

**Atlantic Intracoastal Waterway Federal Navigation Channel  
Cumberland Dividings Maintenance Dredging  
Camden County, Georgia  
Environmental Assessment and FONSI**

**Appendix C**

**Public Comments**

**U.S. ARMY CORPS OF ENGINEERS  
SAVANNAH DISTRICT  
100 WEST OGLETHORPE AVENUE  
SAVANNAH, GEORGIA 31401  
January 2023**



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**From:** [Keyes, Tim](#)  
**To:** [Gregory, Alexander B CIV USARMY CESAS \(USA\)](#)  
**Cc:** [Moore, Kelie](#)  
**Subject:** [Non-DoD Source] FW: Public Notice: Creation of Bird Island Near Cabin Bluff  
**Date:** Friday, February 17, 2023 2:48:48 PM

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Alex,  
Here were questions from the adjacent landowner.  
Here was my response – but I gave him Erica’s contact.

Kelly,  
This project is an Army Corps project so they would be much better able to answer your questions. It is associated with routine dredging of the intracoastal waterway (ICW) between Cabin Bluff and Kings Bay to maintain the channel at 12 feet above Mean-Low-Low-Water. The current plan would result in a 2.7 acre sand island mostly hidden from view behind the small marsh island immediately across the ICW from your dock.  
DNR has been working in an advisory capacity to enhance the wildlife value of the project. Due to the proximity to your property we felt you want to be aware of the project. I would reach out to Erica Janocha at [erica.a.janocha@usace.army.mil](mailto:erica.a.janocha@usace.army.mil).  
I have attached the public notice which gives you a mechanism for comment.

All the best,

Tim Keyes

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**From:** Kelly Adcox <Kelly.Adcox@CoE22.com>  
**Sent:** Tuesday, January 17, 2023 1:16 PM  
**To:** Lee, Jason <Jason.Lee@dnr.ga.gov>  
**Cc:** Keyes, Tim <Tim.Keyes@dnr.ga.gov>  
**Subject:** Re: Public Notice: Creation of Bird Island Near Cabin Bluff

**CAUTION:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

All,

If I may, I have a few questions concerning the Bird Island project.

What is the target start date for this project? **COMMENT 1**

How long will the project last? **COMMENT 2**

What impact will this have on our church retreats? **COMMENT 3**

Will this project impact our view? [COMMENT 4](#)

Will there be an off-putting odor associated with this project? [COMMENT 5](#)

When was the last time this project was accomplished and was bird island used as the dump site? [COMMENT 6](#)

I appreciate your reply in advance.

Thank you,

In Christ,

Kelly Adcox  
General Manager  
The Retreat Center  
The Church of Eleven22  
912-674-1438

**From:** [Hill, Suzanne CIV USARMY CESAS \(USA\)](#)  
**To:** [Gregory, Alexander B CIV USARMY CESAS \(USA\)](#)  
**Cc:** [Garvey, Kimberly L CIV USARMY CESAS \(USA\)](#)  
**Subject:** FW: [URL Verdict: Neutral][Non-DoD Source] Re: Draft EA/FONSI Comment Review for Cumberland Dividings Maintenance Dredging- comments due Feb.10 2023  
**Date:** Tuesday, February 14, 2023 8:58:27 AM

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**From:** Pace Wilber - NOAA Federal <pace.wilber@noaa.gov>  
**Sent:** Monday, February 13, 2023 10:17 PM  
**To:** Hill, Suzanne CIV USARMY CESAS (USA) <Suzanne.Hill@usace.army.mil>  
**Cc:** Cynthia Cooksey - NOAA Federal <cynthia.cooksey@noaa.gov>  
**Subject:** [URL Verdict: Neutral][Non-DoD Source] Re: Draft EA/FONSI Comment Review for Cumberland Dividings Maintenance Dredging- comments due Feb.10 2023

Hi Suzanne.

