&D.