

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

**Final Integrated Feasibility Report and Environmental
Assessment**

**Appendix F – Comments and Comment Response
Matrix**

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



November 2021

From: Holliman, Daniel <Holliman.Daniel@epa.gov>
Sent: Thursday, July 9, 2020 4:13 PM
To: Richards, Mary E CIV USARMY CESAS (USA) <Mary.E.Richards@usace.army.mil>
Cc: Kajumba, Ntale <Kajumba.Ntale@epa.gov>; Martin, Molly <Martin.Molly@epa.gov>; Calli, Rosemary <Calli.Rosemary@epa.gov>
Subject: [Non-DoD Source] EPA Comments for Brunswick Harbor Modification Draft EA

Dear Ms. Richards:

The US Environmental Protection Agency Region 4 is in receipt of a public notice dated June 4, 2020, for the draft Environmental Assessment (EA) to evaluate the potential environmental impacts for the Brunswick Harbor Modifications. The Port of Brunswick, located at Brunswick Harbor, consists of three terminals. Of these, the Colonel's Island Terminal handles all the Roll-on/Roll-off (RO/RO) traffic and is the second busiest port in the U.S. for total RO/RO cargo and busiest for RO/RO imports.

The EPA understands that the purpose of the draft EA is to investigate the feasibility of reducing transportation cost inefficiencies associated with the Federal deep draft navigation channel at Brunswick Harbor. 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 U.S. Army Corps of Engineers (Corps) selected Alternative eight as the agency recommended plan. The proposed action includes bend widening, turning basin expansion, and meeting area at St. Simons Sound.

Based on our review of the EA, the EPA provides the following comments:

1. Clean Water Act - 404 (b)(1) – Discharge of dredge material is defined in 40 CFR 232.2 to include the runoff or overflow, associated with a dredging operation, from a contained land or water disposal area. The EPA notes that the draft Finding of No Significant Impact Statement (FONSI) includes a statement that no 404(b)(1) analysis will be needed since this project would not involve discharge of dredge or fill material under Section 404 of the Clean Water Act. The EPA also notes that Section 4.7 – Water Quality - indicates that a 404(b)(1) analysis was prepared for the project and is in Appendix F. The EPA reviewed Appendix F which includes agency communications but does not

include a 404(b)(1) analysis. After further discussion with the Corps, it is our understanding that the Corps does not intend on developing a new 404(b)(1) for this project. The EPA reviewed the 1998 EIS 404(b)(1) analysis and finds that it does not address the currently proposed project. The EPA recommends a new 404(b)(1) evaluation be included in the environmental assessment to support the currently proposed project. The 404(b)(1) evaluation should include factual determinations of the potential effects of the discharge including potential contaminant-related impacts to aquatic resources. Any conclusions reached from past or future sediment evaluations should also be included in the 404(b)(1) evaluation.

2. Beneficial Use Disposal – Beneficial use of dredge material is considered by the Corps in Section 5.2.2 of the EA. Resource agencies are working with the Corps to identify potential sites for beneficial use of dredge materials. The EPA supports the use of dredge materials for beneficial uses such as marsh creation and enhancement of wildlife habitat. Based on discussions with the Corps, the EPA understands that the Corps will perform additional environmental analysis and NEPA documents on decisions related to material to use for beneficial use and selection of sites should the options become viable. As fine-grained material is more likely to carry contaminants, placement of contaminated sediments would be counter-productive to the intent of beneficial use goals. Therefore, the EPA recommends updating sediment testing and evaluation for any material proposed for beneficial use that is less than 80% sand following methods outlined in the Inland Testing Manual. Lastly, the EPA is available to provide additional technical guidance and support for selection of appropriate sites and determining suitability of material.
3. Water Quality Certification – The EPA recommends continued consultation with the Georgia Environmental Protection Division regarding water quality impacts from the proposed project. The EPA recommends including any project conditions outlined in the State Water Quality certification and any mitigation commitments made by the Corps in the FONSI.
4. Dissolved Oxygen and Salinity – Historically, the EPA has noted dissolved oxygen (DO) and salinity impacts associated with similar dredging projects along the east coast. However, we note that the Brunswick Harbor project area has unique geomorphic and tidal conditions that may minimize the impact of the current proposed project on water quality conditions. We also note the following statement in the EA on page 90 “In addition, most of the project area is open water that receives semi-diurnal tidal flushing from St. Simons Sound. As a result, the water in the harbor is well-mixed with a relatively uniform salinity, DO, and other important water quality parameters. This tidal flush in turn enables the water quality to return to normal levels relatively quick.” The EPA recommends the Corps include supporting information relative to the anticipated impact on water quality.
5. Turbidity Monitoring - The EPA supports turbidity monitoring in the project area during dredging events to ensure State Water Quality Standards are always met.
6. Impacts to Threatened & Endangered Species –The EPA recommends any Endangered Species Act commitments required by the National Marine Fisheries Service and the U.S. Fish and Wildlife Service be included in the FONSI.

Thanks for the opportunity to comment on this project. If you have questions, please contact me at Holliman.daniel@epa.gov.