## COMMENT 1

The NMFS has completed a review of the Cumberland Dividings Environmental Assessment, inclusive of the EFH Assessment, and FONSI, dated January 2023. In addition to the review of these documents, NMFS has also reviewed draft documents and participated in multiple pre-application meetings with the Savannah District and other nature resource agencies. NMFS has appreciated the extensive engagement on this project which has resulted in a preferred alternative that avoids and minimizes adverse impacts to EFH as much as practicable while identifying a beneficial use placement site (BU-E) that will maximize ecological benefits to the project area. Specifically, BU-E is a habitat restoration effort that will involve placement of dredge material into a portion of the AIWW which has experienced extensive erosion. The open water placement at BU-E will initially restore upland bird habitat, but as the site will not be hardened, it is expected to erode over time restoring sediment back into the system benefiting EFH from a regional sediment management perspective. NMFS deems the EFH Assessment comprehensive and complete and offers no conservation recommendations at this time.

Thanks,  
Pace and Cindy

On Wed, Jan 11, 2023 at 6:27 PM Hill, Suzanne CIV USARMY CESAS (USA) <[Suzanne.Hill@usace.army.mil](mailto:Suzanne.Hill@usace.army.mil)> wrote:

Cindy and Pace,

The Corps is pleased to announce that the Draft Environmental Assessment (EA)/Finding of No Significant Impact (FONSI) for the dredging and beneficial use of dredged material for bird island restoration project in the Atlantic Intracoastal Waterway Cumberland Dividings, Camden County, is now available for public comment. Please refer to the attached public notice for project

information. Link to the draft EA and associated appendices is below.

<https://www.sas.usace.army.mil/About/Divisions-and-Offices/Planning-Division/Plans-and-Reports/>

Additionally, we are requesting your review under the Magnuson-Stevens Fishery Conservation and Management Act. Please find attached the public notice, MSA coordination request letter and Appendix G which contains our essential fish habitat assessment. We are requesting receipt of comments by February 10, 2023.

Please reach out with any questions or comments. We appreciate your coordination on this project.

Thank you,

Suzy

Suzanne Hill  
NEPA Team Lead  
USACE Savannah District, Planning Branch  
Ph. 912.423.2324

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Pace Wilber, Ph.D.  
South Atlantic and Caribbean Branch Chief  
Habitat Conservation Division  
NOAA Fisheries Service  
331 Ft Johnson Road  
Charleston, SC 29412

843-592-3024 (NOAA Google Voice)

[Pace.Wilber@noaa.gov](mailto:Pace.Wilber@noaa.gov)

**From:** [White, Douglas](#)  
**To:** [CESAS-Planning](#)  
**Cc:** [Gregory, Alexander B CIV USARMY CESAS \(USA\)](#); [Buskey, Traci P.](#); [Kajumba, Ntale](#)  
**Subject:** [Non-DoD Source] EPA Comments Draft EA Cumberland Dividings AIWW Dredging USACE  
**Date:** Friday, February 10, 2023 1:11:15 PM

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Mr. Alexander Gregory  
U.S. Army Corps of Engineers  
Savannah District  
100 West Oglethorpe Avenue  
Savannah, Georgia 31401

Re: EPA Comments on the Draft Environmental Assessment of Cumberland Dividings  
Maintenance Dredging, Camden County, Georgia

Dear Mr. Gregory:

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 United States Army Corps of Engineers (USACE) has completed this Draft Environmental Assessment (EA) to evaluate impacts from proposed maintenance dredging within the Cumberland Dividings section of the Atlantic Intracoastal Waterway (waterway), and associated sediment placement. The purpose of the project is to maintain safe and efficient vessel traffic within the waterway that has been impacted by shoaling of the federally authorized channel.

To meet the project's purpose, USACE developed and analyzed the Proposed Action from a list of nine alternative sediment placement sites and bathymetric surveys of the waterway. The Draft EA also analyzes impacts from the No-Action Alternative. USACE's Proposed Action would carry out maintenance dredging with hydraulic cutterhead dredges to clear the waterway to its authorized depth of 12-feet, within the three sections of the 5-mile Cumberland Dividings stretch that have been identified as critically shoaled. Pipelines would transfer up to 316,000-cubic yards of dredged sediments to a small unnamed island north of the dredging site, identified as placement site BU-E. This island was selected through evaluation based on the criteria of minimal biological impacts, sufficient capacity for sediment storage, distance from dredging within limits of efficient pipeline use, and real estate access. Based on the EPA's review of the Draft EA, the following comments are provided for your consideration:

#### COMMENT 1

**Biological Resources:** The Proposed Action is regulated by the National Marine Fisheries Service's (NMFS) 2020 South Atlantic Regional Biological Opinion (SARBO). The 2020 SARBO 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 USACE is coordinating with NMFS and the United States Fish and Wildlife Service (FWS) on the development of this project. Section 3.3.3 of the Draft EA, Environmental Consequences, indicates that turbidity is not expected to extend far from dredging and placement sites. USACE has determined that potential impacts from the Proposed Action to threatened and endangered species would be minor and temporary.

