

**Brunswick Harbor Navigation Project Modifications
and Harbor Dredging Operations and Maintenance
Glynn County, Georgia**

**Final Integrated Feasibility Report and Environmental
Assessment**

**Appendix F.1 – Comments and Comment Response
Matrix - July 21, 2021 Public Comment Period**

**U.S. ARMY CORPS OF ENGINEERS
SAVANNAH DISTRICT
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Submitted via electronic mail

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**Re: Comments on Draft Environmental Assessment for Brunswick Harbor
Modifications Study and Year-Round Maintenance Dredging**

Dear Ms. Garvey:

On behalf of One Hundred Miles, the Southern Environmental Law Center submits these comments regarding the Draft Integrated Feasibility Report and Environmental Assessment and Draft FONSI for the Brunswick Harbor Modifications Study (Draft EA).

In the Draft EA, the Corps proposes to completely eliminate seasonal hopper dredging windows for the first time in decades. As described below, conducting annual maintenance dredging with hopper dredges during the spring and summer months would almost certainly increase loggerhead sea turtle deaths and could potentially lead to population-level impacts. It would also cause significant harm to fisheries and other sensitive species in and around Brunswick Harbor.

While we recognize the need for harbor maintenance and do not suggest that hopper dredging should be banned year-round, we urge the Corps to continue the use of these longstanding seasonal dredging windows. At a minimum, we ask that the Corps prepare an Environmental Impact Statement (EIS) to fully evaluate the impacts of unrestricted hopper dredging. We believe that once the Corps does so, the benefits of continuing the use of seasonal windows will be clear.

I. BACKGROUND

A. **Because hopper dredging is harmful to sea turtles, fisheries, and other coastal wildlife, the Corps has historically limited its use of hopper dredges to winter months**

Maintenance dredging involves the periodic removal of built-up sediment from existing navigational channels in order to keep the channels at their authorized depth. Although there are several methods of dredging available, the Corps typically prefers hopper dredging.

Hopper dredges work by removing sediments with suction pipes—essentially vacuuming up everything on the bottom of the dredged area. Unfortunately, this often includes federally threatened loggerhead sea turtles, which can easily become entrained in the hopper dredge pipes.¹ When this happens, the pipes' rotating blades can cause massive fractures, crushed organs, hemorrhage, and death.² These effects are heightened in late spring, summer, and early fall when there are more sea turtles in southeast shipping channels.³

Hopper dredging also poses threats to other valuable wildlife resources. For example, impacts to fisheries, such as entrainment and increased sedimentation, can be significant.⁴ Like impacts to sea turtles, these effects are amplified during certain times of the year.⁵

¹ Mem. from Mark Dodd, Ga. Dep't of Nat. Res., to Kelie Moore, Ga. Dep't of Nat. Res. (Feb. 22, 2021), at 1-2 ("DNR Mem.") (provided as Attachment 1); Daphne W. Goldberg et al., *Hopper dredging impacts on sea turtles on the Northern Coast of Rio de Janeiro State, Brazil*, Marine Turtle Newsletter (Oct. 2015) at 17 (provided as Attachment 2); J.L. Miselis et al., *Impacts of sediment removal from and placement in coastal barrier island systems: U.S. Geological Survey Open-File Report 2021-1062*, at 33 (U.S. Geol. Survey and U.S. Fish & Wildlife Serv. 2021) (provided as Attachment 3).

² Goldberg, *supra* n. 1, at 17; *see also* Dena Dickerson et al., *Dredging impacts on sea turtles in the southeastern USA: A historical review of protection*, Proceedings of the 17th World Dredging Congress (2004) (provided as Attachment 4).

³ DNR Mem., *supra* n. 1, at 2; Letter from Rusty Garrison, Wildlife Res. Div., Ga. Dept. of Nat. Res., to Margaret McIntosh, U.S. Army Corps of Eng'rs (Sept. 28, 2020), at 1 ("WRD Letter") (provided as Attachment 5); Letter from Doug Haymans, Coastal Res. Div., Ga. Dept. of Nat. Res., to Kimberly Garvey, U.S. Army Corps of Eng'rs (Apr. 23, 2021), at 7 ("CRD Letter") (provided as Attachment 6).

⁴ *See* Letter from Melvin Bell, S. Atlantic Fishery Mgm't Council, to Emily Hughes, U.S. Army Corps of Eng'rs (Oct. 1, 2020) ("SAFMC Letter") (provided as Attachment 7); S. Atlantic Fishery Mgm't Council, *Policies for the Protection and Restoration of Essential Fish Habitats from Beach Dredging and Filling, Beach Renourishment and Large-Scale Coastal Engineering* (2015) (provided as Attachment 8); Lisa Wickliffe et al., *An Assessment of Fisheries Species to*

To minimize these impacts, federal and state agencies have historically restricted hopper dredging to winter months. At the state level, the Georgia Department of Natural Resources (DNR) has implemented winter dredging windows through the state's Clean Water Act § 401 Certifications and Coastal Zone Management Act consistency determinations.⁶ According to DNR:

[D]ata and decades of experience clearly show that winter dredging windows are the best way to maintain deep water channels in Georgia and minimize mortality of threatened loggerhead sea turtles in hopper dredges. Summer dredging will place nesting female loggerhead sea turtles—and loggerhead recovery efforts generally—at unnecessary risk.⁷

At the federal level, the National Marine Fisheries Service (NMFS) has until recently imposed winter hopper dredging windows through its South Atlantic Regional Biological Opinions, or “SARBOs,” which assess impacts to federally protected species from dredging and related activities at a regional level.⁸ As NMFS recognized nearly three decades ago:

The primary Endangered Species Act (ESA) concern with hopper dredging is the documented take of a significant number of sea turtles.... What has been learned from past dredging episodes is that turtle take cannot be avoided if hopper dredging occurs when turtles are present.⁹

The South Atlantic Division of the Corps also historically recognized the importance of limiting spring and summer dredging by adopting and implementing a protocol establishing a

Inform Time-of-Year Restrictions for North Carolina and South Carolina (NOAA Technical Mem. NOS NCCOS 263), Nat'l Oceanic & Atmospheric Admin. (NOAA) (Oct. 2019) (provided as Attachment 9); A.S. Wenger, et al., *A critical analysis of the direct effects of dredging on fish*, 18 *Fish and Fisheries*, no. 5, 967 (2017) (provided as Attachment 10); Miselis, *supra* n. 1.

⁵ SAFMC Letter, *supra* n. 4, at 2; Wenger, *supra* n. 4, at 978.

⁶ DNR Mem., *supra* n. 1, at 2.

⁷ WRD Letter, *supra* n. 3, at 1.

⁸ See Nat'l Marine Fisheries Serv., *Biological Opinion: Dredging of Channels in the Southeastern United States from North Carolina Through Cape Canaveral, Florida* (Nov. 25, 1991) (“1991 SARBO”) (on file with Nat'l Marine Fisheries Serv.); Nat'l Marine Fisheries Serv., *Biological Opinion: Hopper Dredging of Channels and Beach Nourishment Activities in the Southeastern United States from North Carolina Through Florida East Coast* (Aug. 25, 1995) (“1995 SARBO”) (on file with Nat'l Marine Fisheries Serv.); Nat'l Marine Fisheries Serv., *Biological Opinion: The Continued Hopper Dredging of Channels and Borrow Areas in the Southeastern United States* (Sept. 25, 1997) (on file with Nat'l Marine Fisheries Serv.).

⁹ 1991 SARBO, *supra* n. 8, at 6.

hopper dredging window of roughly December 15 through March 31 to reduce impacts to sea turtles.¹⁰

By all measures, these seasonal dredging windows have been tremendously successful as a mitigation tool, balancing the need for efficient dredging of navigation channels with the protection of sea turtles, fisheries, and other wildlife.¹¹ However, in 2020, a new SARBO (the 2020 SARBO) eliminated the decades-old NMFS-imposed dredging windows.¹² The Corps appears poised to follow suit, proposing unrestricted year-round maintenance dredging for the first time in nearly thirty years.

B. The Brunswick Harbor Modifications Study NEPA Process

The June 2021 Draft EA considers two separate actions: (1) modifications to the harbor turning basin and bend widener to be completed by 2025 and (2) annual maintenance dredging covering over thirty miles of Brunswick Harbor shipping channels for a fifty-year period.¹³

The original draft EA for the Brunswick Harbor Modifications Study, published in June 2020, covered only the first action. That draft noted that a “key assumption” underlying the Corps’ analysis was the Corps would use cutterhead, not hopper, dredges.¹⁴ Indeed, in an appendix to that draft, the Corps described its “minimization measures” for the project as follows:

In order to minimize impacts to T&E species, critical habitats, and marine mammals...the BHMS [Brunswick Harbor Modification Study] proposed to use

¹⁰ See, e.g., U.S. Army Corps of Eng’rs, South Atlantic Division, *Hopper Dredging Protocol for Atlantic Coast: FY 98 - FY 03* (provided as Attachment 11).

¹¹ DNR Mem. *supra* n. 1, at 4; WRD Letter, *supra* n. 3, at 3 (“The USACE has successfully maintained these channels for the last 22 years using winter dredging windows to assist in the recovery of protected species.”); 1995 SARBO, *supra* n. 8, at 10 (finding that seasonal dredging windows have “greatly reduced the rate of sea turtle takes by hopper dredges”).

¹² See Nat’l Marine Fisheries Serv., *South Atlantic Regional Biological Opinion for Dredging and Material Placement Activities in the Southeast United States* (Mar. 27, 2020) (“2020 SARBO”) (on file with Nat’l Marine Fisheries Serv.).

¹³ U.S. Army Corps of Eng’rs, *Brunswick Harbor Modifications Study, Glynn County, GA: Draft Integrated Feasibility Report and Environmental Assessment and Draft FONSI 15* (June 2021) (“Draft EA”), <https://go.usa.gov/xw9Wt>.

¹⁴ U.S. Army Corps of Eng’rs, *Brunswick Harbor Modifications Study, Glynn County, GA: Draft Integrated Feasibility Report and Environmental Assessment and Draft FONSI 81* (June 2020) (“2020 Draft EA”), https://www.sas.usace.army.mil/Portals/61/docs/Planning/Plansandreports/Brunswick%20Harbor/Mod.%20Study/BHMS_Draft_IFR-EA_Main_Report.pdf?ver=2020-06-09-065202-900.

the cutterhead dredge method.... Cutterhead dredges are known to have less direct impacts to listed species than other dredge types. Other dredge methods were analyzed and would be too costly to endangered species such as sea turtles and sturgeon....”¹⁵

The Corps hastily added the second action—annual year-round maintenance dredging of thirty miles of shipping channels over a fifty-year period—last month in an apparent response to an ongoing court case challenging the Corps’ 2021 maintenance dredging contract.¹⁶ In early 2021, the Corps solicited bids and entered into a dredging contract for summer 2021 without preparing any new or supplemental NEPA analysis. When One Hundred Miles challenged the Corps’ actions in federal court in Savannah, the federal court preliminarily enjoined the Corps from proceeding with spring and summer hopper dredging without a proper NEPA analysis.¹⁷ Now, rather than conduct the thorough and targeted analysis that is warranted for such a drastic and far-reaching change, the Corps has tacked a rushed and incomplete analysis onto the existing Brunswick Harbor Modifications Study EA—a move that violates both the letter and spirit of NEPA.

II. THE DRAFT EA IS FUNDAMENTALLY FLAWED

For all major federal actions, NEPA obligates the Corps to “take a hard and honest look at the environmental consequences of [its] decisions” at the “earliest reasonable time.”¹⁸ By focusing the agency’s attention on the environmental consequences of its proposed action, NEPA aims to “ensure[] that important effects will not be overlooked or underestimated only to be discovered after resources have been committed or the die otherwise cast.”¹⁹ To this end, an agency’s EA “will pass muster only if it undertook a ‘well-considered’ and ‘fully informed’ analysis of the relevant issues and opposing viewpoints.”²⁰

As described below, the Draft EA here is inadequate in a number of ways: it underestimates or ignores significant harms to turtles, fisheries, and other wildlife; it fails to

¹⁵ Draft EA, *supra* n. 13 at App. H, p. 5; *see also* Draft EA, *supra* n. 13 at App. K, p. 17 (“Using a cutterhead dredge as the USACE plans should minimize dredging impacts to turtles in the water.”); *id.* at 18 (“We recommend the USACE condition the project as they have described for the safety of wildlife and the environment. These conditions include using only cutterhead dredges....”).

¹⁶ *One Hundred Miles v. U.S. Army Corps of Engineers*, 4:21-cv-00134-RSB-CLR (S.D.G.A.).

¹⁷ Oral Order Granting Preliminary Injunction, *One Hundred Miles v. U.S. Army Corps of Engineers*, 4:21-cv-00134-RSB-CLR (S.D.G.A. May 20, 2021).

¹⁸ *Am. Rivers v. Fed. Energy Regulatory Comm’n*, 895 F.3d 32, 49 (D.C. Cir. 2018); 40 C.F.R. § 1501.2(a).

¹⁹ *Robertson v. Methow Valley Citizens Council*, 490 U.S. 332, 349 (1989).

²⁰ *Am. Rivers v. Fed. Energy Regulatory Comm’n*, 895 F.3d 32, 49 (D.C. Cir. 2018)

consider reasonable alternatives to year-round maintenance dredging; and it ignores important cumulative impacts.

A. The Corps underestimates impacts to sea turtles

1. Spring and summer hopper dredging will almost certainly kill and injure federally protected loggerhead sea turtles

Spring and summer hopper dredging will almost certainly kill and injure federally threatened loggerhead sea turtles.²¹ As described above, sea turtles can easily become entrained in hopper dredge pipes, causing massive fractures, crushed organs, hemorrhage, and death.²² These effects are heightened during the spring and summer months, when nesting females are congregated in local waters and actively using the Brunswick shipping channels during their inter-nesting periods.²³

Recent history confirms the high likelihood of turtle mortality under these circumstances. In September 2009 (several months earlier than the typical start of dredging in December but still after the majority of adult females had left the area), the Corps conducted a “test case” to determine the feasibility of summer dredging in Brunswick Harbor.²⁴ Within the first nine days of dredging, hopper dredges killed four loggerhead turtles before the project was discontinued.²⁵ During a similar test in Savannah, dredges killed two loggerhead turtles in just six days before the project was shut down.²⁶ This late summer mortality rate was more than *eight times higher* than that of the winter dredging window²⁷—and presumably may have been even more significant if it had taken place during the early summer timeframe.

²¹ See DNR Mem., *supra* n. 1, at 4.

²² *Id.* at 2-6 (describing history of sea turtles takes from hopper dredging); Goldberg, *supra* n. 1, at 17 (collecting studies and noting that hopper dredges cause “physical harm (e.g., massive injuries, fractures, crushed tissues and hemorrhage) and mortality” to sea turtles); Dickerson, *supra* n. 2, at 2 (noting that a total of 508 sea turtle takes by hopper dredges were documented between 1980 and 2003, but that this is likely a “low estimate”); Norton Decl. *supra* n. 2, ¶¶ 13-20 (describing first-hand account of dredging injuries); Miselis, *supra* n. 1, at 33; Transcript of Hearing on Motion for Preliminary Injunction, *One Hundred Miles v. U.S. Army Corps of Engineers*, 4:21-cv-00134-RSB-CLR (S.D.G.A. May 20, 2021) (excerpts provided as Attachment 12).

²³ DNR Mem. *supra* n. 1, at 2, 9.

²⁴ *Id.* at 4.

²⁵ *Id.*

²⁶ *Id.*

²⁷ *Id.*

More recently, in Spring 2021, a hopper dredge entrained between five and seven turtles in approximately 24 hours of dredging in Charleston Harbor after the Corps sought permission to dredge outside of historic dredging windows.²⁸

There is no reason to believe turtles will fare any better during this round of spring and summer maintenance dredging. Indeed, according to DNR, “similar results will occur if hopper dredging resumes in summer months.”²⁹

Concerningly, there are no restrictions on the age class or life stage of the turtles allowed to be killed during the dredging process.³⁰ While any loss is unwanted, the take of reproductively active adult females—as is likely during nesting season—would be particularly devastating.³¹ Unlike many species, loggerhead sea turtles do not reach sexual maturity until their early to mid-30s.³² As a result, any adult loggerhead killed would take at least three decades to replace.³³

These losses would come at a high cost. Loggerhead sea turtles are considered threatened and protected under federal and state laws. While annual nesting is slowly increasing, models show that the Northern Recovery Unit population (loggerheads born on nesting beaches from the Florida/Georgia border through southern Virginia) is still only a third to half of the size it was in the 1960s.³⁴ And despite recent high nesting seasons, Georgia experienced record low nesting seasons in the early 2000s.³⁵ That string of low nesting years means that even if current protections and management practices (like dredging windows) are kept in place, Georgia’s loggerhead population is predicted to plateau or even decline for the next two decades as the hatchlings born in the early 2000s reach maturity.³⁶ If dredging windows or other protections are lifted, this decline could be even more precipitous.³⁷

²⁸ Transcript, *supra* n. 22, at 25-26.

²⁹ WRD Letter, *supra* n. 3, at 3.

³⁰ DNR Mem., *supra* n. 1, at 7, 11; CRD Letter, *supra* n. 3, at 7.

³¹ DNR Mem., *supra* n. 1, at 7, 11; CRD Letter, *supra* n. 3, at 7.

³² DNR Mem., *supra* n. 1, at 11.

³³ *Id.*

³⁴ *Id.* at 7; Bryan L. Nuse, et al., *An integrated population model for loggerhead sea turtles in the Northern Recovery Unit* (Oct. 21, 2020) (provided as Attachment 13).

³⁵ DNR Mem., *supra* n. 1, at 9.

³⁶ *Id.*

³⁷ *Id.*; CRD Letter, *supra* n. 3, at 7. In addition, upward trends in nesting abundance do not necessarily translate into an increase in adult female or overall population abundance, and as a result, abundance is often overestimated in management contexts. See Simona A. Ceriani et al., *Conservation implications of sea turtle nesting trends: Elusive recovery of a globally important loggerhead population*, *Ecosphere* (Nov. 25, 2019) (provided as Attachment 14); Paolo Casale

These risks are particularly acute for local and regional loggerhead populations. The Northwest Atlantic Distinct Population Segment (DPS) (the loggerhead population segment analyzed in the 2020 SARBO) includes five distinct recovery units, including the Northern Recovery Unit. The Northern Recovery Unit population makes up only a small fraction of the Northwest Atlantic DPS. Unfortunately, even though it makes up only a small fraction of the population, all six channels targeted by the Corps for spring and summer dredging are located within the Northern Recovery Unit range.³⁸ Because winter dredging results in very few takes, that means that nearly all of the 214 takes allowed under the 2020 SARBO will likely occur within the Northern Recovery Unit range—specifically Georgia, South Carolina, and North Carolina. As a result, these regions will bear a disproportionate level of impacts to local and regional loggerhead populations. As explained by DNR, although the SARBO purports to authorize loggerhead takes at a rate of around one turtle per every 1,000 nests, when you account for the fact that nearly all of these takes will occur within the Northern Recovery Unit range, the actual rate is more than one turtle per every 100 nests—far greater than the take rate contemplated by the 2020 SARBO.

Although the Corps is permitted to incorporate the SARBO into its NEPA analysis, it cannot stop there. In assessing regional and local impacts from this specific project, the Corps is obligated to consider this disproportionate impact. It did not do so in the Draft EA.

2. The Draft EA relies on inaccurate assumptions

The Draft EA relies on inaccurate assumptions to reach its conclusion that spring and summer dredging will have no significant impacts on loggerhead sea turtles. For example, the Corps substantially downplays the significant risks to loggerhead sea turtles, writing:

[Removal of historic dredging windows] may slightly increase risk to sea turtles as more sea turtles may be in the area in the spring, summer or fall because sea turtles are more abundant in the study area during warmer months. However, sea turtles thermoregulate so while those encountered during winter months are less able to avoid interactions with equipment, those encountered during warmer months are able to react quicker. In addition, sea turtles are believed to move

& Simona A. Ceriani, *Sea turtle populations are overestimated worldwide from remigration intervals: Correction for bias*, *Endangered Species Res.* (Jan. 30, 2020) (provided as Attachment 15); Nicole Esteban et al., *How numbers of nesting sea turtles can be overestimated by nearly a factor of two*, *Proceedings Royal Soc’y B: Biological Scis.* (Jan. 23, 2017) (provided as Attachment 16).

³⁸ The Corps has considered spring or summer dredging in six channels: Brunswick Harbor (GA), Savannah Harbor (GA), Charleston Harbor (SC), Wilmington Harbor (NC), Morehead City (NC), and Manteo Entrance Channel (NC). See 2020 SARBO, *supra* n. 12, at 327; CRD Letter, *supra* n. 3, at 6.

more throughout the water column in warmer months reducing the time they rest on the bottom and would interact with a dredging equipment.³⁹

As shown above and in the attached scientific literature, data plainly show that hopper dredging during warmer months poses significantly greater risks to loggerhead sea turtles. As explained by the Georgia Department of Natural Resources, the 2009 Brunswick and Savannah Harbor test studies showed that capture rates of sea turtles in Georgia shipping channels were substantially higher during the summer and fall than during winter months, undercutting the idea that capture rates of sea turtles may be lower in the summer due to higher activity rates and less time on the bottom.⁴⁰ The Corps' suggestion otherwise is unsupported by science.

It is also undercut by the Corps' and NMFS' thirty-year practice of restricting hopper dredging to winter months. As a federal court recently put it:

Frankly, it's a stretch to believe that the Corps would have abstained from spring and summer dredging in this critical area for three decades if it did not believe that there was a danger and a significant danger to loggerheads in the area during that time.⁴¹

The June 2021 Draft EA seems to recognize as much. The June 2020 original draft EA recognized that project "[c]onstraints include avoiding significant environmental effects to endangered species" such as loggerhead sea turtles within Brunswick Harbor.⁴² Tellingly, the Corps deliberately removed this language from its discussion of constraints in the June 2021 Draft EA.⁴³

The Corps also suggests that spring and summer hopper dredging will not have a significant environmental impact because it "has been successfully done in other areas when sea turtle abundance was high and did not result in sea turtle take by hopper dredging or take was not higher than timeframes when turtle abundance was low."⁴⁴ However, as discussed above, the weight of the data shows that sea turtle take by hopper dredging is typically substantially higher in spring and summer than in colder months—as demonstrated by this spring's mortalities in Charleston Harbor and the 2009 test studies in Savannah and Brunswick Harbors.

The Corps further dismisses the substantial risks to loggerhead sea turtles by noting:

³⁹ Draft EA, *supra* n. 13, at 109.

⁴⁰ CRD Letter, *supra* n. 3, at 33.

⁴¹ Transcript, *supra* n. 22, at 143.

⁴² June 2020 Draft EA, *supra* n. 14, at 58.

⁴³ Draft EA, *supra* n. 13, at 109.

⁴⁴ *Id.* at 109

USACE has a long history of managing hopper dredging projects without excessive take. Since 1997, no more than six observed lethal loggerhead sea turtle takes have occurred at a single project covered under SARBO.⁴⁵

The Corps misses the point. The reason that there has been minimal take for nearly three decades is because seasonal dredging windows have been in place since 1991. That hopper dredging projects have been conducted without significant take during that period is evidence that hopper dredging windows work—not evidence that they should be eliminated.

The Corps also overstates the value of mitigation measures. Although the Corps suggests that relocation trawling and other measures will mitigate any significant impacts to loggerhead sea turtles, the data does not support this conclusion. As a NMFS biologist recently explained:

I simply do not think that there are good mitigation options for dredging during times and at locations where reproductive females are present This is why the current dredging windows are highly effective—they avoid interactions with significant numbers of reproductive females.⁴⁶

3. The Corps overstates the role of its “risk assessment process” in minimizing impacts to loggerhead sea turtles and other threatened and endangered species

In addition to downplaying the risks of spring and summer dredging, the Corps overstates the role of its pre-construction risk assessment process in setting the dredging schedule. According to the Draft EA, “[t]he Corps proposes to replace historic hopper dredge environmental window with the risk-based adaptive management process outlined in the 2020 SARBO, as detailed in Appendix J of the 2020 SARBO.”⁴⁷ That process purports to “involve[] the consideration of institutional knowledge of particular project sites, the potential effects to ESA-listed species and designated critical habitat, and the use of any current or new best available information.”⁴⁸

Step 1 of the risk-based process requires the Corps to conduct a “pre-construction risk assessment” and “compile a list of projects proposed for the next year and beyond ..., including relevant minimization measures based on the pre-construction risk assessment results.”⁴⁹ Theoretically, this process could allow the Corps to schedule dredging in a way that would

⁴⁵ *Id.* at 112.

⁴⁶ Email from Brian Stacy, Nat’l Marine Fisheries Serv., to Nicole Bonine, Nat’l Marine Fisheries Serv. (Aug. 23, 2018) (provided as Attachment 17).

⁴⁷ Draft EA, *supra* n. 13, at 84; *see also* 2020 SARBO, *supra* note 12, at 69, App. J.

⁴⁸ *See* 2020 SARBO, *supra* note 12, at 69, App. J.

⁴⁹ *Id.*

“minimize the risk to ESA-listed species by considering the risk to ESA-listed species posed by particular projects based on project-specific timing, location, and equipment used, as appropriate.”⁵⁰

To our knowledge, however, the Corps has not conducted any pre-construction risk assessment for its proposed maintenance dredging. Indeed, when SELC submitted a FOIA request seeking all documents or communications related to the pre-construction risk assessment, the Corps responded that it had no responsive documents.⁵¹

Instead, it appears that the Corps intends to delegate decisions about scheduling to dredging contractors—not species experts, as they suggest in the Draft EA. As the Wilmington District recently explained, “Under this year-round alternative, hopper dredging would occur when a hopper contract dredge is available and not confine dredging impacts to any particular time of year.”⁵² The Chief of Navigation for the Savannah Division confirmed, “we are dependent on the contractor’s schedule to schedule and perform the work.”⁵³ He later added that the 2021 schedule was based on the dredging contractor’s “first availability or his desire.”⁵⁴

The Corps also apparently delegates decisions about dredging equipment to dredging contractors rather than species experts. After acknowledging that cutterhead dredges (which are significantly less harmful to sea turtles and other marine life) were an option, the Chief of Navigation explained that the Corps “ultimately [tries] to include the greatest flexibility for the industry to select which method of dredging they would like to use.”⁵⁵

B. The Corps entirely ignores the impacts of spring and summer hopper dredging on fisheries

Hopper dredging also poses threats to economically and recreationally important fisheries on Georgia’s coast.⁵⁶ Many of these threats are more severe during the egg and larval stages. For example:

⁵⁰ *Id.*

⁵¹ Letter from Terry G. Peters, District Counsel, U.S. Army Corps of Eng’rs, to Robert Sherrier, S. Env’t L. Ctr. (Mar. 29, 2021) (on file with U.S. Army Corps of Eng’rs).

⁵² U.S. Army Corps of Eng’rs, *Wilmington Harbor and Morehead City Harbor Dredging and Bed Leveling: Final Environmental Assessment and Finding of No Significant Impact 75* (Feb. 2021).

⁵³ Transcript, *supra* n. 22, at 87.

⁵⁴ *Id.* at 90.

⁵⁵ *Id.* at 78-79.

⁵⁶ See SAFMC Letter, *supra* n. 4; SAFMC Policies, , *supra* n. 4; Wickliffe, , *supra* n. 4; Wenger, *supra* n. 4; Miselis, *supra* n. 1.

- Hopper dredges can entrain fish in the dredge's suction pipes. Although all life stages of fish are vulnerable to entrainment, the risk is higher for early life stages like eggs and larvae that move passively through the water.⁵⁷
- Hopper dredging increases the amount of suspended sediments in the water. Fish often avoid areas with high concentrations of suspended sediments because the suspended sediments can affect feeding patterns and predator avoidance behavior.⁵⁸ This is particularly true for larval fish, which rely more on visible cues and therefore may have more difficulty finding suitable habitats when suspended sediments limit visibility.⁵⁹ Indeed, the U.S. Department of the Interior has specifically cautioned that high concentrations of suspended sediments are known to cause mortality in the eggs and larvae of economically important fish along the Atlantic Coast.⁶⁰
- Suspended sediments may also cause physiological damage to fish. Suspended particles can coat and damage the respiratory surface of a fish's gills or block the flow of water across them, leading to oxygen deprivation, osmoregulatory stress, and mortality.⁶¹ Again, early life stages like eggs and larvae are typically more sensitive to these types of physiological damage.⁶²
- Hopper dredging also affects the level and type of noise in dredged areas. This dredging noise may mask other sounds used by some larval fishes to find suitable habitat.⁶³

Because early life stages are more vulnerable to these and other risks, the harm caused by dredging can vary significantly by season, with greater impacts during key reproductive and recruitment time periods that often fall in the spring and summer—a fact that the Corps entirely fails to consider.

This is a particular concern for Brunswick Harbor. The South Atlantic Fishery Management Council (SAFMC), which is responsible for the conservation and management of fish stocks within the federal 200-mile limit of the Atlantic off the coasts of North Carolina, South Carolina, Georgia and east Florida, has identified essential fish habitat (EFH) for brown shrimp, white shrimp, pink shrimp, gag grouper, gray snapper, black sea bass, Spanish mackerel,

⁵⁷ Miselis, *supra* n. 1, at 33; Wenger, *supra* n. 4, at 978.

⁵⁸ Miselis, *supra* n. 1, at 34; Wenger, *supra* n. 4, at 973.

⁵⁹ Miselis, *supra* n. 1, at 35.

⁶⁰ *Id.*

⁶¹ *Id.*

⁶² *Id.*

⁶³ *Id.* at 36.

summer flounder, and several shark species in or around the project area.⁶⁴ In addition to serving as EFH for these species, these areas provide habitat for numerous other commercially and recreationally important species, including red drum, southern flounder, Florida pompano, spot, and blue crab.⁶⁵ Some of this habitat has also been designated as “habitat areas of particular concern” (HAPC), which are “subsets of [essential fish habitat] that ... [are] rare, stressed by development, provide important ecological functions for federally managed species, or are especially vulnerable to anthropogenic (or human impact) degradation.”⁶⁶

According to the SAFMC, spring and summer maintenance dredging can be detrimental to many of these fisheries for the reasons listed above. In fact, during the NEPA process for a related proposal to remove winter dredging windows in North Carolina, the SAFMC warned:

[Spring and summer dredging] would likely impact larvae and early juvenile of Gag Grouper (*Mycteroperca microlepis*), Gray Snapper (*Lutjanus griseus*) and other finfish The proposed action could also impact economically important crustacean species such as Pink Shrimp (*Farfantepenaeus duorarum*), Brown Shrimp (*Farfantepenaeus aztecus*), and White Shrimp (*Litopenaeus setiferus*) that spawn offshore in the winter and recruit to nearby estuaries in spring (April – June). Allowing hopper dredging and bed leveling outside of the current December 1 through April 15 window would increase risk of injury, mortality, or poor recruitment in these fisheries. Allowing these activities during the spring and summer months would potentially impact Council-managed species that are in critical early life stages in, and adjacent to, the project area at these times.⁶⁷

Despite these documented concerns from North Carolina, the Corps has done no analysis of how or if shifting dredging away from winter months would impact these economically and recreationally important fisheries in Georgia.

C. The Corps does not consider seasonal impacts to other sensitive species

The Corps also overlooks the impacts of spring and summer hopper dredging on other sensitive species, including manatees, horseshoe crabs, and benthic organisms. Like with sea

⁶⁴ Draft EA, *supra* n. 13, at 30-31.

⁶⁵ Letter from Virginia Fay, Nat’l Marine Fisheries Serv., to Col. Daniel Hibner, U.S. Army Corps of Eng’rs (July 8, 2020) (attached to Draft EA as Appx. G).

⁶⁶ Nat’l Marine Fisheries Serv., *Habitat Areas of Particular Concern within Essential Fish Habitat*, <https://www.fisheries.noaa.gov/southeast/habitat-conservation/habitat-areas-particular-concern-within-essential-fish-habitat>.

⁶⁷ SAFMC Letter, *supra* n. 4, at 2-3; *see also* Wenger, *supra* n. 4, at 978 (noting that “the risk of entraining larval fish and eggs can be minimized by restricting dredging during key reproductive and recruitment time periods”).

turtles and fish, these effects can be more acute during the spring and summer. For example, although manatees spend their winters in Florida's warmer waters, they are often present in Georgia's coastal waters during warmer months. If dredging occurs during these warmer months, it may cause entanglement or collisions with equipment or support craft.⁶⁸ In addition, noise associated with dredging can mask the sounds of other boat traffic, thereby increasing the potential for manatee-boat collisions near the shipping channel.⁶⁹

Hopper dredging also poses risks to horseshoe crabs. In 2007, for example, hopper dredging in the Savannah Harbor Entrance Channel entrained over 5,500 horseshoe crabs, despite being conducted outside of spring or fall migration windows.⁷⁰ According to the U.S. Fish and Wildlife Service and the U.S. Geological Survey, these effects can be heightened during spring and fall migration periods.⁷¹

Hopper dredging can also harm benthic communities by removing surficial sediment and associated fauna.⁷² Although the Draft EA considers the impacts of hopper dredging on benthic communities in passing, it entirely ignores that timing may play a role in determining how quickly the benthic community recovers after dredging. According to the U.S. Fish and Wildlife Service and the U.S. Geological Survey, "sediment removal during peak spawning or settlement times may delay recovery of communities and have adverse effects on higher trophic levels."⁷³ In addition, "the timing of sediment removal in relation to spawning and recruitment of the benthic fauna...can also affect feeding and reproduction of shellfish and finfish that rely on benthic fauna."⁷⁴

⁶⁸ Miselis, *supra* n. 1, at 34; *see also* U.S. Army Corps of Eng'rs, Final Environmental Impact Statement: Brunswick Harbor Deepening Project 23 (Mar. 1998) (on file with U.S. Army Corps of Eng'rs) (noting that hopper dredging may impact West Indian manatees and that "if dredging were conducted during the winter, there would be less likelihood of harming these mammals")

⁶⁹ Miselis, *supra* n. 1, at 36.

⁷⁰ *Id.* at 33-34; Gary L. Ray and Douglas G. Clarke, *Issues Related to Entrainment of Horseshoe Crabs (Limulus Polyphemus) by Hopper Dredges* 82, 85, 30th Western Dredging Association Technical Conference (June 2010) (provided as Attachment 18).

⁷¹ Miselis, *supra* n. 1, at 33-34 (noting that because adult horseshoe crabs congregate along migratory pathways, the "timing of dredging operations and area restrictions can effectively reduce the likelihood of entrainment").

⁷² *Id.* at 26.

⁷³ *Id.* at 28.

⁷⁴ *Id.* at 28.

D. The Corps did not analyze a reasonable range of alternatives

NEPA requires federal agencies to “study, develop, and describe appropriate alternatives” to the agency’s proposed course of action.⁷⁵ The purpose of an agency’s alternatives analysis is to provide a full and complete picture of the environmental impacts of the agency’s proposed action and to determine whether there are “other options [the agency] could take that might be *less damaging* to the natural environment.”⁷⁶ An agency must consider a range of alternatives “sufficient to permit a reasoned choice.”⁷⁷ “Only alternatives that accomplish the purposes of the proposed action are considered reasonable, and only reasonable alternatives require detailed study. So how the agency defines the purpose of the proposed action sets the contours for its of available alternatives.”⁷⁸

Here, the Corps did not define the purpose or need for annual maintenance dredging at all—and certainly not in a way that would allow for a reasonable exploration of available alternatives.⁷⁹ Instead, the Corps largely discounts potential impacts by pointing to the 2020 SARBO. But the Endangered Species Act consultation process does not require an agency to consider alternatives. Instead, after a consultation, it is up to the action agency (in this case, the Corps) to determine whether or how to proceed in light of the consultation.⁸⁰

Here, although the 2020 SARBO allows maintenance dredging between April 16 and November 30, it does not require it.⁸¹ That means the Corps still has to decide when to dredge,

⁷⁵ 42 U.S.C. § 4332(E); *see also id.* § 4332(C)(iii) (requiring a “detailed statement on ... alternatives to the proposed action”).

⁷⁶ *Soda Mountain Wilderness Council v. Norton*, 424 F. Supp. 2d 1241, 1263 (E.D. Cal. 2006) (emphasis added) (citing *Headwaters, Inc. v. Bureau of Land Mgmt.*, 914 F.2d 1174, 1180 (9th Cir. 1990)).

⁷⁷ *Nat. Res. Def. Council v. Morton*, 458 F.2d 827, 836 (D.C. Cir. 1972); *see also W. Watershed Project v. Abbey*, 719 F.3d 1035, 1050 (9th Cir. 2013) (applying reasonableness standard to EA alternatives analysis).

⁷⁸ *Webster v. U.S. Dep’t of Agric.*, 685 F.3d 411, 22 (4th Cir. 2012) (citations omitted).

⁷⁹ Draft EA, *supra* n.13, at 1, 60 (“The purpose of the proposed action is to reduce transportation cost inefficiencies experienced by the largest RO/RO ship type calling on Brunswick Harbor.”).

⁸⁰ *See* 50 C.F.R. § 402.15 (“Following the issuance of a biological opinion, the Federal agency shall determine whether and in what manner to proceed with the action in light of its section 7 obligations and the Service’s biological opinion.”); *see also Sierra Club v. U.S. Army Corps of Engineers*, 803 F.3d 31, 41 (D.C. Cir. 2015).

⁸¹ The 2020 SARBO contains a project design criterion requiring survey vessels that are longer than 33 feet to be scheduled outside the North Atlantic right whale migration and calving season (November 1 through April 30) to the “maximum extent practicable.” However, this restriction applies to survey vessels, not dredging vessels, and continues to grant discretion to the Corps.

what type of dredge to use, what size survey vessels to use, and whether to apply any additional restrictions beyond what NMFS imposed. That's where the NEPA alternatives analysis comes in.