Thanks,
Dan

Dan Holliman

NEPA Section | Strategic Programs Office
USEPA Region 4 | Office of the Regional Administrator
61 Forsyth Street SW | Atlanta, GA 30303

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DEPARTMENT OF THE ARMY
U.S. ARMY CORPS OF ENGINEERS, SAVANNAH DISTRICT
 100 W. OGLETHORPE AVENUE
 SAVANNAH, GEORGIA 31401-3604



U. S. Fish and Wildlife Service
RG Stephens, Jr. Federal Building
355 E. Hancock Ave., Rm 320, Box 7
Athens, GA 30601 ; 706-613-9493

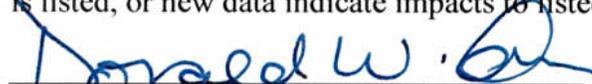
FWS Log No.

2020-2494

Planning Branch

Mr. Don Imm
 Field Supervisor
 U.S. Fish and Wildlife
 RG Stephens Jr. Fed
 355 East Hancock A
 Athens, Georgia 306

Based on information provided, we concur with your determination that the project is not likely to adversely affect federally-listed species. No further ESA Section 7 action is required, unless the project changes, a new species is listed, or new data indicate impacts to listed species may occur.


Donald W. Imm, Ph.D., Field Supervisor

June 18, 2020

Date

Dear Mr. Imm:

The U.S. Army Corps of Engineers, Savannah District (Corps), in collaboration with the Georgia Ports Authority, has evaluated the feasibility of increasing transportation cost efficiencies in the deep draft Federal navigation channel at Brunswick Harbor, Glynn County, Georgia. A draft Integrated Feasibility Report (IFR)/Environmental Assessment (EA) and draft Finding of No Significant Impact (FONSI) under the authority of Section 1201 of the Water Resources Development Act (WRDA) of 2016 have been prepared to present the results of the study, and to analyze impacts of the proposed measures on the environment.

The Draft IFR/EA evaluates the potential impacts of eight action alternatives against the no action alternative. Alternative 8 consists of expansion of a bend widener, the turning basin, and a meeting area at St. Simons Sound and includes removal of 205,000 cubic yards of material at the bend widener and 346,000 cubic yards at the turning basin expansion. No dredging is needed at St. Simon's Sound as it is naturally deep and only requires realignment of the authorized channel dimensions. This alternative was identified as the plan that reasonably maximized net National Economic Development (NED) benefits, consistent with protecting the Nation's environment, and as such, is the Tentatively Selected Plan (TSP).

In accordance with Section 7 of the Endangered Species Act, the Corps has made a no effect determination for the piping plover (*Charadrius melodus*) and red knot (*Calidris canutus*). Piping plovers and red knot do not nest in the proposed project area, and the area does not possess their preferred feeding or resting habitats. With implementation of the Project Design Criteria in the 2020 Nation Marine Fisheries Service South Atlantic Regional Biological Opinion for Dredging and Material Placement Activities in the Southeast United States, the Corps has made a may affect, not likely to adversely affect determination for the West Indian manatee (*Trichechus manatus*). There is no designated critical habitat within the project location.

In accordance with the provisions of the National Environmental Policy Act (NEPA), your comments on the Draft IFR/EA and Draft FONSI are hereby solicited. We also

request your concurrence on our effects determination for the West Indian Mantee. The Draft IFR/EA are available for review at <http://www.sas.usace.army.mil/About/Divisions-and-Offices/Planning-Division/Plans-and-Reports/>. A Public Notice has also been sent to all the parties on the Corps' Regulatory mailing list in Georgia for the project area and is available at: <https://www.sas.usace.army.mil/Missions/Regulatory/Public-Notices/>.

Please submit comments within 30 calendar days to CESAS-PD@usace.army.mil. Questions concerning this request can be directed to Mr. Stephen Fox, Biologist, at Stephen.M.Fox@usace.army.mil or (912) 652-6210.

Sincerely,

Kimberly L Garvey

Kimberly L. Garvey
Chief, Planning Branch



July 8, 2020

F/SER47:CC/pw

(Sent via Electronic Mail)

Col. Daniel Hibner, Commander
Savannah District Corps of Engineers
100 W. Oglethorpe Avenue
Savannah, Georgia 31402-0889

Attention: Stephen Fox

Dear Colonel Hibner:

NOAA's National Marine Fisheries Service (NMFS) reviewed the *Brunswick Harbor Modifications Study draft Integrated Feasibility Report/Environmental Assessment (Draft IFR/EA)* and Draft *Finding of No Significant Impact*, dated June 2020, prepared by the U.S. Army Corps of Engineers, Savannah District. The Draft IFR/EA evaluated potential impacts from modifying the Federal navigation channel at Brunswick Harbor, Glynn County, Georgia. The District's initial determination in the Draft 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 Savannah District, in collaboration with the Georgia Ports Authority, evaluated eight action alternatives against the no action alternative. The Savannah District initiated this study in May 2019 with a planning charrette. Over the next year as the planning process progressed, the Savannah District continued its engagement with the NMFS to discuss avoidance and minimization strategies resulting in a significant reduction in adverse impacts to EFH during development of the Final Array of Alternatives. The Final Array of Alternatives is:

- No Action Alternative
- Alternative 2 – bend widener (BW)
- Alternative 3 – turning basin expansion (TB)
- Alternative 4 – meeting area west of Sidney Lanier Bridge (SLB)
- Alternative 5 - meeting area at St. Simons Sound (SSS)
- Alternative 6 – BW and TB
- Alternative 7 – BW, TB and SLB
- Alternative 8 – BW, TB, and SSS (Tentatively Selected Plan)
- Alternative 9 – BW, TB, SLB and SSS



The Tentatively Selected Plan (TSP) includes the bend widener, turning basin expansion, and meeting area at St. Simons Sound. Implementing the TSP would include dredging 205,000 cubic yards of material at the bend widener and 346,000 cubic yards at the turning basin expansion for a total of approximately 551,000 cubic yards of dredged material; no dredging is necessary for the meeting area at St. Simons Sound.