**Recommendation:** The EPA principally defers to NMFS and FWS regarding compliance with the Endangered Species Act. The EPA recommends that any additional conservation measures identified by NMFS and FWS during consultation be implemented. The EPA also recommends that USACE implement turbidity monitoring and best management practices throughout the project, where required by the 2020 SARBO and necessary for the protection

of manatees.

## COMMENT 2

**Environmental Justice:** Executive Order 12898 directs federal agencies to identify and address the disproportionately high and adverse human health and environmental effects of their actions on minority and low-income populations, to the greatest extent practicable and permitted by law. Section 5.2 of the Draft EA, Executive Orders, states: “the Corps has determined that no group of people would bear a disproportionately high share of adverse environmental consequences resulting from the proposed work.” The EPA understands that the areas surrounding the Cumberland Dividings section is sparsely populated and primarily consist of protected lands and land owned by the U.S. Navy.

**Recommendation:** The EPA recommends that the environmental document identify the methodology that was used to determine that the Proposed Action would not contribute to disproportionate impacts on minority and low-income populations. The Environmental Justice Interagency Working Group *Promising Practices for EJ Methodologies in NEPA Reviews (Promising Practices)*, dated March 2016, provides guiding principles agencies can consider in identifying disproportionately high and adverse impacts on minority and low-income populations.

## ÔUT T ÔPVÁH

**Air Quality:** The location of the Proposed Action is Camden County, Georgia, which is in attainment status with the National Ambient Air Quality Standards. Section 3.1, Resources Dismissed from Detailed Analysis, indicates that temporary effects to air quality, particularly those from dredging and placement operations, will be minor.

**Recommendation:** The EPA recommends that USACE implement clean dredge technology to the maximum extent possible. A preference should be given to dredge fleets operating Tier 3 or greater diesel engines.

## ÔUT T ÔPVÁH

**Beneficial Use of Sediments:** The Proposed Action would dispose of dredged sediments on the 30-acre area of the BU-E island site. In general, using dredged material for beach nourishment and other environmentally sensitive applications is strongly encouraged and supported by the EPA. The EPA understands that sediment migration at the nourishment site will be monitored for a year following placement. Appendix E of the Draft EA discusses findings of the Tier 1 survey of shoaled sediments that was used to determine the suitability of placement at site BU-E.

The EPA appreciates the opportunity to review the Draft EA and looks forward to continued participation with Atlantic Intracoastal Waterway maintenance. If you have any questions regarding our technical recommendations, please contact me at [white.douglas@epa.gov](mailto:white.douglas@epa.gov) or at 404-562-8586.

Douglas White  
U.S. Environmental Protection Agency / Region 4  
Strategic Programs Office / NEPA Section  
61 Forsyth Street, SW  
Atlanta, GA 30303-8960  
404-562-8586



Sent via email: [CESAS-Planning@usace.army.mil](mailto:CESAS-Planning@usace.army.mil)

U.S. Army Corps of Engineers Savannah District  
Attn: Planning Branch/ Mr. Alexander Gregory  
100 West Oglethorpe Ave  
Savannah, GA 31401



February 10, 2023

*RE: Comments regarding Cumberland Dividings Draft Environmental Assessment (EA),  
Camden County, Georgia*

Dear Mr. Gregory,

Thank you for the opportunity to offer comments regarding the maintenance dredging of shoaled areas within the Cumberland Dividings area of the Atlantic Intracoastal Waterway. These comments are submitted on behalf of One Hundred Miles, a non-profit advocacy organization with the mission to preserve and protect, Georgia's 100-mile coast through education, advocacy, and community engagement. We represent over 1200 members throughout Georgia and the country.

