

**Brunswick Harbor Modifications Study, Glynn County,
Georgia**

**Draft Integrated Feasibility Report and Environmental
Assessment and Draft FONSI**

Appendix F – Comment Response Matrix

**U.S. ARMY CORPS OF ENGINEERS
SAVANNAH DISTRICT
100 WEST OGLETHORPE AVENUE
SAVANNAH, GEORGIA 31401**



October 2020

Comment ID	Commenter	Comment Date	Comment Summary	Corps Response
1	Dan Holliman/ EPA	7/9/2020	The EPA recommends a new 404(b)(1) evaluation be included in the environmental assessment to support the currently proposed project. The 404(b)(1) evaluation should include factual determinations of the potential effects of the discharge including potential contaminant-related impacts to aquatic resources. Any conclusions reached from past or future sediment evaluations should also be included in the 404(b)(1) evaluation.	On July 20, 2020, the BHMS PDT, EPA and GADNR-EPD participated in a teleconference regarding comments received from both agencies. The result of that discussion led to the decision that the Corps will prepare and include in the IFR/EA a section 404(b)(1) evaluation of the project incorporating the requested information. References in the document text to the 404(b)(1) evaluation will be revised accordingly.
			The EPA recommends updating sediment testing and evaluation for any material proposed for beneficial use that is less than 80% sand following methods outlined in the Inland Testing Manual. Lastly, the EPA is available to provide additional technical guidance and support for selection of appropriate sites and determining suitability of material.	Concur, the base plan for this project consists of disposal of all material at Andrews Island DMCA. The results of physical and chemical sediment testing performed during this study may be used to inform potential beneficial use projects that could be pursued under a separate project authority.
			The EPA recommends continued consultation with the Georgia Environmental Protection Division regarding water quality impacts from the proposed project. The EPA recommends including any project conditions outlined in the State Water Quality certification and any mitigation commitments made by the Corps in the FONSI.	The Corps continues to coordinate with GADNR-EPD and will incorporate information into the final report regarding consultation with respect to potential water quality impacts, including the State Water Quality Certification.
			The EPA recommends the Corps include supporting information relative to the anticipated impact on water quality.	Concur, supporting information will be incorporated into the final report.
			The EPA supports turbidity monitoring in the project area during dredging events to ensure State Water Quality Standards are always met.	The Corps continues to coordinate with GADNR-EPD and will comply with all conditions of the State Water Quality Certification.
			The EPA recommends any Endangered Species Act commitments required by the National Marine Fisheries Service and the U.S. Fish and Wildlife Service be included in the FONSI.	The Corps continues to coordinate with NMFS and will incorporate information regarding any ESA commitments into the final report. The FONSI is a HQ template and has a space for mitigation requirements, however, the Corps doesn't not anticipate any other than those listed in the 2020 SARBO, which is incorporated by reference into the main report for compliance with species and critical habitat where NOAA is the action agency.
2	Don Imm/ USFWS	6/18/2020	Based on information provided, we concur with your determination that the project is not likely to adversely affect federally listed species. No further ESA action is required, unless the project changes, a new species is listed or new data indicate impacts to listed species may occur.	Thank you for your confirmation that no further action is required under S7(a)(2) of the Endangered Species Act. If there is any new information or changes in the project involving Federally-listed species, further consultation with the Service may be necessary.
3	Thomas Wilbur/ NOAA/NMFS	7/8/2020	The NMFS offers no EFH conservation recommendations at this time for the proposed Brunswick Harbor Modifications.	Thank you for your confirmation that no further action is required under the authority of Section 1201 of the Water Resources Development Act (WRDA) of 2016.
4	Wenona Haire/THPO Catawba	7/9/2020	The Catawba have no immediate concerns with regard to traditional cultural properties, sacred sites or Native American archaeological sites within the boundaries of the proposed project areas. However, the Catawba are to be notified if Native American artifacts and / or human remains are located during the ground disturbance phase of this project.	Thank you for the comment. The Corps will consult with the Catawba immediately if any artifacts or remains are uncovered.
5	Rusty Garrison/ GADNR-WRD	7/8/2020	We support using spoil from the proposed project to mitigate the erosional scarp on the slopes of Bird Island and spreading new spoil over the entire island to reduce the need for annual vegetation control. This would be beneficial if the substrate is comparable to the existing sand/shell mixture on the island rather than excessively fine substrate.	Thank you for your response. Your comment is acknowledged. Currently, the base plan (i.e. the lowest cost, technically feasible, and environmentally acceptable plan) is disposal of dredged material at Andrews Island DMCA. The Corps continues to evaluate beneficial use of dredged material under all available authorities and looks forward to working with you in the future on these important efforts.

