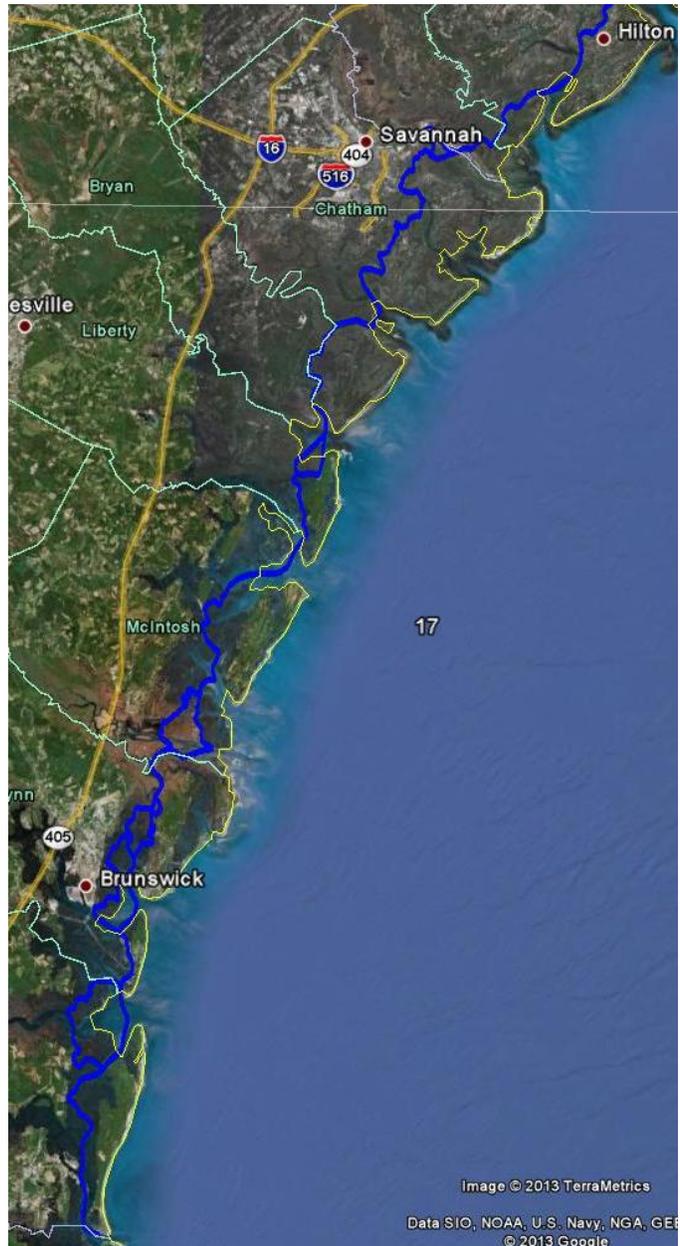

Dredged Material Management Plan
Atlantic Intracoastal Waterway
Port Royal Sound, South Carolina to Cumberland Sound,
Georgia
November 2015

Appendix A:
Correspondence



**US Army Corps of
Engineers®**
South Atlantic Division
Savannah District



August 21, 2007

MEMORANDUM

TO: The Honorable Jack Kingston
The Honorable Eric Johnson
Office of the Governor
U.S. Army Corps of Engineers
Georgia Department of Transportation
Georgia Marine Business Association

FROM:  Coastal Resources Division, Georgia Department of Natural Resources

SUBJECT: AIWW Maintenance Dredging and Disposal

Thank you for the opportunity to attend today's dialogue regarding the dredging challenges associated with the Atlantic Intracoastal Waterway (AIWW) maintenance and disposal of dredge material. Following is background regarding this issue, specifically, the background behind the Department of Natural Resources' policy decision regarding unconfined disposal on certain sites.

Several thousand vessels traverse the Georgia portion of the AIWW each year with increasing difficulty, since many portions have not been maintained at the authorized depth of 12 feet for nearly a decade, leaving nine areas currently impassable at low tide. When maintenance dredging was performed in the past, the majority of spoil materials were disposed of on up to 7,000 acres of state-owned saltmarsh that had been set aside via easements obtained for that purpose in 1940.