One Hundred Miles recognizes that rising seas are affecting wildlife habitat as much as human habitat throughout coastal communities. As such, we generally support the use of beneficial dredge material to enhance degraded bird habitat as described in the Environmental Assessment (EA) posted for public comment. We appreciate the preparation of the EA and the details provided in the supplemental material and offer the following suggestions for the agency to consider prior to proceeding with the project.

#### COMMENT 1

First, we recommend an adaptive management plan be incorporated into the project in the case sea level change (SLC) or storm surge proves greater than expected. Section 3.10.3 of the EA states, "Placement at each location is intended to provide increased elevation or stabilization at each site, and this will help reduce the loss of habitat from SLC. Additionally, the dredging and placement activities will not contribute to climate change through release of greenhouse emissions" (page 68). However, considering that sea level on the Georgia coast is rising at an accelerated rate compared to recent historic rates<sup>1</sup>, we recommend this project incorporate a monitoring program and adaptive management strategy that would allow safe, additional dredge material to be applied to the site to increase the elevation, should SLC be greater than expected.

#### COMMENT 2

Second, we recommend that prior to placement of the dredge material, a thorough and comprehensive assessment be conducted to determine if the dredge material has unacceptable levels of toxic chemicals known to be found in the marshes, waterways, and estuaries of our coastal environment. For generations, Southeastern Georgia and Northeastern Florida have been home to many industrial facilities and U.S. Environmental Protection Agency

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<sup>1</sup> Sweet, W.V., et. al. "2022: Global and Regional Sea Level Rise Scenarios for the United States: Up- dated Mean Projections and Extreme Water Level Probabilities Along U.S. Coastlines." NOAA Technical Report NOS 01. National Oceanic and Atmospheric Administration, National Ocean Service, Silver Spring, MD, 111 pp. <https://oceanservice.noaa.gov/hazards/sealevelrise/noaa-nos-techrpt01-global-regional-SLR-scenarios-US.pdf>

(EPA)-designated Superfund sites. The sites still active on our coasts discharge known contaminants into waterways and the Superfund sites have left a legacy of contamination that will remain in our waterways for many more decades. Many of these toxins, especially illegally discharged contaminants such as mercury and polychlorinated biphenyls (PCBs), spread far from their source of origin<sup>2</sup> and bind to sediments with no available methods of treatment, apart from removal.<sup>3</sup> It is imperative that the dredged material be tested, and confirmation be offered to the public that the birds and other animals in contact with the material will not be harmed.

### COMMENT 3

Lastly, as you noted in the packet, manatees are present on our coast April through October. Dredging should only occur during times when manatees are not present, from mid-November through mid-March. Further, proper monitoring should take place during dredging activity to identify manatees in the area and halt dredging, as needed.

Thank you for the opportunity to comment on this project. Contact me at any time should you need more information or have questions regarding these comments and recommendations. I can be reached by cell phone at (912) 230-6494 and by email at [Alice@OneHundredMiles.org](mailto:Alice@OneHundredMiles.org).

Sincerely,



Alice M. Keyes  
VP of Coastal Conservation  
One Hundred Miles

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<sup>2</sup> "Exposure to mercury and Aroclor 1268 congeners in least terns (*Sternula antillarum*) in coastal Georgia, USA," *Environ.Sci.: Processes Impacts*, 2015, 17, 1424. DOI: 10.1039/c5em00183h

<sup>3</sup> "Remediation of Polychlorinated Biphenols (PCBs) in Contaminated Soils and Sediment: State of Knowledge and Perspectives." *Front. Environ. Sci.*, 17 July 2018, Sec. Environmental Toxicology, Volume 6 - 2018 | <https://doi.org/10.3389/fenvs.2018.00079>



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

DOCUMENT 5

COMMENT 1



**U. S. Fish and Wildlife Service**

RG Stephens, Jr. Federal Building  
 355 E. Hancock Ave, Room 320, Box 7  
 Athens, GA 30601  
 706-613-9493

2023-0019851

FWS Log No.

Planning Branch

Mr. Peter Maholland  
 Field Supervisor  
 U.S. Fish and Wildlife Service  
 RG Stephens Jr. Federal Building  
 355 East Hancock Avenue  
 Athens, Georgia 30601

Based on information provided, we concur with your determination that the project is not likely to adversely affect federally-listed species. No further action is required under Section 7(a)(2) of the Endangered Species Act. However, consultation should be resumed if the project changes, a new species is listed, or new data shows impacts to listed species may occur.