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6	Jennifer Dixon/ SHPO-GAHPD	6/10/2020	The subject project consists of modifying the Brunswick Harbor, to occur in two (2) phases. Phase I includes geotechnical boring investigations with 100-foot buffers around known anomalies, which is the subject of the current review. Phase II includes preconstruction, engineering, and design of the project, which will be addressed through a programmatic agreement (PA). Based on the information submitted, HPD concurs that no historic properties that are listed or eligible for listing in the National Register of Historic Places (NRHP) will be affected by Phase I of the undertaking, as defined in 36 CFR Part 800.4(d)(1), due to the scope of work. This letter evidences consultation with our office regarding Phase I of the undertaking for compliance with Section 106 of the NHPA. It is important to remember that any changes to this phase, as it is currently proposed, may require additional consultation. HPD encourages federal agencies to discuss such changes with our office to ensure that potential effects to historic resources are adequately considered in project planning. We look forward to working with you and continued consultation regarding Phase II.	Thank you for the comments. The Corps will continue to consult with the GAHPD as needed and engage in additional discussions for any changes to the Phase I process that affect the Section 106 compliance process.
7	Steve Wiedl/ GADNR-EPD	7/11/2020	We thank you for your coordination on this project and for providing the requested water quality and sediment sampling information as would allow EPD to determine whether the 401 WQC from the previous 1998 harbor deepening will be sufficient for this new Brunswick Harbor Modification project or whether a new 401 WQC would be in order.	On July 20, 2020, the Project Team, EPA and GADNR-EPD participated in a teleconference regarding comments received from both agencies. The result of that discussion led to agreement between the Corps, GADNR-EPD, and EPA on a scope of sediment testing that will be conducted. A request for 401 WQC was submitted to your office in August of 2020.
			we request that information be provided to EPD regarding dissolved oxygen profile data in the project vicinity as to support the assertion of minimal, temporary water quality effects	The Corps compiled historical DO data and provided it to GADNR-EPD.
			We also request information on the characteristics of the sediments to be dredged at the specific new project footprints (the Turning Basin and the Bend Widener).	The Corps is in the process of performing a subsurface investigation including physical and chemical characterization of sediment to be dredged. This information will be provided to GADNR-EDP.
8	Jill Andrews/ GADNR-CRD	8/6/2020	We respectfully request an extension to review this project for consistency until such time as a decision is made on the Water Quality Certification.	Thank you for your response. Your comment is acknowledged and the request to extend CZM Federal Consistency review has been granted on August 8, 2020.
			We strongly support beneficial use of dredge material and adopted the River and Harbor Development Act (O.C.G.A. 50-9-1 et seq.) into law and the GCMP in 2005. We request that you expand Appendix J (federal consistency determination) to include this law in the Final Environmental Assessment. This Act requires grain size analysis (percent sand, clay and silt) to determine if material can be used beneficially	Concur, the Corps has added the following discussion regarding into Appendix J to reflect conditions found within The River and Harbor Development Act that are specific to this study.
8 (cont'd)	Jill Andrews/ GADNR-CRD	8/6/2020	If the Corps receives Water Quality Certification prior to determining if material will be used beneficially, or prior to fully describing any proposed beneficial use in detail, we request the Corps submit a supplemental federal consistency determination addressing these deficiencies. If the Corps determines there will not be any beneficial use of dredge material associated with the project prior to or in conjunction with receiving Water Quality Certification, a supplemental federal consistency determination will not be required.	Concur, if the Corps receives a Water Quality Certification prior to determining beneficial use, the Corps will submit a supplemental Federal consistency determination addressing these deficiencies.
			If the naturally deep hole placement site falls into the expanded Federal Project, can it be used for future disposal of Jekyll Creek material and would additional permitting be required (e.g. Section 408) that could delay the project? We request this be addressed in the EA as a potential secondary impact.	The AIWW “Deep Hole” placement pilot-project is located within the footprint of the proposed meeting area at St Simons Sound. The Deep Hole pilot-project is not a disposal area approved for regular use, but rather was intended as “proof of concept” to determine the fate and transport of sediment placed there. There are other deep hole locations (e.g. St. Andrews Sound) that would not be affected by the recommended plan and that may be available for potential AIWW disposal.