The South Atlantic Fishery Management Council (SAFMC) identifies sub-tidal and intertidal non-vegetated flats (unconsolidated bottom) and coastal inlets as EFH in several fishery management plans, including the plans for penaeid shrimp, the snapper-grouper complex, and coastal migratory pelagic species. The NMFS identifies these habitats as EFH in the fishery management plan for highly migratory species. In addition to serving as EFH, these areas provide habitat for numerous species and their prey that have commercial or recreational importance, including red drum (*Sciaenops ocellatus*), southern flounder (*Paralichthys lethostigma*), Florida pompano (*Trachinotus carolinus*), summer flounder (*Paralichthys entatus*), spot (*Leiostomus xanthurus*), and blue crab (*Callinectes sapidus*). The SAFMC also identifies inlets as a Habitat Area of Particular Concern (HAPC) in the fishery management plans for shrimp and the snapper-grouper complex. HAPCs are subsets of EFH that are rare, particularly susceptible to human-induced degradation, especially important ecologically, or located in an environmentally stressed area. The SAFMC provides detailed information on the EFH requirements of federally managed species in amendments to the fishery management plans and in *Fishery Ecosystem Plan of the South Atlantic Region*¹ and the *Users Guide to Essential Fish Habitat Designations by the South Atlantic Fishery Management Council*².

While the TSP includes a meeting area at St. Simons Sound, the proposed activity at that location does not require any new dredging activity. The bend widener dredging activity would require removal of material in deep, open-water habitat and, given the abundance of nearby habitats for organisms to recruit from, will likely recovery quickly. Dredging at the turning basin expansion will result in converting some shallow sub-tidal habitat to open-water habitat. Habitat conversion will cause a loss of ecosystem services resulting from photosynthetic limitations, reductions in primary and secondary productivity, likely exacerbated occurrence of bottom hypoxia, and alteration of the benthic-pelagic coupling system that will negatively impact federally managed species. The NMFS agrees that benthic organisms will likely rapidly colonize that dredged footprint, but they will be different communities due to alteration in depths from shallow to deep. The Savannah District has historically not sought compensatory mitigation for project impacts to unconsolidated bottom in open water; therefore, the Savannah District does not propose compensatory mitigation for these proposed impacts. However, the NMFS stresses that converting shallow subtidal habitat to open-water habitat results in the loss of ecosystem services that would normally require implementing an appropriate mitigation plan. The NMFS notes early engagement during the planning process resulted in reducing the proposed size of the turning basin expansion from approximately 18 acres to approximately 2 to 3 acres. In addition, as noted in Appendix I of the Fish and Wildlife Coordination Act Report, beneficial use of the dredged material is likely as the project plans develop further, and the NMFS strongly encourages pursuit of the opportunities identified in the report that include intertidal shelves, shell

¹ <https://safmc.net/fishery-ecosystem-plan-ii-essential-fish-habitat-and-habitat-conservation-essential-fish-habitat/>

² https://safmc.net/download/SAFMCFHUsersGuideFinalRevAug17_2.pdf

rakes, and other EFH features. Consequently, the NMFS offers no EFH conservation recommendations at this time for the proposed Brunswick Harbor Modifications.

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,

/ for

Virginia M. Fay
Assistant Regional Administrator
Habitat Conservation Division

cc: COE, Stephen.M.Fox@usace.army.mil
GADNR CRD, Karl.Burgess@gadnr.org
GADNR EPD, Bradley.Smith@dnr.ga.gov
EPA, Somerville.Eric@epa.gov
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F/SER47, Cynthia.Cooksey@noaa.gov



MARK WILLIAMS
COMMISSIONER

RUSTY GARRISON
DIRECTOR

July 8, 2020

U.S. Army Corps of Engineers
Savannah District
100 W. Oglethorpe Avenue
Savannah, Georgia 31401-3604

RE: Draft Integrated Feasibility Report/Environmental Assessment and Draft Finding of No Significant Impact (FONSI) for Brunswick Harbor Management Modification

The Wildlife Resources Division of the Georgia Department of Natural Resources (GADNR) submits the following comments on the Brunswick Harbor Modifications Study. These comments address preferred Alternative 8, which includes removal of 205,000 cubic yards of material at the bend widener and 346,000 cubic yards at the turning basin expansion. This alternative proposes use of a portion of material from the bend widener for placement on an existing spoil island known as Bird Island to address erosion concerns.

The Brunswick Harbor dredge spoil island (Bird Island) was created during a harbor deepening project in 2007-2008. This island was created to benefit beach nesting birds and has been highly successful in that regard. American oystercatcher, Wilson's plover, royal tern, sandwich tern, least tern, gull-billed tern, black skimmer, and American brown pelican have been documented nesting on the island. The combination of the absence of terrestrial predators, elevation above flooding tides, and maintenance of a bare sand substrate have contributed to this island becoming the largest seabird colony in Georgia. Since 2010, Bird Island has averaged approximately 6,500 nesting pairs of seabirds and shorebirds.