While only about half of these 100-200 acre saltmarsh easement sites have ever been utilized, some remain problematic. There is an adverse impact associated with pumping dredge spoil material onto pristine saltmarsh that has not been confined or had any type of barrier erected to keep the material inside the easement area. Dredge spoils spread out, covering much larger areas of saltmarsh than intended, leading to hundreds of acres of additional habitat loss. Georgia recognized that allowing disposal in any additional saltmarsh areas was contrary to public interest in safeguarding this vital natural resource by adopting the Coastal Marshlands Protection Act of 1970. O.C.G.A. 12-5-288 (b) specifically states: "The amount of marshlands to be altered must be minimum in size. ***The following activities and structures are normally considered to be contrary to the public interest when located in coastal marshlands*** but the final decision as to whether any activity or structure is considered to be in the public interest shall be in the sound discretion of the committee: (3) ***Construction of dump sites and depositing of any waste materials or dredge spoil;***" [emphasis added]. For similar reasons South Carolina has prohibited not just new but all unconfined saltmarsh disposal.

Memorandum: AIWW Maintenance Dredging and Disposal

August 21, 2007

Page 2

In areas where the dredge spoils are composed of clays and very fine-grained, light-weight material, such as Creighton Narrows, Little Mud/South River and Jekyll Creek, most of the dredge materials rapidly run off the marsh disposal site back into the estuary where they remain suspended in the water column, killing marine life, degrading essential fish habitat, and necessitating more frequent dredging. Following repeated fish kills associated with dredging in these three areas in the early 1990's, the Corps of Engineers and the Georgia Department of Natural Resources partnered in water quality studies at the worst of these sites, Jekyll Creek, and concluded that alternative dredge spoil disposal methods and/or sites were essential to adequately protect natural resources and reduce the need for frequent dredging.

In 1998 the DNR Commissioner informed the Colonel of the Savannah District, Corps of Engineers that the continued practice of placing dredged materials from the AIWW onto unconfined saltmarsh disposal sites was not consistent with the Georgia Coastal Management Program and that the resulting impacts to Essential Fish Habitat were contrary to the federal Magnuson-Stevens Fishery Conservation and Management Act. The Commissioner requested the Colonel to commit to implement a policy over the next three years that would reduce or eliminate unconfined disposal of dredged materials, with priority given to developing alternative disposal techniques for sites with fine-grained materials.

While numerous meetings were held to discuss concepts during that three-year period and continue today, the specifics of which are included in the attached addendum, little progress has been made towards the Corps' development of an environmentally sound and efficient AIWW maintenance dredging and disposal policy. The Corps' has not performed any dredging in Georgia for over seven years (nine years in some places, such as Jekyll Creek). The initial concepts and recommendations that were developed nearly a decade ago, however, remain applicable today and the Georgia Department of Natural Resources remains committed to assisting the Corps' of Engineers with development and implementation of both short-term and long-term strategies that will not only protect our vital natural resources but also meet the needs of national security, interstate commerce, commercial fishing and recreational users of the Atlantic Intracoastal Waterway.

cc: Commissioner Noel Holcomb

Addendum

AIWW Maintenance Dredge Disposal Issues and Concepts GADNR, Coastal Resources Division

Biological Issues:

- Fine-grained particles that run off from unconfined marsh disposal sites into adjacent waterways are suspended in the water column and clog finfish and shrimp gills, smother fish and crab eggs, and clog bivalve (oysters, clams) siphons, killing a wide variety of marine life
- Fine-grained particles suspended in the water column reduce the water's ability to incorporate dissolved oxygen and when the dissolved oxygen content of water is too low fish swimming through the area don't have enough oxygen to "breathe" and can die or become weakened and susceptible to disease
- Sediments that accumulate over sandy or rocky waterbottoms make those areas inhospitable to animals that prefer a firm substrate, thereby reducing available essential fish habit
- Dredge spoil deposited on unconfined marsh areas spreads out past the boundaries of authorized easements, resulting in the unintended loss of hundreds of additional acres of saltmarsh

Problematic Dredging Areas:

- There are 3 reaches of the AIWW that contain fine-grained sediments:
 - Jekyll Creek is 14,750 ft. long and requires 500,000 cy of annual dredging
 - Materials are placed on Spoil Area #52A (easement area = 116 acres) or
 - Materials are placed on Spoil Area #52B (easement area = 95 acres)
 - Little Mud/South River is 13,900 ft. long and requires 413,000 cy of annual dredging
 - Materials are placed on Spoil Area #32A (easement area = 281 acres)
 - Materials are placed on Spoil Area #30A (easement area = 269 acres)
 - Creighton Narrows is 4,500 ft. long and requires 121,500 cy of annual dredging
 - Materials are placed on Spoil Area #25E (easement area = 43 acres)
- The other 6 areas that are currently impassable at low tide [Field's Cut, Hell's Gate, Florida Passage, Altamaha Sound, and Buttermilk Sound] do not contain fine-grained sediments that pose water quality concerns. Dredge spoil disposal on unconfined marsh sites could continue in the short-term if long-term solutions to unconfined disposal are being actively pursued.