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			It has not yet been determined if utilizing thin layer placement is a successful BU approach for Georgia and we do not recommend TLP as a BU at this time.	Thank you for your response. Your comment is acknowledged and revisions were made to the EA per recommendation.
			We would like to see this potential impact to wetlands acknowledged in the Environmental Assessment Section 4.4 Environmental Consequences of Alternatives – Wetlands. We would also like to see steps taken to mitigate or reduce potential impacts	Concur, the Corps has added a discussion regarding Weir #3 at Andrews Island DMCA to section 5.2.1 Upland Disposal. The Corps does not expect there to be a loss of wetlands from operation of the weirs at Andrews Island DMCA, therefore section 4.4 was not modified. However, discussion of Weir #3 and proposed monitoring to address GADNR-CRD concerns was included in section 5.2.1 Upland Disposal as noted in the response to the comment.
			The Coastal Marshlands Protection Act (O.C.G.A. 12-5-280 et seq.) included as a relevant enforceable policy in the Appendix J Federal Consistency Determination is an important law regulating dredging and other activities in coastal marshlands to ensure that values and functions are not impaired by these activities.	Concur, the Corps has added a discussion into Appendix J to reflect conditions found within the Coastal Marshlands Protection Act that are specific to this study.
			Federal agencies are obligated to approve one request for an extension period of 15 days or less [15 CFR 930.41(b)]. We have requested an extension period until such time as the Georgia Water Quality Certification has been obtained, the date of which is not known at this time but could extend until June 8, 2021. If beneficial use projects are still being entertained at the time the Water Quality Certification is obtained, we will request a phased or supplemental federal consistency determination as developing information becomes available.	Thank you for your response. Your comment is acknowledged and although an extension was granted, we do not intend to phase CZM Federal consistency at this time
9	Bruce Fending/Brunswick Pilots Assoc	7/8/2020	<p>Existing channel design matrix is over (20) years old, significant changes to the current fleet calling on the Port of Brunswick have been made since the original design was studied and completed.</p> <p>Ocean-going RO/RO vessels in excess of the previous modeling have been able to transit the Federal Channel to Colonel's Island with certain navigational restrictions. In the pilots' experience these bend wideners were not addressed in the previous design study and now it is imperative they be enhanced. We seek to minimize these restrictions, increase efficiency and enhance safety.</p> <p>In the pilots' experience these bend wideners were not addressed in the previous design study and now it is imperative they be enhanced.</p> <p>Large portions of the fleet calling on Brunswick today are NEO-PANAMAX class and/or very large RO/RO vessels and these channel improvements will no doubt reduce delays and increase efficiencies as this trade goes forward.</p> <p>These federally authorized channel improvements, including wideners, passing zones, and associated modifications, will greatly facilitate safe navigation while also substantially improving the versatility and efficiency of the Port.</p>	Thank you for your support of the project.
10	William Lee Buckley	6/10/2020	The project at hand is the dredging of the St. Simons sound will greatly help the ship to navigate through the sound towards the terminals of Brunswick and Colonels Island. There is a huge area next to Andrew's Island that can be dredged as a turning Basin and terminal slip docking for ships and the excess dirt grading to build warehouse space, Cold Storage and residential Units on Andrews Island.	Thank you for your support of the project.

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11	James McCurry/GPA	7/9/2020	The Georgia Ports Authority supports the proposal set forth in the Draft Integrated Feasibility Report and Environmental Assessment and Draft FONSI (Finding of No Significant Impact) for the Brunswick Harbor Modification Study. The areas identified for modification as part of the study have presented problems since the completion of the Brunswick Harbor Deepening Project in 2008. The proposed modifications, including reconfiguration of the Colonels Island Turning Basin, addition of a bend widener at Cedar Hammock Range and the widening of the channel at St. Simons Sound, will enable future vessels to more efficiently transit the Brunswick Harbor.	Thank you for your support of the project.