For example, the Corps should have considered maintaining historical dredging windows in combination with one or more of the action alternatives, instead of only considering the use of dredging windows as part of the no action alternative. The Corps could also have considered using expanded dredging windows or different equipment types. Indeed, although the Corps prefers hopper dredging, the Chief of Navigation for the Savannah District acknowledged that cutterhead dredges (which are far less harmful to threatened loggerhead sea turtles and other wildlife) could be used.⁸² At a minimum, the Corps should have considered using less harmful equipment in portions of the harbor, like the Cedar Hammock Range, which the Draft EA specifically acknowledges is suitable for other dredge types.⁸³

The Corps should also have considered imposing more protective measures for right whales during traditional winter dredging windows. The Corps contends that the primary goal for removing dredging windows is to minimize right whale interactions with high-speed survey vessels. Although the Georgia Department of Natural Resources disputes this claim (explaining that hopper dredges have been used in Georgia channels during right whale calving season for thirty years with no whale fatalities),⁸⁴ the state has also recommended that the Corps require more restrictive speed measures for survey vessels in Georgia harbors, thereby eliminating risks to right whales as well as turtle species.⁸⁵ The Corps should have considered these alternatives before removing dredging windows entirely.

The Corps should also have consider bundling the Brunswick Harbor maintenance dredging contract with the Savannah Harbor maintenance dredging contract instead of other regional harbors to achieve greater cost savings. Although Savannah Harbor was originally slated for spring and summer dredging, the Corps recently announced that it would continue to abide by winter dredging windows pursuant to the State of Georgia's Clean Water Act Section 401 Certification and the Savannah Harbor Expansion Project (SHEP) Compromise and Settlement Agreement.⁸⁶

According to the Georgia Department of Natural Resources, "smaller vessels could be used or the surveys could be conducted prior to November 1st and/or after April 30th," while still dredging during winter months. CRD Letter, *supra* n. 3, at 4.

⁸² Transcript, *supra* n. 22, at 90.

⁸³ Draft EA, *supra* n.13, at 72.

⁸⁴ CRD Letter, *supra* n. 3, at 4.

⁸⁵ *Id.*

⁸⁶ U.S. Army Corps of Eng'rs, Memorandum re: Operation and Maintenance (O&M) Hopper Dredging: Brunswick Harbor and Savannah Harbor (July 13, 2021) (on file with U.S. Army Corps of Eng'rs).

E. The Corps did not adequately consider the cumulative impacts of region-wide spring and summer dredging.

Under NEPA, the Corps is obligated to evaluate the cumulative effects of a project before moving forward. This means that the Corps must consider the impacts of the authorized action “when added to other past, present, and reasonably foreseeable future actions.”⁸⁷

Aside from a passing mention of an anticipated new RO/RO berth and the removal of the Golden Ray (neither of which are adequately described or assessed), the Corps summarily concludes that year-round maintenance dredging during the 50-year assessment window will have no adverse cumulative impacts at all. But the Corps’ proposal is inherently rife with adverse cumulative impacts by facilitating more frequent maintenance dredging events during times of the year when ecosystems are most susceptible to additional stressors.

The Corps also inappropriately limits the geographic scope of its cumulative impacts analysis to projects “within and near the Brunswick Harbor study area.”⁸⁸ As explained by the Council on Environmental Quality (CEQ), “[w]hen analyzing the contribution of [the] proposed action to cumulative effects ... the geographic boundaries of the analysis almost always should be expanded.”⁸⁹ So, for example, when conducting a cumulative effects analysis for wildlife resources like fisheries or protected species, CEQ recommends analysis of the entire species habitat or ecosystem⁹⁰—which the Corps acknowledges extends throughout the Southeast region.⁹¹ By limiting its cumulative impacts analysis to projects “within and near” Brunswick Harbor, the Corps ignores important considerations that NEPA requires it to consider.

The Corps also ignores the cumulative impacts of climate change on loggerhead sea turtle recovery. Climate change is expected to significantly hinder recovery, especially in regions that are under threat of sea level rise and prone to coastal development.⁹² Any interruption of breeding or nesting—particularly the loss of nesting females—from year-round dredging could be detrimental to their populations, especially when allowed annually.

⁸⁷ See 40 C.F.R. §§ 1508.7, 1508.8.

⁸⁸ Draft EA, *supra* n. 13, at 124; see also *id.* (discussing cumulative impacts “within the study area”).

⁸⁹ CEQ, *Considering Cumulative Effects under the National Environmental Policy Act* 12 (Jan. 1997), <https://ceq.doe.gov/docs/ceq-publications/ccenepa/sec2.pdf>.

⁹⁰ *Id.*

⁹¹ Draft EA *supra* n. 13, at 110 (“Under the 2020 SARBO species are appropriately managed at the regional level, as all move throughout the South Atlantic.”).

⁹² See Mariana M.P.B. Fuentes et al., *Potential adaptability of marine turtles to climate change may be hindered by coastal development in the USA*, Reg’l Env’tl. Change (July 15, 2020) (provided as Attachment 19).

F. The Corps appears to be already implementing the proposal

Despite NEPA's clear admonitions against predetermined decision-making, the Corps appears to be proceeding on the assumption that dredging windows will be removed before completing the NEPA process or allowing the public the opportunity to comment on the removal of dredging windows. On May 13, 2021, over a month before publishing the revised Draft EA, the Corps published a pre-solicitation notice for 2022 maintenance dredging in Brunswick Harbor. In the notice, the Corps says there are no environmental windows for the project and that year-round dredging is permitted.⁹³

Engaging in this type of predetermined decision-making undermines the entire purpose of NEPA. Rather than using the NEPA process as intended to consider reasonable, less-harmful alternatives that fit the agency's need, the Corps appears to be merely going through the motions to justify decisions already made.

III. THE CORPS MUST PREPARE AN EIS FOR THIS PROPOSAL

The Corps' proposal is a major federal action that will have significant effects on Georgia's threatened and endangered species. Such significant projects necessarily demand a full EIS, rather than the inadequate EA that the Corps has provided here. The entire purpose of NEPA is to "focus[] government and public attention on the environmental effects of proposed agency action" and "ensure[] that important environmental consequences will not be 'overlooked or underestimated only to be discovered after resources have been committed or the die otherwise cast.'"⁹⁴

To satisfy its obligations under NEPA, the Corps may first prepare an EA to determine whether a proposed project will have any significant environmental impacts.⁹⁵ But if the EA shows that "*any* significant environmental impacts *might* result" from the issuance of a permit, the Corps must then prepare an EIS to fully evaluate the potential environmental impacts.⁹⁶ A "detailed EIS...serves as a springboard for public comment and incorporates the critical views of other federal, state, and local agencies."⁹⁷

In the Eleventh Circuit, the decision not to proceed to an EIS is only justified if (1) the agency satisfied its obligation to "identify the relevant environmental concern," (2) took a "hard

⁹³ U.S. Army Corps of Eng'rs, *South Atlantic Regional Harbor Dredging Presolicitation Notice* (May 13, 2021), <https://sam.gov/opp/dc4f3a8750d64743ac267b07533185c2/view>.

⁹⁴ *N. Buckhead Civic Ass'n v. Skinner*, 903 F.2d 1533, 1540 (11th Cir. 1990).

⁹⁵ 40 C.F.R. § 1501.5.

⁹⁶ *Sierra Club v. Peterson*, 717 F.2d 1409, 1415 (D.C. Cir. 1983) (first emphasis in original); 42 U.S.C. § 4332(2)(C).

⁹⁷ *N. Buckhead Civic Ass'n*, 903 F.2d at 1540.

look” at the concern during its EA process, and (3) either made “a convincing case” to support its findings of no significant impact, or demonstrated that “changes or safeguards in the project sufficiently reduce the impact to a minimum.”⁹⁸ Under this test, an agency’s EA “will pass muster only if it undertook a ‘well-considered’ and ‘fully informed’ analysis of the relevant issues and opposing viewpoints.”⁹⁹ Here, the Corps has failed to satisfy these requirements. It has not made a convincing case that its proposal will not have a significant impact on loggerhead sea turtles, fisheries, and other wildlife, and it has not shown that the mitigation measures it briefly mentions will actually be used or actually be effective.

The crucial trigger for an EIS is “significance,” which the Council for Environmental Quality (CEQ) has traditionally defined in terms of the action’s context and the intensity of its impact.¹⁰⁰ Intensity is evaluated in light of ten factors, only one of which needs to be met for an action to be deemed significant.¹⁰¹ At least seven of those factors apply here:

(1) Impacts that may be both beneficial and adverse.

...

(3) Unique characteristics of the geographic area such as proximity to historic or cultural resources, park lands, prime farmlands, wetlands, wild and scenic rivers, or ecologically critical areas.

(4) The degree to which the effects on the quality of the human environment are likely to be highly controversial.

...

(6) The degree to which the action may establish a precedent for future actions with significant effects or represents a decision in principle about a future consideration.

(7) Whether the action is related to other actions with individually insignificant but cumulatively significant impacts. Significance exists if it is reasonable to anticipate a cumulatively significant impact on the environment. Significance cannot be avoided by terming an action temporary or by breaking it down into small component parts.

...

⁹⁸ *Hill v. Boy*, 144 F.3d 1446, 1450-51 (11th Cir. 1998) (quoting *Coal. on Sensible Transp. v. Dole*, 826 F.2d 60, 66-67 (D.C. Cir. 1987)).

⁹⁹ *Am. Rivers v. Fed. Energy Regulatory Comm’n*, 895 F.3d 32, 49 (D.C. Cir. 2018)

¹⁰⁰ 40 C.F.R. § 1508.27 (1978).

¹⁰¹ *See Ctr. for Biological Diversity v. Nat’l Highway Traffic Safety Admin.*, 538 F.3d 1172, 1220 (9th Cir. 2008).

- (9) The degree to which the action may adversely affect an endangered or threatened species or its habitat that has been determined to be critical under the Endangered Species Act of 1973.
- (10) Whether the action threatens a violation of federal, state, or local law or requirements imposed for the protection of the environment.¹⁰²

In 2020, CEQ altered this framework,¹⁰³ a controversial move that is currently being reevaluated.¹⁰⁴ As briefly discussed at the end of this comment, this project is significant and deserving of an EIS regardless of which CEQ regulations are applied. However, the original framework clearly applies here. The new regulations expressly provide discretion for the continuing application of the prior regulations to “ongoing activities and environmental documents begun before September 14, 2020.”¹⁰⁵ The Brunswick Harbor Modifications Study NEPA process was initiated in May 2019 and itself states that “the prior CEQ regulations continue to apply to this report.”¹⁰⁶ Under that framework, the Corps’ Draft EA conclusions fall far short of a “hard look” or “convincing case.” Rather, the following seven factors clearly indicate that a full, detailed EIS is necessary.

A. The traditional NEPA factors for determining “significance” demand that a full EIS be prepared

1. The Corps’ proposal will have adverse impacts

As described in Section II, spring and summer maintenance dredging will almost certainly have significant adverse impacts to loggerhead sea turtles, fisheries, and other wildlife. These impacts are not “slight” or minor as the Corps suggests.¹⁰⁷ Indeed, upon reviewing scientific literature and testimony from a senior wildlife biologist at the Georgia Department of Natural Resources, a federal court recently found that “there is a strong likelihood that a substantial and appreciable number of [loggerhead] sea turtles would be killed by hopper dredging [during the summer].”¹⁰⁸ To paraphrase the court, “perhaps the best evidence” that spring and summer hopper dredging will have significant impacts “is the Corps’ own 30-some-

¹⁰² 40 C.F.R. § 1508.27(b) (1978).

¹⁰³ See 40 C.F.R. § 1501.3 (2020).

¹⁰⁴ See Ellen M. Gilmer, *Biden Officials Rethinking Trump Environmental Review Rule*, BLOOMBERG LAW, <https://news.bloomberglaw.com/environment-and-energy/biden-officials-rethinking-trump-environmental-review-rule> (March 17, 2021).

¹⁰⁵ 40 C.F.R. § 1506.13 (2020).

¹⁰⁶ Draft EA, *supra* n. 13, at 1.

¹⁰⁷ *Id.* at 109.

¹⁰⁸ Transcript, *supra* n. 22, at 142.

odd year practice of not dredging outside of the winter months and the underlying studies which prompted this restriction by the Corps.”¹⁰⁹

2. The project area contains ecologically critical areas

The natural environment surrounding Brunswick Harbor boasts spectacular barrier islands, tidal creeks, and marsh ecosystems rife with wildlife and natural resources. As explained above, the area surrounding the lower Brunswick River contains essential fish habitat (EFH) for brown shrimp, white shrimp, pink shrimp, gag grouper, gray snapper, black sea bass, Spanish mackerel, summer flounder, and several shark species in or around the project area.¹¹⁰ Some of this habitat has also been designated as “habitat areas of particular concern” (HAPC), which are “subsets of [essential fish habitat] that ... [are] rare, stressed by development, provide important ecological functions for federally managed species, or are especially vulnerable to anthropogenic (or human impact) degradation.”¹¹¹ The area also provides important habitat for loggerhead sea turtles and a number of other threatened and endangered species, as described in Section II above.

3. The Corps’ proposal is highly controversial

For purposes of NEPA, controversy exists when there is “a substantial dispute...as to the environmental consequences of the proposed action.”¹¹² This dispute must be “about the size, nature or effect of a federal action,” rather than just “the existence of opposition.”¹¹³ Showing that there are “underlying flaws” in the agency’s methodology or data can demonstrate the existence of controversy.¹¹⁴ This is especially true if those raising the concerns “are themselves government agencies with ‘special expertise’...[C]ourts regularly find that such concerns demonstrate that a project qualifies as highly controversial.”¹¹⁵ Once confronted with controversy, agencies have a responsibility to not just acknowledge it but to actually resolve it.¹¹⁶

¹⁰⁹ *Id.* at 143.

¹¹⁰ Draft EA, *supra* n. 13, at 30-31.

¹¹¹ Nat’l Marine Fisheries Serv., *Habitat Areas of Particular Concern within Essential Fish Habitat*, <https://www.fisheries.noaa.gov/southeast/habitat-conservation/habitat-areas-particular-concern-within-essential-fish-habitat>.

¹¹² 43 C.F.R. § 46.30 (2008).

¹¹³ *Natural Resources Def. Council v. Nat’l Park Serv.*, 250 F.Supp.3d 1260, 1297 (M.D. Fla. 2017) (quoting *Ga. River Network v. U.S. Army Corps of Eng’rs*, 334 F.Supp.2d 1329, 1338 (N.D. Ga. 2003)).

¹¹⁴ *See id.* at 1297-98.

¹¹⁵ *Nat’l Parks Conservation Ass’n v. Semonite*, 916 F.3d 1075, 1084 (D.C. Cir. 2019).

¹¹⁶ *Id.* at 1085-86 (“The question is not whether the Corps attempted to resolve the controversy, but whether it succeeded.”).

Here, the Corps' proposal has drawn substantive, sustained criticism from other agencies with special expertise and investment in the harbor's health. The Georgia Department of Natural Resources has sent at least two letters to the Corps objecting to its proposal – one from the Wildlife Resources Division (WRD) and one from the Coastal Resources Division (CRD).¹¹⁷ In its letter objecting to year-round dredging, CRD specifically emphasized that the new biological opinion has “consequential and controversial differences that may have population level impacts, and an Environmental Assessment is not sufficient to adequately evaluate these impacts.”¹¹⁸

These letters do not merely reflect public opposition to the Corps' proposal.¹¹⁹ Rather, they identify fundamental flaws with the scientific methods and data behind the Corps' proposal. Coming from a state agency whose opinion the Corps is legally required to solicit,¹²⁰ this is the very definition of “highly controversial.” As the D.C. Circuit has recently pointed out, “repeated criticism from many agencies who serve as stewards of the exact resources at issue...surely rises to more than mere passion.”¹²¹ The following is a sampling of the existing controversy:

- In its September 28, 2020 letter to the Corps, WRD wrote that it “fundamentally disagree[s]” with the 2020 South Atlantic Regional Biological Opinion (SARBO) that the Corps now seeks to incorporate into the Draft EA.¹²² It referenced the findings of a 2009 demonstration project by the Corps that “showed that summer dredging was not feasible due to high sea turtle capture rates, including mortality of reproductively active loggerhead turtles.”¹²³ By contrast, WRD found that “[t]he 2020 SARBO does not provide adequate biological or logical justification for not complying with winter dredging windows.”¹²⁴ It emphasized that “we do not concur” with the agency's claims about the SARBO's effect on threatened and endangered species.¹²⁵

¹¹⁷ A similar proposal by the Corps in North Carolina has also drawn objection from the South Atlantic Fishery Management Council. *See generally* SAFMC Letter, *supra* n. 4.

¹¹⁸ *See* CRD Letter, *supra* n. 3, at 12.

¹¹⁹ In addition to the legal controversy factors, it should be noted that there is significant public opposition to this proposal. The Coastal Resource Division's letter notes that it received over 1,500 public comments opposing hopper dredging outside the traditional dredging windows, mostly based on the potential threat to sea turtles and inconsistency with Georgia's state environmental laws. *See id.* at 2. We anticipate that the Corps will receive substantial public opposition during this comment period as well.

¹²⁰ *See* 16 U.S.C. § 1456.

¹²¹ *Semonite*, 916 F.3d at 1085.

¹²² WRD Letter, *supra* n. 3, at 1.

¹²³ *Id.* at 2.

¹²⁴ *Id.*

¹²⁵ *Id.*

- A February 22, 2021 memorandum summarizing the department’s concerns further underscored the scientific flaws in the Corps’ proposal. As the memorandum noted, the 1991 SARBO found that dredging practices before the establishment of dredging windows “jeopardized the continuing existence” of threatened and endangered sea turtle species.¹²⁶ The memorandum disputed the contention that removing dredging windows would help other protected species like the right whale and the Atlantic sturgeon.¹²⁷ It emphasized that “available data does not support either of [the] arguments” involving right whales, calling the conclusion “illogical.”¹²⁸ It also found that even a “legal allowable take for adult loggerheads could lead to significant local declines in loggerhead populations in Georgia.”¹²⁹
- Similar concerns were communicated to the Corps in an April 23, 2021 letter from CRD. In addition to challenging the Corps’ statements on protecting right whales,¹³⁰ CRD directly identified scientific shortcomings in the Corps’ analysis – namely, its treatment of turtle population distribution and their age-class abundance by season.¹³¹ It again called the Corps’ attention to its own 2009 demonstration project.¹³² Ultimately, it found that the Corps’ EA, FONSI, and Federal Consistency Determination “do not adequately address the increased risk to Georgia’s sea turtle population, do not provide justification for changing from the winter hopper dredge window...and have not shown that changing to a summer hopper dredging window will have similar or less reasonably foreseeable impacts to those resources.”¹³³ Based on these findings, it concurred only on the condition that, among other things, the dredging window would remain in place “unless prior approval, based on extraordinary justification, is obtained from GCMP.”¹³⁴ Despite this condition, the Corps has indicated its intent to move forward anyway.

These comments from the state clearly demonstrate that the Corps’ proposal is “highly controversial” within the meaning of NEPA. In response to these concerns, “the Corps had to

¹²⁶ DNR Mem., *supra* n. 1, at 2.

¹²⁷ *Id.* at 10.

¹²⁸ *Id.*

¹²⁹ *Id.* at 11.

¹³⁰ CRD Letter, *supra* n. 3, at 4.

¹³¹ *Id.* at 6-7.

¹³² *Id.* at 7.

¹³³ *Id.* at 9.

¹³⁴ *Id.* at 11. Absent those conditions, the agency dictated that “all parties shall treat this conditional concurrence letter as an objection.” In its EA, the Corps “found the conditions unacceptable” and thus now treats this letter as an objection. *See* Draft EA, *supra* n. 13, at 139.

either confront those fact or explain why [subsequent events] rendered them irrelevant.”¹³⁵ Instead, the Corps makes only passing reference to these criticisms. Indeed, it does not address the 2009 demonstration project or the recent turtle mortalities in Charleston Harbor at all, and it barely mentions the direct and sustained objections from the Georgia Department of Natural Resources. Though the Corps purports to provide its own competing “conclusions,” the Corps has essentially “just shrugged off” the state’s repeated objections.¹³⁶ This falls far short of resolving the controversy and demonstrates the necessity of an EIS. Indeed, the purpose of an EIS is “to provide robust information in situations precisely like this one, where, following an environmental assessment, the scope of a project’s impacts remains both uncertain and controversial.”¹³⁷

4. The Corps’ proposal will have negative precedential impacts

While an action’s precedential effect is generally “insufficient on its own” to establish significance, it can nevertheless weigh in favor of the need to perform an EIS¹³⁸—for example, when the proposal might exert pressure on future actors¹³⁹ or, “by design, shape [an agency’s] methods and strategies moving forward.”¹⁴⁰

Here, the Corps’ proposal has great potential to precipitate the lifting of dredging windows in other states. This is not mere speculation. When the Corps first moved to dredge outside of its traditional windows, it simultaneously sought to dredge in two harbors—the Savannah and Brunswick Harbors. Around the same time, it made a similar proposal for two harbors in North Carolina, which conservation groups opposed for similar reasons. As SELC pointed out in those proceedings, at least ten states along the Atlantic Coast have seasonal dredging restrictions.¹⁴¹ The Corps has gone on the record calling these proposals part of a “paradigm shift” in their approach to dredging.¹⁴²

¹³⁵ *Nat’l Parks Conservation Ass’n v. Semonite*, 916 F.3d 1075, 1085 (D.C. Cir. 2019).

¹³⁶ *Cf. Am. Rivers v. Fed. Energy Regulatory Comm’n*, 895 F.3d 32, 50 (D.C. Cir. 2018).

¹³⁷ *Semonite*, 916 F.3d at 1087-88.

¹³⁸ *Anderson v. Evans*, 371 F.3d 475, 493 (9th Cir. 2004).

¹³⁹ *Cf. Sierra Club v. Marsh*, 769 F.2d 868, 879 (1st Cir. 1985) (citing concern that development pressures “could well prove irreversible”).

¹⁴⁰ *Or. Wild v. Bureau of Land Mgmt.*, 2015 WL 1190131 *1, *9 (D. Or. 2015).

¹⁴¹ In addition to Georgia, those states are Florida, Maryland, Maine, Massachusetts, New Hampshire, New Jersey, New York, North Carolina, South Carolina, and Virginia.

¹⁴² Mary Landers, *Summertime dredging in Georgia threatens sea turtles; Corps allowed to kill 214 loggerheads*, Savannah Morning News (Mar. 26, 2021), <https://www.savannahnow.com/story/news/2021/03/26/dredging-georgia-threatens-sea-turtles-summer-right-whales-winter/4704913001/>.

The fact that the Corps has, in one year, moved to lift dredging windows in at least two states (and four harbors) reflects the very real possibility that year-round dredging will soon be seen as the norm for the entire southeast coast. Indeed, in 2021, the Corps attempted to bundle maintenance dredging contracts for certain North Carolina and Georgia harbors together (with no environmental windows). The agency has indicated that it intends to add Charleston Harbor, South Carolina, to the regional harbor dredging contract in 2022, suggesting that it will no longer abide by historic dredging windows in South Carolina either.¹⁴³ Despite the obviously significant environmental effects that this would have, the Corps' Draft EA demonstrates no awareness of how these collective impacts might play out, creating a "troubling vacuum" in their environmental review.¹⁴⁴

The Corps also ignores the potential precedential effects of this proposal on beach fill projects. Spring and summer dredging could effectively create greater "demand" for beach fill projects outside of current nourishment windows as a means of disposing of the dredged material, causing indirect impacts to shorebirds, sea turtles, and other wildlife through ill-timed nourishment projects.

5. The Corps' proposal will have cumulatively significant impacts

Just as the Corps cannot ignore the precedential effects of this decision, the Corps cannot evaluate this decision's environmental impacts in a vacuum. Under NEPA regulations, an agency cannot avoid review by labeling a project as temporary or by breaking it down into seemingly insignificant components.¹⁴⁵ Instead, the agency must give "a realistic evaluation of the total impacts,"¹⁴⁶ taking into account all "reasonably foreseeable"¹⁴⁷ actions that are "sufficiently concrete"¹⁴⁸ to "further the informational purposes of NEPA."¹⁴⁹ After all, any given action could be "the straw that breaks the back of the environmental camel."¹⁵⁰

¹⁴³ U.S. Army Corps of Eng'rs, *South Atlantic Regional Harbor Dredging Presolicitation Notice* (May 13, 2021), <https://sam.gov/opp/dc4f3a8750d64743ac267b07533185c2/view>.

¹⁴⁴ *Cf. Anderson*, 371 F.3d at 493 (describing government's failure to consider whether approving tribal whale hunts would increase whaling by "other domestic groups").

¹⁴⁵ 40 C.F.R. § 1508.27(b)(7).

¹⁴⁶ *Ga. River Network v. U.S. Army Corps of Eng'rs*, 334 F.Supp.2d 1329, 1339 (N.D. Ga. 2003) (quoting *Grand Canyon Trust v. Fed. Aviation Admin.*, 290 F.3d 339, 342 (D.C. Cir. 2002)).

¹⁴⁷ *City of Oxford, Ga. v. Fed. Aviation Admin.*, 428 F.3d 1346, 1353 (11th Cir. 2005).

¹⁴⁸ *Id.*

¹⁴⁹ *Id.* at 1353-54.

¹⁵⁰ *Ga. River Network*, 334 F.Supp.2d at 1338-39 (quoting *Hanly v. Kleindienst*, 471 F.2d 823, 831 (2d Cir. 1972)).

As discussed further in Section II.E, the Draft EA does not adequately consider how the lifting of summer dredging windows might act in concert with other harbor management decisions in Brunswick and throughout the region. As discussed elsewhere in these comments, the Corps has proposed other projects for this harbor and is in the process of making similar proposals in other Southeastern harbors. These projects are reasonably foreseeable and sufficiently concrete – and they matter because, as the Draft EA itself notes, “species are appropriately managed at the regional level, as all move throughout the South Atlantic.”¹⁵¹ Indeed, the Draft EA concludes that turtles will not be significantly impacted by the SARBO *because* of “the increased number of loggerhead sea turtles [throughout the region] and their ability to nest along the southeast coast.”¹⁵² Despite this acknowledgment, neither of the dredging proposals in Georgia and North Carolina have factored in the *cumulative* effects of this region-wide spring and summer dredging on turtle populations. Those potentially significant effects are exactly the kind of information that an EIS is designed to uncover.

6. The Corps’ proposal will significantly affect threatened and endangered species

As previously discussed, this proposal poses a serious threat to the long-term viability of loggerhead sea turtle populations by making it more likely that reproductive-age adult turtles will be killed or severely injured. This effect would be significant and can only be properly evaluated by a full EIS.

The Corps attempts to dismiss these effects by pointing to the 2020 SARBO. But the purpose of a biological opinion like the 2020 SARBO is to evaluate whether a proposed project would jeopardize the continued existence of a species—not to opine on whether a project would have a significant impact. “Clearly, there can be a significant impact on a species even if its existence is not jeopardized.”¹⁵³

¹⁵¹ Draft EA, *supra* n. 13, at 110.

¹⁵² *Id.* at 112.

¹⁵³ *Makua v. Rumsfeld*, 163 F. Supp. 2d 1202, 1218 (D. Haw. 2001); *see also Sierra Club v. Norton*, 207 F. Supp. 2d 1310, 1322 (S.D. Ala. 2002) (“An environmentally significant action need not involve a threat of extinction to a federally-protected species. Lesser impacts, including impacts on non-listed species, can constitute a significant effect.”); *see also Cascadia Wildlands v. U.S. Forest Serv.*, 937 F. Supp. 2d 1271, 1283 (D. Or. 2013) (holding project may have significant effect on environment where project will “likely adversely affect” northern spotted owl); *Klamath-Siskiyou Wildlands Ctr. v. U.S. Forest Serv.*, 373 F. Supp. 2d 1069, 1080-81 (E.D. Cal. 2004) (same); *Sierra Club v. Van Antwerp*, 719 F. Supp. 2d 58, 65-67 (D.D.C. 2010) (Lamberth, J.) (holding that “an EIS should have been prepared because ... [d]estroying the habitats of the Indigo Snake and the Wood Stork clearly may adversely affect these protected

In any event, like the state of Georgia, we also have serious concerns with the methods and data by which the 2020 SARBO concluded otherwise. These fundamental disagreements suggest that the significance of the impact on turtles is at least a matter of serious scientific controversy. This is especially true when the full scale of potential spring and summer dredging is considered. For these reasons as well, an EIS is necessary.

7. The Corps' proposal ignores the State's Coastal Zone Management objection

As discussed in detail in Section IV, the Corps has not complied with Georgia's Coastal Management Plan (CMP) to the maximum extent practicable, as required by the Coastal Zone Management Act (CZMA). Instead, the Corps intends to proceed over the state's objection. This potential violation of the CZMA warrants further review in an EIS.

B. The new NEPA regulations also demand that a full EIS be prepared

As previously discussed, the Corps has already determined that the prior NEPA regulations—which use the preceding factors—apply to this project. However, even the new regulations, if applied here, would require a full EIS for this proposal. Under those regulations, agencies still must determine significance in light of “the affected area (national, regional, or local) and its resources, such as listed species and designated critical habitat under the Endangered Species Act.”¹⁵⁴ When evaluating the degree of an action's effects, agencies should consider:

- (i) Both short- and long-term effects.
- (ii) Both beneficial and adverse effects.
- (iii) Effects on public health and safety.
- (iv) Effects that would violate Federal, State, Tribal, or local law protecting the environment.¹⁵⁵

The preceding sections clearly demonstrate that the Draft EA has not adequately considered how a change to traditional dredging windows would adversely affect endangered species like the loggerhead sea turtle—especially when played out over the long-term and along

species” even though “this fact is not fatal to the ultimate substantive determinations” under the ESA concerning jeopardy), *rev'd on other grounds*, 661 F.3d 1147 (D.C. Cir. 2011).

¹⁵⁴ 40 U.S.C. § 1501.3(b)(1).

¹⁵⁵ *Id.*

the entire coast. Furthermore, as the state's sustained objection demonstrates, the Corps' proposal threatens to violate long-standing Georgia laws and policies designed to protect those same species. In light of these significant effects, a full EIS is necessary.

IV. THE CORPS HAS NOT COMPLIED WITH OTHER FEDERAL AND STATE LAWS

A. The Corps improperly disregards the State of Georgia's Coastal Zone Management Act consistency objection

The federal Coastal Zone Management Act of 1972 (CZMA) was passed by Congress to “promote comprehensive and coordinated planning for coastal zone development and preservation between states and the federal government.”¹⁵⁶ Under the CZMA, each coastal state may adopt a Coastal Management Program (CMP) that provides for “the protection of natural resources, including ... fish and wildlife and their habitat, within the coastal zone.”¹⁵⁷ Once a state develops a CMP, the CZMA requires any federal activity within the coastal zone to be consistent “to the maximum extent practicable” with the state CMP.¹⁵⁸

The phrase “consistent to the maximum extent practicable” means “fully consistent with the enforceable policies of management programs unless full consistency is prohibited by existing law applicable to the Federal agency.”¹⁵⁹ In other words, “whenever legally permissible, Federal agencies shall consider the enforceable policies of management programs as requirements to be adhered to in addition to existing Federal agency statutory mandates.”¹⁶⁰

Here, the State of Georgia objected to the Corps' proposal to conduct year-round hopper dredging, explaining that the proposal would result in the taking of the state-listed loggerhead sea turtles and other wildlife in violation of the Georgia Game and Fish Code and other wildlife protection laws.

Rather than accept the CZMA's mandate to comply with Georgia's CMP, the Corps sent the state a letter informing it that the Corps intended to move forward with year-round dredging

¹⁵⁶ *Conservation Law Found. v. Watt*, 560 F. Supp. 561, 574 (D. Mass. 1983) *aff'd sub nom. Com. of Mass. v. Watt*, 716 F.2d 946 (1st Cir. 1983).

¹⁵⁷ 16 U.S.C. § 1452(2)(a).

¹⁵⁸ 16 U.S.C. § 1456(c)(1)(A); *see also* 15 C.F.R. § 930.30 (“The provisions of this subpart are intended to assure that all Federal agency activities including development projects affecting any coastal use or resource will be undertaken in a manner consistent to the maximum extent practicable with the enforceable policies of approved management programs.”).

¹⁵⁹ 15 C.F.R. § 930.32.

¹⁶⁰ *Id.*

anyway. In the letter, the Corps offered no explanation for why it was no longer practicable to abide by seasonal dredging windows—a practice the Corps followed for three decades.

B. The Corps made substantial changes to the proposed action after consulting with agencies under the Magnuson-Stevens Act.

The Magnuson-Stevens Act requires federal agencies to consult with NMFS regarding potential impacts to essential fish habitat. Here, the Corps consulted with the NMFS in early 2020.¹⁶¹ At that time, however, the original draft EA reviewed by NMFS said the Corps would use a cutterhead, not hopper, dredge and made no reference to the removal of seasonal hopper dredging windows.¹⁶² Indeed, in Appendix H to the original draft EA, the Corps described its “minimization measures” as follows:

In order to minimize impacts to T&E species, critical habitats, and marine mammals...the BHMS [Brunswick Harbor Modification Study] proposed to use the cutterhead dredge method.... Cutterhead dredges are known to have less direct impacts to listed species than other dredge types. Other dredge methods were analyzed and would be too costly to endangered species such as sea turtles and sturgeon....”¹⁶³

It was not until February 2021, well after the FWCA consultation, that the Corps revealed in a revised appendix that it planned to allow the use of hopper dredges for annual maintenance dredging.¹⁶⁴ It does not appear that the Corps has consulted with NMFS again since that time. Given the significant risks to fisheries, EFH, and HAPCs from the shift to spring and summer dredging, the failure to consult with NMFS about fisheries impacts is particularly problematic.

V. CONCLUSION

Given the substantial threats described above, we urge the Corps to continue the use of longstanding and effective seasonal dredging windows to balance the need for efficient dredging of Brunswick Harbor with the protection of loggerhead sea turtles, fisheries, and other sensitive

¹⁶¹ Letter from Kimberly Garvey, U.S. Army Corps of Eng’rs, to Pace Wilbur, Nat’l Marine Fisheries Serv. (June 9, 2020) (attached to Draft EA as Ex. G); E-mail from Stephen M. Fox, U.S. Army Corps of Eng’rs, to Pace Wilbur, Nat’l Marine Fisheries Serv. (June 9, 2020) (attached to Draft EA as Ex. G).

¹⁶² See Draft EA, *supra* n. 13.

¹⁶³ *Id.* at App. H p. 5; see also *id.* at App. K, p. 17 (“Using a cutterhead dredge as the USACE plans should minimize dredging impacts to turtles in the water.”); *id.* at 18 (“We recommend the USACE condition the project as they have described for the safety of wildlife and the environment. These conditions include using only cutterhead dredges....”).

¹⁶⁴ See Draft EA, *supra* n. 13, at App. J.

Ms. Kimberly Garvey

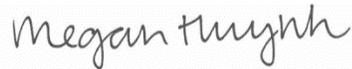
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species. At a minimum, the Corps should fully evaluate the impacts of unrestricted hopper dredging in an EIS. We believe that once the Corps does so, the benefits of continuing the use of seasonal windows will become even more clear.

Thank you for considering our concerns. If you have any questions, please feel free to contact me at 404-521-9900 or mhuynh@selcga.org.

Sincerely,



Megan Hinkle Huynh
Senior Attorney



Robert D. Sherrier
Associate Attorney

Attachments

cc: Megan Desrosiers, One Hundred Miles
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RE: BHMS and Brunswick Harbor O&M, Revised IFR/EA Public Comment, Glynn County

Dear Ms. Garvey,

Staff of the Georgia Department of Natural Resources (DNR) has reviewed the June 21, 2021 and June 23, 2021 Public Notices and updated draft Integrated Feasibility Report (IFR)/Environmental Assessment (EA) for the Brunswick Harbor Modification Study (BHMS). The Corps has updated the analysis in the IFR/EA to provide clarity related to the operations and maintenance (O&M) of the federal navigation channel that includes additional analysis and information regarding the Corps' compliance with the 2020 South Atlantic Regional Biological Opinion for the Dredging and Material Placement Activities in the Southeast U.S. (2020 SARBO). The comment period extends through July 21, 2021.

On April 23, 2021, DNR Georgia Coastal Management Program (GCMP) issued a Coastal Zone Management Act (CZMA) Federal Consistency Determination Conditional Concurrence that provided twelve (12) mitigation measures or conditions that could be incorporated to allow the proposed project to be consistent to the maximum extent practicable with GCMP's enforceable policies. The U.S. Army Corps of Engineers (Corps) responded May 20, 2021, that, among other things, the conditions were not acceptable, the letter would be treated as an objection, the proposed action was consistent without the management measures, and that they would proceed with the project over GCMP's objection. On June 21, 2021, the Corps revised the IFR/EA, including the Appendix J Federal Consistency Determination, and included their May 20, 2021, response letter.

In an effort to inform the public record as it relates to the IFR/EA Appendix J, DNR takes this opportunity to assert that our April 23, 2021 letter and attachments contained both an explanation of why the conditions are necessary to ensure consistency with specific enforceable

policies of the GCMP as required in 15 CFR 930.4(a)(1) and an identification of the specific enforceable policies as required in 15 CFR 930.4(a)(1). Our letter is a valid consistency response.

However, we find that the Corps' May 20, 2021 response letter did not meet the burden as required by federal regulations in order to proceed over a state objection as follows:

1. In claiming the proposed project was fully consistent with the enforceable policies of the management program as required in 15 CFR 930.43(d)(2) when enforceable policies forbid the taking of sea turtles;¹
2. In claiming the proposed project was consistent to the maximum extent practicable with the enforceable policies of the management program as required in 15 CFR 930.43(d)(1) when it failed to clearly describe in writing the statutory provisions, legislative history, or other legal authority which limits the Corps' discretion to be fully consistent with the enforceable policies as required under 15 CFR 930.32(a)(2). Both 2020 SARBO² and the IFR/EA³ state that winter hopper dredging is allowed; and
3. Not adhering to 15 CFR 930.32(a)(2) that requires, whenever legally permissible, the Corps consider the enforceable policies of a management program as requirements to be adhered to in addition to existing federal agency statutory mandates. Section 307(e) of the Coastal Zone Management Act was intended to cause substantive changes in federal agency decision-making within the context of the discretionary powers residing in such agencies⁴ and the Corps has the discretion to adopt all twelve (12) mitigation measures outlined in our conditional concurrence letter.