Alternative Methods and Concepts:

- **Limit the time of year dredging takes place:** Juvenile shrimp, crabs and finfish use these areas most heavily in the late spring, summer and early fall, when the waters natural ability to absorb dissolved oxygen is reduced by high water temperatures. Limiting dredging events to the cooler months could reduce marine life mortality.
- **Confine the disposal sites with berms:** Berms need to be short and wide or they will sink into the soft marsh. Because the berms need to be short, the disposal sites would need to be expanded to gain the capacity needed for a 10-15 year lifespan before they were full. The current easement areas for the 3 problematic sites are about 800 acres and they would have to be expanded by another 350 acres. It will be difficult and expensive to obtain and move large amounts of berm material (sand & gravel), and the loss of vast amounts of public marshlands to dredge spoil may not be in the public interest, and thus contrary to the Marsh Act. This would have associated federal consistency issues.

- **Confine the disposal sites with geo-tubes:** It is speculated that the dredge material itself could be used to construct a small berm if it were pumped directly into long, fiber-mesh, geotextile tubes and placed along the circumference of the easement areas. It is unknown whether the dredge materials would be so fine-grained that they would flow directly through the tubes or if a flocculating agent could be added to the spoil to make it settle out and stay in the tubes. Because these tubes are circular and not wide-based, they may sink into the marsh, perhaps before they can be filled to capacity. If the berms are successful they could confine materials pumped into the interior of the easement areas. If they sink, geo-tube may be able to be placed one on top of another until they form a stable berm. The Department is very supportive of conducting a small-scale dredging project to investigate this technique.
- **Convert mud flats to saltmarsh:** Where there are shallow, non-productive mud flats adjacent to existing saltmarsh, it may be possible to create a dike or jetty with rocks and fill the area with dredge spoil material until it reaches the elevation of the adjacent marsh, then plant the area with saltmarsh grasses. The large rock needed for the dike/jetty may be expensive and difficult to transport into shallow waters and there will be a loss of Essential Fish Habitat. It may be possible to create new Essential Fish Habitat in another area that would compensate for the loss. The Department is supportive of investigating this method if an appropriate site can be identified.
- **Restore historic river flows:** In at least one area, the Jekyll Creek reach, historic river flows were reduced when the Georgia Department of Transportation constructed the Jekyll Island Causeway. Initial research has been done that indicates if two bridges were placed in the causeway to reconnect the Latham River with Jekyll Creek, natural historic water flows would be restored, thereby increasing the velocity of water traveling through that reach, and reducing the amount of sediments that settled out of the river and reducing the amount of material to be dredged. The Department is very supportive of continuing/reviving research into this restoration project. The Department also supports investigating if roads or stream diversions have impacted historic flows in other areas of the AIWW that shoal in rapidly, and identifying other potential restoration areas.
- **Use ocean disposal sites:** Materials would have to be tested for toxic materials before being pumped to the ocean. Materials can easily be pumped approximately 20,000', but it becomes less feasible for longer distances due to equipment costs. All of the problematic sites are more than 20,000' from the ocean. Placing fine-grained materials in the ocean may cause water quality issues and loss of marine life, thereby shifting the current problems. The creation of any new ocean disposal sites would have to be approved by the Environmental Protection Agency.
- **Agitation dredging:** Some waterways can be stirred up so that the bottom sediments are suspended in the water column and are swept out with the tide. There is not enough tidal flushing in any of these problematic areas for this method to work and it is generally not favored because of water quality concerns.
- **Use/create upland confined disposal sites:** Upland non-marsh disposal sites could be purchased and confined, but availability of upland is low and cost is high. It is unknown if the dried sediments would make a suitable load-bearing substrate for future development on the site. It may be possible to use an upland site to temporarily dewater the dredge spoil materials, which could take 1-2 years, and then truck the materials offsite to a waste disposal site or for alternative use – maybe as a concrete or other industrial additive.