To maintain suitable habitat for beach nesting birds, the island must be kept free of significant vegetation. This is achieved by burning dead vegetation in winter and annual application of foliar and soil active herbicide early each spring. This management regime is a joint effort of GADNR and the ACOE and provides significant nesting habitat in April and May when seabirds initiate their colonies.

Another important habitat factor for nesting seabirds is erosion around the northern portion of the island resulting from Hurricanes Matthew and Irma. These hurricanes created a scarp that ranges from 2 to 4 feet in height. Given the high mobility of seabird chicks and the formation of large creches of flightless chicks, there is potential for injury or mortality from birds becoming trapped between extreme high tides and the scarp.

This problem could be addressed by mechanical smoothing of the scarp and/or the addition of spoil material to the island. An additional benefit of placing fresh spoil on the island

is that it will likely postpone the need to conduct vegetation control on the site for several years. We support using spoil from the proposed project to mitigate the erosional scarp on the slopes of Bird Island and spreading new spoil over the entire island to reduce the need for annual vegetation control. This would be beneficial if the substrate is comparable to the existing sand/shell mixture on the island rather than excessively fine substrate.

Thank you for the opportunity to provide comments on this management alternative. For further information, please contact Jason Lee at 404-291-8083 or jason.lee@dnr.ga.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Rusty Garrison". The signature is fluid and cursive, with a prominent initial "R" and a long, sweeping tail.

Rusty Garrison

C: Jason Lee
Jon Ambrose



HISTORIC PRESERVATION DIVISION

MARK WILLIAMS
COMMISSIONER

DR. DAVID CRASS
DIVISION DIRECTOR

June 10, 2020

Kimberly Garvey
Chief, Planning Branch
US Army Corps of Engineers, Savannah District
100 West Oglethorpe Avenue
Savannah, Georgia 31401-3604
Attn: Julie Morgan, Archaeologist

**RE: Programmatic Agreement: Modify Brunswick Harbor
Glynn County, Georgia
HP-191113-003**

Dear Ms. Garvey:

The Historic Preservation Division (HPD) has received the information submitted concerning the above referenced undertaking. Our comments are offered to assist the U.S. Army Corps of Engineers (USACE) in complying with provisions of Section 106 of the National Historic Preservation Act of 1966, as amended (NHPA).

The subject project consists of modifying the Brunswick Harbor, to occur in two (2) phases. Phase I includes geotechnical boring investigations with 100-foot buffers around known anomalies, which is the subject of the current review. Phase II includes preconstruction, engineering, and design of the project, which will be addressed through a programmatic agreement (PA). Based on the information submitted, HPD concurs that no historic properties that are listed or eligible for listing in the National Register of Historic Places (NRHP) will be affected by Phase I of the undertaking, as defined in 36 CFR Part 800.4(d)(1), due to the scope of work.

This letter evidences consultation with our office regarding Phase I of the undertaking for compliance with Section 106 of the NHPA. It is important to remember that any changes to this phase, as it is currently proposed, may require additional consultation. HPD encourages federal agencies to discuss such changes with our office to ensure that potential effects to historic resources are adequately considered in project planning. We look forward to working with you and continued consultation regarding Phase II.

Please refer to project number **HP-191113-003** in any future correspondence regarding this project. If we may be of further assistance, please contact Jennifer Bedell, Archaeological Compliance Unit Manager, at (770) 389-7861 or Jennifer.bedell@dnr.ga.gov or me at (770) 389-7851 or Jennifer.dixon@dnr.ga.gov.

Sincerely,

Jennifer Dixon, MHP, LEED Green Associate
Program Manager
Environmental Review & Preservation Planning

From: [Wiedl, Stephen](#)
To: [Richards, Mary E CIV USARMY CESAS \(USA\)](#); [Garvey, Kimberly L CIV USARMY CESAS \(US\)](#); [Planning Branch Calendar](#)
Cc: [Armetta, Robin E CIV USARMY CESAS \(USA\)](#); [Smith, Bradley](#); [Zeng, Wei](#); [Potter, Amy](#); [Booth, Elizabeth](#)
Subject: [Non-DoD Source] 401 WQC Requirement and GaEPD Comments per Brunswick Harbor Modification and Study
Date: Saturday, July 11, 2020 12:35:07 AM
Attachments: [o2020 06 09 No SAS Number BS USACE Planning Notice - Brunswick Harbor Modifications, Glynn Co. KLG.pdf](#)

To:

Mary Richards and Kimberly Garvey
Savannah District Corps of Engineers
Planning Branch

This message comprises Georgia EPD Wetlands/401 Unit's response to inquiries made last month by Savannah USACE Planning Branch's Mary Richards regarding the possible need for a new 401 Water Quality Certification (WQC) for the upcoming Brunswick Harbor Modifications (BHM) project. This project was posted by a USACE Planning Notice as of June 9, 2020 and this message by association comprises comments for that USACE Planning Notice.