The National Environmental Policy Act (NEPA) requires the more detailed and rigorous environmental impact statement (EIS) rather than a simplified environmental assessment (EA) when environmental impacts are significant, such as shifting risk from one endangered species to another. The 2020 SARBO provides a process for shifting risk between species that the 1997 SARBO did not but was not intended as a stand-alone document providing defense against unsubstantiated choices. The 2020 SARBO requires completion of a pre-construction risk assessment that was not included in the EA; therefore it has not been substantiated and cannot be concluded that there will be no significant impacts from the proposed project.

¹ Game And Fish Code O.C.G.A. 27-1-3(f) states it is unlawful to hunt, trap, or fish except during open season; O.C.G.A. 27-1-2(39) defines "hunting" as pursuing, shooting, killing, taking, or capturing wildlife; O.C.G.A. 27-1-2(34) defines sea turtles and their eggs as "game animals"; and no hunting season has been promulgated for sea turtles.

² 2020 SARBO Appendix F, page 593: "Hopper dredging and projects requiring survey vessels over 33-ft in length will be scheduled, to the maximum extent practicable, outside of North Atlantic right whale migration and calving seasons..."

³ Brunswick Harbor Modification Study, Draft Integrated Feasibility Report and Environmental Assessment and Draft FONSI, Section 4.5 Protected Species, page 103: "While the 2020 SARBO allows dredging any time of year, including the historic winter environmental windows, it also requires that a project meet all relevant project design criteria..."

⁴ 15 CFR 930.32 (a)(2)

The project has two components including 1) dredging of a bend widener and turning basin, and 2) annual maintenance dredging of the Brunswick Ship Channel. The bend widening and turning basin portion of the project will be completed with a pipeline/hydraulic dredge. Pipeline/hydraulic dredges are not known to cause mortality of protected species. The channel maintenance component of the project will rely on trailing suction hopper dredges which have been shown to have significant effects on protected species populations. The following comments focus on the channel maintenance portion of the project. The Corps considered 9 alternatives for the project. The No Action Alternative (NAA, Alternative 1) includes the use of seasonal winter dredging windows for channel maintenance dredging. All other alternatives include the use of a risk-based assessment to determine the appropriate time of year for maintenance dredging. Under the risk-based assessment alternatives, the Corps states its intention to dredge during the summer months. The EA did not consider winter dredging windows in Alternatives 2 through 9; winter dredge windows were only considered in the No Action Alternative.

After review of the environmental data, the Corps selected Alternative 8 with a risk assessment-based approach for maintenance dredging and issued a Draft Finding of No Significant Impact (FONSI). We disagree with the Corps' FONSI for the Brunswick Harbor Modification Project and find the EA deficient for several reasons including: 1) the target species and goal of the risk assessment are not clearly defined, 2) the risk discussion does not take into account quantitative data on species mortality rates and population status, 3) risk is described in broad qualitative categories with no explanation of how the categories are defined, 4) mitigation measures for reducing sea turtle mortality associated with summer dredging are speculative with no scientific basis, and 5) the Corps did not select the alternative for maintenance dredging with the least impacts to population recovery. The proposed alternative represents a major shift in the seasonal timing of maintenance dredging that will result in significant increased threats to loggerhead population recovery without demonstrating any reduction in risk to North Atlantic right whale (NARW) or sturgeon population recovery. Because potential impacts to protected species are not adequately explored in the EA by limiting alternative analysis to summer dredging rather than including year-around risk-based assessments to inform timing for hopper dredging, NEPA requires the Corps to develop an EIS to ensure the impacts of the project are fully understood and disclosed in advance. The more detailed and rigorous EIS process is also required to address cumulative impacts.

Regarding target species and goal of the risk assessment, the EA risk assessment discussion is deficient for several reasons. First, the EA should provide a statement that describes each species, including distinct population segments and recovery units, to which the risk assessment applies. For example, the EA frequently refers to risks to "sea turtles" as a group. Several species and life stages of sea turtles occur in Georgia seasonally with different levels of concern for population recovery. It is not appropriate to consider risk at the level of all sea turtles. In addition, it is unclear whether the purpose of the risk assessment is to reduce risk of mortality to individual

animals or ensure the project doesn't affect population status or recovery. For instance, the EA selects alternative 8 as the preferred alternative partially due to predicted reductions in mortality of Atlantic sturgeon. The difference in sturgeon mortality between the 2 scenarios is very small and would not result in effects on population abundance or recovery. It is not appropriate to use sturgeon mortality as a factor in selection of the alternatives if the goal of the risk assessment is to minimize effects on sturgeon population recovery. The selection of the appropriate alternative depends on the goal of the risk assessment. Without a clearly defined biological goal, it is impossible to select the best alternative.

Second, the risk assessment fails to consider critical biological data DNR provided the Corps via the April 23, 2021 Memorandum including historic and predicted mortality rates for summer and winter dredging in Georgia and assessments of the predicted mortality on population status and recovery. At a minimum, the risk assessment process should include the development of a matrix that includes this data for the relevant species and subpopulation/recovery units potentially affected by the project. A consideration of all relevant biological data is necessary to select the appropriate alternative.

Third, the EA describes risk in broad qualitative categories with no explanation of how the categories are defined (low, slight, high). For example, the EA argues that the risk of a right whale vessel strike is very low but the consequences to the population are high. A low-risk action could include an event that happens so infrequently that it is discountable. Alternatively, it could represent an event that has effects on population recovery. In the NAA section, the EA argues that the NAA alternative increases "risk" to Atlantic sturgeon; however, there is no discussion of what the increased risk means and whether it will have effects on population recovery.

In the case of the NARW, the EA states that the consequences of a strike could "change the survivability of a species with such low population numbers"; however, there is no discussion of how they arrived at this conclusion. Hopper dredging has occurred for over 30 years in Georgia during the winter months with no documented NARW/vessel interactions or mortalities. By definition, the activity has had no effect on population recovery. During the period 1990-2010, the NARW population grew at approximately 2.8% per year with dredging occurring during the winter dredging window in Georgia. We have no reason to assume that the probability of interaction between NARW, hopper dredges and support vessels will increase in the future. By comparison, a recent summary of human caused NARW mortalities in the U.S. and Canada (vessel strikes, pot/trap gear entanglements, other) estimated ~141 NARW mortalities from 2010-2018 (NMFS Draft BiOp 2021). The risk categories in the EA should be clearly defined and have some relation to population recovery.

Fourth, the EA includes speculative information used to argue that summer dredging will have little or no effect on sea turtle populations.⁵ Citations should be provided in the text, or the statements should be removed from the EA. Similarly, the risk assessment includes misinterpretations of research conducted by DNR [Assessment of demographic recovery criteria for the Northern Recovery Unit (NRU) of loggerhead turtles (*Caretta caretta*) using genetic mark-recapture including implementation of high priority actions (Report submitted for NOAA Grant Number: NA16NMF4720076)]. The EA states that genetic work in Brunswick and North Florida suggests that there “may not be” as much fidelity of loggerhead turtles to a specific nesting beach as previously thought. This statement is not correct. The study in question found that loggerhead turtles exhibit extremely high intra-seasonal nest site fidelity (Shamblin et al. 2017). Forty seven percent (47%) of NRU loggerhead nesting females used 5 km of beach or less for nesting and 73% used less than 20 km. These results were consistent with previous satellite telemetry studies (Hart 2013, Tucker 2010). In addition, the EA states that the study “seems” to indicate that there are more loggerhead females than previously thought. Again, this statement is not correct. Previous estimates of adult female loggerheads were derived from nest numbers, clutch frequency and remigration estimates. There was a high degree of uncertainty associated with these estimates. The study conducted by DNR was the first recovery unit-wide count of adult female loggerheads using genetic analysis (microsatellite DNA) of egg samples from all observed nests. Overall, our study found that loggerheads have high site fidelity and that mortality of adult females during proposed summer dredging would have effects on local nesting populations.

Finally, the EA provides several justifications as to why Alternative 8 is the preferred alternative that will significantly reduce risk to NARW and Atlantic Sturgeon and may slightly increase risk to sea turtles,⁶ even though risks to population recovery have been refuted or are incomplete assessments. Research provided by DNR shows that loggerhead sea turtles exhibit extremely high site fidelity, local sources of mortality will have effects on local populations (Shamblin 2017), and population modeling shows the NRU loggerhead population came very close to extirpation in the early 2000’s and has sustained a recent increase in nesting due to intensive beach management and the implementation of Turtle Excluder Devices (TED; Nuse et al 2020). Modeling predicts that the population will plateau and possibly decline slightly because of lack of recruitment from low nesting in the early 2000s. Allowable take limits for adult loggerheads in the 2020 SARBO (214

⁵ Examples of speculative information in the EA include: 1) the take of sea turtles tends to be highest near the end of dredging projects and bed-leveling will mitigate sea turtle mortality, 2) sea turtle brumation on or in the surface layer is more likely during the winter making deflectors more effective and relocation trawling less effective, 3) sea turtles thermoregulate so those encountered during the winter months are less able to avoid interactions and those encountered during the warmer months are able to react quicker to equipment, and 4) sea turtles are believed to move throughout the water column during the warmer months reducing bottom time and interaction with dredge equipment. We are not aware of biological data or scientific studies that supports these statements.

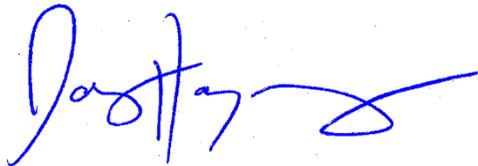
⁶ The justification provided includes the following points: 1) there is an increased number of loggerheads, 2) loggerheads have the ability to nest along the southeast coast, 3) dredging outside the traditional windows is not expected to impact the species (loggerheads), 4) take is limited (107 observed loggerheads over 3 years), 5) the Corps has a history of managing hopper dredging without excessive take, and 6) the NAA has greater risk to NARW and Atlantic sturgeon.

over 3 years) could lead to a decline in the overall NRU population or declines in local populations adjacent to ship channels. The risk of mortality to nesting females is estimated to be 8 times higher during the spring and summer than during winter hopper dredging and should be avoided. Atlantic sturgeon mortality is expected to be slightly higher for the NAA; however, the predicted take is estimated to be ~1 animal per channel per year. This level of take is not expected to have effects on population recovery. There is no discussion of the effects of the alternative plans on Atlantic sturgeon population recovery in the EA.

For the last 30 years, channel maintenance dredging in the Brunswick Ship Channel has been restricted to winter months to reduce sea turtle mortality (15 December-31 March). From 1994-2019, loggerhead sea turtle mortality averaged 1.3 turtles per year in Georgia channels (Savannah, Brunswick, and Kings Bay). All winter dredging mortalities were juveniles. No right whale interactions or mortalities were documented during the period (0 per year). Sturgeon mortalities were low with an average of 3.4 per year in Georgia (most recent 5-year period with standardized monitoring). A review of the biological data clearly shows that the use of winter dredging windows for hopper dredging activities in Georgia represents the best alternative to minimize mortality of protected species and achieve population recovery. Overall, the use of winter dredging windows represents a highly successful multi-species approach to minimizing threats to protected species in Georgia.

DNR submits this letter solely for the purpose of public comment on the IFR/EA, and the Corps may not view this as a final response or rebuttal to the May 20, 2021 letter. DNR intends to continue working with the Corps toward amicable resolution of these and other disputes related to the BHMS proposed project subject to the April 23, 2021 federal consistency conditional concurrence letter. Please contact Jason Lee (jason.lee@dnr.ga.gov) if you have technical questions, Kelie Moore (kelie.moore@dnr.ga.gov) if you have questions about GCMP federal consistency provisions, or me if I can be of further assistance.

Sincerely,



Doug Haymans
Director

DH/km

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Kimberly L. Garvey, Chief, Planning Branch
United States Army Corps of Engineers, Savannah District
100 W. Oglethorpe Avenue
Savannah, Georgia 31401-3604

Dear Kimberly,

The Jekyll Island Authority appreciates the civilian and military personnel of the Corps and their efforts upholding the strength of our nation, the vitality and resilience of our communities, and the conscientious stewardship of our natural resources.

The Georgia Sea Turtle Center, proudly operated by the Jekyll Island Authority since 2007, is the only veterinary hospital focusing on turtles in the state of Georgia. We receive and treat sea turtle patients facing severe injuries due to entrapment in dredging equipment. In addition to rehabilitation, our mission encompasses biological research and public education.

As the leadership of the Georgia Sea Turtle Center, we write to express significant concerns in the context of the updated draft Integrated Feasibility Report (IFR)/Environmental Assessment (EA) and Finding of No Significant Impact (FONSI) as it pertains to the action alternative for operations and maintenance (O&M) dredging utilizing hopper dredge to occur outside of historic winter environmental window at Brunswick Harbor.

Our concerns fall into the following categories:

1. Lack of robust scientific consensus supporting the proposed changes to policy and practice.
2. Insufficient communication and interpretation of the scientific rationale underpinning proposed changes, accessible at the local community level.
3. Lack of a strategic approach to forge a collaborative inter-agency alignment between NOAA, USACE, Georgia DNR, and other actors, such as the Georgia Sea Turtle Center based on a common science-based understanding of the issues.

In reviewing the 2020 SARBO and the updated draft IFR/EA and FONSI, our view is that the available science is inadequate to sufficiently evaluate the risks or potential benefits to protected species of allowing O&M dredging to proceed without seasonal restrictions. Furthermore, the process by which the risk-based management approach, outlined in the 2020 SARBO, would inform any post hoc scientific analyses designed to objectively assess outcomes is unspecified. We list the following questions as



examples of scientific uncertainties that, without further investigation, collaborative discussion, and consensus building, call for a more precautionary approach than is currently being advanced.

1. What is the significance of loggerhead population dynamics within the geographically unique Georgia Bight sub-region to the stability of the overall Northern Recovery Unit (NRU)? If dredging-related take disproportionately occurs within the Georgia Bight, could population fragmentation within the NRU destabilize the recovery trajectory?
2. Considering climate change, are some geographies of greater importance than others in regard to the effects of rising incubation temperatures on the proportion of male and female hatchlings recruiting to the population?
3. What is known and unknown about loggerhead behavioral responses to stimuli that might be employed in the risk-based management approach and incorporated into project design criteria (PDCs), such as lights, tickler chains, or predator silhouettes. If these or similar techniques, with the aim of provoking an evasive response by loggerheads to avoid entrainment, are employed, how will they be scientifically evaluated?
4. To what extent does existing data inform consideration of the effects of relocation trawling and relocation on gravid loggerheads? What is the potential range in the proportion of females captured and relocated that could experience clutch losses? What affect might clutch loss have on the subsequent reproductive capacity of a female loggerhead within a season?
5. What dynamics influence the use of Saint Simons Sound and the Brunswick River by Atlantic and short-nosed sturgeon?

We urge the Corps not to proceed with O&M dredging utilizing hopper dredge equipment outside of the historic winter environmental window before a more inclusive and collaborative discussion can be convened. We strongly advocate the need to build expert consensus around existing science and scientific process as it relates to these and other pertinent questions that may be raised before going forward.

We certainly understand that considerable scientific communication and deliberation has already occurred within the Federal agencies. However, it is evident from the record of communication between the Corps and the Georgia DNR Coastal Resources Division that federal and state biologists are not aligned. We believe this lack of alignment could be resolved by inviting a broader range of experts into the discussion to include academic and other researchers not previously engaged.

We propose that a scientific workshop, or series of workshops be convened to this end and that a collaborative white paper be produced summarizing the proceedings in an accessible way for a broad public audience. The Jekyll Island Authority and the Georgia Sea Turtle Center would welcome this taking place in whole or in part on Jekyll Island and offer to contribute to its planning and execution. If a



NEPA Environmental Impact Statement were to ultimately be carried out, the proceedings of the session(s) we propose could directly inform that.

If, despite an abundance of state agency and local concern, the Corps determines that it will seek to proceed as currently proposed in the draft in the draft IFR/EA and FONSI, we are troubled by the potential for this issue to divide federal and state interests that we know can and should be mutually supportive to achieve common goals.

Without a doubt, these are challenging issues to grapple with, but we believe that, with strategic effort focusing on the science and bringing more depth of expertise to bear, a broader consensus is achievable. Community support will follow, and the Corps' decisions will be better informed and more accepted by the public you faithfully serve. We ask that the Corps identify a path forward that makes space for this to occur.

Sincerely,

Ben Carswell, Director of Conservation and Sustainability, the Jekyll Island Authority

Michelle Kaylor, Director of the Georgia Sea Turtle Center

Dr. Terry Norton, GSTC Director of Veterinary Services and Wildlife Health

cc:

Doug Haymans, Director, GADNR Coastal Resources Division

Jason Lee, Program Manager, GADNR Wildlife Resources Division – Wildlife Conservation Section

BRUNSWICK BAR PILOTS' ASSOCIATION, LLC.
8 GLYNN AVENUE
BRUNSWICK, GA 31520
912-280-9464



20 July 2021

VIA: EMAIL ONLY

COMMANDER
U.S. ARMY CORPS OF ENGINEERS, SAVANNAH DISTRICT
100 W. Oglethorpe Ave
Savannah, GA 31401

Re: BHMS Public Comment from Brunswick Bar Pilots' Assn.

Dear Colonel Geary,

Thank you for the opportunity to comment. The Brunswick Bar Pilots' Association has reviewed the Brunswick Harbor Modifications Study, Glynn County, GA and supports the recommended plan (Alternative 8).

The recommended plan supports the continued growth in Roll-On/Roll-Off (RO/RO) activities in the Port of Brunswick. The Port has grown into the United States' largest RO/RO complex with multiple processors having sizable acreage dedicated to auto, machinery, and other rolling stock that are regularly handled aboard this class of vessels. As this business has grown, so has the size and capacity of the vessels serving the port. The proposed Brunswick Harbor modifications will provide critical improvements in both vessel safety and operational efficiencies. The value of the proposed project is clearly substantiated by the positive benefit-to-cost ratio identified in the study documents.

We support and strongly encourage the timely completion of this project to expand the turning basin, bend widener, and vessel meeting areas at the Port of Brunswick. These key components of vessel traffic safety are essential elements to keeping the port functioning safely and efficiently.

While commerce through Brunswick Harbor is important to the local, State and National economy, we also recognize the importance of protecting natural resources and balancing the needs of humans and our environment. Fortunately, this project can be accomplished with appropriate safeguards for important environmental concerns.

If you have any questions, please contact us at the Pilot's office 912-280-9460.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Bruce Fendig'. The signature is stylized with a large initial 'B' and a long horizontal stroke.

Bruce Fendig
Brunswick Pilot

CC: Griff Lynch, Executive Director, GPA
Jim Royal, Chairman of Brunswick Pilot Commission



UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
NATIONAL MARINE FISHERIES SERVICE
Southeast Regional Office
263 13th Avenue South
St. Petersburg, Florida 33701-5505
<https://www.fisheries.noaa.gov/region/southeast>

July 21, 2021

F/SER47:CC/pw

(Sent via Electronic Mail)

Col. Joseph Geary, Commander
U.S. Army Corps of Engineers Savannah District
100 W. Oglethorpe Avenue
Savannah, Georgia 31402-0889

Attention: Kim Garvey

Dear Colonel Geary:

NOAA's National Marine Fisheries Service (NMFS) reviewed the revised *Brunswick Harbor Modifications Study draft Integrated Feasibility Report/Environmental Assessment* (revised IFR/EA) and Draft *Finding of No Significant Impact*, dated June 2021, prepared by the U.S. Army Corps of Engineers (USACE) Savannah District. The revised IFR/EA evaluates potential impacts from modifying the federal navigation channel and changes to the operation and maintenance (O&M) dredging at Brunswick Harbor, Glynn County, Georgia. The Savannah District's initial determination in the revised IFR/EA is the proposed modifications to Brunswick Harbor would not adversely affect essential fish habitat (EFH). As the nation's federal trustee for the conservation and management of marine, estuarine, and anadromous fishery resources, the NMFS provides the following comments and recommendations pursuant to authorities of the Fish and Wildlife Coordination Act and the Magnuson-Stevens Fishery Conservation and Management Act (Magnuson-Stevens Act).

The NMFS previously reviewed the Draft IFR/EA, dated June 2020, and provided comments by letter on July 8, 2020, which offered no EFH conservation recommendations at that time for the proposed Brunswick Harbor modifications. The Draft IFR/EA from June 2020 evaluated eight action alternatives against the no action alternative and identified Alternative 8 as the Tentatively Selected Plan (TSP), which included a bend widener, turning basin expansion, and meeting area at Saint Simons Sound. The revised IFR/EA clarifies the proposed changes related to the O&M dredging of the federal navigation channel and the TSP. Specifically, the Public Notice for the revised IFR/EA notes the "O&M analysis in the draft IFR/EA has been updated to include additional analysis and information regarding the Corps' compliance with the 2020 South Atlantic Regional Biological Opinion for the Dredging and Material Placement Activities in the Southeast U.S. (2020 SARBO)."

The Savannah District's proposed O&M action is the elimination of the existing hopper dredging window in portions of Brunswick Harbor so that maintenance dredging and bed leveling can occur year-round. One important benefit of the window, which limited hopper dredging to the period of December 1 to April 15 and has been in place for over twenty years, is that it



minimized impacts from dredging to fishery resources migrating between ocean and nursery areas and to the habitats used by the migrants.

The NMFS letter dated July 8, 2020, provided comments reviewing EFH and Habitat Areas of Particular Concern (HAPCs) from the South Atlantic Fishery Management Council (SAFMC) for the fishery management plans (FMPs) covering penaeid shrimp, the snapper-grouper complex, and coastal migratory pelagic species. The NMFS continues to support those descriptions and, for brevity, will focus instead on information missing from the revised IFR/EA and relevant to the proposed changes to the environmental window for hopper dredging. While most species with FMPs are managed by regional fishery management councils, highly migratory species (HMS) such as sharks differ by occurring throughout U.S. Atlantic Ocean waters and the NMFS having primary authority for developing and implementing an Atlantic HMS FMP (Amendment 10 to the 2006 Consolidated HMS Fishery Management Plan: Essential Fish Habitat). The Atlantic HMS FMP designated EFH in the proposed project area includes coastal inlets and estuaries for bull sharks (*Carcharhinus leucas*), finetooth sharks (*C. isodon*), blacktip sharks (*C. limbatus*), sandbar sharks (*C. plumbeus*), scalloped hammerhead sharks (*Sphyrna lewini*), bonnethead sharks (*S. tiburo*), and Atlantic sharpnose shark (*Rhizoprionodon terraenovae*). Georgia estuaries have specifically been identified as primary and secondary nursery habitats for many coastal sharks with pregnant females entering estuaries to pup during spring through early summer and then neonates and juveniles using these areas as nursery habitats until exiting in the fall.

The revised IFR/EA does not review the historically successful application of hopper dredge environmental windows in Georgia to provide safe, efficient navigation while also protecting safe ingress of pregnant sharks through coastal inlets to access estuaries for pupping, and the safe egress of neonates and juveniles through coastal inlets. Sub-adult mortality is already high in Georgia estuaries and coastal habitats as a result of trawling bycatch¹. Altering the hopper dredge environmental windows may increase the cumulative impacts to these species by increasing mortality of pregnant adults as well as that of neonates and juveniles due to entrainment into the suction draghead of the hopper dredge during periods of ingress and egress through the coastal inlet.

The revised IFR/EA does not review the efforts by the NMFS and the NOAA National Centers for Coastal Ocean Science (NCCOS) to continue developing new information for efficiently tailoring environmental windows to navigation projects with applicability for Georgia. The NCCOS recently completed *An Assessment of the Fisheries Species Time-of-Year Restrictions for North Carolina and South Carolina*² to provide an up-to-date synthesis of the information about the distribution of vulnerable life stages of fishery resources with respect to dredging projects and is applicable to Georgia. Additionally, the North Carolina Division of Coastal Management, in partnership with USACE Engineer Research and Development Center (ERDC),

¹ Belcher, C.N. 2008. Investigating Georgia's shark nurseries: Evaluation of sampling gear, habitat use, and a source of sub-adult mortality. Ph.D. Dissertation. University of Georgia, Athens, GA. 154 pp.

² Wickliffe, L.C., F.C. Rohde, K.L. Riley, and J.A. Morris, Jr. (eds.). 2019. An Assessment of Fisheries Species to Inform Time-of-Year Restrictions for North Carolina and South Carolina. NOAA Technical Memorandum NOS NCCOS 263. 268 pages.

East Carolina University, Duke University, and other state offices, is examining impacts to marine resources and habitats from hopper dredging operations at Wilmington Harbor and Morehead City Harbor. Results of this study will be valuable for addressing issues needed to complete the revised IFR/EA and for guiding any follow-up work necessary for minimizing dredging impacts to Georgia's marine resources.

The revised IFR/EA does not review or acknowledge the successful use of environmental windows by USACE district offices outside the USACE South Atlantic Division to provide safe, efficient navigation while also protecting vital fisheries resources. For example, various reports prepared by the USACE ERDC and others discuss dozens of federal projects in the Mid-Atlantic and New England successfully maintained through use of environmental windows³.

Lastly, the revised IFR/EA does not reflect the USACE-funded review by the National Research Council Marine Board and Ocean Studies Board (NRC) of the effectiveness of environmental windows for providing safe, efficient navigation while also protecting public-trust resources⁴. Among NRC's key findings is "environmental windows are one of a number of tools for reducing the environmental impacts of dredging and disposal operations and for increasing the efficiency and effectiveness of those operations." The NRC goes on to describe adaptive management processes for obtaining and incorporating new information about environmental windows into a risk management framework for managing dredge operation.

In summary, the NMFS believes the revised IFR/EA is incomplete, particularly in its review of the successful application of environmental windows to provide safe, efficient navigation while also protecting economically important and federally managed fisheries. Reports prepared and/or funded by the USACE describe processes for adaptively managing environmental windows for dredging projects. The revised IFR/EA should be based on those processes. The NMFS stands ready to work with the Savannah District, state resource agencies, and stakeholders to improve the IFR/EA and adaptively manage environmental windows for hopper dredges using the most up-to-date information available.

³ Evans, N.T., K.H. Ford, B.C. Chase, and J.J. Sheppard. 2011 (revised 2015). Recommended Time of Year Restrictions (TOYs) for Coastal Alteration Projects to Protect Marine Fisheries Resources in Massachusetts. Massachusetts Division of Marine Fisheries, New Bedford, Massachusetts. 80 pages.

LaSalle, M.W., D.G. Clarke, J. Homziak, J.D. Lunz, and T.J. Fredette. 1991. A Framework for Assessing the Need for Seasonal Restorations on Dredging and Disposal Operations. Dredging Operations and Technical Support Program TR D-91-1. USACE Waterways Experiment Station, Vicksburg, Mississippi. 77 pages.

Latchford, L. 2016. Collaborative Research during Massive Port Deepening Does Not Flounder: NOAA Fisheries Teams up with the U.S. Army Corps of Engineers on its Latest Deep-Draft Navigation Project. Environment Coastal and Offshore October 2016:30-35

Reine, K.J., D.D. Dickerson, and D.G. Clarke. 1998. Environmental Windows Associated with Dredging Operations. Technical Report DOER-E2. USACE Waterways Experiment Station, Vicksburg, Mississippi. 14 pages.

⁴ National Research Council. 2001. A Process for Setting, Managing, and Monitoring Environmental Windows for Dredging Projects. National Research Council Special Report 262, National Academy Press, Washington D.C. 96 pages.

EFH Conservation Recommendation

Section 305(b)(4)(A) of the Magnuson-Stevens Act requires NMFS to provide EFH Conservation Recommendations for any federal action or permit which may result in adverse impacts to EFH. Therefore, NMFS recommends the following to ensure the conservation of EFH and associated fishery resources:

- The USACE Savannah District should use the adaptive management process described by the National Research Council, or a similar adaptive/risk management process, to update the existing hopper dredging windows for operations and maintenance dredging in Brunswick Harbor.

Section 305(b)(4)(B) of the Magnuson-Stevens Act and implementing regulation at 50 CFR Section 600.920(k) require the USACE Savannah District to provide a written response to this letter within 30 days of its receipt. If it is not possible to provide a substantive response within 30 days, an interim response should be provided to the NMFS. A detailed response then must be provided prior to final approval of the action. The detailed response must include a description of measures proposed by the USACE Savannah District to avoid, mitigate, or offset the adverse impacts of the activity. If the response is inconsistent with the EFH conservation recommendation, the USACE Savannah District must provide a substantive discussion justifying the reasons for not following the recommendation.

The NMFS appreciates the opportunity to provide these comments and thanks the Savannah District for their efforts in coordination on the Brunswick Harbor Modification Study. Please direct related correspondence to the attention of Cindy Cooksey at our Charleston Area Office. She may be reached at (843) 460-9922 or by e-mail at Cynthia.Cooksey@noaa.gov.

Sincerely,

Rusty Swafford
Acting Assistant Regional Administrator
Habitat Conservation Division

cc: COE, Kimberly.L.Garvey@usace.army.mil
GADNR CRD, Karl.Burgess@gadnr.org
GADNR EPD, Bradley.Smith@dnr.ga.gov
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Department of the Army
U.S. Army Corps of Engineers, Savannah District
100 W. Oglethorpe Avenue
Savannah, Georgia 31401-3604
(CESAS-Planning@usace.army.mil)

Re: EPA Comments on the Draft Integrated Feasibility Study and Environmental Assessment of the Brunswick Harbor Modifications Study, Glynn County, Georgia

The United States Environmental Protection Agency (EPA) has reviewed the referenced document in accordance with Section 309 of the Clean Air Act and Section 102(2)(C) of the National Environmental Policy Act (NEPA). The purpose of this draft Integrated Feasibility Study and Environmental Assessment (IFR/EA) is for the United States Army Corps of Engineers (Corps) to evaluate navigational improvements for the reduction of transportation cost inefficiencies associated with the federal deep draft navigation channel at Brunswick Harbor and evaluate associated impacts of the proposed modification. The Brunswick Harbor Modifications Study (BHMS) analysis is based on the current and projected traffic of Brunswick Harbor's Colonel's Island terminal which is the destination of all Roll On/Roll Off (RO/RO) traffic in Brunswick Harbor and the busiest RO/RO import harbor in the United States. The EPA understands that vessels that call on the Port of Brunswick experience navigation and maneuverability issues primarily due to the channel width at specific locations between St. Simons Sound and the Colonel's Island terminal including a channel bend near the Cedar Hammock Range and a turning basin near Colonel's Island terminal.

The Corps' recommended action, Alternative Eight, will add a bend widener and turning basin expansion to the inner channel of Brunswick Harbor, in addition to procedural expansion of the outer channel. 351,000-cubic yards of dredged material will be initially removed to the upland Andrew's Island Dredged Material Containment Area (DMCA). Annual maintenance dredging of Brunswick Harbor will increase by one percent as a result of this additional area. Entrance channel maintenance dredged materials will continue to be deposited at the Brunswick Ocean Dredged Material Disposal Site.

The EPA has not identified any significant environmental impacts from the proposed action that would require substantive changes to the draft IFR/EA or require the Corp's consideration of other alternatives for navigational improvements. The EPA has enclosed detailed technical comments for your consideration (See enclosure).

The EPA appreciates the opportunity to review the draft IFR/EA of the Brunswick Harbor Modifications Study. If you have questions regarding our comments, please contact Douglas White, Project Manager in the NEPA Section at white.douglas@epa.gov or at 404-562-8586.

Enclosure

EPA Comments on the Draft Integrated Feasibility Study and Environmental Assessment of the Brunswick Harbor Modifications Study, Glynn County, Georgia

Water Quality: 404(b)(1) analysis in Appendix L evaluates potential impacts from the discharge of dredged materials. Sediment samples taken November of 2020 from the area of the proposed modification indicate the presence of arsenic, cadmium, and mercury levels in exceedance of EPA Region 4 Ecological Screen Values (ESV). The EPA understands that the preferred hydraulic dredging method will limit mixing of dredged sediments with immediately adjacent waters and place sediments on the upland DMCA that drains to the Turtle and East rivers. DMCA outfalls will be monitored regularly and sampled when there is a discharge. Tidal conditions at Brunswick Harbor contribute to well-mixed waters that maintain dissolved oxygen and salinity levels. The 404 analysis indicates that a section 401 State Certification of Water Quality will be obtained from the Georgia Department of Natural Resources (DNR) prior to construction.

Recommendation: The EPA recommends continued consultation with the DNR regarding water quality impacts from the proposed modification. Periodic turbidity monitoring should be implemented to ensure suspended solids fall out of the water column as expected.

Beneficial Use of Sediments: The Corps has acknowledged the requests from federal and state organizations for the beneficial use of sediments and indicated the Corps' own restraints on funding of sediment placement above the cost of navigational improvements. ACE Manual 1110-2-5026 Beneficial Uses of Dredge Material requires that the beneficial use of dredged material be maximized within the coastal system. The EPA also understands that sediment placement at the upland DMCA allows for future use including continued use by local and state agencies.

Recommendation: In general, using dredged material for beach nourishment and other environmentally sensitive applications is strongly encouraged and supported by the EPA. Where sediments are potentially contaminated with toxic metals, the Corps should coordinate with DNR for their proper disposal. The EPA is available to provide additional technical guidance and support for selection of appropriate placement sites and determining suitability of material.

Biological Resources: Section 4.5 of the draft IFR/EA indicates that the Corps will continue coordinating with the National Marine Fisheries Service (NMFS). The proposed modification is regulated by NMFS's 2020 South Atlantic Regional Biological Opinion (SARBO). While the 2020 SARBO allows dredging at any time of year, including the historic winter environmental windows, it also requires that a project meet all relevant project design criteria and that the dredging equipment, timing, and minimization measures be evaluated under the umbrella of risk-based adaptive project management, as outlined in the 2020 SARBO Section 2.9.2. The EPA understands that Corps has consulted the United States Fish and Wildlife Service (FWS) and was issued a Fish and Wildlife Coordination Act Evaluation on May 2020.

Recommendation: The EPA recommends consulting with NMFS, FWS, and DNR through the project's duration including for ongoing maintenance and operations.

Cultural Resources: The Corps entered into a Programmatic Agreement with the Georgia Historic Preservation Division (HPD) on October 2020. Historical records indicate the possible presence of multiple shipwrecks within Brunswick Harbor. Section 2.10 indicates that archeological investigation of shipwrecks will take place prior to construction, under coordination with the HPD. Compensatory mitigation will be funded where impacts cannot be avoided.

Recommendation: The EPA recommends adding final archeological survey findings as an appendix to the final NEPA document.

Air Quality and Climate Change: The proposed activity is located in Glynn county, Georgia. In accordance with National Ambient Air Quality Standards (NAAQS), Glynn county is designated as in attainment. Air emissions are likely to increase slightly during the one-year construction period beginning in the latter half of 2025, while efficiencies gained through the proposed modification may result in less idling time of vessels waiting to navigate the channel. The EPA understands that the majority of vehicle traffic at the Colonel's Island Terminal is made up of new vehicles with modern emissions equipment being driven under their own power. RO/RO vehicle and machinery handling capability is determined by the Georgia Ports Authority (GPA) and is planned to increase from 800,000 units to 1.5 million units over the fifty-year analysis period; this additional capacity is planned separately from the proposed modification. Sea level rise has been calculated using software models and determined to not likely affect Port of Brunswick operations over the next fifty years. Additional modeling determined that the proposed modification will not directly alter sea levels within the harbor.

Environmental Justice: The EPA appreciates the Corps' use of EJSCREEN in the analysis of the proposed modification. Existing land, sea, and air use associated with the Port of Brunswick will not significantly change because of the proposed modification.

The following tables provide the Corps responses to comments received during the public comment period on the revised IFR/EA that concluded on July 21, 2021. The Corps has not included in this appendix individual comments received as part of an email campaign; however those comments are available upon request. The Corps does provide response to those comments in Table 2.

Table 1. Responses to Individual Comments

DOC ID	Comment ID	Name	Organization	Comment Summary	Corps Response
1	1	Megan Huynh	Southern Environmental Law Center	"At a minimum, we ask that the Corps prepare an Environmental Impact Statement (EIS) to fully evaluate the impacts of unrestricted hopper dredging...the Draft EA is inadequate in a number of ways: it underestimates or ignores significant harm to turtles, fisheries, and other wildlife; it fails to consider reasonable alternatives to year-round maintenance dredging; and it ignores important cumulative impacts."	Disagree. The EA provides the requisite hard look for analysis of effects to turtles, fisheries, wildlife, and ESA-listed species. A range of alternatives is evaluated in Chapter 4.0 of the EA. Chapter 5.0 evaluates cumulative effects. An EIS is not required because, using presently available information, the proposed action is not likely to significantly affect the quality of the human environment.
1	2	Megan Huynh	Southern Environmental Law Center	"The June 2021 EA considers two separate actions....The original draft EA for the Brunswick Harbor Modification Study, published in June 2020, covered only the first action. That draft noted that a "key assumption" underlying the Corps analysis was the Corps would use cutter head, not hopper, dredges...The Corps hastily added the second action...In early 2021, the Corps solicited bids and entered into a dredging contract for summer 2021 without preparing any new or supplemental NEPA analysis...the Corps has tacked a rushed and incomplete analysis onto the existing Brunswick Harbor Modifications Study EA - a move that violates both the letter and spirit of NEPA."	Disagree. The Corps revised the EA to provide clarity regarding the Corps' continued O&M and included additional analysis of the effects for continued O&M. This clarity was in response to comments received during the CZMA public notice and to the 2020 SARBO. The Corps provided a second 30-day public comment period to ensure robust public participation, which is in the spirit of NEPA. The Corps has not entered into a dredging contract that violates the preliminary injunction.