February 25, 2008

Mr. Bill Bailey
US Army Corps of Engineers
P.O. Box 889
Savannah, Georgia 31402-0889



RE: Atlantic Intracoastal Waterway Dredging Priorities for FY08, \$1.3M

Dear Mr. Bailey:

In your February 6, 2008 e-mail you asked for our concurrence with your interpretation of our August 21, 2007 letter regarding AIWW Maintenance Dredging and Disposal and the Corps' proposed prioritization for the \$1.3 million in funding obtained for the current fiscal year. Your proposed priority is Hell's Gate, Florida Passage, Buttermilk Sound, Altamaha Sound, and Field's Cut. An alternative, and more preferable, prioritization would be: Hell's Gate, Buttermilk Sound, Field's Cut, Florida Passage, Altamaha Sound, and Elba Cut.

All of these areas were listed in our August 21, 2007 letter as areas that currently use unconfined marsh disposal sites, but that did not contain fine-grained sediments that pose water quality concerns. Concerns remain in these areas, however, that dredge materials may spread past the boundaries of your authorized easements, resulting in the unintended loss of additional saltmarsh.

Coastal Resources Division has no objection to the proposed dredging in the portions of the AIWW stated above, and to the placement of the dredged materials in the unconfined disposal areas, so long as long-term solutions to unconfined disposal are pursued. In 1998, the Commissioner of the DNR informed the Savannah District that the continued practice of placing dredged materials from the AIWW onto unconfined saltmarsh disposal sites was not consistent with the Georgia Coastal Management Program and that the resulting impacts to Essential Fish Habitat were contrary to the Federal Magnuson-Stevens Fishery Conservation and Management Act. The Commissioner requested the District to commit to implement a policy over the next 3 years that would reduce or eliminate unconfined disposal of dredged materials, with priority given to developing alternative disposal techniques for sites with fine-grained materials. Based on the proposal before us today, there has been no progress by the Corps to identify, much less implement, alternative disposal practices.

Your February 6, 2008 e-mail states that a portion of the \$1.3M for FY08 will be used to resume efforts on long-term sediment placement needs and solutions. Should other sources of monies become available, the increase could be used, in part, to help identify long-term solutions. One possible long-term solution, as outlined in our August 21, 2007 letter, is using geotextile tubes to confine existing disposal sites. We are still very supportive of investigating this technique and conducting a small-scale dredging project in Jekyll Creek, the worst of these sites for water quality degradation.

AIWW Dredging Priorities
February 25, 2008
Page 2

To that end, we have arranged for a representative from TenCate Geotube® to conduct a "Lunch and Learn" session on April 15th from 11:30 – 1:00. We would like to extend our invitation to you and other Corps' personnel to join us in learning more about this technology and potential application on AIWW dredge disposal sites. Please contact Kelie Moore for arrangements to attend the presentation.

The Department of Natural Resources has not received from the COE a determination that the AIWW maintenance project is consistent with Georgia's Coastal Management Program, as required by 15 CFR Part 930. This letter should not be construed to be a concurrence that the project is consistent with Georgia's Coastal Management Program. Further, it is highly recommended that the proposal to dredge and dispose be coordinated with Federal and State Trust Resource Agencies, such as the US Fish and Wildlife Service and DNR's Wildlife Resources Division.

Sincerely,



Susan Shipman

SS/km



REPLY TO
ATTENTION OF:

DEPARTMENT OF THE ARMY
SAVANNAH DISTRICT, CORPS OF ENGINEERS
100 W. OGLETHORPE AVENUE
SAVANNAH, GEORGIA 31401-3640

MAP 0 9 2012

Executive Office

Ms. Joyce Bear, Representative
Native American Graves Protection and Repatriation Act
Muscogee (Creek) Nation
Post Office Box 580
Okmulgee, Oklahoma 74447

Dear Ms. Bear:

The Savannah District, US Army Corps of Engineers (Corps) is proposing to implement a Dredged Material Management Plan (DMMP) for the portion of the Atlantic Intracoastal Waterway (AIWW) that extends between Port Royal Sound/Hilton Head Island (AIWW Mile 552) and the Cumberland Sound/Florida state line (AIWW Mile 713), approximately 161 miles in Georgia and South Carolina. In addition to the navigation channel the AIWW project includes 71 dredged material disposal tracts totaling approximately 14,251 acres located along that waterway.

The DMMP will outline a 20-year dredged material maintenance strategy based on dredging volume and frequency projections for the Savannah District portion of the AIWW. The plan will likely require creation of confined upland disposal facilities for the dredged material or possibly off-shore disposal areas.