January 19, 2023

Dear Mr. Maholland:

Peter Maholland, Field Supervisor

Date

The U.S. Army Corps of Engineers (USACE), Savannah District (Corps) is proposing to conduct maintenance dredging of shoaled areas within the Cumberland Dividings of the Atlantic Intracoastal Waterway (AIWW) river mile 704.5-709.5. USACE has developed placement alternatives that prioritize beneficial use of dredged material placement area within the Cumberland Dividings in Camden County, Georgia. These alternatives will support the efforts of the USACE to maximize beneficial use of dredged materials in accordance with the implementing guidance for Section 125 of the Water Resources Development Act of 2020. The dredged material has historically been placed in Big Crab Island; a confined upland facility located on Naval Submarine Base Kings Bay.

Through a robust process of screening placement sites, the Corps is proposing placement of the dredged material on a highly eroded bird island (BU-E). Placement at BU-E will add additional material to the eroding bird island providing elevation and stabilization for the shoreline and restoring foraging and roosting habitat for birds. The enclosed biological assessment provides figures showing the location of these placement sites.

The Corps has prepared an Environmental Assessment (EA) in accordance with the National Environmental Policy Act (NEPA). The draft EA and draft Finding of No Significant Impact (FONSI) are now available for a 30-day public comment at: <http://www.sas.usace.army.mil/About/Divisions-and-Offices/Planning-Division/Plans-and-Reports/>. In accordance with the provisions of the NEPA, your comments on the Draft EA and FONSI are hereby solicited. 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/>.

The Corps, in accordance with the Section 7 of the Endangered Species Act (ESA) has made effects determinations for ESA-listed species that may occur in the project area. Our findings are detailed in the enclosed biological assessment and summarized below:

- No effect determination for the following species: nesting sea turtles, piping plover (*Charadrius melodus*), and rufa red knot (*Calidris canutus*).

- May affect, not likely to adversely affect determination for the West Indian manatee (*Trichechus manatus*) with implementation of Savannah District In-Water Construction Manatee Conditions as agreed upon between the Corps and your office.
- May affect but not likely to adversely affect wood stork (*Mycteria Americana*). While the project location is not located near existing rookeries, it is within the core foraging area of at least one rookery and may contain foraging habitat. However, there are large quantities of high-quality foraging habitat in proximity to the project area.
- May affect, but not likely to adversely affect Eastern Black Rail, as there are large quantities of higher quality habitat in proximity to the project area.

We are also requesting review of this action under the Fish and Wildlife Coordination Act. Please provide any comments you maybe have within 30 calendar days to [CESAS-Planning@usace.army.mil](mailto:CESAS-Planning@usace.army.mil). If you have any questions, you may contact Mr. Alexander Gregory via email, [Alexander.b.Gregory@usace.army.mil](mailto:Alexander.b.Gregory@usace.army.mil) or (912) 515-5148.