1	3	Megan Huynh	Southern Environmental Law Center	<p>"Spring and summer hopper dredging will almost certainly kill and injure federal threatened loggerhead sea turtles...Recent history confirms the high likelihood of turtle mortality under these circumstances...In Sept 2009...the Corps conducted a "test case" to determine the feasibility of summer dredging in Brunswick Harbor...within the first nine days...killed four logger head turtles before the project was discontinued...There is no reason to believe turtles will fare any better during this round of spring and summer maintenance dredging."</p>	<p>Disagree. Winter dredging also results in the injury and take of loggerhead sea turtles; in fact, similar take numbers have been observed during the traditional winter dredging window (Section 5.5 of the IFR/EA). Dredging during any season is likely to result in injury and lethal take of loggerheads. As the observed lethal take limit under the 2020 SARBO remains the same as in the 1997 SARBO and the amount of lethal take allowed would not change. The Corps summer dredging in 2021 in four harbors in North Carolina, these dredging events resulted in relatively low lethal take numbers, (one harbor had 0 take, two harbors had 2, and one harbor had 3 lethal take) section 5.5. These recent dredging events demonstrate that lethal take numbers during summer dredging is similar to take numbers during winter dredging, indicating that sea turtles may fare equally well during summer dredging. Furthermore, the September 2009 pilot study was conducted in fall, during sea turtle migration, and is not fully representative of conditions that would occur in summer dredging.</p>
1	4	Megan Huynh	Southern Environmental Law Center	<p>"There are no restrictions on the age class or life stage of the turtles allowed to be killed during the dredging process...the take of reproductively active adult females...would be particularly devastating...and despite recent high nesting seasons, Georgia experienced record low nesting seasons in the early 2000s...That string of low nesting years means that even if current protections and management practices (like dredging windows)are kept in place, Georgia's loggerhead population is predicated to plateau or even decline for the next two decades as the hatchlings born in the early 2000s reach maturity."</p>	<p>Population level effects for ESA-listed species were considered in the 2020 SARBO, including evaluating the effects to the species at different life stages. A full route of effects can be found in the 2020 SARBO, p 324. The 2020 SARBO also assesses the population trends over time (see Section 4.1.1.5 starting on page 203, and page 390). The Corps has incorporated by reference the 2020 SARBO and relies on the robust analysis included in the 2020 SARBO. Additionally, as indicated in the IFR/EA, the winter dredging window may not be the most protective of the sea turtle species, and any measure including the application of the risk assessment and management process is intended to reduce take levels in the long-term, resulting in long-term benefits to sea turtle populations.</p>

1	5	Megan Huynh	Southern Environmental Law Center	<p>These risks are particularly acute for local and regional loggerhead populations. The Northwest Atlantic Distinct Population Segment (DPS) (the loggerhead population segment analyzed in the 2020 SARBO) includes five distinct recovery units, including the Northern Recovery Unit. The Northern Recovery Unit population makes up only a small fraction of the Northwest Atlantic DPS. Unfortunately, even though it makes up only a small fraction of the population, all six channels targeted by the Corps for spring and summer dredging are located within the Northern Recovery Unit range. Because winter dredging results in very few takes, that means that nearly all of the 214 takes allowed under the 2020 SARBO will likely occur within the Northern Recovery Unit range—specifically Georgia, South Carolina, and North Carolina. As a result, these regions will bear a disproportionate level of impacts to local and regional loggerhead populations. As explained by DNR, although the SARBO purports to authorize loggerhead takes at a rate of around one turtle per every 1,000 nests, when you account for the fact that nearly all of these takes will occur within the Northern Recovery Unit range, the actual rate is more than one turtle per every 100 nests—far greater than the take rate contemplated by the 2020 SARBO.</p> <p>Although the Corps is permitted to incorporate the SARBO into its NEPA analysis, it cannot stop there. In assessing regional and local impacts from this specific project, the Corps is obligated to consider this disproportionate impact. It did not do so in the Draft EA.</p>	<p>Brunswick Harbor specific information has been included in the IFR/EA in Section 5.5. There currently is a disproportionate impact in Kings Bay, Savannah, and Brunswick Harbor from winter dredging, sixty percent of all annual loggerhead take across all the Corps projects covered under the 1997 SARBO result in these three harbors, and sixty percent of that take occurs in March. Furthermore, this statement presumes that summer dredging will result in significantly more take than winter dredging, but there is no data to support that presumption. As the 2021 summer dredging in the North Carolina harbors demonstrate, take levels during summer dredging is similar to take during winter dredging. Three decades ago, the consensus was that winter windows were necessary to protect sea turtles. In the 2020 SARBO, NMFS describes why this was no longer the best approach based on three decades of information gathered, available data, and input from species experts. The 2020 SARBO switches from a static conservation measure to an adaptive management approach to ensure decisions are made scientifically allowing ways to try to continue to reduce take to all species.</p> <p>However, given that loggerhead sea turtles are taken in higher numbers than other sea turtle species, additional analysis is provided below for this species. This threatened species was divided into nine Distinct Population Segments (DPS) in 2011, with all loggerhead sea turtles in the United States along the Atlantic Coast and Gulf of Mexico in the Northwest Atlantic DPS (76 FR 58868, published on September 22, 2011). While the loggerhead sea turtle Recovery Plan identified smaller nesting populations based on genetics, it classified loggerhead sea turtles in the study area as part of the Northern Recovery Unit spanning from the Florida /Georgia border north through southern Virginia. Therefore, loggerhead sea turtle take occurring at a single project or across all five RHDC projects would have the same effect to the Northwest Atlantic DPS and/or the Northern Recovery Unit (NRU). Even if 35 loggerhead sea turtles were taken under the 2020 SARBO at a specific project or within a specific state, it would not change the status of the loggerhead sea turtle population or recovery.</p> <p>USACE would not allow a single project to use all take allowed under the SARBO for a single species or combination of species since it must manage all USACE navigation covered under the 2020 SARBO.</p>
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1	6	Megan Huynh	Southern Environmental Law Center	<p>"[D]ata plainly show that hopper dredging during warmer months poses significantly greater risks to loggerhead sea turtles. As explained by the Georgia Department of Natural Resources, the 2009 Brunswick and Savannah Harbor test studies showed that capture rates of sea turtles in Georgia shipping channels were substantially higher during the summer and fall than during winter months, undercutting the idea that capture rates of sea turtles may be lower in the summer due to higher activity rates and less time on the bottom. The Corps' suggestion otherwise is unsupported by science. It is also undercut by the Corps' and NMFS' thirty-year practice of restricting hopper dredging to winter months."</p>	<p>The September 2009 pilot dredging event resulted in take numbers comparable to take numbers during winter dredging, this is addressed in Section 5.5. This statement presumes that summer dredging will result in significantly more take than winter dredging, but there is limited data to support higher take in summer, and other studies also demonstrate that there may be comparable or less take in summer. As the 2021 summer dredging in the North Carolina harbors demonstrate, take levels during summer dredging is similar to take during winter dredging. Three decades ago, the consensus was that winter windows were necessary to protect sea turtles. In the 2020 SARBO, NMFS describes why this was no longer the best approach based on three decades of information gathered, available data, and input from species experts. The 2020 SARBO switches from a static conservation measure to an adaptive management approach to ensure decisions are made scientifically allowing ways to try to continue to reduce take to all species.</p>
1	7	Megan Huynh	Southern Environmental Law Center	<p>The June 2020 original draft EA recognized that project "[c]onstraints include avoiding significant environmental effects to endangered species" such as loggerhead sea turtles within Brunswick Harbor. Tellingly, the Corps deliberately removed this language from its discussion of constraints in the June 2021 Draft EA.43</p>	<p>This constraint was regarding the proposed modifications. As the IFR/EA demonstrated that significant effects would not occur to ESA-listed species, no constraints were necessary.</p>

1	8	Megan Huynh	Southern Environmental Law Center	<p>The Corps also suggests that spring and summer hopper dredging will not have a significant environmental impact because it “has been successfully done in other areas when sea turtle abundance was high and did not result in sea turtle take by hopper dredging or take was not higher than timeframes when turtle abundance was low.” However, as discussed above, the weight of the data shows that sea turtle take by hopper dredging is typically substantially higher in spring and summer than in colder months—as demonstrated by this spring’s mortalities in Charleston Harbor and the 2009 test studies in Savannah and Brunswick Harbors....The reason that there has been minimal take for nearly three decades is because seasonal dredging windows have been in place since 1991. That hopper dredging projects have been conducted without significant take during that period is evidence that hopper dredging windows work—not evidence that they should be eliminated.”</p>	<p>This statement presumes that summer dredging will result in significantly more take than winter dredging, but there is limited data to support higher take in summer, and other studies also demonstrate that there may be comparable or less take in summer. The September 2009 pilot dredging event resulted in take numbers comparable to take numbers during winter dredging, but this is addressed in Section 5.5. As the 2021 summer dredging in the North Carolina harbors demonstrate, take levels during summer dredging is similiar to take during winter dredging. Three decades ago, the consensus was that winter windows were necessary to protect sea turtles. In the 2020 SARBO, NMFS describes why this was no longer the best approach based on three decades of information gathered, available data, and input from species experts. The 2020 SARBO switches from a static conservation measure to an adaptive management approach to ensure decisions are made scientifically allowing ways to try to continue to reduce take to all species.</p> <p>Charleston Harbor work done under a separate opinion (not SARBO) did experience high take in a single day and decided to cease hopper dredging. This was the cleanup phase of work when it is the most challenging to keep the draghead embedded as it travels over the hills and valleys created by previous hopper dredging passes in the area. They switched to bed-leveling to complete the remaining work. Bed-leveling is now allowed under the 2020 SARBO to reduce take during cleanup operations.</p>
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1	9	Megan Huynh	Southern Environmental Law Center	<p>"To our knowledge, however, the Corps has not conducted any pre-construction risk assessment for its proposed maintenance dredging. Indeed, when SELC submitted a FOIA request seeking all documents or communications related to the pre-construction risk assessment, the Corps responded that it had no responsive documents. Instead, it appears that the Corps intends to delegate decisions about scheduling to dredging contractors." (Note omitted.)</p>	<p>The Corps has not delegated and will not delegate risk assessments related to the listed species to a construction contractor. The Corps gives avoidance and minimization of impacts to protected species utmost consideration in its dredging decisions and relies on the best available information. The Corps has and will continue meet monthly with NMFS and BOEM to discuss upcoming scheduled dredging and the potential risks associated with these events, and the Corps has and will continue to perform risk-assessments. Documentation regarding pre-construction risk assessment for O&M dredging is part of the deliberative process and meets an exception of FOIA. Project tracking and risk-assessments are occurring.</p>
1	10	Megan Huynh	Southern Environmental Law Center	<p>"The Corps entirely ignores the impacts of spring and summer hopper dredging on fisheries...Because early life stages are more vulnerable to these and other risks, the harm caused by dredging can vary significantly by season, with greater impacts during key reproductive and recruitment time periods that often fall in the spring and summer—a fact that the Corps entirely fails to consider...According to the SAFMC, spring and summer maintenance dredging can be detrimental to many of these fisheries for the reasons listed above...Despite these documented concerns from North Carolina, the Corps has done no analysis of how or if shifting dredging away from winter months would impact these economically and recreationally important fisheries in Georgia."</p>	<p>Disagree. The EA in sections 5.2 and 5.3 address the impacts of hopper dredging on fisheries. Impacts are constrained to the previously and regularly disturbed federal navigation channel. As noted in the IFR/EA impacts are temporary, and due to the abundant adjacent habitat, that is available, recolonization as well as viable habitat to aquatic species are provided for and the impacts are considered insignificant. The Corps additionally received from NMFS Habitat Conservation Division a letter regarding EFH considerations for O&M, species identified by NMFS HCD have been addressed in the IFR/EA.</p>

1	11	Megan Huynh	Southern Environmental Law Center	"The Corps also overlooks the impacts of spring and summer hopper dredging on other sensitive species, including manatees, horseshoe crabs, and benthic organisms."	<p>The Corps does not overlook impacts. The EA in sections 5.2 and 5.3 provide analysis of EFH and aquatic resources. Impacts are constrained to the previously and regularly disturbed federal navigation channel. As noted in the IFR/EA impacts are temporary, and due to the abundant adjacent habitat impacts are considered insignificant. Entrainment of any species from dredging is limited to those within the direct vicinity of the draghead on the sea floor. Benthic species, such as horseshoe crabs, that are affected by dredging will repopulate and recolonize the dredged areas. The temporary loss will not cause a significant effect. The 2020 SARBO requires pumps to be disengaged when traveling through the water column to prevent entrainment. Maintenance dredging is limited to the existing channel areas and will not entrain species outside of the channel regardless of time of year. Additional information regarding impacts to West Indian manatee has been added to section 5.5 of the IFR/EA. Regarding the Miselis study, the complete statement from that study on p.34 indicates 10-5,521 horseshoe crabs per project and concludes the statement with: "But ASMFC (2019) evaluated the status of the horseshoe crab population in the southeast, where Savannah Harbor is located, and determined it to be in good condition and better than all other regional populations along the Atlantic coast." Impacts to benthic communities and aquatic resources are discussed in Sections 5.2 and 5.3.</p> <p>Regarding impacts to West Indian manatees, the SELC letter selectively quotes the following statement: (on file with U.S. Army Corps of Eng'rs) noting that hopper dredging may impact West Indian manatees and that "if dredging were conducted during the winter, there would be less likelihood of harming these mammals". In fact, the complete statement is found in the 1998 EIS, p. 43: "If the proposed dredging is conducted during the winter, there would be less potential for harming these mammals. However, if dredging does occur in the summer, precautions would need to be implemented to avoid injuring any animal present." Conservation measures are listed in the USFWS 1998 biological opinion. The Corps has continued to implement these conservation measures and has further refined the measures to further avoid and minimize impacts to manatees. The IFR/EA addresses impacts to West Indian manatees in Section 5.5.</p>
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1	12	Megan Huynh	Southern Environmental Law Center	<p>"The Corps did not analyze a reasonable range of alternatives...the Corps should consider:</p> <ul style="list-style-type: none"> - Maintaining historical dredging windows - using expanded dredging windows or different equipment types - consider using less harmful equipment in portions of the harbor like Cedar Hammock Range -considered imposing more protective measures for right whales during traditional winter dredging windows - consider bundling the Brunswick Harbor maintenance dredging contract with the Savannah Harbor maintenance dredging contract 	The Corps has completed analysis of a range of action alternatives for O&M dredging in the IFR/EA, see Chapter 4.0. The Corps considered maintaining historical dredging windows, using expanded windows, using different equipment types, avoidance measures for the right whale, and maintains the flexibility with regard to procurement. The 2020 SARBO includes avoidance measures in Appendix F for North Atlantic right whale, and the Corps is required to follow these avoidance measures.
1	13	Megan Huynh	Southern Environmental Law Center	<p>"The Corps did not adequately consider the cumulative impacts of region-wide spring and summer dredging...The Corps also inappropriately limits the geographic scope of its cumulative impacts analysis to projects "within and near the Brunswick Harbor study area...CEQ recommends analysis of the entire species habitat or ecosystem—which the Corps acknowledges extends throughout the Southeast region. By limiting its cumulative impacts analysis to projects "within and near" Brunswick Harbor, the Corps ignores important considerations that NEPA requires it to consider."</p>	The Corps did adequately consider regional impacts, particularly with regard to listed species. The 2020 SARBO is incorporated by reference into the IFR/EA, the routes of effect analysis in the 2020 SARBO considers species habitat and ecosystem. The risk assessment process which would be applied under any of the O&M action alternatives, considers in the pre-construction risk assessment multiple dredge projects across the region, as the Corps needs to balance the allowed take of multiples ESA-listed species across dredging projects across the area managed by South Atlantic Division. Therefore, impacts regionwide are considered in the incidental take in Chapter 10 of the 2020 SARBO, as well as in the risk assessment and management process.
1	14	Megan Huynh	Southern Environmental Law Center	<p>"The Corps also ignores the cumulative impacts of climate change on loggerhead sea turtle recovery. Climate change is expected to significantly hinder recovery, especially in regions that are under threat of sea level rise and prone to coastal development. Any interruption of breeding or nesting—particularly the loss of nesting females—from year-round dredging could be detrimental to their populations, especially when allowed annually."</p>	The 2020 SARBO, which is incorporated by reference, addresses climate change effects to covered species. This is considered when determining incidental take. The climate change analysis is Section 4.1.1.1.5 in the 2020 SARBO.
1	15	Megan Huynh	Southern Environmental Law Center	<p>"The Corps appears to be already implementing the proposal...On May 13, 2021, over a month before publishing the revised Draft EA, the Corps published a pre-solicitation notice for 2022 maintenance dredging in Brunswick Harbor. In the notice, the Corps says there are no environmental windows for the project and that year-round dredging is permitted."</p>	The May 13, 2021 referenced document is a pre-solicitation notice that did identify year-round dredging for Brunswick Harbor, but on July 19, 2021 the actual solicitation notice was issued which identified an environmental window of 15 December – 31 March for Brunswick Harbor for FY22 Operations and Maintenance. The solicitation notice can be found here: https://sam.gov/opp/280399a9f205447b887b7bf4d17b15b8/view#general

1	16	Megan Huynh	Southern Environmental Law Center	<p>"The Corps must prepare an EIS for this proposal".</p> <p>1. The Corps proposal will have adverse impacts...spring and summer maintenance dredging will almost certainly have significant adverse impacts to loggerhead sea turtles, fisheries, and other wildlife. These impacts are not "slight" or minor as the Corps suggests.¹⁰⁷ Indeed, upon reviewing scientific literature and testimony from a senior wildlife biologist at the Georgia Department of Natural Resources, a federal court recently found that "there is a strong likelihood that a substantial and appreciable number of [loggerhead] sea turtles would be killed by hopper dredging [during the summer]. To paraphrase the court, "perhaps the best evidence" that spring and summer hopper dredging will have significant impacts "is the Corps' own 30-some-odd year practice of not dredging outside of the winter months and the underlying studies which prompted this restriction by the Corps."</p>	<p>Disagree. This statement presumes that summer dredging will result in significantly more take than winter dredging, but there is limited data to support higher take in summer, and other studies also demonstrate that there may be comparable or less take in summer. The September 2009 pilot dredging event resulted in take numbers comparable to take numbers during winter dredging. The dredging event is addressed in Section 5.5 of the IFR/EA. As the 2021 summer dredging in the North Carolina harbors demonstrate, take levels during summer dredging are similar to those during winter dredging. Three decades ago, the consensus was that winter windows were necessary to protect sea turtles. In the 2020 SARBO, NMFS describes why this was no longer the best approach, based on three decades of information gathered, available data, and input from species experts. The 2020 SARBO switches from a static conservation measure to an adaptive management approach to ensure decisions are made scientifically, allowing ways to try to continue to reduce take to all species.</p>
1	17	Megan Huynh	Southern Environmental Law Center	<p>"The Corps must prepare an EIS for this proposal."</p> <p>2. The project area contains ecologically critical areas...the area surrounding the lower Brunswick River contains essential fish habitat (EFH) for brown shrimp, white shrimp, pink shrimp, gag grouper, gray snapper, black sea bass, Spanish mackerel, summer flounder, and several shark species in or around the project area.</p>	<p>The Corps acknowledges and addresses the effects to ecologically important areas (EFH) in the IFR/EA. As discussed in Section 5.3 of the IFR/EA, effects were not found to be significant to these resources. Additionally, the Corps has consulted with NMFS regarding impacts to EFH, and NMFS has provided review of the Corps action, in letters submitted on July 8, 2020 and July 21, 2021. Information included in those letters is incorporated into the IFR/EA.</p>

1	18	Megan Huynh	Southern Environmental Law Center	<p>"The Corps must prepare an EIS for this proposal."</p> <p>3. The Corps proposal is highly controversial...For purposes of NEPA, controversy exists when there is "a substantial dispute...as to the environmental consequences of the proposed action....Once confronted with controversy, agencies have a responsibility to not just acknowledge it but to actually resolve it...Here, the Corps' proposal has drawn substantive, sustained criticism from other agencies with special expertise and investment in the harbor's health. The Georgia Department of Natural Resources has sent at least two letters to the Corps objecting to its proposal – one from the Wildlife Resources Division (WRD) and one from the Coastal Resources Division (CRD)...These letters do not merely reflect public opposition to the Corps' proposal. Rather, they identify fundamental flaws with the scientific methods and data behind the Corps' proposal. Coming from a state agency whose opinion the Corps is legally required to solicit, this is the very definition of "highly controversial." As the D.C. Circuit has recently pointed out, "repeated criticism from many agencies who serve as stewards of the exact resources at issue...surely rises to more than mere passion."</p>	<p>The author of the comment assumes that the pre-2020 CEQ rule will be reinstated and misstates the former "highly controversial" standard besides. First, the standard was only one of ten applicable factors to determine the intensity of effects; second the standard was not the "highly controversial nature" of the project, but the "highly controversial" nature of the "effects (of the project) on the quality of the human environment." The case the commenter relies on, Nat'l Parks Conservation Ass'n v. Semonite, 916 F.3d 1075, 1084 (D.C. Cir. 2019), informs that disputes over one component of a complex project does not render the whole enterprise "controversial:" "The word "controversial" refers to situations where substantial dispute exists as to the size, nature, or effect of the major federal action. Certainly, something more is required for a highly controversial finding besides the fact that some people may be highly agitated and be willing to go to court over the matter." The commenter also suggests that mere numbers of opposing comments, no matter how repetitious or spammed, is a valid indicator of controversy. There is no controversy regarding the effects that hopper dredging may have on environmental resources. Effects from hopper dredging are well known and documented. The Corps has been conducting hopper dredging for over 30 years in federal navigation channels across the nation. The Corps, in coordination, with federal and state resource agencies have consistently and successfully applied adaptive management approach to minimizing effects, as detailed throughout the EA. The disagreement, which does not amount to a controversy, resides in the application of an adaptive management approach to determining the timing of hopper dredging and the uncertainty regarding the amount of take of ESA-listed sea turtle species. NMFS provides a thorough evaluation of the effects to water quality and ESA-listed species for the risk assessment and risk management process that would be applied in the 2020 SARBO, which relied on numerous scientific studies, historic dredging data and input from multiple federal and state resource agencies. Additionally, the Corps is addressing the potential effects of the preferred action by implementing internal protocols to minimize take during an active dredge event, including ceasing dredging, if unacceptable levels of take occur according to internal protocols or if species such as the North Atlantic right whale are observed, or if necessary, ceasing dredging all together (see Section 4.8). Therefore, it is the Corps' determination that implementation of the O&M preferred alternative is not highly controversial regarding the effects of hopper dredging.</p>
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1		Megan Huynh	Southern Environmental Law Center	<p>"In response to these concerns [from GA-DNR], "the Corps had to either confront those fact or explain why [subsequent events] rendered them irrelevant." Instead, the Corps makes only passing reference to these criticisms. Indeed, it does not address the 2009 demonstration project or the recent turtle mortalities in Charleston Harbor at all, and it barely mentions the direct and sustained objections from the Georgia Department of Natural Resources. Though the Corps purports to provide its own competing "conclusions," the Corps has essentially "just shrugged off" the state's repeated objections. This falls far short of resolving the controversy and demonstrates the necessity of an EIS. Indeed, the purpose of an EIS is "to provide robust information in situations precisely like this one, where, following an environmental assessment, the scope of a project's impacts remains both uncertain and controversial."</p>	<p>The Letter correctly quotes the legal case, but the quote is not applicable to our issue here. At that page in the cited case, the Court was talking about responding to letters from different Secretaries of the same agency (they were the Secretary of the Dept. of Interior at different times), because the letters had diametrically different views on the subject, which supported the controversial nature of the USACE's proposed action.</p> <p>Our letter dated May 23, 2021, which is included in Appendix J.1, the Corps has given serious consideration to GA-DNR conditions in their April 23, 2021 response to the Corps federal consistency determination.</p> <p>The SELC letter discusses but the referenced case says that the Federal Energy Regulatory Commission (FERC) knew that its project turbines in the Coosa River would result in high mortality of wildlife due to entrainment, and "shrugged off" that death rate as insignificant. the Corps is not "shrugging off" GA-DNR repeated objections and continue to coordinate with GA-DNR. Additionally, the Corps is not "shrugging off" lethal take of ESA-listed species, rather the Corps is proposing to implement a process that would be more protective of all ESA-listed species under NMFS jurisdiction.</p>
1	19	Megan Huynh	Southern Environmental Law Center	<p>4. The Corps proposal will have negative precedential impacts...Here, the Corps' proposal has great potential to precipitate the lifting of dredging windows in other states. This is not mere speculation. When the Corps first moved to dredge outside of its traditional windows, it simultaneously sought to dredge in two harbors—the Savannah and Brunswick Harbors. Around the same time, it made a similar proposal for two harbors in North Carolina, which conservation groups opposed for similar reasons. As SELC pointed out in those proceedings, at least ten states along the Atlantic Coast have seasonal dredging restrictions. The Corps has gone on the record calling these proposals part of a "paradigm shift" in their approach to dredging. The fact that the Corps has, in one year, moved to lift dredging windows in at least two states (and four harbors) reflects the very real possibility that year-round dredging will soon be seen as the norm for the entire southeast coast...Despite the obviously significant environmental effects that this would have, the Corps' Draft EA demonstrates no awareness of how these collective impacts might play out."</p>	<p>The Corps has long-standing practice of applying adaptive management processes to their actions. This action does not set any precedent for use of risk assessment and management process for management of resources. It does not set a precedent for evaluation of effects as any future actions, either conducted by Savannah District or other Corps' districts would be expected to comply with NEPA and other applicable laws and analyze effects specific to that action. The quote from Savannah Morning News regarding "paradigm shift" is taken out of context -- the Corps is referring to shifting from a sea turtle centric regional biological opinion (the 1997 SARBO) to taking measures that are intended to avoid impacts to multiple ESA-listed species (the 2020 SARBO). The article goes on to describe how other species may benefit from implementation of the 2020 SARBO.</p>

1	20	Megan Huynh	Southern Environmental Law Center	5. "The Corps proposal will have cumulatively significant impacts....Draft EA does not adequately consider how the lifting of summer dredging windows might act in concert with other harbor management decisions in Brunswick and throughout the region. As discussed elsewhere in these comments, the Corps has proposed other projects for this harbor and is in the process of making similar proposals in other Southeastern harbors. These projects are reasonably foreseeable and sufficiently concrete – and they matter because, as the Draft EA itself notes, “species are appropriately managed at the regional level, as all move throughout the South Atlantic.” Indeed, the Draft EA concludes that turtles will not be significantly impacted by the SARBO because of “the increased number of loggerhead sea turtles [throughout the region] and their ability to nest along the southeast coast.” Despite this acknowledgment, neither of the dredging proposals in Georgia and North Carolina have factored in the cumulative effects of this region-wide spring and summer dredging on turtle populations. Those potentially significant effects are exactly the kind of information that an EIS is designed to uncover. "	As the 2020 SARBO is incorporated by reference into the IFR/EA, the routes of effect analysis in the 2020 SARBO considers entire species habitat and ecosystem. The risk assessment process which would be applied under any of the O&M action alternatives, considers in the pre-construction risk assessment multiple dredge projects across the region, as the Corps needs to balance the allowed take of multiples ESA-listed species across dredging projects across the area managed by South Atlantic Division.
1	21	Megan Huynh	Southern Environmental Law Center	6. The Corps proposal will significantly affect threatened and endangered species...As previously discussed, this proposal poses a serious threat to the long-term viability of loggerhead sea turtle populations by making it more likely that reproductive-age adult turtles will be killed or severely injured. This effect would be significant and can only be properly evaluated by a full EIS. The Corps attempts to dismiss these effects by pointing to the 2020 SARBO. But the purpose of a biological opinion like the 2020 SARBO is to evaluate whether a proposed project would jeopardize the continued existence of a species—not to opine on whether a project would have a significant impact. “Clearly, there can be a significant impact on a species even if its existence is not jeopardized."	USACE has and will continue to closely monitor all take (lethal and non-lethal) and adjust dredging operations or cease dredging as deemed appropriate based on multiple considerations. USACE would not allow a single project to use all take allowed under the SARBO for a single species or combination of species since it must manage all USACE navigation covered under the 2020 SARBO. Given that sea turtle populations are large and the 2020 SARBO allows only limited take of any covered turtle species, the impact to any species of sea turtle from dredging under the 2020 SARBO would not affect sea turtle population status or recovery, as analyzed and concluded in the 2020 SARBO. As the action would not affect sea turtle population status or recovery, there are no significant effects.
1	22	Megan Huynh	Southern Environmental Law Center	7. The Corps proposal ignores the State's Coastal Zone Management objection...the Corps has not complied with Georgia’s Coastal Management Plan (CMP) to the maximum extent practicable, as required by the Coastal Zone Management Act (CZMA). Instead, the Corps intends to proceed over the state’s objection. This potential violation of the CZMA warrants further review in an EIS.	The Corps letter dated May 23, 2021, which is included in Appendix J.1, , the Corps has given serious consideration to GA-DNR conditions in their April 23, 2021 response to the Corps federal consistency determination. The Corps continues to find that we are in compliance with the coastal zone management plan or in compliance to the maximum extent possible and is therefore not in violation of CZMA. See Section 307 of the CZMA, at 16 U.S.C. 1456
1	23	Megan Huynh	Southern Environmental Law Center	The new NEPA regulations also demand that a full EIS be prepared	Chapter 1.0 and the FONSI outline why an EIS is not required, the Corps action would not result in significant effects, and the threshold of significance requiring an EIS is not met.

1	24	Megan Huynh	Southern Environmental Law Center	<p>"The Corps improperly disregards the State of Georgia's Coastal Zone Management Act consistency objection...Here, the State of Georgia objected to the Corps' proposal to conduct year-round hopper dredging, explaining that the proposal would result in the taking of the state-listed loggerhead sea turtles and other wildlife in violation of the Georgia Game and Fish Code and other wildlife protection laws. Rather than accept the CZMA's mandate to comply with Georgia's CMP, the Corps sent the state a letter informing it that the Corps intended to move forward with year-round dredging anyway. In the letter, the Corps offered no explanation for why it was no longer practicable to abide by seasonal dredging windows—a practice the Corps followed for three decades. "</p>	<p>The Corps letter dated May 23, 2021, which is included in Appendix J.1, , the Corps has given serious consideration to GA-DNR conditions in their April 23, 2021 response to the Corps federal consistency determination. The Corps continues to find that we are in compliance with the coastal zone management plan or in compliance to the maximum extent possible and is therefore not in violation of CZMA. See Section 307 of the CZMA, at 16 U.S.C. 1456.</p>
1	25	Megan Huynh	Southern Environmental Law Center	<p>The Corps made substantial changes to the proposed action after consulting with agencies under the Magnuson-Stevens Act...The Magnuson-Stevens Act requires federal agencies to consult with NMFS regarding potential impacts to essential fish habitat. Here, the Corps consulted with the NMFS in early 2020. At that time, however, the original draft EA reviewed by NMFS said the Corps would use a cutterhead, not hopper, dredge and made no reference to the removal of seasonal hopper dredging windows...It was not until February 2021, well after the FWCA consultation, that the Corps revealed in a revised appendix that it planned to allow the use of hopper dredges for annual maintenance dredging... It does not appear that the Corps has consulted with NMFS again since that time. Given the significant risks to fisheries, EFH, and HAPCs from the shift to spring and summer dredging, the failure to consult with NMFS about fisheries impacts is particularly problematic. "</p>	<p>The Corps has consulted with NMFS regarding impacts to EFH, and NMFS has provided review of the Corps action, in letters submitted on July 8, 2020 and July 21, 2021. Information included in those letters is incorporated into the IFR/EA.</p>

2	1	Georgia DNR - CRD	Doug Haymans	<p>"We find that the Corps' May 20, 2021 response letter did not meet the burden as required by federal regulations in order to proceed over a state objection as follows:</p> <ol style="list-style-type: none"> 1. In claiming the proposed project was fully consistent with the enforceable policies of the management program as required in 15 CFR 930.43(d)(2) when enforceable policies forbid the taking of sea turtles;1 2. In claiming the proposed project was consistent to the maximum extent practicable with the enforceable policies of the management program as required in 15 CFR 930.43(d)(1) when it failed to clearly describe in writing the statutory provisions, legislative history, or other legal authority which limits the Corps' discretion to be fully consistent with the enforceable policies as required under 15 CFR 930.32(a)(2). Both 2020 SARBO2 and the IFR/EA3 state that winter hopper dredging is allowed; and 3. Not adhering to 15 CFR 930.32(a)(2) that requires, whenever legally permissible, the Corps consider the enforceable policies of a management program as requirements to be adhered to in addition to existing federal agency statutory mandates. Section 307(e) of the Coastal Zone Management Act was intended to cause substantive changes in federal agency decision-making within the context of the discretionary powers residing in such agencies4 and the Corps has the discretion to adopt all twelve (12) mitigation measures outlined in our conditional concurrence letter." 	<p>The Corps letter dated May 23, 2021, which is included in Appendix J.1, the Corps has given serious consideration to GA-DNR conditions in their April 23, 2021 response to the Corps federal consistency determination. The Corps continues to find that we are in compliance with the coastal zone management plan or in compliance to the maximum extent possible and is therefore not in violation of CZMA.</p>
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2	2	Georgia DNR - CRD	Doug Haymans	<p>"The National Environmental Policy Act (NEPA) requires the more detailed and rigorous environmental impact statement (EIS) rather than a simplified environmental assessment (EA) when environmental impacts are significant, such as shifting risk from one endangered species to another. The 2020 SARBO provides a process for shifting risk between species that the 1997 SARBO did not but was not intended as a stand-alone document providing defense against unsubstantiated choices. The 2020 SARBO requires completion of a pre-construction risk assessment that was not included in the EA; therefore it has not been substantiated and cannot be concluded that there will be no significant impacts from the proposed project. "</p>	<p>Chapter 1.0 and the FONSI outline why an EIS is not required, the Corps action would not result in significant effects, and the threshold of significance requiring an EIS is not met. The purpose of the EA is not to provide a pre-construction risk assessment, as outlined in Chapter 4.0 the Corps would prepare a pre-construction risk assessment for specific projects. The Corps has and will continue meet monthly with NMFS and BOEM to discuss upcoming scheduled dredging and the potential risks associated with these events. The documentation of this process internally, and coordination between those making recommendations and the decision makers, do not meet the requirements of FOIA requests. The process is deliberative and exempted from production under FOIA. That such documentation is not produced does not mean that project tracking and risk-assessments are not being completed.</p>
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2	3	Georgia DNR - CRD	Doug Haymans	<p>"We disagree with the Corps' FONSI for the Brunswick Harbor Modification Project and find the EA deficient for several reasons including:</p> <ol style="list-style-type: none"> 1) the target species and goal of the risk assessment are not clearly defined, 2) the risk discussion does not take into account quantitative data on species mortality rates and population status, 3) risk is described in broad qualitative categories with no explanation of how the categories are defined, 4) mitigation measures for reducing sea turtle mortality associated with summer dredging are speculative with no scientific basis, and 5) the Corps did not select the alternative for maintenance dredging with the least impacts to population recovery." 	<p>1)The target species and goals of the risk assessment are defined in the 2020 SARBO. 2)The quantitative data on species mortality and population status was accounted for in determining incidental take numbers, this is discussed in Chapter 10 of the 2020 SARBO. 3)The IFR/EA provides a qualitative comparison of potential effects of the different alternatives. This qualitative comparison is related to potential to reduce take of all the species covered by the 2020 SARBO, that occur in the project area. 4)The use of bed-leveling during cleanup, trawling, monitoring dredging operations through DQM, etc. are all long standing minimization measures. 5) The Corps selected the alternative that was determined to have balance impacts to multiple species covered under the 2020 SARBO, NEPA does not require the selection of alternative that would have the least amount of impacts. The Corps provides in Chapter 4.0, the reasons for the selection of a preferred alternative.</p>
2	4	Georgia DNR - CRD	Doug Haymans	<p>"The proposed alternative represents a major shift in the seasonal timing of maintenance dredging that will result in significant increased threats to loggerhead population recovery without demonstrating any reduction in risk to North Atlantic right whale (NARW) or sturgeon population recovery. Because potential impacts to protected species are not adequately explored in the EA by limiting alternative analysis to summer dredging rather than including year-around risk-based assessments to inform timing for hopper dredging, NEPA requires the Corps to develop an EIS to ensure the impacts of the project are fully understood and disclosed in advance. The more detailed and rigorous EIS process is also required to address cumulative impacts."</p>	<p>The impacts analysis in Chapter 5.0 addresses this concern. The dredging event is addressed in Section 5.5 of the IFR/EA. As the 2021 summer dredging in the North Carolina harbors demonstrate, take levels during summer dredging are similar to those during winter dredging. Three decades ago, the consensus was that winter windows were necessary to protect sea turtles. In the 2020 SARBO, NMFS describes why this was no longer the best approach, based on three decades of information gathered, available data, and input from species experts. The 2020 SARBO switches from a static conservation measure to an adaptive management approach to ensure decisions are made scientifically, allowing ways to try to continue to reduce take to all species. Population level effects for ESA-listed species were considered in the 2020 SARBO, including evaluating the effects to the species at different life stages. Furthermore, the IFR/EA discusses cumulative impacts.</p>

2	5	Georgia DNR - CRD	Doug Haymans	"The EA risk assessment discussion is deficient for several reasons." First, the EA should provide a statement that describes each species, including distinct population segments and recovery units, to which the risk assessment applies. For example, the EA frequently refers to risks to "sea turtles" as a group. Several species and life stages of sea turtles occur in Georgia seasonally with different levels of concern for population recovery. It is not appropriate to consider risk at the level of all sea turtles."	Section 5.5 does consider the risk to species populations by considering all species that may be present when work is proposed and evaluating ways to reduce risk of take. Since the goal is to reduce all take, this includes individuals within the population.
2	6	Georgia DNR - CRD	Doug Haymans	"In addition, it is unclear whether the purpose of the risk assessment is to reduce risk of mortality to individual animals or ensure the project doesn't affect population status or recovery...The selection of the appropriate alternative depends on the goal of the risk assessment. Without a clearly defined biological goal, it is impossible to select the best alternative."	The purpose of the risk assessment and management process is to consider the risk to species populations by considering all species that may be present when work is proposed and evaluating ways to reduce risk of take. Since the goal is to reduce all take, this includes to each individual within the population.
2	7	Georgia DNR - CRD	Doug Haymans	"Second, the risk assessment fails to consider critical biological data DNR provided the Corps via the April 23, 2021 Memorandum including historic and predicted mortality rates for summer and winter dredging in Georgia and assessments of the predicted mortality on population status and recovery. At a minimum, the risk assessment process should include the development of a matrix that includes this data for the relevant species and subpopulation/recovery units potentially affected by the project. A consideration of all relevant biological data is necessary to select the appropriate alternative."	This EA is a framework for decision making alternatives selection under NEPA and is not intended to be the risk assessment for individual dredge events. The Corps will consider not only information provided by GA-DNR, but also any new available data in development of preconstruction risk assessments for individual construction projects. The EA is not a replacement for the routes of effect in the 2020 SARBO, rather the decision-making document for alternative selection. Moreover, the 2020 SARBO limits take and associated risks to species. The Corps has considered relevant biological information in selection of the preferred alternative, including species specific information.
2	8	Georgia DNR - CRD	Doug Haymans	"Third, the EA describes risk in broad qualitative categories with no explanation of how the categories are defined (low, slight, high). For example, the EA argues that the risk of a right whale vessel strike is very low but the consequences to the population are high. A low-risk action could include an event that happens so infrequently that it is discountable. Alternatively, it could represent an event that has effects on population recovery. In the NAA section, the EA argues that the NAA alternative increases "risk" to Atlantic sturgeon; however, there is no discussion of what the increased risk means and whether it will have effects on population recovery."	The Corps has updated information about specific species impacts in Section 5.5. The IFR/EA evaluation has been conducted to determine the significance of effects from the proposed action, including a qualitative comparison regarding potential for increased take of a species. By following the 2020 SARBO, the determination has already been made that dredging covered will not have an effect on the population or recovery of any species with take covered under the opinion. The only species that a take could affect survivability of the species or recovery would be to a NARW, which there is no take allowed under the 2020 SARBO.