The DMMP is still in development stages and the potential new confined disposal facility sites and off-shore disposal areas have not yet been identified. The activities that may be proposed in the plan may have an effect upon historic properties included in or eligible for inclusion in the National Register of Historic Places. To comply with Section 106 of the National Historic Preservation Act (NHPA) (16 U.S.C. 470h-2(f)) and 36 CFR Part 800, we will implement a Programmatic Agreement to develop a survey strategy to ensure that the historic property investigations are completed in all areas of this project prior to dredging or disposal of excavated sediments.

An Environmental Impact Statement is being prepared to analyze the environmental impacts from implementing the DMMP. That document will be coordinated separately with your tribe to comply with the National Environmental Policy Act.

In accordance with Section 106 of the NHPA and 36 CFR Part 800, we would like to solicit your interest in this project. Please review the enclosed information and submit your comments on our proposed undertaking.

If you have any questions, please direct them to Ms. Julie Morgan, Planning Division Archaeologist, at (706) 856-0378. or by email to julie.a.morgan@usace.army.mil.

Sincerely,

A handwritten signature in black ink that reads "Jeffrey M. Hall". The signature is written in a cursive style with a large, stylized initial "J".

Jeffrey M. Hall
Colonel, US Army
Commanding

Enclosure

Project Information for Atlantic Intracoastal Waterway Dredged Material Management Plan

Location

The Atlantic Intracoastal Waterway (AIWW) is a continuous sheltered waterway used by commercial and private shallow-draft vessels. The waterway extends from Norfolk, Virginia to Florida. The Savannah District's authorized maintenance project is the 161 mile stretch between Port Royal Sound, South Carolina and Cumberland Sound at the Georgia/Florida border. That portion of the AIWW maintained by Savannah District is located in Chatham, Bryan, Liberty, McIntosh, Glynn, and Camden Counties, Georgia and the portion of Beaufort County, South Carolina, located between Port Royal Sound and Savannah River (Figure 1). Twenty-four (24) miles of the navigation channel are located in South Carolina; the remaining 137 miles are situated in Georgia.