The original Brunswick Harbor deepening project had a 401 WQC issued more than 22 years ago as of March 24, 1998. We have held in-house discussions with EPD's Risk Assessment Unit and Watershed Monitoring and Planning Program and also discussions with Environmental Protection Agency Region IV staff on this current harbor modification topic. Based on these discussions and before a determination whether a new 401 WQC would be required for this project or whether the 1998 vintage 401 WQC would be sufficient to embrace the newly conceived Brunswick Harbor Modifications, we request that information be provided to EPD regarding dissolved oxygen profile data in the project vicinity as to support the assertion of minimal, temporary water quality effects cited on pages 89-90 of the USACE June 2020 Draft Integrated Feasibility Report & Environmental Assessment and Draft FONSI. We also request information on the characteristics of the sediments to be dredged at the specific new project footprints (the Turning Basin and the Bend Widener).

The following sampling scheme as provided by EPD's Risk Assessment Unit should be executed to determine the quality of the sediments which will be removed by dredging during the BHM project:

12 core samples from the Turning Basin and 15 core samples from the Bend Widener area should be obtained. The core samples should be driven to 6 inches below the project dredging depth.

To determine the impact of sediment disposition at Andrews Island, both sediment samples and elutriate from those samples should be obtained from above the project depth. Sediment samples taken from 6" below the project depth will determine the quality of the sediments after dredging operations. If sediment is to be beneficially reused (i.e., placed on Bird Island or other marshy area), a toxicity bioassay for benthic organisms should be conducted using sediment samples of the dredged material above the project depth.

Sediment samples may be composited to reduce the number of samples to analyzed. Samples in a composite should represent sediments taken from approximately the same depth and from the

same geographic area within the dredging area.

- Composites should be comprised of no more than three samples.
- Core material above the project depth will be composited.
- Core material below the project depth (additional six inches) will be composited separately.
- Cores from areas known or suspected to consist of impacted sediments (e.g. outfall or spill areas) are not to be composited with cores from other areas.

All composited sediment samples, and sediment elutriate from the project depth samples should be analyzed for metals (including Mercury), organochlorine pesticides, PCBs, and PAHs.

We thank you for your coordination on this project and for providing the requested water quality and sediment sampling information as would allow EPD to determine whether the 401 WQC from the previous 1998 harbor deepening will be sufficient for this new Brunswick Harbor Modification project or whether a new 401 WQC would be in order.

Stephen C. Wiedl, PWS
Manager – Wetlands Unit
Georgia Environmental Protection Division
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MARK WILLIAMS
COMMISSIONER

DOUG HAYMANS
DIRECTOR

August 6, 2020

Ms. Kim Garvey
USACE Savannah District
CESAS-PD.SAS@usace.army.mil
Kimberly.L.Garvey@usace.army.mil

RE: CZMA Federal Consistency Determination: Request for Extension of Time and Phased or Supplemental Determination – Brunswick Harbor Modifications Study, Brunswick Harbor, Glynn County, Georgia

Dear Ms. Garvey:

Staff of the Georgia Coastal Management Program (GCMP, the Program) have reviewed your June 9, 2020 letter requesting concurrence with the federal consistency determination contained in the June 2020 Brunswick Harbor Modification Study Draft Integrated Feasibility Report and Environmental Assessment and Draft Findings of No Significant Impact (FONSI). The U.S Army Corps of Engineers, Savannah District (the Corps) is investigating the feasibility of navigation channel improvements in the Brunswick Harbor from St. Simons Sound to the Colonel's Island Terminal to reduce transportation cost inefficiencies experienced by the largest ship type utilizing the harbor.

The Tentatively Selected Plan, Alternative 8, includes dredging 205,000 cubic yards (cy) of material from a 321' x 2,700' (maximum) bend widener; 346,000 cy from a 100'-170' x 1,000' turning basin expansion, and 0 cy from a naturally deep 800' x 10,000' meeting area at St. Simons Sound. Dredge material from the bend widener would first be considered for beneficial use (BU) on Bird Island. Otherwise it will be placed in the Andrews Island Dredge Material Containment Area (DMCA). It is expected that all dredge material from the turning basin expansion will be placed in Andrews Island DMCA. Beneficial use has been considered, but no suitable location has been identified. Some physical characteristic data was collected in adjacent areas during the last deepening project (circa 2005-2008) and additional borings and sediment data will be collected from the areas to be modified as part of the feasibility-level engineering design and included in a final report.

Resource agencies have requested a more specific description of the additional borings and sediment data collection (number and location) that is planned, as well as development of a contaminant testing protocol. The results of the contaminant testing may influence whether materials can be used beneficially. It has not yet been determined if a new, existing, or

modified Clean Water Act Section 401 Water Quality Certification will be required. The Georgia Water Quality Control Act, upon which the Water Quality Certification is based, is an applicable enforceable policy of the GCMP and Certification must be issued/modified/determined to be adequate before the Program can issue a concurrence or conditional concurrence with your Coastal Zone Management Act (CZMA) federal consistency determination. For this reason, we respectfully request an extension to review this project for consistency until such time as a decision is made on the Water Quality Certification.