2	9	Georgia DNR - CRD	Doug Haymans	<p>"In the case of the NARW, the EA states that the consequences of a strike could "change the survivability of a species with such low population numbers"; however, there is no discussion of how they arrived at this conclusion. Hopper dredging has occurred for over 30 years in Georgia during the winter months with no documented NARW/vessel interactions or mortalities. By definition, the activity has had no effect on population recovery. During the period 1990-2010, the NARW population grew at approximately 2.8% per year with dredging occurring during the winter dredging window in Georgia. We have no reason to assume that the probability of interaction between NARW, hopper dredges and support vessels will increase in the future. By comparison, a recent summary of human caused NARW mortalities in the U.S. and Canada (vessel strikes, pot/trap gear entanglements, other) estimated ~141 NARW mortalities from 2010-2018 (NMFS Draft BiOp 2021). The risk categories in the EA should be clearly defined and have some relation to population recovery."</p>	<p>The IFR/EA evaluates risk in terms of likelihood for take that may occur under any of the alternatives analyzed. Since the goal is to reduce all take, this includes individuals within the population. The very selective statistic used looks at 1990-2010 for NARW population trends, does not account for mortality events after 2010, Section 5.5 includes updated information on mortality events for NARW through 2021. Risk assessments will be applied to each dredging event based on the best available information.</p>
2	10	Georgia DNR - CRD	Doug Haymans	<p>Fourth, the EA includes speculative information used to argue that summer dredging will have little or no effect on sea turtle populations.⁵ Citations should be provided in the text, or the statements should be removed from the EA. Similarly, the risk assessment includes misinterpretations of research conducted by DNR [Assessment of demographic recovery criteria for the Northern Recovery Unit (NRU) of loggerhead turtles (<i>Caretta caretta</i>) using genetic mark-recapture including implementation of high priority actions (Report submitted for NOAA Grant Number: NA16NMF4720076)]. The EA states that genetic work in Brunswick and North Florida suggests that there "may not be" as much fidelity of loggerhead turtles to a specific nesting beach as previously thought. This statement is not correct.</p>	<p>The IFR/EA does not rely on speculative data in the impacts analysis, the Corps relies on data presented in the 2020 SARBO, and on historic dredging events, including summer dredging conducted at four harbors in North Carolina in 2021. The Corps appreciates the feedback regarding the statement included in the IFR/EA, we have modified this language to be more accurate.</p>

2	11	Georgia DNR - CRD	Doug Haymans	<p>The study in question found that loggerhead turtles exhibit extremely high intra-seasonal nest site fidelity (Shamblin et al. 2017). Forty seven percent (47%) of NRU loggerhead nesting females used 5 km of beach or less for nesting and 73% used less than 20 km. These results were consistent with previous satellite telemetry studies (Hart 2013, Tucker 2010). In addition, the EA states that the study “seems” to indicate that there are more loggerhead females than previously thought. Again, this statement is not correct. Previous estimates of adult female loggerheads were derived from nest numbers, clutch frequency and remigration estimates. There was a high degree of uncertainty associated with these estimates. The study conducted by DNR was the first recovery unit-wide count of adult female loggerheads using genetic analysis (microsatellite DNA) of egg samples from all observed nests. Overall, our study found that loggerheads have high site fidelity and that mortality of adult females during proposed summer dredging would have effects on local nesting populations.</p>	<p>The IFR/EA has been updated to be more accurate. However, this data does indicate that at least a portion of the population may use a wider range of nesting areas. If 74% are within 20 km then the remaining 26% range even further and likely will help to ensure nesting over the full range over time even if individual members are lost in a specific location for any reason including natural ones such as lost nests during hurricanes, etc. Additionally, it is not clear that the data support that a sea turtle take in a specific location like Brunswick Harbor are always associated with a nearby beach. The turtle could be passing through and be one that nests in another state. Therefore, the loss of that individual or individuals in the harbor are not likely going to disproportionately change the local population unless they are all residents. Given that sea turtle populations are large and the 2020 SARBO allows only limited take of any covered turtle species, the impact to any species of sea turtle from dredging under the 2020 SARBO would not affect sea turtle population status or recovery, as analyzed and concluded in the 2020 SARBO.</p>
2	12	Georgia DNR - CRD	Doug Haymans	<p>Finally, the EA provides several justifications as to why Alternative 8 is the preferred alternative that will significantly reduce risk to NARW and Atlantic Sturgeon and may slightly increase risk to sea turtles,6 even though risks to population recovery have been refuted or are incomplete assessments. Research provided by DNR shows that loggerhead sea turtles exhibit extremely high site fidelity, local sources of mortality will have effects on local populations (Shamblin 2017), and population modeling shows the NRU loggerhead population came very close to extirpation in the early 2000’s and has sustained a recent increase in nesting due to intensive beach management and the implementation of Turtle Excluder Devices (TED; Nuse et al 2020). Modeling predicts that the population will plateau and possibly decline slightly because of lack of recruitment from low nesting in the early 2000s. Allowable take limits for adult loggerheads in the 2020 SARBO (214 over 3 years) could lead to a decline in the overall NRU population or declines in local populations adjacent to ship channels.</p>	<p>Disagree- this statement misstates the allowable lethal take, the 2020 SARBO observed lethal take for loggerheads is 107 over three years or 35 per year, which is the same as allowed under the 1997 SARBO. Population levels and effects were considered in the 2020 SARBO, which is incorporated by reference in the IFR/EA. Given that sea turtle populations are large and the 2020 SARBO allows only limited take of any covered turtle species, the impact to any species of sea turtle from dredging under the 2020 SARBO would not affect sea turtle population status or recovery, as analyzed and concluded in the 2020 SARBO. The 2020 SARBO already analyzed that the allotted take would not change the survivability or recovery of the species by population. USACE alternatives are trying to minimize take so that we do not reach those allotted numbers meaning we would never be in a position where any alternative would have a population level effect other than maybe to help reduce loss even further. For loggerheads, the take limits have remained the same as the 1997 SARBO so no change in the potential loss allowed to the population.</p>

2	13	Georgia DNR - CRD	Doug Haymans	<p>The risk of mortality to nesting females is estimated to be 8 times higher during the spring and summer than during winter hopper dredging and should be avoided. Atlantic sturgeon mortality is expected to be slightly higher for the NAA; however, the predicted take is estimated to be ~1 animal per channel per year. This level of take is not expected to have effects on population recovery. There is no discussion of the effects of the alternative plans on Atlantic sturgeon population recovery in the EA.</p>	<p>It is unclear how the 8 times higher mortality statistic was determined. If the reference is to the 2009 pilot study conducted in September, it is not accurate. Dredging was conducted at Brunswick Harbor Channel from 1-9 September 2009 (10 calendar days). There were two dredges operating, one in the inner harbor, one in the entrance channel. There was a trawler conducting non-capture (sweep) trawling for each hopper dredge 24 hr./day. There were 4 loggerhead sea turtle takes during the 10 days. Dredging was conducted at Savannah Harbor Channel from 11-16 September 2009 (6 calendar days). Only one hopper dredge was operating. Non-capture trawling was conducted 24hr/day. Two loggerheads were taken during the 6 days. A total of 6 loggerheads were taken in the combined 16 days of dredging in Brunswick and Savannah. Five were classified as sub-adult, one was classified as an adult. Since 2009, dredging during the historical winter window Dec-Mar, turtles were taken every year except 2010, 2011 & 2013. The number of sea turtle takes: FY12 - 9 sea turtles were taken in Brunswick, 2 in Savannah; FY14 – 2 in Brunswick; 2015 – 3 in Savannah; FY16 – 1 in Savannah; FY17 – 9 in Brunswick, 2 in Savannah; FY18 – 2 in Brunswick; 2019 – 1 in Brunswick; FY20 – 5 in Brunswick, 1 in Savannah. This shows that the number of takes varies significantly between years and there are years when take numbers significantly exceeded those from the 2009 September project. The September 2009 pilot study was a single event that occurred in the Fall, given variability that can occur between years, conclusions drawn that this study supports an 8 times higher mortality in summer is inaccurate.</p>
2	14	Georgia DNR - CRD	Doug Haymans	<p>For the last 30 years, channel maintenance dredging in the Brunswick Ship Channel has been restricted to winter months to reduce sea turtle mortality (15 December-31 March). From 1994-2019, loggerhead sea turtle mortality averaged 1.3 turtles per year in Georgia channels (Savannah, Brunswick, and Kings Bay). All winter dredging mortalities were juveniles. No right whale interactions or mortalities were documented during the period (0 per year). Sturgeon mortalities were low with an average of 3.4 per year in Georgia (most recent 5-year period with standardized monitoring). A review of the biological data clearly shows that the use of winter dredging windows for hopper dredging activities in Georgia represents the best alternative to minimize mortality of protected species and achieve population recovery. Overall, the use of winter dredging windows represents a highly successful multi-species approach to minimizing threats to protected species in Georgia.</p>	<p>Disagree. The winter dredging window does not present a multi-species approach to minimizing threats to protected species. The winter dredging window overlaps with the calving and migration season for NARW and increases risk to NARW. The IFR/EA includes information about recent trends in mortality events for NARW, including mortality from a vessel strike has been recorded in St. Augustine Florida in February 2021. Information about Atlantic sturgeon indicate that this species would be most impacted by a narrow winter window. Additionally, as indicated in the IFR/EA the majority (60%) of loggerhead/sea turtle from past dredging events in Brunswick Harbor occurs in March. This statistic indicates that the narrow winter hopper dredging window may not be the most advantageous to loggerhead as well. Three decades ago, the consensus was that winter windows were necessary to protect sea turtles. In the 2020 SARBO, NMFS describes why this was no longer the best approach based on three decades of information gathered, available data, and input from species experts. The 2020 SARBO switches from a static conservation measure to an adaptive management approach to ensure decisions are made scientifically allowing ways to try to continue to reduce take to all species, a goal that would not be achieved through a narrowly defined winter window.</p>

3	1	Jekyll Island Authority/Georgia Sea Turtle Center	Ben Carson, Michelle Kaylor, Dr. Terry Norton	<p>"Our concerns fall into the following categories:</p> <ol style="list-style-type: none"> 1. Lack of robust scientific consensus supporting the proposed changes to policy and practice. 2. Insufficient communication and interpretation of the scientific rationale underpinning proposed changes, accessible at the local community level. 3. Lack of a strategic approach to forge a collaborative inter-agency alignment between NOAA, USACE, Georgia DNR, and other actors, such as the Georgia Sea Turtle Center based on a common science-based understanding of the issues." 	<p>1- Disagree that there was a lack of robust scientific consensus supporting the changes to policy and practices. Development of the 2020 SARBO by NMFS included a thorough evaluation of the routes of effects to ESA-listed species for the risk assessment and risk management process that would be applied in the 2020 SARBO as well as the determination of incidental take allowed for multiple species, which relied on numerous scientific studies, historic dredging data and input from multiple state and federal agencies.</p> <p>2- GA-DNR input was sought during the development of the 2020 SARBO, the Corps has reached out to state agencies and will continue to coordinate with state agencies.</p> <p>3- We appreciate the JLA willing to come to the table to help support and foster a more collaborative relationship between the Corps, GA-DNR and local stakeholders, such as your organization. The Corps agrees and would welcome an annual meeting or forum to share information amongst all the players in the spirit of creating more productive relationships between the Corps, NOAA, state resource agencies and other local stakeholders and researchers.</p>
3	2	Jekyll Island Authority/Georgia Sea Turtle Center	Ben Carson, Michelle Kaylor, Dr. Terry Norton	<p>We list the following questions as examples of scientific uncertainties that, without further investigation, collaborative discussion, and consensus building, call for a more precautionary approach than is currently being advanced.</p> <ol style="list-style-type: none"> 1. What is the significance of loggerhead population dynamics within the geographically unique Georgia Bight sub-region to the stability of the overall Northern Recovery Unit (NRU)? If dredging related take disproportionately occurs within the Georgia Bight, could population fragmentation within the NRU destabilize the recovery trajectory? 	<p>The Corps disagrees that there is too much uncertainty in the data to move forward with following the risk assessment and management process in the 2020 SARBO. These research questions may be answered through studies that may be conducted by a variety of researchers in the future. As this risk assessment process provides for a way to include new information into any preconstruction risk assessment, any new information from recent relevant research would be taken into consideration. However, best available information was reviewed during the development of the 2020 SARBO and analysis of routes of effects to multiple species, as such there is a degree of certainty about the effects of covered activities to move forward with the risk assessment process. The 2020 SARBO does evaluate population level effects and enough information is available to address this uncertainty. As loggerhead sea turtles are taken in higher numbers than other sea turtle species, additional analysis is provided below for this species. This threatened species was divided into nine Distinct Population Segments (DPS) in 2011, with all loggerhead sea turtles in the United States along the Atlantic Coast and Gulf of Mexico in the Northwest Atlantic DPS (76 FR 58868, published on September 22, 2011). While the loggerhead sea turtle Recovery Plan identified smaller nesting populations based on genetics, it classified loggerhead sea turtles in the study area as part of the Northern Recovery Unit spanning from the Florida /Georgia border north through southern Virginia. Therefore, loggerhead sea turtle take occurring at a single project or across all five RHDC projects would have the same effect to the Northwest Atlantic DPS and/or the Northern Recovery Unit (NRU). Even if 35 loggerhead sea turtles were taken under the 2020 SARBO at a specific project or within a specific state, it would not change the status of the loggerhead sea turtle population or recovery.</p>
3	3	Jekyll Island Authority/Georgia Sea Turtle Center	Ben Carson, Michelle Kaylor, Dr. Terry Norton	<ol style="list-style-type: none"> 2. Considering climate change, are some geographies of greater importance than others in regard to the effects of rising incubation temperatures on the proportion of male and female hatchlings recruiting to the population? 	<p>The 2020 SARBO, which is incorporated by reference, addresses climate change effects to covered species as well as populations level. This is considered when determining incidental take as discussed in Chapter 10 of the 2020 SARBO. The climate change analysis is Section 4.1.1.1.5 in the 2020 SARBO. See also response to your question 1.</p>

3	4	Jekyll Island Authority/Georgia Sea Turtle Center	Ben Carson, Michelle Kaylor, Dr. Terry Norton	3. What is known and unknown about loggerhead behavioral responses to stimuli that might be employed in the risk-based management approach and incorporated into project design criteria (PDCs), such as lights, tickler chains, or predator silhouettes. If these or similar techniques, with the aim of provoking an evasive response by loggerheads to avoid entrainment, are employed, how will they be scientifically evaluated?	The Corps disagrees, following the risk assessment and management process in the 2020 SARBO provides for a way to include new information into any preconstruction risk assessment that accounts for the timing of dredge activities, potential take of multiple species, and any minimization measures that should be taken, including any new information about the degree of success of the measures listed here. The Corps has a long history of conducting pilot studies, such as the pilot study conducted for bed-leveling in Brunswick Harbor and uses several methods to understand how different measures may minimize entrainment. For example, the bed-leveling pilot study used relocation trawling to capture and count species to evaluate the success of that measure.
3	5	Jekyll Island Authority/Georgia Sea Turtle Center	Ben Carson, Michelle Kaylor, Dr. Terry Norton	4. To what extent does existing data inform consideration of the effects of relocation trawling and relocation on gravid loggerheads? What is the potential range in the proportion of females captured and relocated that could experience clutch losses? What affect might clutch loss have on the subsequent reproductive capacity of a female loggerhead within a season?	The 2020 SARBO that is incorporated by reference includes an analysis of effects on gravid loggerheads (Section 6.1.4.1.2). These effects were considered when determining the incidental take statement in Chapter 10 of the 2020 SARBO.
3	6	Jekyll Island Authority/Georgia Sea Turtle Center	Ben Carson, Michelle Kaylor, Dr. Terry Norton	5. What dynamics influence the use of Saint Simons Sound and the Brunswick River by Atlantic and short-nosed sturgeon?	Section 5.5 has provided information using the best available information regarding the use of Atlantic and short-nosed sturgeon in the project area, this information supports that Atlantic sturgeon are expected to be in the entrance channel in the winter months, while there is low likelihood for them to be present in the summer.
3	7	Jekyll Island Authority/Georgia Sea Turtle Center	Ben Carson, Michelle Kaylor, Dr. Terry Norton	We urge the Corps not to proceed with O&M dredging utilizing hopper dredge equipment outside of the historic winter environmental window before a more inclusive and collaborative discussion can be convened. We strongly advocate the need to build expert consensus around existing science and scientific process as it relates to these and other pertinent questions that may be raised before going forward...However, it is evident from the record of communication between the Corps and the Georgia DNR Coastal Resources Division that federal and state biologists are not aligned. We believe this lack of alignment could be resolved by inviting a broader range of experts into the discussion to include academic and other researchers not previously engaged.	The Corps disagrees, following the risk assessment and management process in the 2020 SARBO provides for a way to include new information into any preconstruction risk assessment that accounts for the timing of dredge activities, potential take of multiple species, and any minimization measures that should be taken, including any new information. Development of the 2020 SARBO by NMFS included a thorough evaluation of the routes of effects to ESA-listed species for the risk assessment and risk management process that would be applied in the 2020 SARBO as well as the determination of incidental take allowed for multiple species, which relied on numerous scientific studies, historic dredging data and input from multiple state and federal agencies.

3	8	Jekyll Island Authority/Georgia Sea Turtle Center	Ben Carson, Michelle Kaylor, Dr. Terry Norton	We propose that a scientific workshop, or series of workshops be convened to this end and that a collaborative white paper be produced summarizing the proceedings in an accessible way for a broad public audience. The Jekyll Island Authority and the Georgia Sea Turtle Center would welcome this taking place in whole or in part on Jekyll Island and offer to contribute to its planning and execution. If a NEPA Environmental Impact Statement were to ultimately be carried out, the proceedings of the session(s) we propose could directly inform that...we believe that, with strategic effort focusing on the science and bringing more depth of expertise to bear, a broader consensus is achievable. Community support will follow, and the Corps' decisions will be better informed and more accepted by the public you faithfully serve. We ask that the Corps identify a path forward that makes space for this to occur.	We appreciate the JLA willing to come to the table to help support and foster a more collaborative relationship between the Corps, GA-DNR and local stakeholders, such as your organization. The Corps agrees and would welcome an annual meeting or forum to share information and review the science with all the players in the spirit of creating more productive relationships between the Corps, NOAA, state resource agencies and other local stakeholders and researchers.
4	1	Brunswick Bar Pilots' Association	Bruce Fendig	"The Brunswick Bar Pilots' Association has reviewed the Brunswick Harbor Modifications Study, Glynn County, GA and supports the recommended plan (Alternative 8)...We support and strongly encourage the timely completion of this project to expand the turning basin, bend widener, and vessel meeting areas at the Port of Brunswick. These key components of vessel traffic safety are essential elements to keeping the port functioning safely and efficiently...While commerce through Brunswick Harbor is important to the local, State and National economy, we also recognize the importance of protecting natural resources and balancing the needs of humans and our environment. Fortunately, this project can be accomplished with appropriate safeguards for important environmental concerns.	Thank you for your support of the project.

5	1	NOAA - NMFS	Rusty Swafford	<p>The revised IFR/EA does not review the historically successful application of hopper dredge environmental windows in Georgia to provide safe, efficient navigation while also protecting safe ingress of pregnant sharks through coastal inlets to access estuaries for pupping, and the safe egress of neonates and juveniles through coastal inlets. Sub-adult mortality is already high in Georgia estuaries and coastal habitats as a result of trawling bycatch¹. Altering the hopper dredge environmental windows may increase the cumulative impacts to these species by increasing mortality of pregnant adults as well as that of neonates and juveniles due to entrainment into the suction draghead of the hopper dredge during periods of ingress and egress through the coastal inlet.</p>	<p>The Corps appreciates the information provided regarding potential effects to sharks, additional information has been added to Sections 2.4 and 5.4 of the IFR/EA.</p>
5	2	NOAA - NMFS	Rusty Swafford	<p>The revised IFR/EA does not review the efforts by the NMFS and the NOAA National Centers for Coastal Ocean Science (NCCOS) to continue developing new information for efficiently tailoring environmental windows to navigation projects with applicability for Georgia. The NCCOS recently completed <i>An Assessment of the Fisheries Species Time-of-Year Restrictions for North Carolina and South Carolina</i>² to provide an up-to-date synthesis of the information about the distribution of vulnerable life stages of fishery resources with respect to dredging projects and is applicable to Georgia. Additionally, the North Carolina Division of Coastal Management, in partnership with USACE Engineer Research and Development Center (ERDC), East Carolina University, Duke University, and other state offices, is examining impacts to marine resources and habitats from hopper dredging operations at Wilmington Harbor and Morehead City Harbor. Results of this study will be valuable for addressing issues needed to complete the revised IFR/EA and for guiding any follow-up work necessary for minimizing dredging impacts to Georgia's marine resources.</p>	<p>As the risk assessment and management process outlined in Section 2.9.2 of the 2020 SARBO would be followed, the preconstruction risk assessment would consider the data contained in the reference cited as well as from any future research or pilot studies. The Corps appreciates NMFS providing this information and will continue to coordinate with NMFS to ensure that future preconstruction risk assessments that would be conducted for specific dredging projects considers the most recent relevant information.</p>

5		NOAA - NMFS	Rusty Swafford	<p>The revised IFR/EA does not review or acknowledge the successful use of environmental windows by USACE district offices outside the USACE South Atlantic Division to provide safe, efficient navigation while also protecting vital fisheries resources. For example, various reports prepared by the USACE ERDC and others discuss dozens of federal projects in the Mid-Atlantic and New England successfully maintained through use of environmental windows.</p>	<p>The 2020 SARBO switches from a static conservation measure to an adaptive management approach to ensure decisions are made scientifically allowing ways to try to continue to reduce take to all species, while considering new research and data. While environmental windows have been successful, the 2020 SARBO describes why this no longer the best approach based on three decades of information gathered, available data, and input from species experts. Each preconstruction risk assessment will evaluate past dredging data, recent and relevant studies, and make determination regarding dredging timing that balances impacts across multiple species. Although, there the preferred alternative does not propose a static window and environmental window for dredging will be established during the preconstruction risk assessment phase, which is coordinated with NMFS.</p>
5		NOAA - NMFS	Rusty Swafford	<p>Lastly, the revised IFR/EA does not reflect the USACE-funded review by the National Research Council Marine Board and Ocean Studies Board (NRC) of the effectiveness of environmental windows for providing safe, efficient navigation while also protecting public-trust resources⁴. Among NRC's key findings is "environmental windows are one of a number of tools for reducing the environmental impacts of dredging and disposal operations and for increasing the efficiency and effectiveness of those operations." The NRC goes on to describe adaptive management processes for obtaining and incorporating new information about environmental windows into a risk management framework for managing dredge operation.</p>	<p>The 2020 SARBO switches from a static conservation measure to an adaptive management approach to ensure decisions are made scientifically allowing ways to try to continue to reduce take to all species, while considering new research and data. While environmental windows have been successful, the 2020 SARBO describes why this no longer the best approach based on three decades of information gathered, available data, and input from species experts. Each preconstruction risk assessment will evaluate past dredging data, recent and relevant studies, and make determination regarding dredging timing that balances impacts across multiple species. The Corps will continue to seek input from multiple federal and state agencies and request for new information throughout the risk assessment and management process. The goal is that through an adaptive management approach, long term benefits may be realized for multiple species. Although, there the preferred alternative does not propose a static window and environmental window for dredging will be established during the preconstruction risk assessment phase, which is coordinated with NMFS.</p>
5		NOAA - NMFS	Rusty Swafford	<p>In summary, the NMFS believes the revised IFR/EA is incomplete, particularly in its review of the successful application of environmental windows to provide safe, efficient navigation while also protecting economically important and federally managed fisheries. Reports prepared and/or funded by the USACE describe processes for adaptively managing environmental windows for dredging projects. The revised IFR/EA should be based on those processes. The NMFS stands ready to work with the Savannah District, state resource agencies, and stakeholders to improve the IFR/EA and adaptively manage environmental windows for hopper dredges using the most up-to-date information available.</p>	<p>Thank you for your offer to continue to coordinate and work with the Corps and other stakeholders to improve the adaptive management process for determining hopper dredge windows. The Corps will continue to seek input from multiple federal and state agencies and request for new information throughout the risk assessment and management process. The goal is that through an adaptive management approach, long term benefits may be realized for multiple species.</p>

5		NOAA - NMFS	Rusty Swafford	Section 305(b)(4)(A) of the Magnuson-Stevens Act requires NMFS to provide EFH Conservation Recommendations for any federal action or permit which may result in adverse impacts to EFH. Therefore, NMFS recommends the following to ensure the conservation of EFH and associated fishery resources: · The USACE Savannah District should use the adaptive management process described by the National Research Council, or a similar adaptive/risk management process, to update the existing hopper dredging windows for operations and maintenance dredging in Brunswick Harbor.	The Corps will use the process outlined in the 2020 SARBO, Section 2.9.2 to satisfy the conservation recommendation. The Corps will continue to seek input from multiple federal and state agencies and request for new information throughout the risk assessment and management process. The goal is that through an adaptive management approach, long term benefits may be realized for multiple species.
6	1	EPA	Douglas White	The EPA has not identified any significant environmental impacts from the proposed action that would require substantive changes to the draft IFR/EA or require the Corp's consideration of other alternatives for navigational improvements.	Comment noted.
6	2	EPA	Douglas White	The EPA recommends continued consultation with the DNR regarding water quality impacts from the proposed modification. Periodic turbidity monitoring should be implemented to ensure suspended solids fall out of the water column as expected.	The Corps has coordinated and will continue to coordinate with GADNR regarding water quality impact, including conducting the monitoring as required in the October 2020 CWA 401 WQC.
6	3	EPA	Douglas White	In general, using dredged material for beach nourishment and other environmentally sensitive applications is strongly encouraged and supported by the EPA. Where sediments are potentially contaminated with toxic metals, the Corps should coordinate with DNR for their proper disposal. The EPA is available to provide additional technical guidance and support for selection of appropriate placement sites and determining suitability of material.	The Corps appreciates EPA offer of support to provide technical guidance. Beneficial use is discussed in Section 6.4
6	4	EPA	Douglas White	The EPA recommends consulting with NMFS, FWS, and DNR through the project's duration including for ongoing maintenance and operations.	The Corps agrees and has a long history of coordinating with our federal and state partners, the Corps will continue to coordinate and seek input from state and federal resource agencies.
6	5	EPA	Douglas White	The EPA recommends adding final archeological survey findings as an appendix to the final NEPA document.	The archaeological surveys will be conducted during the post-NEPA pre-construction planning phase only if it is determined that the anomalies do not fall within the project's Area of Potential Effect. The survey would occur after the final EA is produced, so it will not be possible to add a summary of the final archaeological survey findings as an appendix to the final NEPA document. If the surveys are conducted, the survey summary and associated consultation letters can be provided. However, because of the sensitive nature of information that is typically contained in archaeological surveys, this information is generally not shared in public documents. No further Section 106 consultation and documentation will be necessary if it is determined that the anomalies do not fall within the project's Area of Potential Effect.
6	6	EPA	Douglas White	The EPA appreciates the Corps' use of EJSCREEN in the analysis of the proposed modification. Existing land, sea, and air use associated with the Port of Brunswick will not significantly change because of the proposed modification.	Comment noted.

Table 2. Responses to Email Campaign Comments

DOCID	Comment ID	Name	Organization	Comment Summary	Corps Response
Multiple	1	Multiple individuals	Email Campaign Standard Paragraphs	Spring and summer dredging will negatively impact the recovery of Georgia's loggerhead sea turtles, a state and federally-protected species. Summer is the height of sea turtle nesting season, when adult females swim in local waters and actively use these same channels during their inter-nesting periods. For this reason, seasonal restrictions prohibiting dredging during summer months have long been used as a successful tool for species recovery efforts. Your plan to utilize hopper dredging year-round ignores windows that have been in place and proven effective for more than 30 years, and you have failed to provide a logical, data-supported reason for this change.	Yes, three decades ago, the consensus was that winter windows were necessary to protect sea turtles. NMFS issued the 2020 SARBO explaining why they believed this was no longer the best approach based on three decades of information gathered, available data, and input from species experts. The 2020 SARBO switches from a static conservation measure to an adaptive management approach to ensure decisions are made scientifically allowing ways to try to continue to reduce take to all species. Development of the 2020 SARBO by NMFS included a thorough evaluation of the routes of effects to ESA-listed species for the risk assessment and risk management process that would be applied in the 2020 SARBO as well as the determination of incidental take allowed for multiple species, which relied on numerous scientific studies, historic dredging data and input from multiple state and federal agencies. Section 5.5 of the IFR/EA evaluates the effects of dredging during the summer months.
Multiple	2	Multiple individuals	Email Campaign Standard Paragraphs	Further, your updated analysis contains multiple inaccuracies and misrepresents the conservation data collected by the Georgia Department of Natural Resources, the Georgia Sea Turtle Cooperative, and the findings of the Northern Recovery Unit Loggerhead DNA Project. At a minimum, in order to accurately understand the true impacts of your proposal, the Corps must conduct a full Environmental Impact Statement (EIS). I am confident that once the Corps fully evaluates the environmental impacts of year-round hopper dredging, the benefits of continuing the use of these longstanding, effective dredging windows will be clear. I ask that you complete this necessary step before proceeding further and give this process the full attention and respect it deserves.	The IFR/EA provides the requisite hard look to understanding the effects of the action and in the selection of the preferred alternative. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information. Chapter 1.0 and the FONSI outline why an EIS is not required, and Chapter 5.0 evaluates the effects of the action on multiple resources. It is the Corps finding that the preferred alternative would not result in significant effects, and the threshold of significance requiring an EIS is not met.
Multiple	3	Multiple individuals	Email Campaign Standard Paragraphs	The Corps' proposed plan to dredge in Brunswick and along Georgia's coast year-round will set loggerhead recovery efforts back decades. There is no reason to make this change when more than 30 years of data show that winter dredging safely protects loggerhead sea turtles, right whales, and other coastal species. I urge you to listen to our state scientists and drop this dangerous proposal.	Yes, three decades ago, the consensus was that winter windows were necessary to protect sea turtles. NMFS issued the 2020 SARBO explaining why they believed this was no longer the best approach based on three decades of information gathered, available data, and input from species experts. The 2020 SARBO switches from a static conservation measure to an adaptive management approach to ensure decisions are made scientifically allowing ways to try to continue to reduce take to all species. Development of the 2020 SARBO by NMFS included a thorough evaluation of the routes of effects to ESA-listed species for the risk assessment and risk management process that would be applied in the 2020 SARBO as well as the determination of incidental take allowed for multiple species, which relied on numerous scientific studies, historic dredging data and input from multiple state and federal agencies. Section 5.5 of the IFR/EA evaluates the effects of dredging during the summer months.

D3	1	Steve Kendall	Private Individual	As a St. Simons resident the sea turtles are very special to us and I am strongly opposed to any potential threat to them.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D4	1	David Weitnauer	Private Individual	As a Georgia native, I have been a visitor to our coast my entire life. For the last 14 years, I have represented a charitable foundation that contributes regularly to coastal conservation. Our board set that priority due to the international significance of the Georgia coast from an ecological and environmental standpoint. Georgia's coast functions as critical habitat for nesting sea turtles, right whales, and other species. Thanks to a 30+year coordinated conservation effort, our nesting sea turtle population has shown a steady, significant rebound. Right whales have not been so fortunate. Still, there is hope. For the Georgia coast to have a sustainable future where nature and people can both thrive, we have to make reasonable, science-informed accommodations. In this case, the Corps' plan shows no such respect for the science and long-proven successful steps of such accommodation.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D5	1	John Duren	Private Individual	Sea turtle populations were severely depleted until protection measures began about 30 years ago. Now that they are partially recovered, it would be unconscionable to institute dredging practices that are sure to have negative impact on them.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.

D6	1	Mary Herrington	Private Individual	I can't understand why any Georgian would want to undermine years of sea turtle conservation successes in any way. We have a responsibility to be stewards for the voiceless and exercise wisdom. Georgia's environment faces numerous man-made threats, potentially including a spaceport and mining near the Okefenokee Swamp. Although I don't live near the coast, I would love to visit the Georgia Sea Turtle Center and possibly witness newly hatched sea turtles make their way to the ocean.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D6	2	Mary Herrington	Private Individual	As a taxpayer, lifelong resident of Georgia, and someone who cares about sea turtles and the natural world, I expect nothing short of due diligence regarding this matter. I honestly can't understand why this schedule change is necessary. If something has changed to create this perceived need, then address that issue. Nature always pays the price.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D8	1	Patricia Wright	Private Individual	I am a lifelong Georgia resident. My experience as such has long been enriched by the culture and natural beauty of Georgia's coast. I am grieved by the persistent and recalcitrant threat to its well-being now coming from the Corps of Engineers.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.

D8	2	Patricia Wright	Private Individual	Please be willing to demonstrate open-minded intelligence and be willing to err on the side of protecting the natural environment. I consider your job a sacred trust.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D10	1	Duressa Pujat	Private Individual	I live on Saint Simons Island and each year I look forward to the number of sea turtle nests and the number of new hatchlings. these turtles have many barriers to their habitat. It has taken years of work to restore their numbers. I object to this dredging during their nesting season.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
	2	Duressa Pujat	Private Individual	Please base your decisions on the science that has been developed over the years that has led to the protection of loggerhead sea turtles. The animals cannot speak for themselves. I am protesting for them. We have flexibility, they don't.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.

D11	1	Steve Brown	Private Individual	I am a frequent visitor to the coast from Shellman Bluff to Darien, including trips to St Simon's Island. The wildlife there in places like Harris Neck National Wildlife Refuge and all along the coast are an irreplaceable treasure I want to see preserved for future generations.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D11	2	Steve Brown	Private Individual	The fact that there remain unanswered questions in the face of the risk of irreparable harm should be sufficient grounds for reasonable people to pause and reconsider.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D14	1	Jamie Anderson	Private Individual	We've come too far in helping endangered loggerhead and other sea turtles. We need to keep protecting and learning to live with our wild spaces and wild life. This includes the ocean and rivers.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.

D14	2	Jamie Anderson	Private Individual	Please consider doing this work during the off season when turtles are not nesting.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D15	1	Beth Sutton	Private Individual	This plan is wrong in every way. The current system has created a growing sea turtle population and not significantly harmed other sea life. What is behind this change? Certainly not the science!	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D16	1	Brittany Dodge	Private Individual	As a wildlife biologist with experience as a Sea Turtle Research Technician, I can attest to the importance of nest protection and preventing turtles from slipping back onto the endangered species list. I have read the Army Corps updated information and can not believe some of the blatantly false statements made that hide under the guise of scientific data when in fact there has been NO actual impact report conducted. Why? Because any scientist worth their snuff will come to the opposite conclusion of the Corps. The data of these marine observers on dredges show the "acceptable takes" but don't show the consequences of these actions on nesting seasons and egg hatching rates.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.

D17	1	Kevin Austin	Private Individual	As a resident of St. Simons Island, I can experience the nesting and hatching of turtles every year. I believe these turtles are a valuable and irreplaceable resource to our area. Further, I believe that year-round dredging with adversely affect their habitat and chances to survive.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D17	2	Kevin Austin	Private Individual	I am opposed to removing seasonal restrictions for dredging in Brunswick Harbor and along Georgia's Coast.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D18	1	Elizabeth Knight	Private Individual	I have watched these magnificent animals slowly come ashore to lay their precious eggs in the stillness of a summer's night and I know how easily they can be deterred by noise and light pollution of machinery.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.

D18	2	Elizabeth Knight	Private Individual	Have you ever seen the carcass of a turtle washed up on a beautiful beach after it has made contact with this type of machinery? A mother, trying desperately to bring her offspring into the world, savagely ripped apart and her eggs scattered into the ocean. It would break your heart.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D24	1	Ana Hernandez	Private Individual	This activity puts Georgia's sea turtles at risk and I am strongly opposed to anything that puts wildlife and Georgia's ecosystem at risk. Please do whatever is necessary to protect Georgia's turtles, wildlife, and ecosystem from these and other activities that pose a threat to our states natural wonders.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D25	1	Martin O'Hara	Private Individual	I am a homeowner and seasonal visitor to St. Simons Island and a large part of the appeal of coastal Georgia is its largely unspoiled, natural environment. Spotting the nest of a returning loggerhead turtle contributes much to the thrill of an early morning walk on the beach and I really can't believe that the Corps are still continuing to consider a change to the existing dredging regime. Any change will, in my opinion have a adverse impact on the turtles and, by implication, makes one wonder what steps may next be taken that devalue this special coastline.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.

D25	2	Martin O'Hara	Private Individual	I again ask you to voice objections to the Corps proposed plan. It will only harm the reputation of coastal Georgia as a natural attraction and wildlife haven.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D27	1	Carolyn Rock	Private Individual	I am not a biologist but I love sea turtles and all the natural resources that God has created on our coast. The hard work that biologists have done to help the turtles continue to nest on our beaches should not be in vain! I have been fascinated with being able to see the turtles nest and hatch, and hope that continues for my children and grandchildren!	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D30	1	Megan Mayhew Bergman	Private Individual	I spend several weeks a year in Georgia working as a journalist for The Guardian and professor for Middlebury College. I think it's imperative we take wildlife conservation and protections seriously and place them over convenience and profit. Ultimately, a clean and cared for coast is better for Georgia's citizens.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.