Sincerely,



Kimberly L. Garvey  
Chief, Planning Branch

Enclosure

DOCUMENT ID	COMMENT ID	NAME	ORGANIZATION	COMMENT SUMMARY	CORPS RESPONSE
1	1	Kelly Adcox	Cabin Bluff Retreat Center	What is the target start date for this project?	The anticipated start date for this action is in December 2022 - January 2023.
1	2	Kelly Adcox	Cabin Bluff Retreat Center	How long will the project last?	The project will have an approximate duration of 6-8 weeks.
1	3	Kelly Adcox	Cabin Bluff Retreat Center	What impact will this have on our church retreats?	The church retreats will not be affected by this project. While the proposed action involves dredging in the river, which may be visible to those on nearby land or boats on the river, the river will still be accessible for navigation. Furthermore, the placement work will occur greater than 700 feet away to the east of the nearest dock structure, ensuring that there will be no disturbance to activities to adjacent upland activities.
1	4	Kelly Adcox	Cabin Bluff Retreat Center	Will this project impact our view?	Only during construction will there be any equipment visible. Post-construction, where there was once intertidal habitat, there will now be an above water island suitable for bird roosting and nesting. This will attract many species of migratory birds which may improve the view from adjacent land.
1	5	Kelly Adcox	Cabin Bluff Retreat Center	Will there be an off-putting odor associated with this project?	The Corps does not expect that odor will have any impact to recreational boaters or nearby residents. The boats used for the proposed activities may release minor odors due to fuel emissions, but that will only be noticeable in the immediate vicinity of the boat. Additionally, the sand-dominant sediment that will be utilized to restore the bird habitat comes from the same river system and is not expected to have a noticeably different odor than the sediment already present.
1	6	Kelly Adcox	Cabin Bluff Retreat Center	When was the last time this project was accomplished and was bird island used as the dump site?	This section of the AIWW was last dredged 2001. The dredged material for that cycle was placed at an upland containment area, Big Crab Island, that is owned and managed by the Department of the Navy. This containment area is at capacity so there is no option to place additional material there. This presented an opportunity to beneficially use the sediment to restore habitat within the river system that has eroded or degraded due to natural erosion and tidal forces.
2	1	Pace Wilber	NMFS	<p>The NMFS has completed a review of the Cumberland Dividings Environmental Assessment, inclusive of the EFH Assessment, and FONSI, dated January 2023. In addition to the review of these documents, NMFS has also reviewed draft documents and participated in multiple pre-application meetings with the Savannah District and other nature resource agencies. NMFS has appreciated the extensive engagement on this project which has resulted in a preferred alternative that avoids and minimizes adverse impacts to EFH as much as practicable while identifying a beneficial use placement site (BU-E) that will maximize ecological benefits to the project area.</p> <p>Specifically, BU-E is a habitat restoration effort that will involve placement of dredge material into a portion of the AIWW which has experienced extensive erosion. The open water placement at BU-E will initially restore upland bird habitat, but as the site will not be hardened, it is expected to erode over time restoring sediment back into the system benefiting EFH from a regional sediment management perspective. NMFS deems the EFH Assessment comprehensive and complete and offers no conservation recommendations at this time.</p>	Thank you for your review and coordination of this project.

3	1	Douglas White	EPA	<p>Biological Resources: The Proposed Action is regulated by the National Marine Fisheries Service's (NMFS) 2020 South Atlantic Regional Biological Opinion (SARBO). The 2020 SARBO 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 USACE is coordinating with NMFS and the United States Fish and Wildlife Service (FWS) on the development of this project. Section 3.3.3 of the Draft EA, Environmental consequences, indicates that turbidity is not expected to extend far from dredging and placement sites. USACE has determined that potential impacts from the Proposed Action to threatened and endangered species would be minor and temporary.</p> <p>Recommendation: The EPA principally defers to NMFS and FWS regarding compliance with the Endangered Species Act. The EPA recommends that any additional conservation measures identified by NMFS and FWS during consultation be implemented. The EPA also recommends that USACE implement turbidity monitoring and best management practices throughout the project, where required by the 2020 SARBO and necessary for the protection of manatees.</p>	Thank you for your comment
3	2	Douglas White	EPA	<p>Environmental Justice: Executive Order 12898 directs federal agencies to identify and address the disproportionately high and adverse human health and environmental effects of their actions on minority and low-income populations, to the greatest extent practicable and permitted by law. Section 5.2 of the Draft EA, Executive Orders, states: "the Corps has determined that no group of people would bear a disproportionately high share of adverse environmental consequences resulting from the proposed work." The EPA understands that the areas surrounding the Cumberland Dividings section is sparsely populated and primarily consist of protected lands and land owned by the U.S. Navy.</p> <p>Recommendation: The EPA recommends that the environmental document identify the methodology that was used to determine that the Proposed Action would not contribute to disproportionate impacts on minority and low-income populations. The Environmental Justice Interagency Working Group Promising Practices for EJ Methodologies in NEPA Reviews (Promising Practices), dated March 2016, provides guiding principles agencies can consider in identifying disproportionately high and adverse impacts on minority and low-income populations.</p>	Additional information has been added to section 5.2 to clarify how the Corps made the determination.
3	3	Douglas White	EPA	<p>Air Quality: The location of the Proposed Action is Camden County, Georgia, which is in attainment status with the National Ambient Air Quality Standards. Section 3.1, Resources Dismissed from Detailed Analysis, indicates that temporary effects to air quality, particularly those from dredging and placement operations, will be minor.</p> <p>Recommendation: The EPA recommends that USACE implement clean dredge technology to the maximum extent possible. A preference should be given to dredge fleets operating Tier 3 or greater diesel engines.</p>	The Corps includes in our specifications that the dredge equipment must meet emissions standards. Given constraints of the procurement process, the Corps cannot give preference as requested.
3	4	Douglas White	EPA	<p>Beneficial Use of Sediments: The Proposed Action would dispose of dredged sediments on the 30-acre area of the BU-E island site. In general, using dredged material for beach nourishment and other environmentally sensitive applications is strongly encouraged and supported by the EPA. The EPA understands that sediment migration at the nourishment site will be monitored for a year following placement. Appendix E of the Draft EA discusses findings of the Tier 1 survey of shoaled sediments that was used to determine the suitability of placement at site BU-E.</p>	Thank you for your comment.