Additionally, we will not be able to determine all reasonably foreseeable affects to coastal uses or resources until a decision is made whether to use material beneficially. We strongly support beneficial use of dredge material and adopted the River and Harbor Development Act (O.C.G.A. 50-9-1 et seq.) into law and the GCMP in 2005. We request that you expand Appendix J (federal consistency determination) to include this law in the Final Environmental Assessment. This Act requires grain size analysis (percent sand, clay and silt) to determine if material can be used beneficially. Materials containing a majority (51%) of sand should be considered for beneficial use. Predominantly sandy material (80% or more) does not typically require contaminant testing prior to BU placement if Tier 1 analysis indicates it is unlikely to contain contaminants. The Act also requires cost estimates (the cost over and above the Federal Standard) for beneficially using suitable material to determine if BU projects are feasible.

If the Corps receives Water Quality Certification prior to determining if material will be used beneficially, or prior to fully describing any proposed beneficial use in detail, we request the Corps submit a supplemental federal consistency determination addressing these deficiencies. If the Corps determines there will not be any beneficial use of dredge material associated with the project prior to or in conjunction with receiving Water Quality Certification, a supplemental federal consistency determination will not be required.

The St. Simons Sound Meeting Area expansion looks like it will encompass the naturally deep hole that was used to place dredge material from the Jekyll Creek section of the Atlantic Intracoastal Waterway (AIWW) in 2019 as a beneficial use project (placement area approximately 800' x 1,700' with center at 31.131486 x -81.401328). If this placement site falls into the expanded Federal Project, can it be used for future disposal of Jekyll Creek material and would additional permitting be required (e.g. Section 408) that could delay the project? We request this be addressed in the EA as a potential secondary impact (i.e. time delays for permitting and/or loss of an AIWW disposal site).

The Study mentions the possibility of using marsh thin layer placement (TLP) as a beneficial use for the dredge material removed (ref. Section 4.8 Future Conditions with Alternative 2, p. 91). Georgia partnered with the Corps in 2019 to construct a 5-acre TLP demonstration project on Jekyll Island to beneficially use AIWW dredge material. This is the first time this technique has been used in Georgia in a controlled environment that includes extensive (multi-year) data

collection to evaluate its merits and/or impacts. It has not yet been determined if this is a successful BU approach for Georgia and we do not recommend TLP as a BU at this time.

Andrews Island DCMA has experienced erosion and vegetative saltmarsh loss at the Weir #3 outfall since its installation in 2005 for the last Brunswick Harbor deepening project. Extended use of the outfall during deepening over a period of several months led to the loss of approximately $\frac{1}{4}$ - $\frac{1}{2}$ acre of *Spartina alterniflora*. While some corrective action was taken in 2009, including placement of rock along the eroding bank and under the mouth of the outfall, saltmarsh loss continues. This indirect impact was not foreseen during the 2005/2008 deepening, but additional vegetative loss is a reasonably foreseeable coastal impact if dredge material from the Brunswick Harbor modification project is placed in Andrews Island DCMA. We would like to see this potential impact to wetlands acknowledged in the Environmental Assessment Section 4.4 Environmental Consequences of Alternatives – Wetlands. We would also like to see steps taken to mitigate or reduce potential impacts, such as, but not limited to:

- Extend the weir pipe past the vegetated area so source of scour is further from vegetation
- Install a diffuser on the end of the pipe to reduce energy to the surrounding marsh
- Reduce the outflow volume/rate to reduce scour energy when operating the weir
- Place coarse material from the Turning Basin (346,000 cy material available) in the scour hole and on adjacent mudflat to elevation that would support vegetation. This option may have to be combined with one of the options above so that material is not scoured away
- Include language in the dredging contract that pre- and post-surveys of the vegetation surrounding Weir #3 outfall is documented (e.g. via UAV photos) and any loss in vegetation will be rectified by replanting (though there is going to need to be some additional source of sediments – if there is vegetation loss there is also loss in elevation that will need to be corrected)

The Coastal Marshlands Protection Act (O.C.G.A. 12-5-280 et seq.) included as a relevant enforceable policy in the Appendix J Federal Consistency Determination is an important law regulating dredging and other activities in coastal marshlands to ensure that values and functions are not impaired by these activities. The Corps is specifically exempt from obtaining a permit under this law [O.C.G.A. 12-5-295(3)] and Appendix J Section 4.0 Effects of Proposed Project – Required State, Federal, and Local Permits should be updated to reflect that. The Act should remain listed as a relevant enforceable policy even though an actual permit will not be required, since the guiding principles to safeguard the loss of values and functions remains applicable to this project.

Federal agencies are obligated to approve one request for an extension period of 15 days or less [15 CFR 930.41(b)]. We have requested an extension period until such time as the Georgia Water Quality Certification has been obtained, the date of which is not known at this time but could extend until June 8, 2021. Please let us know at your earliest convenience if this is

agreeable. If beneficial use projects are still being entertained at the time the Water Quality Certification is obtained, we will request a phased or supplemental federal consistency determination as developing information becomes available.

We appreciate the opportunity to comment on this proposal and look forward to working with you on the Brunswick Harbor modifications. Please feel free to contact Kelie Moore, Federal Consistency Coordinator, or me if we can be of additional assistance.

Sincerely,

A handwritten signature in black ink, appearing to read "J Andrews".