D30	2	Megan Mayhew Bergman	Private Individual	Please honor the advice of genuine experts and avoid political maneuvering - just do what's right, ethical, and scientifically prudent.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D33	1	Valerie Cochran	Private Individual	Turtles are a friendly symbol of our oceans and their importance to our healthy planet and water supplies. Plus, they bring in tourism dollars.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D36	1	Autumn Tarleton	Private Individual	As a gal born in Florida, I've spent a great deal of time on the coasts of Georgia. As we watch the world around us burn, watch species die off, watch our future fade into the ever-rising waters, can we really watch Georgia be directly involved in the devastation of one of its most popular coastal creatures?	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.

D37	1	Richard Ingalls	Private Individual	This degreed engineer has studied science throughout my entire life. The scientific evidence against year round dredging is clear and indisputable. Any competent, honest engineer cannot support the removal of seasonal restrictions on dredging in these waters.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D38	1	Missy Wilson	Private Individual	I grew up on the Georgia Coast. Our ecology is our life.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D41	1	Kathleen Yeomans	Private Individual	Please do not allow year round dredging. Winter only. The sea turtles that visit our waters are very special and need our protection. The species is on a comeback but they still need our help to survive. I volunteer with different environmental groups and see first hand how we are helping them. Please continue the help and protect the sea turtles and other sea animals. Thank you.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.

D41	2	Kathleen Yeomans	Private Individual	Please protect the sea animals. so many of them are senselessly killed. This needs to stop.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D44	1	Katherine Warden	Private Individual	The dangers posed to these animals are too great to discount or ignore. The costs of spring/summer dredging outweigh any benefits gained.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D48	1	Phyllis Miller	Private Individual	We must do everything in our power to preserve our coastal wildlife, especially since the solution is so available to not dredge during summer turtle season.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.

D52	1	Tiffany Nebb	Private Individual	Please reconsider this dredging. Our turtles deserve to live in their natural habitat and grow undisturbed. These animals have been protected for years and need continued protection by us. Please reconsider this dredging. Our turtles deserve to live in their natural habitat and grow undisturbed. These animals have been protected for years and need continued protection by us.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D53	1	Lacy Bedol	Private Individual	I have grown up going to the coast of Georgia and each year one of my favorite activities is to learn about the sea turtle activity that is taking place. So many people spend countless hours dedicated to protecting our sea turtles - and not just from Georgia. Jekyll is home to a premier rescue center that rehabilitates turtles from all over the east coast. Georgia has uniquely demonstrated dedication to preserving this incredible species and it creates economic impact by attracting tourism to the area as well. Harming the turtles will also harm our economy.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D55	1	Katherine Propst	Private Individual	I live on Tybee Island and, every year, I see first-hand many of the struggles our sea turtles face including over-development and plastic pollution. We are a small island with only a small fraction of Georgia's turtle nests each year, but as a public beach, we have hundred of thousands of visitors each year that have the opportunity to learn about these magnificent creatures.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.

D55	2	Katherine Propst	Private Individual	I simply do not understand why you have chosen to pursue this plan when you can simply continue to dredge in the winter.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D56	1	Connie Darbyshire	Private Individual	Our family looks forward to the nesting turtles and the hatchlings every year. We have worked at Wassau Island with the Caretta project and on Hilton Head Island, SC to protect these precious creatures. If you have ever seen any part of this magical process you would certainly understand the importance of protecting our native wildlife. We have been successful increasing the turtle population for the last 40 years. Please don't dial the clock backwards at the expense of our wildlife. Surely we have learned a thing or 2 in the last few decades. Thank you for your consideration of this important matter!	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D58	1	Jazz Watts	Private Individual	As a descendant of the coastal area of Sapelo Island and St. Simons Island I grew up understanding the importance of Georgia's loggerhead sea turtles. They deserve to be protected and not endangered for the sake of dredging year round; which is something that hasn't been done historically. So I ask each of you to not allow the Army Corps of Engineers to do this. It's time for you to stand up for those that aren't able to stand up for themselves. The history of the windows of time that have proven effective speak for themselves. There is no reason to endanger an entire species and others to do this year round.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.

D59	1	Abigail Gruver	Private Individual	I have always loved sea turtles, and I feel that the connection between Savannah and sea turtle habitats and conservation efforts is vitally important. That connection is what first drew me to this area.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D59	2	Abigail Gruver	Private Individual	Changing the dredging times will unavailably impact the local wildlife that are an important part of this region.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D62	1	Candice Roth	Private Individual	Our family has been vacationing in Tybee for the last 11 years. About 2 years ago, we purchased a property to make long lasting memories at. The sea turtles are part of those memories. Please don't disrupt the beaches, turtles, & ocean. This is our home - our happy place!!!	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.

D62	2	Candice Roth	Private Individual	PLEASE LISTEN & LEARN! Do not disrupt the land.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D63	1	Sheryl Pavlinac	Private Individual	Can't you compromise and expand dredging only for two additional months, thus still avoiding the Spring/Summer season.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D64	1	Amy Capello	Private Individual	I have volunteered with Georgia's sea turtles since 2006. We work tirelessly to protect these incredible species and would hate to see this undermine years of work and growth.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.

D67	1	Kristin Dombrowski	Private Individual	Living on the coast has allowed for me to become devoted to maintaining a safe and healthy environment for the creatures who also call the Georgia coast their home.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D68	1	V Purcell	Private Individual	As a long time resident of beautiful coastal Georgia. I oppose the Corps of Engineers dredging during the spring and summer months. We have many animals that rely on our beaches for food, shelter and reproduction.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D69	1	Barbara Sayer	Private Individual	I grew up in Savannah and Atlanta. I lived in North Carolina for many years and am now back in this wonderful state. I have taken pride for many years in explaining to residents from other states that Georgia recognizes the value of its coastal region. Must I take back my words ? This is 2021 and I cannot understand how the benefit of a healthy coast is even in question. And a healthy coast and a responsible citizenry means protecting and promoting the recovery of special species. Anyone lucky enough to have seen a loggerhead turtle can talk at length about how beautiful and special the turtles are. But it's more than a single ,personal experience. It's about doing the right thing by our planet.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.

D69	2	Barbara Sayer	Private Individual	I'm lucky enough to get up most days and look at marshland. I know that I am blessed because decades ago the state of Georgia passed the Coastal Marshlands Protection Act. I want the U.S. Army Corps of Engineers to act with the same conscience and far-sightedness now that our state legislature did then.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D70	1	Angela Hayes-Boucher	Private Individual	I love sea turtles and always have. Please don't risk the lives of this and future generations of sea turtles because of dredging. I am very much in favor keeping the shipping channels open but I believe it can be done in a way that won't affect our beloved turtles.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D71	1	Ashley Whitley	Private Individual	I am a biology student who has spent time working with sea turtles on Wassaw Island. These beautiful creatures are already threatened by so many different human actions. I believe it is our duty to minimize the harm to Georgia's sea turtle population.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.

D71	2	Ashley Whitley	Private Individual	I believe dredging should only be allowed in winter months.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D72	1	Pamela Barfield	Private Individual	Sea turtles helped make memories for me and all 3 of my boys. We lived in NW GA until 6 years ago and every year we came to Tybee for our vacation and to teach our boys about the sea turtles. They already have so many enemies and you are another large enemy that they don't need. Please leave the work for winter months.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D72	2	Pamela Barfield	Private Individual	I believe you are only concerned with the financial side of the project and not the harmful side.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.

D75	1	Alita Duarte	Private Individual	<p>I began my journey with sea turtles in Tybee Island with our dedicated volunteers. I have been fortunate to learn enough to expand with turtle projects in South Carolina and North Carolina. I am a very active volunteer - 10 years of hard work and educating not only visitors but thousands of children as well. Sea turtles are not my only passion, whales and birds too! Every animal plays an intricate part in our ecosystem and we must consider what is best for them because it impacts us too! If you spend 10 minutes showing a child the wonders of our sea life, you'll rethink everything you think you know. Their curiosity and will to care for our animals is inspiring. What kind of example would we set to them by dredging during active months when we are trying to teach them ways to care for and protect our environment and its habitants?</p>	<p>The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.</p>
				<p>My hope is that kindness will guide this project. I am not opposed to the benefits of this project, but the timing is not appropriate.</p>	<p>The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.</p>
				<p>Doing the right thing makes for a great night of sleep.</p>	<p>The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.</p>

D76	1	Patricia Horner	Private Individual	I am a resident of the state of GA and having seen these amazing turtles in person, in my opinion, it would be detrimental to our coastal ecosystem for this dredging to go on all year. We must allow these beautiful creatures and others including whales the opportunity to live, love and exist. No dredging in spring and summer. Allow them to nest and the eggs to hatch. Preserve our wildlife and our coastal ecosystem.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D79	1	Lenore Hervey	Private Individual	I am a volunteer at the Georgia Sea Turtle Center on Jekyll Island and have seen the tremendous efforts put in by professionals and volunteers to save each and every sea turtle that they have the opportunity to work with. I have learned about the life cycle of sea turtles and their role in the environment in our area. I have great concern about the plan to dredge year round and find the rationale provided in the most recent proposal by the Corps to be inadequate justification to expand dredging operations beyond the winter schedule that has been in place.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D79	2	Lenore Hervey	Private Individual	Please know that I vote with the environment and will support those representatives who also vote to support environmental diversity and preservation. I believe it needs to be our priority at this time.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.

D80	1	Janet O'Hara	Private Individual	I am a seasonal resident of Glynn County, GA, and have visited the Georgia coast for over 20 years. One of its main attractions is the large swathes of unspoiled tidal beaches, which offer perfect habitat for nesting turtles, many of which are threatened and endangered elsewhere. One of my best memories is taking a very early sunrise walk along East Beach in May 2019 to be the first person to witness the first turtle tracks and nest of the season that year. These turtles thrive on the Georgia coast, specifically because their habitat and journey across the sea has been protected by marine scientists for decades.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D80	2	Janet O'Hara	Private Individual	Several years ago I visited Blackbeard Island, north of Sapelo, and took a tour with their turtle specialist. It was incredible to learn that through DNA tracing via the eggs, it was proved that a 90 year old grandmother, a 60 year old daughter and 30 year old granddaughter had all nested on that same beach the previous summer, each one of them swimming thousands of miles across the ocean to return to where they hatched. Please do not destroy these nesting opportunities with catastrophic and unnecessary dredging after the population has built up over a century.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D80	3	Janet O'Hara	Private Individual	The Georgia coast is an extremely special place, largely unspoiled, and provides hope and refuge in a world where biodiversity is being lost and natural habitats are being challenged in so many other places. Please, please do not let your thoughtless and unnecessary year-round dredging activity turn the Georgia coast into yet another area of natural disaster by threatening the livelihood of its turtle population.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.

D84	1	Stephanie Chewing	Private Individual	I have been a member the St Simons Sea Turtle project for many years and spend countless hours monitoring the beaches as well as educating others about threats facing Sea turtles and how best to help them.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D85	1	Pat Bushong	Private Individual	Why can't you just dredge during the off season ? Why is this so hard to understand ? Wintertime dredging has been the safest, effective option for more than 30 years. It can and should continue that way. We have no objections to routine operations and management dredging if conducted during the long-standing winter dredging windows of December 15-March 31.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D87	1	Cnaries Robinson	Private Individual	Having been a scuba enthusiast for many years I can not imagine the intention to ignore time proven methods to protect Sea life especially turtles. Wake up politicians!	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.

D89	1	Gil Johnson	Private Individual	I serve as a volunteer at the Georgia Sea Turtle Center. We have put in a lot of work throughout the years and it is paying off! Recently, Georgia has had several record breaking nesting seasons and our turtles must be protected! Please help us to protect our turtles.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D90	1	Barbara Hayser	Private Individual	I volunteer for the Tybee Island Sea Turtle Project and I feel the window to allow sea turtle nesting is vital to uphold without dredging year round. The environment has suffered setbacks due to growth of our ports and economic development. We need to preserve what little is left. Sometimes money is not the prudent answer to all our ills. we need to take a breath and let nature thrive. What else is so important to our earth???? Be responsible and DO THE RIGHT THING.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D92	1	Sean McQuilken	Private Individual	I am a marine biologist who has the unique perspective of having spent a number of years working on hopper dredges as a protected species observer. I can tell you from first hand experience the protections put in place to protect sea turtles during hopper dredge operations are insufficient to protect them. This is because the permitting agencies consistently fail to enforce the protections. For example I was on multiple projects where the contractors were consistently digging with the dragheads off the bottom with the pumps running, they also had larger holes in screening than permitted yet nobody told them to fix the issues. This was despite there being an observer onboard and the core of engineers having real time data showing the pumps were running when the equipment was off the bottom. Myself and other observers were threatened with removal from jobsites by both the dredging contractors and the core of engineers for trying to enforce the environmental protections we were there to enforce.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.

D94	1	Helen Parker	Private Individual	The welfare of the Earth should be everyone's priority. Dredging to accommodate shipping vessels is not a priority.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D95	1	Burch Barger	Private Individual	I am a 4th generation resident of Glynn County and recognize the environmental importance of protecting sea turtles.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D95	2	Burch Barger	Private Individual	Please do not dredge at times that will interfere with sea turtles nesting and hatching.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.

D97	1	Jessica McQuain	Private Individual	Georgia's coast serves as a unique ecosystem that protects the state from storms. Sea turtles are a key species in maintaining the health of the ecosystem. My family enjoys visiting the coast and protecting sea turtle nesting space is our priority on vacation. It should be our government's priority all the time.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D97	2	Jessica McQuain	Private Individual	The long term impact of this change must be considered. There's too much at stake.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D98	1	Konnie Maxfield	Private Individual	You have successfully dredged in the past in the winter months when sea turtles are not nesting...why the need to change now?	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D98	2	Konnie Maxfield	Private Individual	Can we have nothing pristine or must we destroy absolutely everything on the planet...	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.

D100	1	Erin Howell	Private Individual	I work on Tybee Island and my son attends school at Georgia's only maritime based charter school on Tybee Island. The efforts that have been made to monitor and protect our loggerhead turtles during nesting season has been a long process that has had great results in increasing the number of nests laid on our GA beaches year after year. It is vital to protect the sea turtles survival and it is not worth jeopardizing when the dredging can be completed during other times of the year. Not to mention the negative impact the dredging has had on our tourist driven economy here on Tybee Island and the Savannah area. Doing dredging during the spring and summer will have an impact on the tourist industry in our area as well.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D100	2	Erin Howell	Private Individual	I forgot to mention the endangered right whales that frequent our coast during their birthing season as well. Please consider the impact this will have on our marine life, that we work hard to try to protect.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D104	1	MaryBeth Deiters	Private Individual	Our wildlife and natural habitats along the coast of Georgia are an important and unique ecosystem that deserves to be protected.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D105	1	Elizabeth Goodroe	Private Individual	There is so much unknown about the ocean and ocean life. Conservation is the best key to learning more. The past efforts to protect sea turtles have provided an excellent foundation and continued protection is required to gain more knowledge. Changing the dredging season will absolutely upend everything that has been done in the past and could be learned in the future.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.

D105	2	Elizabeth Goodroe	Private Individual	Additionally, this will have a significant and direct financial impact on the care facilities that treat sea turtles. The Jekyll Island turtle center has stated that it will not be able to care for an expected increased number of injured turtles that will surely be brought there for care. Sea turtles will absolutely suffer -- needlessly-- if this moves forward.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D106	1	Rebecca Jennings	Private Individual	I know you big wigs normally don't care about our environment but it is important to me and others that our efforts in conservation of wildlife and nature do not go unnoticed just because people want to make money. It is sickening to my stomach to think all everyone cares about is money and they don't seem to care about those fee people volunteering and trying wo hard to keep the Earth clean and wildlife preserved for futures to come. Please consider not dreading the oceans and let wildlife flourish.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D106	2	Rebecca Jennings	Private Individual	Keep the dredging down only in winter months	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D108	1	Martha Lang	Private Individual	I took the time (over an hour) to read online the SARBO report submitted by US Army Corps of Engineers and I have pasted below parts of the report where it clearly states the lost of turtles during dredging. They are lying when they say, "finding of no significant impact" Read for yourself. The dredging will kill turtles of all kinds.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.

D108	2	Martha Lang	Private Individual	Status of Species Likely to be Adversely Affected Sea Turtles There are 5 sea turtles (green [NA and SA DPSs], hawksbill, Kemp's Ridley, leatherback, and loggerhead) that travel widely throughout the South Atlantic, Gulf of Mexico and the Caribbean, and may be adversely affected by the proposed action.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D108	3	Martha Lang	Private Individual	OF THE ACTION Section 3 of this Opinion discussed routes of effects expected to occur from activities covered under by Opinion, and identified those activities that are likely to cause adverse effects. We believe that the only activities covered under this Opinion that will result in adverse effects are those listed below, which will be analyzed further in this section: ? Hopper dredging will result in take of sea turtles (green, Kemp's ridley, and loggerhead) and sturgeon (Atlantic and shortnose). ? Cutterhead dredging will result in take of Atlantic and shortnose sturgeon in rivers ? Relocation trawling will result in take of sea turtles (green, Kemp's ridley, leatherback, and loggerhead), sturgeon (Atlantic and shortnose), and elasmobranchs (smalltooth sawfish and giant manta ray). ?	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D109	1	Jen Hatcher	Private Individual	We need to protect these protected species NOW! If we don't it will be too late!	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.

D110	1	Jenn Fletcher	Private Individual	<p>We've taken so many steps forward to protect loggerheads in the state of GA, how could we even consider taking these steps back? Recent nesting records are the direct result of dedicated efforts and the implementation and enforcement of strong management practices. Two summers ago (2019) we had a record-breaking year for the number of nesting loggerheads on the Georgia coast. I can only hope in the upcoming years that we will continue to break those records! Because nesting numbers tend to go in a 3-year cycle, the proposed dredging to start next year could greatly impact our nesting numbers (in potentially our biggest year yet), in much bigger ways than even initially thought. If the Corps is successful in their efforts to dredge in the spring and summer without restrictions, the legal allowable take for loggerheads could reverse our increasing numbers (which we've been working for a long time now to get to!), and lead to more precipitous declines. Our adult loggerheads are precious, have overcome so many obstacles to make it that far in their lives, and deserve our protections.</p>	<p>The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.</p>
D110	2	Jenn Fletcher	Private Individual	<p>I understand that it's more difficult to truly care about a species when you haven't seen one up close and personal before, and I would urge our elected officials to take an opportunity to do this with some of the wonderful threatened species in our state, so that you can better understand how dire it is to protect them, and to be able to connect more personally with them. I'm lucky in that I've had those personal, up close interactions with some of our amazing loggerheads, and it brings me to tears thinking about all of the obstacles that they face, especially when it comes to the impacts from human activities (dredging and shipping included!).</p>	<p>The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.</p>
D112	1	Patricia Colbert	Private Individual	<p>As a citizen of GA who lives along the Savannah River, I have seen many instances of poor decisions made by the Corp concerning our wildlife and waterways. Our eagle population was almost wiped out and lack of proper water management almost turned our huge deep water lakes into deserts several years back. Please don't make these mistakes again concerning our turtles on the coast. Pick times of the year to dredge that won't impact their nesting. They can't plead for their lives, but we can.</p>	<p>The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.</p>

D113	1	Jenna Hutchinson	Private Individual	These turtles are extremely important to our local ecosystem but also for our tourism revenue as well.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D113	2	Jenna Hutchinson	Private Individual	Please do the right thing and help protect our turtles for our generation and the generations to come. Please help set an example of how real legislators can make a positive impact on our environment. We have already lost so much.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D115	1	Cynthia Sinclair	Private Individual	One of the reasons we moved here was our love of the turtles. I walk the beaches daily as part of my daily ritual since losing my son. Seeing the crawls make me so happy. My son was a lover of animals and especially turtles. He would have done anything to help save them.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D115	2	Cynthia Sinclair	Private Individual	We were put here to share the world with the animals already here. Why would we risk killing these wonderful gentle creatures that have come to nest here longer than we were here. We need to save these amazing turtles.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.

D117	1	Samantha Cummins	Private Individual	I grew up on St. Simon's Island and visit often. The sea life that exists there is an integral part of the ecosystem and even the culture of the Golden Isles.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D120	1	Kathleen Magbee	Private Individual	I have been visiting the golden isles for 40 years. Some things are just more important than money. We have a responsibility to be stewards to the animals who were here first and protect them.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D121	1	Marie Wheeler	Private Individual	I grew up about an hour inland and spent many summer months on the coast. My daughter and I visit the Sea Turtle Center each year in the summer and help baby turtles safely to the water when we can. We have a huge opportunity right now to protect the Georgia coast's magic while we still have the loggerhead population. Please. The quality of our lives is dependent upon our inherent responsibility to protect those whose lives depend on us.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D121	2	Marie Wheeler	Private Individual	Dredging is fine from December to March. Please protect our resources!	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.

D124	1	Melinda Jacox	Private Individual	There is nothing about the proposed dredging changes that benefits people or wildlife, particularly sea turtles.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D124	2	Melinda Jacox	Private Individual	Please stand against the proposed change to year-round dredging. Limited times for dredging were implemented for valid reasons and those reasons still exist.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D130	1	Susan Inman	Private Individual	There is a requirement to test the dredge areas sediment and water before dredging begins. The study that was completed on March 2021 has only tested 2 of the 3 areas. Blocked https://www.sas.usace.army.mil/Portals/61/docs/Planning/BrunsHarMod/Appendix_L_BHMS_401WQCand404b1.pdf?ver=XHJhKoH7QKgnvMJG4jmiw%3d%3d)There are 3 areas identified in the permit and only 2 of the areas, the port area and west of Bird Island, have been tested. The area that was left out is the St Simons Fishing Pier area, a highly used public area. This dredge area is only feet away from where people fish and a beach where families play in the water and sand. This area is also the largest section to be dredged. So for the St Simons Pier area to be left out of any type of sediment and water study makes this study incomplete.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.

D130	2	Susan Inman	Private Individual	We need to protect the people of this community. The sediment and water study also needs to expand the testing parameters to include hydrocarbons and ethyls due to the daily leaks from the salvage operations. The sampling and analysis in the Mar 2021 report has already included chemicals from past disasters so the methodology is in line with testing for the current disaster.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D130	3	Susan Inman	Private Individual	30yrs is a long study period and should not be overlooked. The depth of the channel is not an immediate danger to the ships. The capsized cargo ship did not sink because it struck ground. Which was proven by side scans of the river floor and presented during the USCG formal hearing.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D132	1	Joy Collins	Private Individual	For their birthdays, my children receive a symbolic adoption of one of the turtles at the Georgia Sea Turtle Center. We greatly admire these ancient mariners, and are both disgusted and dismayed that anyone could be so polluted with greed as to endanger them with the foolish and disingenuous suggestion of constant dredging. We insist and expect this despicable idea be abandoned, immediately and permanently.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D132	2	Joy Collins	Private Individual	You may dredge when the environmental impact is least, during the winter,...then, and only then.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.

D134	1	Carolyn Janssen	Private Individual	The greatest joy of my retirement on Saint Simons Island is participating in the SSI Sea Turtle Patrol. How exciting to discover a crawl and nest in the quiet dawn!--an event I love sharing with other beach goers. I find immense satisfaction in knowing that today's hatchlings will continue this ancient pattern long after I am gone.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D141	1	Teresa Watson	Private Individual	We have visited in this wonderful area for most of my life & had the pleasure of docking our boat on SSI as well as living on a tidal creek in northern Camden County in the 1990's.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
				Also had the gift of watching a Sea Turtle lay her eggs on Blackbeard Island when a ranger hailed us as we were anchored just behind the dunes. A memory I will always treasure. Few get to witness this.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
				Do Not Allow this Dredging.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.

D143	1	Jeremy Davis	Private Individual	The area is a home for many on the shore and off. This will degrade and harm them all.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D148	1	Nancy Day	Private Individual	As a frequent beachgoer over the past several decades, I have enjoyed seeing the number of loggerhead sea turtles' nests grow. I have had the awesome experience of seeing a female loggerhead come onto the beach to lay her eggs, as well as a nest of turtle hatchlings making their way to the sea. Many Georgia citizens have worked hard to nurture this population, giving me hope that my grandchildren will be able to enjoy the connection with this amazing species that I have.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D148	2	Nancy Day	Private Individual	Killing any number of loggerhead sea turtles is unacceptable to me and many Georgia citizens who have cooperated and worked to protect this species. But the prospect of your killing 87% of nesting females in and around Brunswick harbor is especially alarming.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D149	1	MP Peace	Private Individual	We have destroyed more than enough of our world. Why do we have to keep doing so? We are supposed to take care of it not destroy it.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.

D150	1	Lavonia Prescott	Private Individual	As a child I walked the shores of our Georgia Coastline. I learned from the sea sages that lived there how important and beautiful the sea turtles are and how we are to protect them. As an adult I still walk the beaches looking for " tred" marks showing that a female has laid her eggs and returned to the sea. I have seen tiny turtles rushing to the water. How fortunate I have been to have experienced this beautiful cycle of life.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
				Please protect our turtles.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D151	1	Emillie Skinner	Private Individual	Our family loves sea turtles! Our daughters are extremely upset about the possibility that their beloved turtles could be harmed by this dredging. Please think of the generations of children and turtles this will affect! Winter dredging is safer and would not cause as much environmental destruction. You must protect those who have no voice! Save our turtles!	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D152	1	Melanie Fenley	Private Individual	I live in Coastal Georgia. These animals are rare and should be protected. They are unique to this area.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.

D153	1	Pam Paolantoni	Private Individual	As a citizen of Georgia and a saltwater fisher, I'm opposed to spring,summer dredging. Georgia specifically Brunswick, the costal ecosystem is already in danger by the Golden Ray. We dont need or want dredging in spring summer. Our sea turtles depend on our voices for their survival. Please reconsider this ill advised decision	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D159	1	Julie T Martin	Private Individual	As a 30 year resident of Glynn County and a third term Brunswick City Commissioner, advocating for measures that protect our natural coastal habitats is vitally important as we live in a delicate balance of coastal ecosystems and heavy industry along our waterways. It has taken decades for the nesting loggerhead turtle population to increase to a level of promising sustainability. By allowing year-round dredging by the Corp of Engineers, the population of all nesting sea turtles in our waters will be dramatically effected in very negative and catastrophic ways. This absolutely should NOT be permitted!	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D159	2	Julie T Martin	Private Individual	The voices of the citizens of Glynn County as well as other advocates protecting our nesting sea turtles and other sea creatures affected by dredging year-round MUST be heard!	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D163	1	Jonna Kerrigan	Private Individual	I am proud of the efforts the state has made in the past to protect sea turtles. It would be a shame to see all the work and progress undone by a single decision based on no scientific analysis.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.

D164	1	Jennifer Messner	Private Individual	Our family members have served as sea turtle rescue volunteers and have seen firsthand how vulnerable these unique and beautiful creatures are to nest disturbance, endangering their very existence.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
	1	Haley Watkins	Private Individual	As the Lead Naturalist on Sea Island, I see guests visiting Coastal Georgia from all over the world to experience the phenomenon of Sea Turtle nesting and hatching. The health of Georgia's loggerhead sea turtle population is not only vital to this ecosystem but it is a part of what inspires people to visit and explore Georgia's barrier islands. The proposal to dredge during spring and summer months which are so critical to sea turtle nesting, would be detrimental to a threatened species. Further more, it would be the catalyst for the deterioration of Coastal Georgia's thriving ecotourism industry that surrounds sea turtle nesting season.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D165	2	Haley Watkins	Private Individual	Decades of hard work have been poured into conserving loggerhead sea turtles along this coast. Throwing that away would not only be short sighted but negligent and ultimately catastrophic to a wild species that defines the Georgia Coast.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D166	1	John Hodges	Private Individual	I work in sea turtle research and data collection and I can assure you, if approved, this dredging proposal would set back 60+ years of conservation work. These summer months are when hundreds of Loggerhead Sea Turtles congregate in our coastal waters for nesting season. If approved the fatality rate would be drastic and we would erase years of work that conservationist and the people of Georgia have poured there time and money into. Winter dredging has been an effective and reasonable agreement by the Core of Engineers for 30 years and the people of Coastal Georgia intend for it to stay that way.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.

D167	1	Jordan Hamby	Private Individual	<p>I am a college graduate of the College of Coastal Georgia. I interned at the Georgia Sea Turtle Center and am currently a turtle technician on another island on the Georgia Coast. I have been doing this for four summers and have seen the largest nesting season on the coast and lower seasons as well.</p>	<p>The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.</p>
D167	2	Jordan Hamby	Private Individual	<p>Loggerheads are still listed and a Threatened species (on the Georgia Coast, and endangered world wide) under the Endangered Species Act making it illegal for any to harm any part of the turtle from nest to hatchling to corpse. Why are we even entertaining this thought? Do we not want to help a species of animal that we destroyed in the first place? What about the jellyfish? We all know that tourism is a big part of our revenue in coastal counties. During the spring when hundreds of thousands of jellyfish wash up on our shore and drive tourist away with their smell, wouldn't it be nice to have a predator of the Canon Ball Jellyfish around. Loggerheads (and all sea turtles) love to eat jellyfish. If we have more turtles the less jellyfish meaning the less smell meaning tourist stay and bringing in money. The turtles are not out of the woods yet though many people volunteer to help them and donate money to help them. These creatures are an incredibly important species to the environment biologically and as a whole. They are a megafauna - animals that are large and usually what we think of animals - are an ambassador of our oceans (which are also in trouble). The turtles already have enough human troubles from plastic plaguing the world to shrimp nets to boat strikes. Why add another obstacle into there already long hard life. It takes them 30 years to reach maturity -for them to have their own offspring. 1 in 1,000 make it to adulthood before this unintelligent consideration to dredge where they recover. What if they made your wife, sister, or mother immediately walk out onto the street into oncoming traffic after they had a child? Why should we make the turtles do something like this?</p>	<p>The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.</p>

D168	1	Mary Jo Townsend	Private Individual	Sea turtles do not lay eggs until they are over 30 years old. If they are allowed to dredge during this nesting time they will wipe out a generation of turtles. The nesting mamas won't be replaced for 30 years. We cannot afford this. We need this recovery for sea turtles!	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
	1	Brunswick Bar Pilots Assn.	Private Individual	The recommended plan supports the continued growth in Roll-On/Roll-Off (RO/RO) activities in the Port of Brunswick. The Port has grown into the United States' largest RO/RO complex with multiple processors having sizable acreage dedicated to auto, machinery, and other rolling stock that are regularly handled aboard this class of vessels. As this business has grown, so has the size and capacity of the vessels serving the port. The proposed Brunswick Harbor modifications will provide critical improvements in both vessel safety and operational efficiencies. The value of the proposed project is clearly substantiated by the positive benefit-to-cost ratio identified in the study documents.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
	2	Brunswick Bar Pilots Assn.	Private Individual	We support and strongly encourage the timely completion of this project to expand the turning basin, bend widener, and vessel meeting areas at the Port of Brunswick. These key components of vessel traffic safety are essential elements to keeping the port functioning safely and efficiently.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D169	3	Brunswick Bar Pilots Assn.	Private Individual	While commerce through Brunswick Harbor is important to the local, State and National economy, we also recognize the importance of protecting natural resources and balancing the needs of humans and our environment. Fortunately, this project can be accomplished with appropriate safeguards for important environmental concerns.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.

D172	1	Jessica Howell	Private Individual	This will undermine decades of conservation efforts and is simply a cost savings for dredging companies.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D173	1	Brent Buice	Private Individual	I want my two young daughters to be able to see and appreciate these magnificent and gentle creatures throughout their lives.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D177	1	Audrey Platt	Private Individual	MY GRANDDAUGHTER HAS "MENTORED" TURTLES ON WASSAW FOR 5 SUMMERS!!	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D187	1	Elizabeth	Private Individual	I work on a neighboring barrier island, Ossabaw Island. Each year 600 nests are laid on the island, but very few if any of these hatched babies will make it to adulthood. It is the adults we need to protect, and that includes no dredging during the laying season, May to October.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.

D197	1	Patrick Wilburn	Private Individual	This project could contribute to the collapse of an endangered species.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D197	2	Patrick Wilburn	Private Individual	This project erases all of the work that we have done to save these endangered animals.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D207	1	Hannah Farhadi	Private Individual	Sea turtles have been my favorite animal for as long as I can remember and are an integral part of Georgia's coastal ecosystem. Without these incredible animals, all life on the Georgia Coast would be impacted tremendously.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D212	1	Lynn Moses	Private Individual	Please protect the natural resources in this community.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.

D215	1	Beth Kempe	Private Individual	As a frequent visitor to Glynn Co, and love of all sealift, this is of utmost importance to me	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D216	1	Laura Neale	Private Individual	I have been visiting the coasts of the Carolinas and Georgia (Cumberland Island) for most of my 60 plus years. As our human populations escalate in numbers and competition for resources accelerates, it is IMPERATIVE that we take conscientious measures to protect our wild animals. I urge requirements of thorough Environmental Assessments if an attempt is made to allow dredge in summer months.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D218	1	Sara Benson	Private Individual	We must protect wildlife by ending the senseless human interference into their habitat.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D221	1	Adrienne Lowe	Private Individual	I grew up going to the Georgia coast to enjoy the wildlife with my family. It has always been evident how many Georgians have poured their hearts and money over MANY decades into taking care of the harbor and the coastline. I am shocked and dismayed that Georgia would move forward to allow spring and summer dredging, when we have worked so hard to preserve and improve this area. Loggerhead sea turtles are beloved and should be protected. What does state and federal protected status mean when you are going to allow spring and summer blades that will chop them up at the top of their nesting season? Seriously! That is what is going to happen! That is what you would be authorizing, and that is what you would be directly responsible for allowing!	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.

D221	2	Adrienne Lowe	Private Individual	I need you all to work harder on this.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D231	1	Billy Chism	Private Individual	We humans think we can do anything we want in this world, despite the terrible consequences. Please reconsider.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D231	2	Billy Chism	Private Individual	It seems we humans think the world is ours to do exactly what we want to do, no matter the consequences. Please reconsider.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D234	1	Gayanne Geurin	Private Individual	I am writing in strong opposition to the removal of seasonal restrictions for annual operations and maintenance (O&M) dredging in Brunswick Harbor and channels across Georgia's coast. I truly believe there are creative solutions to how people and nature can co-exist and respect nature instead of mowing it down with disregard. We need thinkers and planners that are willing to respect environment as a key to working with our waterways and wildlife instead of disregarding measures that would make a difference.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.

D236	1	Shari Hunt	Private Individual	We fight for the Survival of the turtles on Jekyll Island. With rescues, hospitalization. their future is our future to continue.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D239	1	Jason Rose	Private Individual	We visit Jekyll/Brunswick annually and hope that reasonable seasonal dredging accommodations can be reached as the wildlife is part of the beauty that draws us.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D240	1	Veronique Perrot	Private Individual	I spent some time on Sapelo Island at turtle nesting season in the hope of witnessing a turtle laying her eggs. I wasn't lucky enough to see it happen, but my daughter did, and spoke of it with stars in her eyes. I want to improve the chances of survival of sea turtles. The deck is already stacked against them. Let's not make it worse!	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D242	1	Rickey Buttery	Private Individual	We The People are watching and sharing on social media. We will remember come election time.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.

D244	1	D Bartolimuci	Private Individual	When we are fighting so hard to protect sea turtles and restore the Georgian coastline, it seems ludicrous and irrational to begin dredging during vital Turtle breeding seasons. I support limiting the dredging to minimally required times and containing it to times when the turtles are not actively present.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D254	1	David Wappler	Private Individual	I support the protection of the magnificent sea turtles that nest on the Georgia coast and forage along the shoreline. There's no need to change from the current seasonal restrictions. If it ain't broke, don't try to "fix it".	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.

					The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D255	1	Nathan Rawlins	Private Individual	I've been to the Georgia Sea Turtle Center on Jekyll. I've seen the good work they are trying to do to restore sea turtle numbers. I've gone on turtle nest observation walks on Sea Island with ecologists and documented the nest sites. I've learned how difficult the recovery process has been.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D255	2	Nathan Rawlins	Private Individual	Find a better way.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D256	1	Patricia Huff	Private Individual	Given changing weather patterns, I would even wonder about sea turtles in fall and winter.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.

D261	1	Galen Kidder	Private Individual	As if this world needs any more grief! It shouldn't surprise me that reasons are needed to not cause more damage to our planet but it for some reason we keep having to give them.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
				The rich need more money so they can avoid living in the dead places they created.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
				We should ALL be ashamed. But those who allow this to continue will carry the shame for eternity...or at least until the last creature gives up and dies.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
				NO MORE DREDGING! And we all know why we shouldn't so don't waste our time with that. Just stop damaging our planet! Just stop.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.

D262	1	Margaret Brockland-Nease	Private Individual	These sea turtles are crucial agents in maintaining a healthy coastal environment, particularly in their consumption of jellyfish (curbing the current overgrowth in those species). Beyond environmental health, which is the most important factor, turtles help keep our beaches appealing to swimmers and other vacationers, supporting Georgia businesses with these visiting consumers.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D262	2	Margaret Brockland-Nease	Private Individual	Georgia's unique ecosystems made our business and economy grow. If we don't protect the environment, the lifestyles we have built on that foundation will collapse.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D264	1	Alice Naegele	Private Individual	Do not allow the Army Corps to do this - we have such environmental problems down in FL due to their work!	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D268	1	Cath	Private Individual	We hear so much about the successes of turtle nesting. PLEASE help us keep this going. When there is a way to dedge without harming them, why not chose that?	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.

D269	1	Carol Clark	Private Individual	Army Corps of Engineers OBEY the Law! You have no right to destroy habitat of the loggerhead sea turtles. Do your dredging in the spring or fall!	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D270	1	Tammy Chopping	Private Individual	I DO understand that it is in our economic interest to have a competitive harbor. However, we need to do it the RIGHT WAY, NOT THE destructuve FAST WAY. Its time to be smart & use real scientific data towards our economic gains & not political inaccuracies.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D279	1	Denise Hosta	Private Individual	I love the turtles! We absolutely need to save them!	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D280	1	Slatinsky	Private Individual	As a native of Savannah and a life-long boater I feel very strongly that we must balance commerce with the nature that makes this part of the world so beautiful. If we don't protect the sea life the sea itself will be in jeopardy as will all of us who live in this ecosystem.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.