4	1	Alice Keyes	100 Miles	<p>First, we recommend an adaptive management plan be incorporated into the project in the case sea level change (SLC) or storm surge proves greater than expected. Section 3.10.3 of the EA states, "Placement at each location is intended to provide increased elevation or stabilization at each site, and this will help reduce the loss of habitat from SLC. Additionally, the dredging and placement activities will not contribute to climate change through release of greenhouse emissions" (page 68). However, considering that sea level on the Georgia coast is rising at an accelerated rate compared to recent historic rates<sup>1</sup>, we recommend this project incorporate a monitoring program and adaptive management strategy that would allow safe, additional dredge material to be applied to the site to increase the elevation, should SLC be greater than expected.</p>	<p>The bird island is intended to slowly erode over time and return sediment back into the system. Additionally, the last dredge event in this area was in 2001 so there will not be a frequent supply of material to maintain the island as this portion of the AIWW shoaling slowly. For these reasons we do not intend to implement an adaptive management plan; however, for future dredging events we will evaluate placement at this site and others based on the environmental conditions at that time.</p>
4	2	Alice Keyes	100 Miles	<p>Second, we recommend that prior to placement of the dredge material, a thorough and comprehensive assessment be conducted to determine if the dredge material has unacceptable levels of toxic chemicals known to be found in the marshes, waterways, and estuaries of our coastal environment. For generations, Southeastern Georgia and Northeastern Florida have been home to many industrial facilities and U.S. Environmental Protection Agency (EPA)-designated Superfund sites. The sites still active on our coasts discharge known contaminants into waterways and the Superfund sites have left a legacy of contamination that will remain in our waterways for many more decades. Many of these toxins, especially illegally discharged contaminants such as mercury and polychlorinated biphenyls (PCBs), spread far from their source of origin and bind to sediments with no available methods of treatment, apart from removal. It is imperative that the dredged material be tested, and confirmation be offered to the public that the birds and other animals in contact with the material will not be harmed.</p>	<p>The Tier 1 Analysis in Appendix E provides a characterization of the sediment, including recent sampling. The Tier 1 was provided for public review and comment during the comment period for the Draft EA. Additionally, the Tier 1 was provided to GADNR-EPD for their review under the Clean Water Act. This correspondence is also included in Appendix E.</p>
4	3	Alice Keyes	100 Miles	<p>Lastly, as you noted in the packet, manatees are present on our coast April through October. Dredging should only occur during times when manatees are not present, from mid-November through mid-March. Further, proper monitoring should take place during dredging activity to identify manatees in the area and halt dredging, as needed.</p>	<p>All conditions required by US Fish and Wildlife Service regarding manatees will be followed during this dredging and placement event. These conditions have been coordinated with USFWS, please see Appendix A for correspondence with USFWS.</p>
5	1	Peter Maholland	US Fish and Wildlife Service	<p>Based on the information provided, we concur with your determination that the project is not likely to adversely affect federally-listed species. No further action is required under Section 7(a)(2) of the Endangered Species Act. However, consultation should be resumed if the project changes, a new species is listed, or new data shows impacts to listed species may occur.</p>	<p>Thank you for your review and coordination of this project.</p>