Jill Andrews
Coastal Management Section Manager

JA/km

cc: Stephen Fox, USACE, Stephen.M.Fox@usace.army.mil

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



July 8, 2020

VIA: EMAIL ONLY

COMMANDER

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

Re: *Brunswick Harbor Modification Study, User Comments*

Dear Colonel Hibner,

Thank you for the opportunity to comment. It has become apparent that changes in the fleet require review and design enhancement to support continued growth in Roll-On/Roll-Off (RO/RO) activities in the Port of Brunswick and we thank the USACE for doing so.

We support the completion of this project with the bend wideners and passing zones that are a key component of vessel traffic safety and are essential element to keep the port functioning efficiently. The Port of Brunswick has grown into a very large (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. Specifically, we respectfully ask that you consider these comments:

- Existing channel design matrix is over (20) years old, significant changes to the current fleet calling on the Port of Brunswick have been made since the original design was studied and completed. Further, the previous "model" ship has been scrapped and is out of service demonstrating the age of the previous study.
- Ocean-going RO/RO vessels in excess of the previous modeling have been able to transit the Federal Channel to Colonel's Island with certain navigational restrictions. We seek to minimize these restrictions, increase efficiency and enhance safety.
- In the pilots' experience these bend wideners were not addressed in the previous design study and now it is imperative they be enhanced.
- Large portions of the fleet calling on Brunswick today are NEO-PANAMAX class and/or very large RO/RO vessels and these channel improvements will no doubt reduce delays and increase efficiencies as this trade goes forward.
- These federally authorized channel improvements, including wideners, passing zones, and associated modifications, will greatly facilitate safe navigation while also substantially improving the versatility and efficiency of the Port.

If you have any questions please give us a call at 912-280-9464.

Regards,

Bruce Fendig
Brunswick Pilot

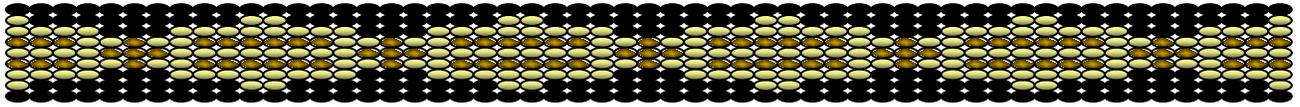
A handwritten signature in blue ink, appearing to read 'Bruce Fendig', with a long, sweeping underline.

CC: Sen. David Perdue, US Senator
Rep. Buddy Carter, US Congress, 1st District
USCG C/O MSU SAVANNAH
Griff Lynch, Executive Director, GA Ports
Jim Royal, Chairman Brunswick Pilot Commission

From: [William Buckley](#)
To: [Planning Branch Calendar](#)
Subject: [Non-DoD Source] Dredging of the St.Simons Sound and Turning Basin @ Colonels Island
Date: Wednesday, June 10, 2020 8:22:00 AM

The project at hand is the dredging of the St.Simons sound will greatly help the ship to navigate through the sound towards the terminals of Brunswick and Colonels Island.there is a huge area next to Andrew's Island that can be dredged as a turning Basin and terminal slip docking for ships and the excess dirt grading to build warehouse space, Cold Storage and residential Units on Andrews Island.

William Bee Buckley 06/10/2020



Catawba Indian Nation
Tribal Historic Preservation Office
1536 Tom Steven Road
Rock Hill, South Carolina 29730

Office 803-328-2427
Fax 803-328-5791

July 9, 2020

Attention: Kimberly L. Garvey
Army Corps of Engineers – Savannah District
100 W. Oglethorpe Avenue
Savannah, Georgia 31401-3604

Re. THPO #	SAC #	Project Description
2020-46-4		Feasibility of increasing transportation cost efficiencies in the deep draft Federal navigation channel at Brunswick Harbor, Glynn Co., GA

Dear Ms. Garvey,

The Catawba have no immediate concerns with regard to traditional cultural properties, sacred sites or Native American archaeological sites within the boundaries of the proposed project areas. **However, the Catawba are to be notified if Native American artifacts and / or human remains are located during the ground disturbance phase of this project.**

If you have questions please contact Caitlin Rogers at 803-328-2427 ext. 226, or e-mail Caitlin.Rogers@catawba.com.

Sincerely,

Wenonah G. Haire
Tribal Historic Preservation Officer



P.O. Box 2406
Savannah, GA 31402
USA

Toll Free (In U.S.): 800.342.8012

James C. McCurry, Jr.
Chief Administrative Officer

Email: jmccurry@gaports.com

Fax: 912.966.3615

Call Direct: 912.966.3608

July 9, 2020

Colonel Daniel H. Hibner
Commander
Savannah District
U.S. Army Corps of Engineers
100 W. Oglethorpe Ave.
Savannah, GA 31401

Dear Colonel Hibner:

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

As the local sponsor of the project, the Authority has been working to prepare the landside facilities to efficiently handle future cargo demands through the Brunswick facilities, investing approximately \$51 million in the last three years. A fourth cargo berth has been permitted by the U.S. Army Corps of Engineers and is currently under design. Additionally, the Colonel's Island Terminal has gone through port improvements over the last of couple of years. Specifically, 610 acres have been developed for vehicle processing and a further 478 acres remain permitted for future development. Other recent upgrades include increase in parking spots for automobiles from 60,000 to 90,000 units, upgraded road construction to handle increase in vehicle traffic, and funds approved for design of future rail expansion. The expansion will also increase GPA's rail capacity for autos at Brunswick, adding 14,100 feet of track to allow Brunswick to expand service in markets west of the Mississippi River and into the Midwest. In FY2019, more than 110,000 vehicles were transported to inland markets from Brunswick by rail. These landside improvements, along with the proposed channel modifications in the study will greatly facilitate efficient movement of cargo for United States exporters and consumers.