D282	1	Babbie Chapman	Private Individual	I grew up on St Simons and remember the excitement when the loggerhead sea turtles started nesting. I can't understand why anyone would want to endanger them, especially in this manner.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D283	1	M. Segal	Private Individual	We have to become better humans and stop raping nature. We are experiencing the raft of mother nature who is over our abusive arrogance of domination over nature.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D283	2	M. Segal	Private Individual	We are better than this, but we no longer have the direction of moral thinking.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D284	1	Kurt Schwartz	Private Individual	I have yet to see any sea turtles, and oppose actions that would harm them.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.

D286	1	Gail Krueger	Private Individual	I moved to Savannah Georgia after years of volunteering on the Caretta Caretta sea turtle project based in Savannah. One of the reasons I moved was because of the quality of Georgia's coastal environment and the apparent dedication of local officials --state and federal -- to keep that environment safe and functioning.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D286	2	Gail Krueger	Private Individual	Spring and summer dredging off the coast is a betrayal of all that.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D286	3	Gail Krueger	Private Individual	Not only will this plan harm the now recovering sea turtle population, it will negatively impact other species.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
				It is my plan to return to Savannah upon my retirement. I only hope the coast is better than when I left the area--this plan will not make it so.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.

D287	1	Mari Mennel-Bell	Private Individual	It is an inexcusable poorly thought out idea to propose planning to dredge here!!	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D290	1	Sonia Abel	Private Individual	Sea turtles have always been a representation of the majestic beauty and wildness of the barrier islands of Georgia. Protecting them is good for tourism.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D291	1	Kristin Kohal	Private Individual	Please protect the sea turtles, as this is their home and they have a right to use it.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D292	1	KL white	Private Individual	Georgia's sea turtles already face threats from climate change, development and now dredging during their nesting season. Tourist that spend money to come to the Ga coast to see these turtles flood the economy with money that helps create jobs.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.

D294	1	JS Friedman	Private Individual	Nature is not an afterthought of our existence. We must try to remain in balance and preserve sea life.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D295	1	Alexandra Marstall	Private Individual	I worked at 4-H Camp Jekyll on Jekyll Island for about a year. I would educate my students, teachers and community on the importance of sea turtles as well as their abundance along Georgia's coastlines. This project would disrupt all of the wonderful things I preached out to visitors. It's a shame that all of the great resources that Georgia's coast has to offer would be disrupted for profit.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D295	2	Alexandra Marstall	Private Individual	There has to be a better way to preserve our coastlines.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D298	1	Susan Davis	Private Individual	I lease a home in Glynn County, GA and follow the activity of Loggerhead Turtles. And support protection of our pollinators which require the undergrowth as well as the canopy of trees.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.

				Eliminating host plants which are source of food and habitation for our pollinators is not a quick recovery.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
				The Southeastern coastline is NOT a place to dredge for ANY purpose.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
				Make your money replenishing the earth instead of innihilating it.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D302	1	Anne Gardner	Private Individual	What is the matter with these people at the Army Corp? We, staff and volunteers, have spent years working to save our loggerhead turtles and now they are talking of dredging spring and summer. It has to come back to the almighty \$. Consider our grandchildren's children and the future generations. Protect the loggerhead turtles.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.

D303	1	Madeline Whalen	Private Individual	Georgia's coastal habitats are unique, beautiful, and delicate. As citizens of this great state, we all share the responsibility to be stewards of the land and to ensure the next generation can enjoy it as we do. Endangering the lives of Georgia's sea turtles endangers both Georgia's natural history and future.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D303	2	Madeline Whalen	Private Individual	I understand and appreciate the economic importance of maintaining Georgia's waterways, but we can and must find a way to pursue Georgia's economic interests without destroying the natural beauty of our state.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D304	1	Angela Riley	Private Individual	The preservation of the GA coast is very important to us. Especially the preservation of turtle breeding grounds. Do not hamper with this turtle preservation program. It is a vital part of Jekyll Islands tourist attraction. We want the GA coast to preserved for nature tourism and to the Georgians, who need it for their relaxation. Georgia has not much of a coastline and what we have needs to be preserved for the wildlife of any kind, especially the turtles.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D304	2	Angela Riley	Private Individual	Personally we do not like any dredging on our coast. You are destroying breeding grounds not only for the turtles. We want to preserve our nature and I say "our", because we live here close to the coast.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.

D305	1	candis	Private Individual	As a resident of a beach area, I am familiar with sea turtles and the measures needed to protect them.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D306	1	KP Zoetting	Private Individual	Please conserve, protect and do everything possible for the recovery of GA's loggerhead sea turtles, right whales all coastal species!	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D307	1	Mary Clark	Private Individual	There are more useful and constructive ways for the Corps to utilize their many and usually beneficent strengths.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D314	1	John Carlson	Private Individual	Turtle season is NOT when you perform maintenance dredging. Maintenance can be done in four months--just place that on your calendar.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.

D315	1	David Corbitt	Private Individual	All GA wildlife and Sealife matters to me, being from ga and a boy scout I have spent a lot of time helping with them. I would love to see them there in the future	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D317	1	Lindsey Braden	Private Individual	My dad was a sea kayak guide, and I grew up spending a lot of time on the water with dolphins, manatees, and sea turtles. I urge you to please take the additional steps necessary to ensure their continued protection.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D317	2	Lindsey Braden	Private Individual	You are so lucky to be in a position to help take care of Georgia's coastal species. I envy that power to do good on such a grand scale, and I hope that you will use it to push for a deeper understanding of the impact of this proposal before it goes into effect. Future generations (turtle and otherwise) will thank you for it.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D318	1	Jamie Klem	Private Individual	The Earth is Gods footstool and all creatures belong to Him. We need to act responsibly in all our ways and never choose profit over protection of our mist valuable resources. The Earth and its creatures.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.

D320	1	Diane Hunter	Private Individual	I have lived in Georgia since 1966, grew up here, went to Georgia Southern and started my career in Brunswick. Now retired to Jasper, I continue to be concerned with the rampant growth that threatens our uniquely beautiful and pristine Georgia coast. Sea turtles continue to lose habitat; when we lose turtle habitat, we break a bond in that eco-system.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D322	1	Roland Sasser	Private Individual	The whole nesting process is a wonderful sight and experience.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D322	2	Roland Sasser	Private Individual	I realize that economics is probably driving this rush to dredge, but they were here first and need that window to survive!	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D325	1	Max Brown	Private Individual	I have seen Green and Loggerhead sea turtles. This magnificent creature deserves our protection here on our shores in Georgia.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.

D325	2	Max Brown	Private Individual	Dredging endangers these animals that cannot protect themselves,	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D327	1	R Harris	Private Individual	We recently went to a sea turtle hospital, and learned how important sea turtle conservation is.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D328	1	Julia McDowell	Private Individual	I work part time for the Georgia Sea turtle Center on Jekyll Island. Any sort of harm to turtles effects the ecosystems just like any other creatures. We only have this one earth and our children to pass on to.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D329	1	Bill Both	Private Individual	Hundreds if not thousands of species become extinct every year. Sea turtles are among the world's endangered species. They need to be protected.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.

D331	1	Claudia Seyle	Private Individual	I am convinced that respecting long evolved natural processes and rhythms is more important to the long term health of the earth, and therefore, the future quality of human life, than instigating more convenient, expedient, and short sighted industrial and economic practices. In your capacity as a public SERVANT, guardianship of the long term health and prosperity of our most precious state resource should be your priority rather than allowing policies that benefit special interests and, indeed, yourself personally move forward too quickly.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D331	2	Claudia Seyle	Private Individual	Government review processes are indeed often laborious and time consuming, but they have been established for the protection of our environment and those with smaller voices from just such self serving interests. Please exert your influence to see that proper due diligence is done in this matter.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D333	1	DD Parkman	Private Individual	Although my primary residence is DeKalb County , I also own a home on Tybee Island in Chatham County. I recognize the environmental and economic value of our beautiful Georgia Coast and care deeply about it protection.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D333	2	DD Parkman	Private Individual	The nesting of sea turtles is a unique feature of our region. It is important for environmental preservation and education and for tourism of the area.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.

D333	3	DD Parkman	Private Individual	Please listen to the environmental experts. A break in dredging operations in order to protect these rare and federally protected creatures is vital. Dredging during other seasons of the year is sufficient. Do not risk the survival of our worldwide sea turtle population .	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D334	1	Patricia Horton	Private Individual	The world has only seven species of sea turtles and five are found along Georgia's coast: loggerhead, green, leatherback, Kemp's ridley and hawksbill.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D334	2	Patricia Horton	Private Individual	The loggerhead is the only species to nest regularly on the state's barrier islands.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D334	3	Patricia Horton	Private Individual	Conservation interruption causes ecological malfunction with habitat and biological loss and is detrimental to this species.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.

D334	4	Patricia Horton	Private Individual	Please consider the current restrictions found to be a positive impact and only conduct your work after a full evaluation of the environmental impact of your year-round proposal.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D338	1	Brian Lambert	Private Individual	We've already decimated more than half of the sea turtle species on the planet in a span of 40-50 years. That's all the justification you need, thanks!	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D339	1	Erika Gilsdorf	Private Individual	I've been on a year long road trip filming inspiring people driving change for our planet. I met amazing people in Georgia. Legislation and political leaders MUST take a stand to protect sea turtles and shoreland. Leaders must take a stand for long-term benefit of wildlife and community health.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D339	2	Erika Gilsdorf	Private Individual	Please take a stand. We must all come together from grassroots efforts to leaders who have the power to make change.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.

D340	1	Paula Morgan	Private Individual	If we need anything it is the Loggerhead Turtles. Let's protect sea turtle nesting and stop dredging during summer to improve the species recovery efforts. This is also a protected species. Do the right thing!	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D340	2	Paula Morgan	Private Individual	Do not set the Loggerhead species back in time. We can't afford that mistake. Listen to science. We are in climate change and all species need our assistance. Do your part to help not hinder.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D342	1	Manuel Muhl	Private Individual	Please continue to protect the habitats of sea turtles during their nesting season with focus on dredging during the off season.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D342	2	Manuel Muhl	Private Individual	So far it has been possible to work with the existing winter/off season time window for dredging and I hope this can remain. As machinery becomes more efficient, the work can hopefully be done in even fewer months.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.

D344	1	Charles Brexel Sr.	Private Individual	Me and my family, including my grandchildren, enjoy watching Georgia's sea turtles when we visit Georgia's coast.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D344	2	Charles Brexel Sr.	Private Individual	It is highly likely that many visitors go to Georgia's coast and count on seeing the sea turtles. This new and dangerous plan would likely do much economic damage to Georgia's tourism industry.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D344	3	Charles Brexel Sr.	Private Individual	Seasonal restrictions prohibiting dredging during summer months have been used for more than 30 years and have been proven effective for species recovery efforts.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D344	4	Charles Brexel Sr.	Private Individual	It would be horrifying and outrageous if you started to use year-round hopper dredging that would kill adult female sea turtles, when what you have been already doing for over 30 years has been highly, highly successful.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.

D346	1	Simply Countree	Private Individual	Our wildlife is a national, even world treasure, and too many times we let the dollar have reign over other considerations. I grew up on the shores of a lake constructed and managed by the Corp of Engineers in the 1950's, and I can assure you that those with the most money were much more likely to get special consideration when it came to environmental issues. And decisions were often arbitrary with no room for compromise.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D346	2	Simply Countree	Private Individual	Sea Turtles cannot vote, nor can other wild creatures, but they do greatly enrich man's environment. For too long we have ignored their needs in favor of supposed expediency.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D346	3	Simply Countree	Private Individual	Please listen to our scientists and wildlife experts when it comes to these matters. As an example, just look at how the reintroduction of the wolf into Yellowstone changed the environment not only in plant life but in the change in the balance of animal species in the park. When we interfere with a species ability to reproduce, there are often unanticipated consequences that can have long lasting effects on the environment in which we all, man, animals & plants must live.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D346	4	Simply Countree	Private Individual	What good does it do to require environmental impact statements if we are going to allow agencies to ignore them. At it's lowest level this is not good or acceptable use of our (the taxpayers) dollars.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.

D347	1	T Rudert	Private Individual	As a teacher, I have often taken my students to what is now called the 4H Tidelands Nature Center at Jekyll Island for environmental education. During their classes they learn about the sea turtles that come ashore to lay eggs and the impact that humans can have on this process so necessary for the survival of the species. I have also visited the GA Sea Turtle Center on Jekyll Island. They seem so knowledgeable about sea turtles.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D347	2	T Rudert	Private Individual	While I understand the need for dredging the channel to allow those large ocean vessels to reach Brunswick, I CAN NOT understand killing turtles to do so when another alternative is available: winter-only dredging when the turtles will not be affected.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D347	3	T Rudert	Private Individual	Please consider wisely. These turtles are already on the endangered species list. Your action could have dire consequences to these turtles.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D350	1	Krysta Gray	Private Individual	Please take into consideration that this species is being wiped out due to warming and increased sea levels. It's our jobs to take care of this earth we call home. My children deserve to be able to see the great things our coast have to offer. What your doing can be done at other times. It's not needed during their migration.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.

D350	2	Krysta Gray	Private Individual	Be responsible. Backing companies and putting into office those who care about our oceans to me and many others is important at election time. Make your voice count for more than a couple dollars.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D351	1	Jan Fraser	Private Individual	The sea turtles are so important to this coastal area. It is hard to believe that anyone would consider doing anything that might be harmful to them, especially when it could so easily be avoided..	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D357	1	Stephen Johnson	Private Individual	You cannot be serious about conservation and then destroy the great work that has helped these animals recover to date.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D357	2	Stephen Johnson	Private Individual	Do not let inaccurate statements cloud your judgement. Leave these animals alone during the spring and summer.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.

D374	1	James Downs	Private Individual	I lived in St Simons for several years and appreciate those beautiful animals!	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D388		David Myers	Private Individual	Please don't be the typical government machine when it comes to these turtles. They don't have the option to reschedule nor detour to accommodate our needs. We, on the other hand, most likely can work around their million years old schedule. Thanks in advance, I'm confident y'all will do the right thing here.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D391	1	Constance Bruce	Private Individual	My family has stayed on Jekyll a number of times. We've been to the Turtle center. Our barrier islands are fragile ecosystems, as well as 100 miles of marsh.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
				Consider the recent problem of the ship that rolled over at St. Simon's which resulted in an oil spill.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.

				We must be good stewards of our natural resources.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D395	1	Bill Witherspoon	Private Individual	I am a geologist and educator who understands that Earth's web of species, woven over eons, sustains the human economy. We have to be smart about how we tackle problems such as sedimented waterways so as to avoid tearing the web of life. Avoiding spring and summer dredging as the USACE has done for 30 years is one of the ways we have been smart in protecting sea turtles and other species.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D397	1	Betsy George	Private Individual	When my daughter was younger she and I volunteered to help mark and protect loggerhead nests.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D397	2	Betsy George	Private Individual	These sea turtles already have so many challenges to successfully reproducing. The Corp should be working to increase their chances of survival, not add another impediment.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.

D400	1	Phillip Hodges	Private Individual	I am sure dredging is necessary, but dredging should be done in an environmentally sensitive way based on scientific data. Surely we can attain two goals at once, to dredge as needed and also protect our environment if we perform a full analysis.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D401	1	Alan Price	Private Individual	I grew up in Brunswick, attended Glynn Academy High School, and have recently returned to the Golden Isles. One of the fabulous assets we have is the sea turtle population and to state the obvious, the plan by the Corps of Engineers to implement new dredging standards is a huge risk to the turtle population. Please stop further dredging until a complete environmental impact assessment is completed and we can assure everyone that this dredging can be undertaken safely and without risk to the sea turtle population.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D401	2	Alan Price	Private Individual	The Corps' proposed plan to dredge in Brunswick and along Georgia's coast year-round will set loggerhead recovery efforts back decades. There is no reason to make this change when more than 30 years of data show that winter dredging safely protects loggerhead sea turtles, right whales, and other coastal species. I urge you to listen to our state scientists and drop this dangerous proposal.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D402	1	Norman Jacobs	Private Individual	The Corps of Engineers has not been responsive, so I am asking that my elected Congressman and Senators take action here.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.

D407	1	Tina Scott	Private Individual	As someone who lives not far from the coast and vacations along that area, I would hate to see the dredging during the nesting season. I've always been proud of the fact that Georgia has worked to protect the turtles and the nesting sites. In fact, I always look forward to the news reports showing the females laying eggs, and the eventual hatchlings making their way to the water.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D407	2	Tina Scott	Private Individual	I understand the importance of the port in Savannah for shipping and the economic impact it has for the state. But we must balance the economic need with the environmental one. It's not worth taking the risk when so much time, effort, and money has been spent over the years to protect the turtles and other marine species.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D408	1	Macampbell	Private Individual	With all the other climate, human and environmental insults Georgia's loggerhead sea turtles receive year round, and the precarious state of their numbers, I plead for their protection.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D409	1	ivaking	Private Individual	I was in Brunswick and went to Cumberland island this past spring and summer. Residents and tourists are working hard to protect the turtles. The Corps of Engineers needs to get on board with protecting our environment and all species!	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.

D409	2	iva king	Private Individual	Surely the Corps can figure out effective ways to dredge that do NOT require year-round dredging.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D411		Laura Johnson	Private Individual	A highlight of a visit to the Georgia coast is to see sea turtles hatch and make their way back to the sea. Sea turtles will travel thousands of miles to return to lay their eggs. Georgia has worked so hard to bring their population back to a safer level. Please help these magnificent turtles. They need your help to survive. Thank you for reading.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D418	1	Suzanne Grace	Private Individual	I feel sure you have enjoyed news of the sea turtles' nesting along the Georgia coast and, perhaps you've actually had the exciting chance to see the females lay their eggs or the tiny hatchlings rush to the sea. This is certainly one of the most cherished wildlife events in our state.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D418	2	Suzanne Grace	Private Individual	I have contacted you before on this issue and some of you have kindly responded; however, no one has confirmed opposition to the Corps' intention to carry out year-round dredging along our coast. I ask you to consider these facts closely and to take steps to stop what will undoubtedly be a disaster for the loggerhead turtles.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.

D419	1	Casidy Cox	Private Individual	Sea turtles are an integral part of our ecosystem	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D420	1	Claire Kern	Private Individual	I recently went to Cumberland Island where I saw sea turtle nests. Each year I go to Cumberland just to look at these miracles! We have such a resource in Cumberland - a protected natural nesting ground - let's leverage that! If we open up dredging year around, then go ahead and build a factory on Cumberland. Let's kill everything.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D423	1	Leah Clements	Private Individual	Extending these operations year-round is a sick exercise in boundless extraction, and only serves to disrupt our coastal ecosystems, which negatively impacts all our health and wellbeing, from the sea turtles to those who live in close proximity, to those of us living further inland.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D424	1	Waverly Eubanks	Private Individual	When species and their habitat are preserved, it ensures the delicate ecological balance tips in favor of human beings as well.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.

D427	1	Christiane Grimes	Private Individual	We already destroy so much wild love habitat. We need to protect what we still have before nothing is left!	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D429	1	Alice Pascale	Private Individual	The whole world is connected. We need to understand that humans are an integral part of the world and all living creatures. The loss of other species and the diversity in our environment is just as important for our own survival as well as all the other creatures, the oceans and the environment. When we destroy one creatures habitat, we are racing ever faster to increase our own chance of extinction. It effects me just as much as residents of your state. Natures laws knows no boarders.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D429	2	Alice Pascale	Private Individual	The court has ruled. You still get to dredge in winter and obey the law at the same time. No agency is above the will of the people.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D430	1	tcpc	Private Individual	Y'ALL WOULD SELL YOUR GRANDMOTHERS FOR A NICKLE. DON'T SELL YOUR GRANDKIDS, TOO!	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.

D431	1	Ellie Meehan	Private Individual	I love all of our creatures, and mostly all species of turtles. We are losing them at a rapid pace.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D431	2	Ellie Meehan	Private Individual	Please don't do this at this critical time for them. Our children and grandchildren will not live in the natural world as we have been blessed to do.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D432	1	David Burkett	Private Individual	We, as Georgians, all appreciate the beauty of our marine wildlife and our history to protect these wildlife. I urge you to reconsider these actions that would undermine the years of progress we've made to maintain the livelihoods of our state's loggerhead sea turtles.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D432	2	David Burkett	Private Individual	I certainly understand how we must make progress along our shorelines but not at the expense of our loggerhead sea turtles. I urge you to consider the advice of our marine biologists.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.

D435		Karen Auvenshine	Private Individual	I have had the experience of watching baby sea turtles headed unto the sea and have read about the significant odds against them, under normal circumstances. Please do not further endanger sea turtles with this plan!	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D441		Jeff Fralish	Private Individual	Let's make smart decisions that have less of an impact on our environment.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D445	1	B Scott	Private Individual	Since the Brunswick harbor already accomodates the ships coming and going out, I cannot understand why the Corps of Engineers feels it is so imperative to dredge the channel. It will take the life of the turtles and at least sixty years to recover the loss. Guess my question is "Who is paying them to go against the Federal court's ruling?" It seems money talks so who's planning BIG things for Brunswick and Glynn County. STOP IT NOW!	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D445	2	B Scott	Private Individual	Maybe instead of asking that you do the research and not conduct the dredging until a full investigation is done and the harm it does is fully understood. Dredging can be done at times rather than nesting time. STOP IT NOW!	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.

D448		KK Wilson	Private Individual	I went on an excursion to Ossabaw Island a few years ago and saw some of the hatched baby sea turtles. Please do not take actions that will jeopardize these protected animals.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D452	1	Bob H	Private Individual	Georgia's coastal sea turtles (adults and their hatchlings, both) would be chopped to bits by dredging machines, if dredging operations were conducted during the periods surrounding the egg-laying and hatching seasons. That would be a wildlife catastrophe of horrendous proportions.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D454	1	Lora Loke	Private Individual	I had lived and worked in Georgia for many years and still care deeply about the state, its people, and its environment.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
				I worked on military bases in and around Georgia. There is no logical reason to ignore or fail to complete a full EIS when making major decisions. Destroying our irreplaceable coastal ecosystem is unnecessary in meeting short and long term goals. Our country should be above such a thoughtless choice.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.

D457	1	Gail Clendenen	Private Individual	There is no scientific basis for this change.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D457	2	Gail Clendenen	Private Individual	All inaccurate information must be removed and accurate, scientific information should be verified. This is an important environmental issue and there should be no rush to degrade the area.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D466	1	Victor Hubbard	Private Individual	We as a Country have lost control of what is right for our environment and the creatures that live in it. Again a total disregard for the sea turtles and their propitiation in the name of Commerce. Where is our National Governmental Departments that are sworn to protect these wildlife?	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D470	1	Mark Miller	Private Individual	There is no reason which outweighs the importance of timing dredging so as to not interfere with the nesting Loggerhead Sea Turtle. The Corp should at all times seek to minimize the impact of all activities on the environment and our fragile living world.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.

D471	1	Joy Valeriio	Private Individual	This area is incredibly protective over our sea turtles. We go to the beaches every year in the early hours to hope to get a glimpse of a mama leaving her nest after laying eggs. We support the Turtle center on Jekyll and love the efforts that they put forth to protect this species.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D472	1	Polly Schwartz	Private Individual	I love sea turtles and support preservation and conservation of their species.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D473	1	Catherine Williams	Private Individual	The Army Corps of Engineers continues to cause ongoing problems in the Everglades and Lake Okechobee in Florida. Summer is indeed turtle nesting season.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D474	1	Linda Gravitt	Private Individual	I have volunteered for the past 45 years to protect the loggerhead turtles that lay their eggs on the beaches of Georgia. These turtles return to the same beach where they were hatched every year to lay their eggs. Dredging will kill any female turtles that cross the paths of the dredging. PLEASE DO NOT ALLOW THIS TO HAPPEN!	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.

D475	1	J Box	Private Individual	Our sea turtles have been a rallying cry to the value of Georgia's natural resources.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D476	1	Cindy Wolfe	Private Individual	It has taken OVER 30 years for DNR, USF&W and other private and public organizations to get to where we now are on turtle nesting. All this to be thrown away for WHAT? An inability to wait until the winter to dredge? Short sighted environmentally and economically on your part. Turtles and the GA coast are an economic driver for GA and the coastal populations. There has been NO EIS done because any EIS study would have said no. Follow the money; some corporation/organization stands to gain while GA citizens lose.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D477	1	Albert Mosley	Private Individual	As an avid scuba diver ocean sport advocate, I have a deep appreciation for sea turtles and their endangered status. Having witnessed sea turtle eggs being laid and the birth of baby turtles emerging from the nest and entering the sea, I believe it is critical that we do not add additional issues for our turtles life cycles.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D478	1	Suzanne Schauer	Private Individual	We have a condo on St Simons Island and want sea turtles to thrive. Please dredge another time of year please.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.

D479	1	Liz Heim	Private Individual	Please stop dredging the waters, disturbing the natural oceans ecosystem, and especially during loggerhead hatching season. These turtles are already at risk. I have seen how the ocean has changed sadly, for the worse. I have traveled to that area since I was little. We need no more negative human involvement.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D480	1	Patrick Stafford	Private Individual	There is no reason to dredge this much and the sea turtles are a major tourist attraction to this area worthy of our protection. Pretty sure we know the elected officials that are environmentally friendly, sadly Buddy Carter does not seem to care about anything but insuring his political career and becoming more wealthy. Prove me wrong!	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D481	1	Tamara Townsend	Private Individual	We need to protect and support our valuable turtle population. They are a huge asset to Georgia and Georgia tourism. Please do not dredge.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D481	2	Tamara Townsend	Private Individual	We have to have transparent policies based on real, correct data to make good decisions. Faulty data corresponds to faulty decisions.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.

D482	1	Susan O'Rourke	Private Individual	My connection is that I love all animals including marine animals especially the loggerhead and this is frightening to realize what can happen to them if allowed to continue. And these are a federally protected species!!	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D482	2	Susan O'Rourke	Private Individual	This must be stopped before there is no more time to turn it around.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D483	1	Sue Stoudemire	Private Individual	We humans have been recklessly, tragically responsible for the extinction of countless species. Please do not contribute to the extinction of yet another. Please do not further endanger Georgia's loggerhead turtles by allowing dredging of our shores during their spring and summer nesting seasons. It is NOT OK to allow profit at the expense of these wonderful animals. It has been a thrill for my family twice lucky enough to watch the magical emergence of baby turtles from nests on a Georgia beach, then their miraculous journey to the ocean.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D483	2	Sue Stoudemire	Private Individual	Please do not change the dredging window to year round!	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.

D484	1	Nora Coyle	Private Individual	All living creatures should be free from harm by humans. People are supposed to be stewards of our environment, not destroyers.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D484	2	Nora Coyle	Private Individual	Much more thorough research is needed to save sentient beings, not killing them. It's nothing less than a massacre	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D485	1	Bill Murdy	Private Individual	As a long time resident of Coastal Georgia, I've witnessed the steady increase in Sea turtle nesting activity over the past couple of decades. This remarkable recovery is due in large part to carefully planned rules and procedures that reduce or eliminate potential threats to nesting female Loggerhead turtles. These steps have included public education, reduced lighting on area beaches and perhaps most importantly, limiting channel dredging operations to times outside of the nesting season.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D485	2	Bill Murdy	Private Individual	I know that part of the Corps' mission is protection of wetlands and coastal natural habitats including evaluating permits for activities that affect jurisdictional wetlands. You have played a key role in protecting these resources for the benefit of all. Similarly, the Corps has for over 30 years paused dredging during these critical times in order protect endangered/threatened species. I cannot understand why you wish to change this procedure now when it has exhibited such success in enhancing sea turtle nesting. Conversely, the ports continue to grow and prosper - limiting dredging would arguably not adversely affect the port commerce in either Brunswick or Savannah.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.

D486	1	Sarah Topper	Private Individual	As a teacher, I have personally participated in conservation efforts on behalf of sea turtles and I am horrified that we are going to ignore the progress we have finally begun to make.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D487	1	James Hunter	Private Individual	The Little Cumberland Island Homeowners Association has supported one of the longest running loggerhead sea turtle monitoring projects in the world. Since the early 1960s, we have tracked nesting activity and egg-laying females and monitored population trends. The turtle population dropped precipitously over the ensuing decades, signaling an alarming decline due to the impact of harmful fishing methods and other manmade threats. Thanks to recent efforts to modify fishing methods and reduce other manmade threats, such as implementing a moratorium on spring and summer dredging, turtle populations are starting to rebound. But the Corps' proposal to conduct year-round dredging poses yet another dire threat to the loggerhead species.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D488	1	Kay Aaron	Private Individual	We are loosing to many animals. Any Sea Turtles lost to the dredging would take a century to recover. We limit lights along the coastal areas to help hatchlings get to the ocean. I spent my summers, living between Waycross, Ga., the Sea Islands and Darien, GA. Looking at the sea life was part of the experience.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D488	2	Kay Aaron	Private Individual	Changing the time you dredge would be much appreciated by all nature lovers. People flock to the coast to see the hatchlings crawl to the sea. Tourist dollars would be lost.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.

D489	1	Mellisa mkbuhler	Private Individual	I am not acquainted with Georgia's loggerhead sea turtles, but I belong to a CSO for a small island in Tampa Bay, Florida, which every summer hosts 100-200 loggerhead nests on its beaches. We have also had dredging experience (with the Army Corps!), in the last months of 2020 during which a turtle was sucked up as sand was being moved. The sea turtles suffer the worst travesties of any creature alive as the man-made world begins to affect and infect the seas. We need to cut them some slack. Any coastal dredging is very dangerous business.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D489	2	Mellisa mkbuhler	Private Individual	I agree that spring and summer are the optimum nesting months for the turtles, but there can be turtles in any area and any time in the warmer waters of the Atlantic and the Gulf of Mexico.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D490	1 2 times	William Iannone	Private Individual	I frequently drive the coastal area and stop to do some birding and observing nature. So I believe the Corps of Engineers should take into consideration the effect dredging will have on our natural resources (wildlife.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D491	1	Linda Harrell	Private Individual	I believe nature is very important to our healthy survival as a civilization. It is entrusted to us by our creator.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.

D491	2	Linda Harrell	Private Individual	PLEASE STOP ANY PLANS TO DREDGE IN AREA OF SEA TURTLE HABITAT! PLEASE!	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D492	1	Paula Wheatley	Private Individual	Please respect the progress that has been made to increase the loggerhead sea turtles populations by respecting the 30 year seasonal restriction prohibiting dredging during summer months.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D493	1	Gerald Bluett	Private Individual	We spend a lot of time on Tybee and support the efforts to protect turtle nesting areas. Nothing should be done that will prevent these turtles from accessing their nesting areas.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D494	1	Sally Mathis	Private Individual	My husband & I have a second home on the coast in McIntosh county & have been coming to the GA coast for over 50 years. We come to enjoy the peacefulness & much wildlife. Please don't ruin it!	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.

D495	1	Anne Melinger	Private Individual	I am writing in strong opposition to the removal of seasonal restrictions for annual operations and maintenance (O&M) dredging in Brunswick Harbor and channels across Georgia's coast.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D496	1	Michael Atkinson	Private Individual	During a recent trip to Jekyll Island, my daughter and I were intrigued by the natural beauty and habitat in which loggerhead sea turtles live. However, the lifting of these restrictions could impact the ability of my three year old daughter to enjoy the full scope of nature along Georgia's barrier islands in the future.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D496	2	Michael Atkinson	Private Individual	The seasonal restrictions currently in place have served well the federal and state goals of protecting loggerhead sea turtles. I stand in opposition to the proposed change.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D497	1	Chris Walden	Private Individual	My family has lived in Georgia for generations, making our living off the land and working as carpenters, railroad workers and teachers. From my grandparents and parents, I have learned to appreciate the wilderness, for recreation (fishing, hiking, camping, paddling) as well as for the wonder, peace and connection to the wider-world that being immersed in wilderness brings. I have similarly tried to pass these experiences and the need to care for the environment (irreplaceable) to my own children, as well as nieces, nephews and the students that I teach.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.

D497	2	Chris Walden	Private Individual	As a Science teacher, I try to help students understand the importance of data, properly collected (independent, blind studies; strong sample sizes; etc.) and how good policy uses this data to benefit humans (for generations) and to protect the world we live in. Bad policy, such as switching the dredging window DESPITE the data, hurts us all for generations.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D498	1	Laurie Crooks	Private Individual	I lived in Georgia for 30 years and worked with UGAMI and Environmental Education Alliance and other environmental groups for that time. I took innumerable trips to the coast to study turtles and enjoy the beauty of Cumberland, Sapelo, and other of the barrier islands. Untouched beauty with exquisite wildlife to appreciate and save.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
				Turtles are included in my wildlife loves. Dredging will kill turtles in the water and destroy nests filled with 90+ eggs. We have worked so hard to save these animals and can't imagine them being sliced to death or having their environment totally destroyed .	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
				I don't see any need for this dredging when the environment is already suffering so much due to climate change and ignoring environmental dicta.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.

D498	2	Laurie Crooks	Private Individual	PLEASE DON'T DREDGE!! The beauty of the islands and coast are irreparable. PLEASE DON'T DREDGE!!!	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D499	1	Rebecca Muzychka	Private Individual	I live in neighboring Florida where sea turtles also come to nest. The survival of sea turtles is important to me.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D500	1	Crisley McCarson	Private Individual	I enjoy Tybee Island and participated in Ossabaw Island turtle adventure and want turtles to have a chance.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D500	2	Crisley McCarson	Private Individual	Stop destroying our environment. We keep loosing more animals and environments are being destroyed. There is no planet B. Save this one!!!!	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.

D501	1	William M Smith Jr.	Private Individual	That which damages the south Georgia coast also damages the north Florida nesting sites of sea turtles; the in-shore counter currents bring the silt and suspended solids into our wetlands and along our shores.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D502	1	Jill Whitesell	Private Individual	Our daughter works on dredges and sees the damage they can cause to our wild life even in the off season. Please do not allow them to dredge during their laying and hatching seasons. Please.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D503	1	Lisa Gurley	Private Individual	As an Atlanta native by family has vacationed at Sea Island for decades. We are headed there in 10 days and my husband commented today that he had gotten out the "sea turtle flashlight" (red light) so that we could take the grandchildren out at night and look for nests. It was part of my growing up, my kids growing up and now my grandchildren and I hope that everything possible will be done to prevent causing potential damage to sea turtles they are fragile enough as it is!	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D504	1	Stephanie Scott	Private Individual	Save our turtles. Save your turtles! While the impact of dredging may have little to do with your political career, for once, please think about the environment and the lives of all creatures you are harming by looking the other way. Once turtles are gone, it is then too late to do the right thing. Economic gain and personal agendas have no place in killing our precious environment and sea turtles. They face enough danger caused by people, do not kill them before they even get a chance to live.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.

D505	1	Amy Atkinson	Private Individual	I have two daughters-Rebekah (age 4) and Abigail, arriving in November. I want them to grow up enjoying the natural wonders of Georgia's sea turtles. Our sea turtle population is already under tremendous strain. Tourism and beach development have greatly impacted their critical habitats along Georgia's coastline. Sea turtles play an important role in our coastal ecosystem.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D505	2	Amy Atkinson	Private Individual	If we are going to risk Georgia's critical and majestic sea turtle population, there must be strong, irrefutable data showing that spring and summer dredging are 100% necessary.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D506	1	Patrica Reynolds	Private Individual	OUR SPECIES MUST STOP CONTINUING THE DESTRUCTION OF OTHER SPECIES IN THE NAME OF PROGRESS. WE SHOULD ADMIT IT HAS NOTHING TO DO WITH MEANINGFUL PROGRESS BUT IS ACTUALLY MORE ABOUT GREED AND AMASSING WEALTH.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D506	2	Patrica Reynolds	Private Individual	IF WE CONTINUE TO DESTROY THE OCEAN AND ITS INHABITANTS, WE WILL SET OURSELVES ON A COURSE OF SELF DESTRUCTION. FOR WITHOUT THE OCEANS AND THE ABUNDANCE, WE ARE HOPELESSLY DOOMED.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.

D507	1	Scott McCarthy	Private Individual	I live in neighboring Florida, where residents have a unique awareness of sea turtles and the fragile ecosystem they inhabit.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D507	2	Scott McCarthy	Private Individual	Sharp hopper blades can destroy loggerheads and many of the organisms they depend on for food.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D508	1	Kyle Sanders	Private Individual	I don't know, the right choice seems obvious to me.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D509	1	Stefan Taylor	Private Individual	Although I am not a Georgia resident, I do reside in a neighboring state and turtles are not confined to any one state. They, like many other animals, including humans, migrate and move.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.

D510	1	Jill Sweetapple	Private Individual	Please, please, please choose one decision this year for something other than money.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D511	1	Ann McLeod	Private Individual	Sea turtles are a national treasure and should be protected. I vigorously oppose the dredging project by the U.S. Army Corp of Engineers. If it must be done, then do the project when it will not put sea turtles in jeopardy.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D512	1	Jimm Stallings	Private Individual	We have been working for decades backed with substantial surveys and data to set the limits for dredging to the winter months when it will have the least environmental impact -	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D513	1	Anna Breeden	Private Individual	My family has frequented the Georgia coast for many years. I have always admired how Brunswick, and other Georgia coastal towns like Tybee, have worked to protect the sea turtles. Sea turtles are amazing animals, and are so important to the ecosystem. Their survival is at stake, for many sea turtle species are endangered.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.

D514	1	David Lee	Private Individual	STOP THGE DREDGING!	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D515	1	Myra Lee	Private Individual	When my children were younger, we loved to go to the turtle center by Summer Waves and a few summers ago, I took my grandson to the newer center. We learned how the center takes care of the turtles that are hurt for various reasons.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D515	1	Anne Hall	Private Individual	Our environment is threatened already in many ways. Please protect the sea turtles during the time they nest and the hatchlings leave the nests on the Georgia Coast.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D515	2	Anne Hall	Private Individual	Better more cautious than not.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.