In FY2019, the Port of Brunswick handled 613,681 units of Roll-on/Roll-off cargo, an increase of 4%, or 23,000 units compared to the previous year. Including the 36,000 units moved via Ocean Terminal in Savannah, Georgia is the second busiest hub for the import-export of vehicles, machinery and other types of Ro/Ro cargo in the U.S. The Brunswick Harbor Modification Project is critical to servicing the American market and supporting the United States economy.

Sincerely,

A handwritten signature in blue ink, appearing to read "J. McCurry, Jr.", is written over the typed name and title.

James C. McCurry, Jr.
Chief Administrative Officer

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

Comment ID	Commenter	Comment Date	Comment Summary	Corps Response
6	Jennifer Dixon/ SHPO-GAHPD	6/10/2020	The subject project consists of modifying the Brunswick Harbor, to occur in two (2) phases. Phase I includes geotechnical boring investigations with 100-foot buffers around known anomalies, which is the subject of the current review. Phase II includes preconstruction, engineering, and design of the project, which will be addressed through a programmatic agreement (PA). Based on the information submitted, HPD concurs that no historic properties that are listed or eligible for listing in the National Register of Historic Places (NRHP) will be affected by Phase I of the undertaking, as defined in 36 CFR Part 800.4(d)(1), due to the scope of work. This letter evidences consultation with our office regarding Phase I of the undertaking for compliance with Section 106 of the NHPA. It is important to remember that any changes to this phase, as it is currently proposed, may require additional consultation. HPD encourages federal agencies to discuss such changes with our office to ensure that potential effects to historic resources are adequately considered in project planning. We look forward to working with you and continued consultation regarding Phase II.	Thank you for the comments. The Corps will continue to consult with the GAHPD as needed and engage in additional discussions for any changes to the Phase I process that affect the Section 106 compliance process.
7	Steve Wiedl/ GADNR-EPD	7/11/2020	We thank you for your coordination on this project and for providing the requested water quality and sediment sampling information as would allow EPD to determine whether the 401 WQC from the previous 1998 harbor deepening will be sufficient for this new Brunswick Harbor Modification project or whether a new 401 WQC would be in order.	On July 20, 2020, the Project Team, EPA and GADNR-EPD participated in a teleconference regarding comments received from both agencies. The result of that discussion led to agreement between the Corps, GADNR-EPD, and EPA on a scope of sediment testing that will be conducted. A request for 401 WQC was submitted to your office in August of 2020.
			we request that information be provided to EPD regarding dissolved oxygen profile data in the project vicinity as to support the assertion of minimal, temporary water quality effects	The Corps compiled historical DO data and provided it to GADNR-EPD.
			We also request information on the characteristics of the sediments to be dredged at the specific new project footprints (the Turning Basin and the Bend Widener).	The Corps is in the process of performing a subsurface investigation including physical and chemical characterization of sediment to be dredged. This information will be provided to GADNR-EPD.
8	Jill Andrews/ GADNR-CRD	8/6/2020	We respectfully request an extension to review this project for consistency until such time as a decision is made on the Water Quality Certification.	Thank you for your response. Your comment is acknowledged and the request to extend CZM Federal Consistency review has been granted on August 8, 2020.
			We strongly support beneficial use of dredge material and adopted the River and Harbor Development Act (O.C.G.A. 50-9-1 et seq.) into law and the GCMP in 2005. We request that you expand Appendix J (federal consistency determination) to include this law in the Final Environmental Assessment. This Act requires grain size analysis (percent sand, clay and silt) to determine if material can be used beneficially	Concur, the Corps has added discussion into Appendix J to reflect conditions found within The River and Harbor Development Act that are specific to this study. That discussion can be found in Section 5.0 of Appendix J.
8 (cont'd)	Jill Andrews/ GADNR-CRD	8/6/2020	If the Corps receives Water Quality Certification prior to determining if material will be used beneficially, or prior to fully describing any proposed beneficial use in detail, we request the Corps submit a supplemental federal consistency determination addressing these deficiencies. If the Corps determines there will not be any beneficial use of dredge material associated with the project prior to or in conjunction with receiving Water Quality Certification, a supplemental federal consistency determination will not be required.	Concur, if the Corps receives a Water Quality Certification prior to determining beneficial use, the Corps will submit a supplemental Federal consistency determination addressing these deficiencies.
			If the naturally deep hole placement site falls into the expanded Federal Project, can it be used for future disposal of Jekyll Creek material and would additional permitting be required (e.g. Section 408) that could delay the project? We request this be addressed in the EA as a potential secondary impact.	The AIWW "Deep Hole" placement pilot-project is located within the footprint of the proposed meeting area at St Simons Sound. The Deep Hole pilot-project is not a disposal area approved for regular use, but rather was intended as "proof of concept" to determine the fate and transport of sediment placed there. There are other deep hole locations (e.g. St. Andrews Sound) that would not be affected by the recommended plan and that may be available for potential AIWW disposal.

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

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