D516	1	Gabrielle Bork	Private Individual	Georgia is a beautiful state that has coastal waters that rely on tourism and animals that shouldn't be disturbed more than we already have.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D516	2	Gabrielle Bork	Private Individual	Please do the right thing! As someone who works in Ports, I understand how harmful dredging can be to the marine life. Please make the right decision now to prevent maximum harm!!	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D517	1	Georgia Burns	Private Individual	Even though Floyd County is a long way from the coast, my concern is with the possible danger to those ancient sea turtles if you allow rules to be changed. Please do not allow this to happen as it could do great harm to all the volunteer work I have done in the past 25 years to save the environment for future generations. Please be firm in protection.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D518	1	Kimberly Harrison	Private Individual	Please do not allow dredging of Georgia loggerhead sea turtle nesting sites in the spring and summer. This will cause major damage to turtles and their offspring. Thank please please stop this insanity	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.

D519	1	Arlene Steinberg	Private Individual	I have volunteered in numerous wildlife rescue missions in many states, including Georgia, with various groups during natural disasters and emergencies. As such, I became much more aware of the plight of all of these species and how fragile their lives often are. Many are already endangered, mostly because of us. They cannot survive human bad judgement and wrong-minded decisions, such as this one. This is a bad plan.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D519	2	Arlene Steinberg	Private Individual	This proposal, which is being pushed over the continued objections of your state scientists, will kill your nesting females and jeopardize nearly 60 years of conservation progress along Georgia's coast. This plan would ignore decades-old restrictions put in place to protect loggerhead sea turtles without any justification or data-supported reason for the change.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D520	1	Pamela Shade Murphy	Private Individual	Our sea turtles are an important part of our Georgia environment as well as a wonder of the world. Imagine hatching from an egg and going out to sea for years and when you are ready to mate, you do so and swim back to the SAME BEACH YOU LEFT AS A HATCHLING to lay your eggs. We Georgians are so lucky to be able to witness such a miracle! A federal court has already ruled that the ACE plan for year round dredging is a threat to sea turtles and other sea life and I have to ask why this has not stopped such an ill-conceived plan. Even if ACE is determined to dredge for God knows what reason, why do it in spring and summer when sea turtles can be seen in the ocean shallows all along the Georgia coast, waiting to come in to the beaches there. This is the sort of human interference that will one day cost us our continuation as a species. This plan is egregious and immoral and it should be stopped	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.

D520	2	Pamela Shade Murphy	Private Individual	The spring and summer windows of human inactivity and maximum sea turtle (and all sea life) activity should not be closed. There is no reason to support year round dredging.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D521	1	Naci Hartland	Private Individual	I have personally been protecting sea turtles here and in the Yucatan for many years... All animals must be protected against this kind of mayhem! Too many of the world's beloved critters are being sacrificed for machinery that ignores the precious balance of humans and nature...	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D521	2	Naci Hartland	Private Individual	IS THIS THE LEGACY YOU WISH TO LEAVE FOR YOUR GREAT-GRANDCHILDREN!	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D522	1	Sandy Sunquist	Private Individual	We are losing animals all over our world. But the loggerhead turtles nest areas and the turtles will be at deaths door if this dredging in Brunswick Harbor is allowed. This is not right and it needs to stop immediately.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.

D522	2	Sandy Sunquist	Private Individual	This is the time for the Loggerhead turtles to nest and lay their eggs. Please do not destroy their habitat.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D523	1	Kristina Williams Carroll	Private Individual	I have worked with sea turtles since 1990 and have been the Executive Director of the Caretta Research Project (CRP) since 1996. The CRP is a hands-on research, conservation and education program that has been protecting sea turtles on Wassaw NWR (off the coast of Savannah, GA) since 1973. Tens of dedicated staff members and 3,500+ volunteers from all over the country have worked throughout the summers for 49 years to protect nests and collect data to better manage and protect these turtles, and we are just starting to see a significant increase in nesting in the last 10 years. It would not take long to reverse this trend if the Corps opens dredging to spring and summer months.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D523	2	Kristina Williams Carroll	Private Individual	Please take the time to consider all of the relevant data collected through the Georgia Sea Turtle Cooperative that clearly shows how detrimental this summer dredging would be.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D524	1	Francina Fluker	Private Individual	I am a Georgia native, lived in south GA and spent many summers over the years of my youth on the beaches of coastal Georgia. I treasure the natural resources of my native state: land, water, animals all. To consider the damage the dredging will cause to the nesting habitat of the ocean going turtles is unpardonable. Please prevent the Corps of Engineers from this destructive plan that will put the sea turtles at risk.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.

D524	2	Francina Fluker	Private Individual	I believe the Georgia coast is a unique environment, that the natural wonders of the state are worth preserving, a true treasure we need to be good stewards of in order to pass the wonders of creation on to future generations.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D525	1	Mona Hegarty	Private Individual	I am very familiar with these beautiful sea turtles, who also nest in the lower part of Florida's Atlantic coastline. These giants need our protection.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D526	1	Paul Gilbert	Private Individual	While we do not live in Georgia, we do love to vacation in the coastal regions, and in fact in the year 2000 we had the privilege of watching several loggerhead turtles hatch out and make their way out into the ocean. Please consider these facts listed below.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D527	1	Stephen Miller	Private Individual	I have had the opportunity to experience a loggerhead nest hatch one evening on Little Saint Simons Island. I can't imagine the damage that the corps of engineers could do with this unnecessary dredging plan. We have made steady progress in the conservation of the loggerheads, it would be unthinkable to loose that progress to the corps of engineers dredging.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.

D527	2	Stephen Miller	Private Individual	It would appear that the Corps of Engineers is ignoring the available information so that they can conclude that there would be no impact.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D528	1	Kathleen Roth	Private Individual	They are needed for our eco system and what right to do we have to destroy creatures in the seas.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D529	1	Tom Nolan	Private Individual	Our coastline is a national treasure, and the marine life that will be decimated by the invasive dredging is unconscionable.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D529	2	Tom Nolan	Private Individual	We stand in strong opposition to this plan.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.

D530	1	Jaime Esobedo	Private Individual	I've been involved in conversation of the ecology of Georgia for the majority of my life.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D530	2	Jaime Esobedo	Private Individual	There's no reason to continue these practices all year, there's plenty of time outside the turtle migratory breeding season.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D531	1	Terri Bailey	Private Individual	Our sea turtles have been nesting and living on our shores for many centuries. They deserve to continue to do so. Please do not dredge during the times that will affect the turtles!	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D532	1	Tammy Poole	Private Individual	These amazing creatures are so gentle and important to the ecosystem.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.

D532	2	Tammy Poole	Private Individual	Greed has no place in Georgia's nature spots. Not on the coast or the Okefenokee Swamp.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D533	1	Hubert Kelsh	Private Individual	I'm not a robot; I'm real, and using a cell phone that is too old or incompatible.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
				Please don't dredge! I'm speaking for future biologists who NEED to study these creatures.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D534	1	Linda Van Kley	Private Individual	2 summers ago, my family saw their first wild sea turtle off the beach at Tybee Island. It was so exciting, and it is still the first thing my kids talk about when we talk about that vacation. It is the sort of experience that many families should have when visiting our beaches but proposed year around dredging project will jeopardize the lives of countless turtles at the critical time when they are coming ashore to nest.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.

D535	1	John Roberts	Private Individual	It is my hope that the Corps begins to show some decency and responsibility, as I have noticed its decline in that regard, over the last several years. The Corps is part of the US government, which is supposed to be a government for the people, by the people. The Corps must start following the wishes of the majority of US citizens, instead of pursuing its own self-serving agenda. I feel the need to remind the Corps that you work for us, the citizenry of the USA.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D536	1	Molly Kimler	Private Individual	Please take care of our wonderful sea turtles along the Georgia coast	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D536	2	Molly Kimler	Private Individual	Don't do this while turtles are nesting on the Georgia coast	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D537	1	Missy Bennett	Private Individual	For more than 20 years, I have been involved in teaching high school science teachers about the ecology of the Georgia coast. We have observed, first-hand, the strides that have been made to protect the fragile ecosystems of our coastal communities.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.

D537	2	Missy Bennett	Private Individual	More information is needed to accurately assess the potential damage to loggerhead nesting and to their population.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D538	1	Carol Weidner	Private Individual	I live on Tybee Island and we guard our turtle nests there. Please put our environment before business! If you live our seas and rivers please protect them!	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D538	2	Carol Weidner	Private Individual	Note: in one of our community meetings we also learned that the dredging is putting our fresh water supply at risk. That too would be irreparable.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D539	1	Lois Ebey	Private Individual	The sea turtles are a treasure. Let's cherish and care for them.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.

D539	2	Lois Ebey	Private Individual	Don't dredge during the sea turtles' nesting season.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D540	1	Lee Ann Elkins	Private Individual	We have to protect all the animals we can. We're running out of time!	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D541	1	Janey Metzger	Private Individual	I have been visiting this coastal area for 40 years. It is a treasure to me because of its natural resources. There are too many hazards to sea turtles as it is, otherwise why would we need the turtle hospital on Jekyll?	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D541	2	Janey Metzger	Private Individual	Stick to winter dredging. It saves turtles.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.

D542	1	Janet Leavell	Private Individual	Wow, even with the declining wildlife population, the Army Corps seems to find killing turtles as "no significant impact" of their dredging during nesting season. Outrageous and needs to be stopped!	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D542	2	Janet Leavell	Private Individual	Get your data straight. Tired of misrepresentations being used to justify what's easier at the time, but damaging and not well thought out.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D543	1	Mary Martin	Private Individual	Sea turtles are an important part of sea life & we have a moral obligation to preserve their habitats. Dredging at any time is harmful to their natural habitat but especially in the spring & summer months.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D543	2	Mary Martin	Private Individual	Do the right thing for these very important species & DO NOT make this change!!! There simply is no reason for it!	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.

D544	1	Claire Dunphy	Private Individual	I believe it is clear that continuous disruption of eco systems in waterways, as well as on land and the loss of their native life forms has a cumulative destructive effect on the health of our planet. Kindly go in the other direction and focus attention on respect for and preservation of the loggerhead turtles of Georgia. Preservation also has a cumulative effect!	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D545	1	LaHayne Livingston	Private Individual	I write in strong opposition to anything that harms the wildlife on the Gulf of Mexico coast, especially the sea turtles. The plan to dredge on the Georgia and Alabama coast will destroy their habitat. The Corp of Engineer's priority should be to protect our nation's natural resources, not destroy it. Sea turtles are amazing and will attract people for generations to come, but only if their environment remains for the future.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D545	2	LaHayne Livingston	Private Individual	As citizens, can we no longer trust our government to tell the truth in their reports? Please listen to the citizens of our country.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D546	1	James Schueler	Private Individual	Here in Florida there are many protected sea turtle nests staked out so people don't disturb them. Why not let the Georgia turtle eggs hatch and help save endangered species?	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.

D546	2	James Schueler	Private Individual	Why not give endangered sea turtles a fighting chance to survive mankind's destruction of our shared environment? At the present rate of rising temperatures global warming will be statistically significantly engaged in October, halfway engaged in six years, and fully engaged in eleven years (will provide global warming chart upon request). We may not be able to survive this. Do we have to kill the turtles too? Is it their fault we cannot control our environmental destruction?	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D547	1	Marisa Downey	Private Individual	As a native Georgian preserving our unique landscape is important to me! We should respect our coast and all the inhabitants we share it with!	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D547	2	Marisa Downey	Private Individual	Please consider limiting dredging without a full environmental impact report.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D548	1	Linda Gunthrie	Private Individual	What is the matter with you? These animals are federally protected and you want to decimate their numbers in the cruelest possible way -- slicing them up in your dredging operations. I suppose your agency is still operating under Trump administration guidelines in their war on wildlife. Those days are gone and Americans want to see wildlife protected, not destroyed, by our government agencies.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.

D548	2	Linda Gunthrie	Private Individual	Go back to previous winter dredging which protects animals. Why the change? The Corps of Engineers already has a bad reputation for disregarding the environment and wildlife. It's time to act responsibly and go back to winter dredging. No excuses, no delays. Just do it.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D549	1	Duncan Cottrell	Private Individual	No species should be damaged during their nesting season.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D550	1	Janet Westervelt	Private Individual	I have watched these beautiful creatures lay eggs on our coast. The Corps must stop dredging while sea creatures are mating and having their young.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D550	2	Janet Westervelt	Private Individual	Please use Science to base your decisions on. Do the EIS. Do the right thing for the creatures of our coastal waters. Protect the Loggerheads and more.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.

D551	1	Angie Thomas	Private Individual	Please don't endanger our turtles. Have you ever seen turtles hatch and then make the mad dash to the ocean? It's amazing. Please don't let there be dredging year round.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D552	1	Janine Bethea	Private Individual	Let's remember the efforts of so many that have gone into helping this wildlife that can do nothing to help themselves from human interference. From those who first realized a problem was occurring to all the volunteers that survey the beaches every morning for new nests, and so on....progress is being made and should not be jeopardized.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D553	1	Susan Pleak	Private Individual	I have seen sea turtle nests on Little St. Simons Island and I know how important it is to protect the waters all along the coast. Please do not allow this dredging!!!	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D553	2	Susan Pleak	Private Individual	We have a house a block from the beach near the Myrtle Street beach access. The beach, coast, marshes and estuaries are extremely important to us and more importantly necessary for the survival of all the living things in the ecosystems that rely on healthy ocean waters. Please stop the plan for year round dredging and go back to winter dredging which has 30 years of scientific data showing it is safe for sea turtles and the seriously endangered Right Whales. We need to be doing EVERYTHING possible to help these species on the brink of extinction.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.

D554	1	Zelda Tenenbaum	Private Individual	<p>I live on the Georgia coast , have been involved with the Thbee Marine Science Center , Ossabaw Island and Mountainfilm on Tour - Savannah , and other environmental organizations focused on awareness and education .</p>	<p>The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.</p>
				<p>These organizations work hard to keep the public informed about the importance of protecting our marine life and the environment that we share .</p>	<p>The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.</p>
				<p>Georgia's sea turtles nest along our shores and we need to create an environment for them to thrive .</p>	<p>The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.</p>
D555	1	Deanne Christman-Resch	Private Individual	<p>As a coastal Georgia resident, I have marveled and been amazed by our beautiful sea turtles. Their well being is our well being, none of us live in a vacuum.</p>	<p>The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.</p>

D555	2	Deanne Christman-Resch	Private Individual	We can not afford to risk the lives of these already endangered animals. Please conduct a full EIS.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D556	1	Sabrina Maxwell	Private Individual	I am concerned because removal of these restrictions puts sea turtles in immediate danger. The conservation of sea turtles is important because they play a vital role in the environment.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D557	1	Angel Danielle	Private Individual	My Dear Representatives, I follow the science that points out that all life is in the precious balance of nature.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D558	2 2X	Angel Danielle	Private Individual	I try to conserve nature at every turn. At least revisiting this important aspect of coastal water and the health and the well being of people and wildlife. Especially in this case the loggerhead. We think it deserves thoughtful consideration. And I personally would like to thank you for the hard work you are doing on behalf of our state. The beautiful state of Georgia. From our mountains to the coast.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.

D559	1	Natalie Larson	Private Individual	I have personally spent many years volunteering on our local beaches and with the Georgia Sea Turtle Center to assist in preserving, protecting, educating and helping to care for wounded sea turtles. They are a precious and threatened animal in our area that has stood the test of time but at a high cost to their numbers. Approving the plan to dredge would put us so far backwards in the progress that many have spent hours, days and years of blood, sweat and tears to help these endangered and threatened species. Please say no to this plan that would hurt and kill so many during their peak nesting season along our coastline.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D560	1	Craig Martinson	Private Individual	We have a vacation home in St Simons on East Beach, and we would be devastated if sea turtles were harmed by something that is preventable. We enjoy looking for the signs of sea turtle life and sharing them with our friends and family.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
				Please limit the dredging activity to times when there is less sea turtle activity in the water	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D561	1	Ron Thrasher	Private Individual	As an attorney, scientist, geologist, paleontologist, naturalist, conservationist and outdoor's man I have visited the shores of the great State of Georgia it's diverse area and particularly the Okefenokee Swamp and the Northern Mountains of Georgia and other areas over the years. I find it very disheartening the Army Corp of Engineers are ignoring the science and facts in their short sighted decision making as to dredging at this time.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.

D561	2	Ron Thrasher	Private Individual	I stringently oppose the dredging windows established by the Corp of Engineers as a short sighted and scientifically flawed decision.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D562	1	Don Clark	Private Individual	How can you people even consider some things such as this	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D563	1	Beth Kinstler	Private Individual	I am all too aware of the incompetence and lying of the USACE. Over a history of 200 plus years this organization has destroyed almost everything to which they have put their hand, including dams, mitigation efforts, wetlands, and more. Now we are being asked to let them destroy sea turtles for the sake of dredging. Please do NOT let this happen.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D564	1	Mary Langley	Private Individual	I recently took my children to see the sea turtles on the coast of Georgia. They both have adopted a turtle that we track where it swims. This is a vital part of our ecosystem and important to the education of our youth. Please make a stop to the dredging that is proposed to take place. We need to prepare for future generations and protect our precious resources.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.

D565	1	Jim Jacobs	Private Individual	I've lived here all my life and so much work has been done to protect sea turtles, I would hate to see it disrupted by year round dredging.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D566	1	Tamara Dean	Private Individual	This plan to remove the restrictions will decimate the loggerhead sea turtle population that many of us have spent years protecting and admiring. It is bad enough that we are clear cutting old growth forests (particularly in my county and just for more warehouses that our infrastructure cannot support). If you allow these restrictions to be lifted, you are going to be killing another part of the planet that can ill afford to lose these beautiful creatures. My vote was cast in the last election under the impression that you would fight for all of us in Georgia and this includes our "non-human" inhabitants. Please stop this attack on our sea turtles....we must be better stewards or our world.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D566	2	Tamara Dean	Private Individual	The remainder of this note contains the facts and figures you should review. The paragraph above is mine and I hope you will vote to stop the lifting of these restrictions.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D567	1	Genevieve Bernetti	Private Individual	All countrymen should be contributing to environmental protection. I oppose spring and summer dredging.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.

D568	1	Andrew Ashburn	Private Individual	Any policies that in effect reduce or harm biodiversity are something the planet, and we the people on it, can not afford.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D569	1	Anahata Iradah	Private Individual	Wake up! How much more abuse will our earth take? Stop whilst we still can or we will pay a price far higher than the floods, fires, earthquakes and tornados that we are currently witnessing.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D570	1	Taylor Spicer	Private Individual	Every species is ecologically significant and serves a role in preventing the collapse of healthy systems. We, humans, can't continue to think of our health, wellbeing and future as separate from, or worse supreme to, that of other species. Without them, we, too, will eventually die amidst the lifeless seas and dead earth that we are creating with decisions like this one.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D571	1	Barbara Miles	Private Individual	We must protect the natural habitat of animals because it is up to US, supposedly the "higher" species. Once the destruction of the turtles happens, it will affect generations of turtles...and in unseen ways, US. Stop the dredging year long. Now.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.

D572	1	Michelle Tucker	Private Individual	This is an event that is part of the circle of life. The impact of dredging will disrupt this natural occurrence that is supposed to happen. It is so rewarding to see the hatching of the new generation of sea turtles.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D572	2	Michelle Tucker	Private Individual	Additional data should be provided to have a clear understanding of the impact year long dredging will have. How many turtles will be lost during this window?	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D573	1	Steve Chasteen	Private Individual	I have been a sea turtle advocate for 50 years...all of my adult life...their numbers and habitat continue to dwindle...it's wrong for ACOE to exacerbate the decline by dredging	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D574	1	Christopher Moss	Private Individual	There should be greater, not lesser, pressure to do right by our greatest natural resource. Not for its own sake but for the sake of everyone that lives along the shores.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.

D575	1	Barbara Schollenberger	Private Individual	I really do not understand why you are even thinking of allowing year round dredging of the Brunswick Harbor and waters all along the Georgia coast! Why are you even considering the undoing of years of conservation in this area, not to mention the sea turtles that come here every year to nest! Please do not allow this travesty to occur!	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D576	1	Sherri Williams	Private Individual	It is imperative that we protect the other life on this planet because when one suffers we all do, we are a circle of life. Pick a better time. Thank you.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D577	1	Dawn Spiegl	Private Individual	We are in a mass extinction on our beautiful planet. All it takes is respect for intangibles rather than profit to reverse the trend.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.

D578	1	Dr. Robert K. Vance	Private Individual	My name is Dr. Robert K. Vance, and I am a resident of Bulloch County, GA. I am a Professor of Geology at Georgia Southern University and have worked in sea turtle conservation and education programs on the Georgia coast for over 20 years, most recently serving as Co-Director of the GSU Sea Turtle Program. Decades of annual sea turtle conservation work have finally brought our Georgia nesting population back from the brink of extinction. The Georgia coast is critical nesting habitat for loggerhead sea turtles; however it does no good to preserve nesting habitat if the nesting females are killed by dredging operations. The previous protocols limiting dredging during nesting season have been an important part of conservation efforts. Removing these restrictions will be a major step backwards in conservation efforts. I am writing in strong opposition to the removal of seasonal restrictions for annual operations and maintenance (O&M) dredging in Brunswick Harbor and channels across Georgia's coast.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D579	1	Lance McBrayer	Private Individual	Valid scientific evidence shows that sea turtles use near shore and inland (harbors and marshes) during mating and nesting seasons (ie spring and summer) in GA. Dredging at this time will undoubtedly kill, drown, or seriously injure sea turtles and thus work to undo 60+ years of progress in the recovery of sea turtle populations.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D580	1	Kathy Oxford	Private Individual	We have property on the Golden Isles but even if we didn't, we would feel the same about this situation. There has to be other options. I know dredging needs to take place and the cost of doing it is expensive, maybe there is a way for everyone to figure out a plan that preserves the years of work in the turtle program and gets the dredging done.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.

D580	2	Kathy Oxford	Private Individual	You must do a complete environmental impact statement, to not do so is totally wreckless to the taxpayers of Georgia and the turtle program.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D581	1	Wanda Lowe	Private Individual	Our sea turtles are amazing reptiles that deserve the protection by humans that share their habitat. Be responsible and respectful of creatures unable to speak for themselves. It is our duty to protect our earth and all the treasures it holds.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D582	1	Dena Maguie Young	Private Individual	Year round dredging is very dangerous to the turtles, right whale and other species. It will roll back what we have been doing to protect these species.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D583	1	Leonora Xhrouet	Private Individual	loggerhead turtles are endangered and must be protected. When a species is gone it is forever. Dredging should not even be considered. Let these turtles live in peace.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.

D583	2	Leonora Xhrouet	Private Individual	summer dredging will threaten these turtles existence!	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D584	1	A. Roe	Private Individual	It's important to protect our wildlife and ecosystem.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D585	1	John Hamilton	Private Individual	I have helped turtle protect nests on Jekyll Island and don't want dredging to reverse the gains we have made.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D586	1	Lind Holingsworth	Private Individual	I love the wildness of the Georgia coast and the sea turtles are a big part of that. The fact that there are places where wildlife can live without the intrusion of human consumption is a treasure that we should value and protect.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.

D587	1	Gordon Insley	Private Individual	I have worked at Burton 4H on tybee for about 5 years. I am also marine mammal stranding certified with DNR. My wife also is involved with feeding and care for 3 sea turtles at Burton and also involved with the turtle nest watch here on tybee.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D588	1	Rick Hindery	Private Individual	I hope we can find a way to balance the needs of industry with the protection of our environment and the creatures we share the planet with. Maintaining current dredging policy seems to be that way. Over the past few years we've seen an increase in our turtle population and growth to our ports and the jobs that we need. We can keep our shipping lanes open and continue to protect the environment by avoiding changes which I don't see as being justified. I think this is a time when doing nothing is actually doing more in protecting this a little part of our great planet while at the same time protecting the jobs that drive our economy. Thank you.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D589	1	Jill Wilson	Private Individual	Please, please leave what little wildlife we have and help preserve these turtles ! We are the stewards of this earth and all there in. Rethink, research more and cease any destruction of our precious turtles.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
				Thanking you in advance for ceasing this dredging, Jill Wilson	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.

D590	1	Sheryl Pavlinac	Private Individual	Sea turtles cannot protect themselves against so many human actions. The turtles already face huge obstacles from ocean litter, fishing lines, etc. Year round dredging is just one more significant impediment to the species survival	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D590	2	Sheryl Pavlinac	Private Individual	If this is truly a sound decision, a full EIS would support this action. Why is this not being done? We should not allow year round dredging to go forward until a full review is done to avoid possible unintended consequences which may have no future remedy. Let's pay more attention to what 30 years of data has shown us.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D591	1	Nancy Linder	Private Individual	Loggerhead sea turtles are an endangered species and we must do everything we can to save them. Loggerhead turtles and other sea life will be greatly impacted by dredging during spring and summer when they came inland and lay their eggs and then have their babies born. In addition to dredging harming the adult loggerhead turtles, they will harm the offspring of an already endangered species.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D591	2	Nancy Linder	Private Individual	The science is sound and dredging impacts many species. The least impacts are made in winter, and therefore, must only be done in the winter.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.

D592	1	Kathy Mackay	Private Individual	From my understanding this will have long-standing tragic impact for the wildlife living along George's coastal region.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D592	2	Kathy Mackay	Private Individual	Please do not look the other way to allow year-round dredging.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D593	1	Sydney Davis	Private Individual	As someone who has devoted their academic career to preserving this species, blatant disregard for their well being will not be getting you my vote again.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D594	1	Venitia Butler	Private Individual	My background includes many years of teaching and studying at the Oaltand Wildlife Center, helping to create the Tybee Island Marine Science Center, Representing educators on the Gray's Reef National Marine Sanctuary for 10 years, as well as sitting on a number of other science and science education boards of directors. I have spent many years working with scientist at both Skidaway Institute of Oceanography and UGA Marine Institute on Sapelo Island. I have watched Tybee's beach, along with others on the GA islands, be empty of sea turtle nesting and other coastal wildlife to finally seeing a number of sea turtle nests along the beach of Tybee Island. This is an indication of a success story that does not need to be destroyed. Look at the facts and data of the science!!!!	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.

D595	1	Gary Sharp	Private Individual	I have studied oceanography at Florida Atlantic University and am very familiar with sea turtle nesting. No dredging should occur during their nesting period. This interrupts the breeding process and will do more to endanger this species.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D596	1	Harold Tessendorf	Private Individual	While I live and currently work from Middle Georgia, my family and I are frequent visitors to the Georgia coast for work and vacation. Georgia's coastline is a treasure, both economically and in terms of its biodiversity. My many visits to the coast are taught me that all parts of the coast's ecology are important. We have made great progress to protect our coast and have balanced that with sound economic development. It has worked thus far and I fail to see how increasing the window for dredging operations benefits any of us. As a resident and citizen of this state, feel that it is incumbent on me to voice my opposition to the changes that you are proposing.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D597	1	John Little	Private Individual	I travel to the SE Georgia Coast regularly usually to Jekyll Island but also St. Simons and Cumberland Island. My parents took me and my siblings there a number of times when I was as a child. Sea turtles were then and still are an important part of the essence of that wonderful part of Georgia. I have more than once participated in viewing of the turtle nests and some of the gathering of scientific information on Jekyll. Protection of their habitat and the turtles themselves is very important to me and my wife and many of our friends.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D597	2	John Little	Private Individual	Once again I want to emphasize my opposition to the removal of seasonal restrictions for annual O&M dredging in Brunswick Harbor and channels across Georgia's coast.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.

D598	1	Ramona Gault	Private Individual	As a visitor to the Georgia coast, I enjoy the presence or evidence of sea turtles on beaches like Cumberland Island. These magnificent animals are already stressed by boat traffic, water pollution, light pollution, and beach activity. Their protection should be a top priority for the Army Corps of Engineers.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
				Spring and summer dredging will negatively impact the recovery of Georgia's loggerhead sea turtles, a state and federally-protected species. Summer is the height of sea turtle nesting season, when adult females swim in local waters and actively use these same channels during their inter-nesting periods. For this reason, seasonal restrictions prohibiting dredging during summer months have long been used as a successful tool for species recovery efforts. Your plan to utilize hopper dredging year-round ignores windows that have been in place and proven effective for more than 30 years, and you have failed to provide a logical, data-supported reason for this change.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D599	1	Parks Underdown III	Private Individual	On personal level I have witnessed see turtles for many years along coastal areas, and they are beautiful and fragile creatures. In particular along the fragile Georgia coast we must do everything in our power to protect them.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D600	1	Pamela Haun	Private Individual	Preserving Georgia's Coastal areas is imperative to protecting the Avian population nesting areas and ecosystems. As we have all recently learned about the connectives of coastal wildlife with our own.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.

D601	1	Cary Wise	Private Individual	Five of only seven species of sea turtles are found in the waters off Georgia's coast. As an endangered species, that means that Georgia has a particularly critical role in protecting the sea turtles and their nesting habitats.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D602	1	John Baker	Private Individual	i love to visit cumberland island & brunswick, GA and i am deeply concerned about sea turtles and other beach-dependent wildlife species. ACOE dredging has caused problems on FL beaches for turtles and the anastasia beach mouse. do not do this dredging when it is likely to cause problems for the sea turtles.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D603	1	Nancy Grove	Private Individual	My extended family has been visiting Jekyll Island for many years and the children's first choice to visit there is the sea turtle rescue center. They are growing up loving the beauty that is this country and will work to protect it and they will vote.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D603	2	Nancy Grove	Private Individual	If dredging must be done, it should be carried out at a time when it will disturb marine life the least.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.

D604	1	Rachel King	Private Individual	Georgia's sea turtles have been a part of my own science research through a program that allows Georgia's teachers to visit Sapelo Island every summer. (GCE-LTER Schoolyard) We have researched the nature and habitats of sea turtles, and have experienced first hand with the turtles. If you just conduct a simple Google search, you will know that this dredging can only negatively impact the turtles during this season.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D605	1	Samantha Williams	Private Individual	Environmentally, I feel Georgia is constantly moving backwards in every aspect. Whether it be neighborhoods constantly battling for their green space that were supposedly protected to our wildlife that the governing bodies are consistently disregarding to allowing private entities destroy our waterways with their waste.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D605	2	Samantha Williams	Private Individual	Personally, I do everything within my power/financial ability to reduce my impact on the environment and I will never understand how government agencies can't hold themselves accountable when they have more resources available to them than the average citizen. Facts and data do matter. Misrepresenting that information is destructive and careless.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D606	1	Karen Kimbrel	Private Individual	We visit this coast every year. We love the area BECAUSE it is less developed & we know some animals/birds can be safe there!!	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.

D607	1	Deborah Collett	Private Individual	Please leave our turtles alone and in peace. This is very much and attraction to our golden isles. As well as the other marine life you will be harming.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D608	1	Terry Michaud	Private Individual	I am a former resident of Brunswick, Georgia, and a member of the Brunswick Woman's Club and, although I am currently living in Florida, I plan to visit Georgia and possibly look at property there. When I lived in Brunswick, I was the head of the Conservation community service program for the BWC, and I very much enjoyed working with local conservation groups like 100 Miles -- and I was a frequent visitor to the turtle center on Jekyll Island. I understand that dredging sometimes needs to be done, but I hope this will be done very carefully to protect the sea turtles.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D609	1	Ishmael Williams	Private Individual	I worked on a sea turtle conservation project on Ossabaw Island located near Savannah Harbor between 1972-1978. We tagged & recorded nesting turtles and collected their eggs to be placed in protective hatcheries for protection against ghost crabs, birds, racoons, wild pigs, and we slowly built the population back. Back then we would often see more dead adult turtles than live ones because of the danger of shrimp nets. That danger has been eliminated with turtle extrusion devices and turtles are slowly making a comeback. However to suggest that 150 turtles could be sacrificed to dredging annually is to completely misunderstand the study cited and risk irrevocably damaging turtle populations and undoing all the work we have done.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D610	1	Louise Hammett	Private Individual	As a nationally recognized preservationist by the DAR, I want very much to protest the summer time dredging which endangers our sea turtles on the Georgia seashore.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.

D611	1	Marlon Finley	Private Individual	Sea Turtle populations are fragile and must be protected from willful destruction of their breeding areas. Humans must share the Earth with living things who have been here for thousands of years before we began disrupting their lives.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D611	2	Marlon Finley	Private Individual	I vote in every election. I want decisions to be made using science and not money as the deciding factor in how to proceed.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D612	1	Avis Wimfield	Private Individual	I am a retired teacher and an environmental educator. I was born in Georgia and have lived here all of my life. I grew up vacationing on the Georgia coast. I am 100% opposed to the destruction of coastal habitat that this dredging operation would cause at any time but most especially during the sea turtle nesting season.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D612	1	Avis Wimfield	Private Individual	There is no justification for doing this year-round. There's a plethora of reasons to forbid it.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.

D613	1	Charon Sharp	Private Individual	Please help by not allowing dredging during turtle nesting time. Give mother earth and the animals a fighting chance. Thank you.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D614	1	Eileen Pierson	Private Individual	It is our right and our privilege to care for loggerhead sea turtles; their health and their reproduction.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D615	1	Anthony DeCarlo	Private Individual	Let's all work together to save these great loggerhead turtles. They play a role in the aquatic life of our country. I say we maintain them, show them off and protect them for our posterity.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D616	1	Harriet Peacock	Private Individual	Mother sea turtles already struggle with predators, beach lights, and development to lay their eggs and have viable hatchlings without having their bodies and nesting areas scraped and mangled by dredging machines.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.

D616	2	Harriet Peacock	Private Individual	Sea turtles are synonymous with the beach. Don't wipe out living things for the sake of the few who will get rich from stepped-up dredging.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D617	1	Johnathan Crossman	Private Individual	I grew up in Georgia and it's coastlines are very important. As now a marine biologist in another state, Georgia is still my home away from home and it's environment and species are what brings me back time and time again. It's disgusting to think that we can't accommodate a globally endangered species nesting season for our simple human issues. Now is the time to focus on more protections for sea turtles rather than causing a high stressor during nesting season.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D618	1	Deborah Adams	Private Individual	My husband and I volunteered the first summer the sea turtle center at Jekyll Island opened. It was amazing to learn how many turtles nested on our barrier islands. The turtle center has brought countless numbers of visitors to the Golden Isles. These people spend money and learn the importance of protecting our natural resources. Year round dredging will have a negative impact on our turtle population as the letter says below.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D618	2	Deborah Adams	Private Individual	I know the ports are very important to our economy. I don't think year round dredging is the answer, though.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.

D619	1	Elizabeth LaBar	Private Individual	The U.S. Army Corps of Engineers has notoriously destroyed natural habit. They are monstrous in their disregard for the flora and fauna with which we share the planet has been well known for decades. Leave a little place for wildlife to survive healthfully.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D620	1	Larry Wells	Private Individual	There is always a negative side to any progress and it appears the special interest groups win again, at the expense of the sea turtle.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D620	2	Larry Wells	Private Individual	Big money plus graft and collusion equal to sounding like the public service commission is running this show.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D621	1	Stephen Kille	Private Individual	Visits to Cumberland Island National Seashore are a welcome retreat from the daily grind of human impact to our one planet. Turtles have earned their place there and the less impact the better for their survival.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.

D621	2	Stephen Kille	Private Individual	Leave things better than found.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D622	1	Judith Bond	Private Individual	Because their numbers are declining. They are beautiful creatures.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D622	2	Judith Bond	Private Individual	They can dredge when it's not nesting season	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D623	1	Margaret Hayman	Private Individual	When I visit the coast, I always am excited to watch loggerhead nests hatching, with the baby turtles making their way toward to moonlit sea. This is one of the joys that all Georgians should get to see when they visit the Georgia coast. For years we neglected the loggerhead population and it is only after Georgia and other coastal states have taken steps to protect them that their population is recovering.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.

D623	2	Margaret Hayman	Private Individual	The loggerhead turtles deserve no less. There is no reason not to act in a responsible way which will preserve the gains we have made. We are stewards.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D624	1	Linda Ring	Private Individual	My family has a long-standing history of preservation support and were residents of both Glynn County and Cumberland Island. We know how deeply this will impact our sea turtles.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D625	1	Tracy Pirosh	Private Individual	Sea turtles are majestic gentle giants who deserve our help. We are the ones who have decimated their populations. We are the ones who must protect them.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D626	1	Sue Gertis	Private Individual	Please don't allow summer dredging which would endanger the sea turtles. So many people have volunteered thousands of hours to help protect the mother turtles and their nests during a few critical months each year. I cannot understand the the reasoning behind this proposed change. Who would possibly benefit from this decision? Please don't.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.

D627	1	Ann Eddy	Private Individual	We need to protect Sea turtles which come to nest in Georgia!	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D627	2	Ann Eddy	Private Individual	It seems so logical to the average citizen the impact summer dredging would cause so not sure why qualified corpsman can't seem to see the impact that it would cause.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D628	1	Stephen Vives	Private Individual	The continued ability of visitors to our coast to glimpse a sea turtle is money in the bank-- fewer species are more charismatic. Please help protect this important Georgia resource.	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.
D629	1	Kevin Stanaland	Private Individual	The nesting sea turtles in Georgia are in just much danger as they are in Florida. We must not do anything that is going to endanger them unnecessarily when it can be prevented.Thank You	The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.

D630	1	Fraidell Fenster	Private Individual	<p>I am a supporter of 100 Miles and their associated advocates. I support the Georgia Sea Turtle Center on Jekyll Island and take all guests to The Golden Isles to visit there to maintain awareness of the fragility of our coasts. It amazes me that the Army Corps of Engineers can ignore decades of agreements to protect sea turtles nesting behavior. Please do whatever is necessary to keep the landscape and our offshore neighbors such as sea turtles, right whales (who calf off our shores), and other marine life, from further desecration of our natural resources by ignoring these agreements.</p>	<p>The Corps appreciates your interest in the project and acknowledges the importance of Georgia's coastal resources, including sea turtle species. The IFR/EA provides an analysis of effects to those resources. The Corps is committed to continuing to work with federal, state, and local stakeholders for the protection of these resources. The Corps' preferred alternative provides a balanced approach that minimizes effects to multiple protected species in the project area. The preferred alternative was selected after careful review of the potential effects and consideration of best available information.</p>
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