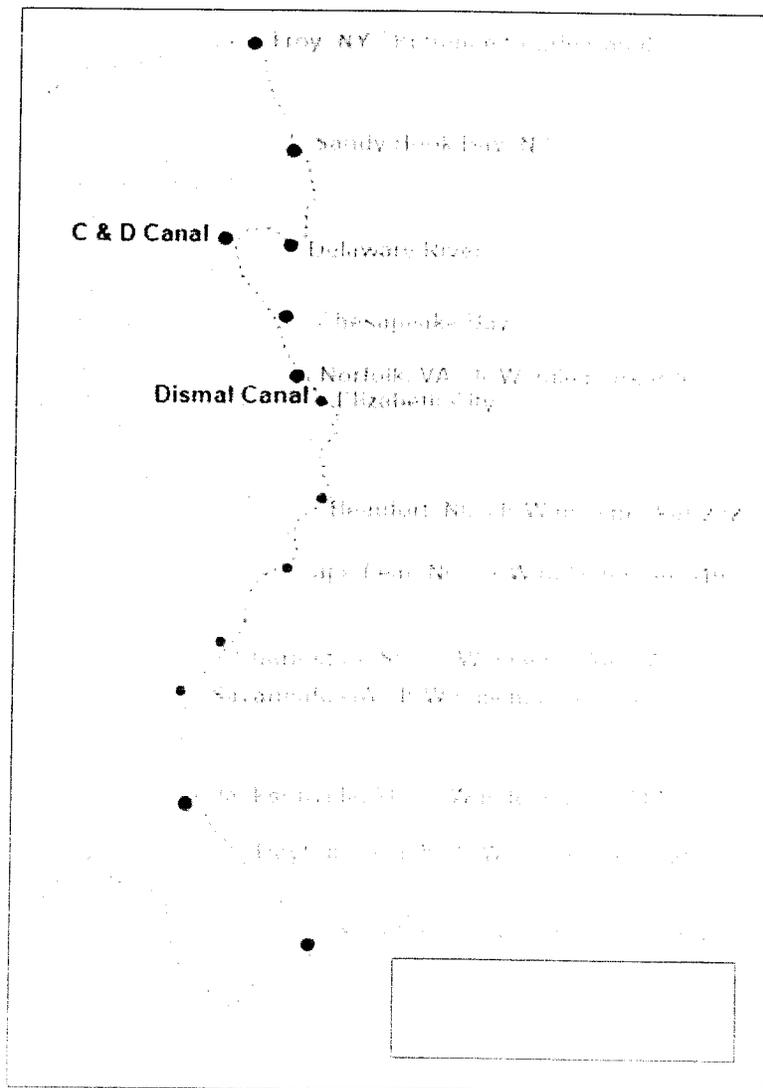


Figure 1. Atlantic Intracoastal Waterway

The AIWW is authorized to 12 feet deep with widths of 90 feet through land cuts and 150 feet in open water areas. In addition to the navigation channel, the AIWW project area consists of 71 tracts of varying acreage totaling approximately 14,251 acres along the waterway. Approximately 817 acres (3 tracts) are located in South Carolina. Nearly 13,434 acres (68 tracts) are in Georgia. The tracts are used to place the dredged material. This acreage total does not include one tract located along the southernmost Georgia reach near the U.S. Naval Submarine Base at Kings Bay, Georgia. The Navy is responsible for maintaining that reach of the waterway.

Description of Action (Undertaking)

The proposed Dredged Material Maintenance Plan (DMMP) will identify how much sediment will be removed to maintain the AIWW navigation channel and how that dredged sediment will be managed in an economically and environmentally sound manner. It is likely that the plan will include the development of upland confined disposal facilities (CDFs) for the containment of dredged sediments and materials. The precise locations of the proposed CDFs have yet to be determined, but they will be located on disposal tracts that are presently part of the AIWW project. Open-water placement of sandy dredged material and placement in Ocean Dredged Material Disposal Sites will also be addressed in the plan. The DMMP will cover dredging and disposal activities for a minimum of 20 years.

The undertaking, as defined in 36 CFR § 800.16(y), is the implementation of the DMMP.

Previous Surveys of the Savannah District portion of the AIWW

In 1979, Texas A&M University conducted reconnaissance level terrestrial and underwater surveys of selected portions of the AIWW. The purpose of the surveys was to locate archaeological (prehistoric and historic) sites and to develop a predictive model for site locations. The terrestrial survey covered the shoreline from Dolphin Head, which is located near Hilton Head, South Carolina extending south on the waterway to the southern tip of Cumberland Island at the Florida State Line. The shoreline and exposed banks were inspected from a boat for evidence of archaeological sites, and periodically the crew would conduct brief walk-overs of areas to determine if surface artifacts were present in association with the material in the river or creek bank. Seventeen archaeological sites were observed. Most of the sites consisted of scatters of shell which were occasionally mixed with prehistoric ceramics and/or historic materials. No excavations or further work was performed at any of the sites.

The underwater remote sensing survey located historic materials in various locations that may be associated with as many as four shipwrecks. More research was recommended to correlate the artifacts with known shipwrecks.

Savannah District has not conducted any additional cultural resources investigations of the AIWW since the Texas A&M University study. The National Register of Historic Places (NRHP) status of the sites is unknown.

A copy of the report will be sent to you by request.

Other Cultural Resources Investigations

A cursory review of the Georgia Site File indicates that there are numerous recorded archaeological sites in the vicinity of the AIWW, especially in Chatham County and on the larger barrier islands. More archival research will be necessary to determine if the resources are within the disposal tracts currently managed by Savannah District or tracts to be acquired.

Effects to Cultural Resources

At this time effects to cultural resources are unknown as survey data is incomplete, particularly remote sensing survey data of the reaches, and NRHP status is indeterminate for many recorded sites. Seventeen site locations were identified in the reconnaissance level survey of the AIWW that Savannah District funded, but no follow on investigations were conducted. As such, the integrity, the condition and the NRHP status of the sites recorded in 1979-1980 are unknown at this time.

Several sites have been recorded in the vicinity of the AIWW, but further archival research is required to determine if any of these sites will be impacted by the proposed actions in the DMMP.

Savannah District recognizes the activities that may be proposed in the DMMP may have an effect upon historic properties included in or eligible for inclusion in the National Register of Historic Places. Due to the large size of the project area it is recommended that a phased approach to survey work be developed. As such, Savannah District will implement a Programmatic Agreement (PA) as specified under 36 CFR § 800.14b(1) (ii). The PA will outline appropriate methodology for fieldwork and determine the treatment of significant cultural resources.

From: [CESAS-PD, SAS](#)
To: [Seyle, Charles W SAS](#)
Subject: FW: intent to prepare draft EIS on AIWW-comment (UNCLASSIFIED)
Date: Thursday, May 17, 2012 1:27:29 PM

Classification: UNCLASSIFIED
Caveats: NONE

-----Original Message-----

From: Wendy Larimer [<mailto:wlarimer@lighthousecg.com>]
Sent: Thursday, May 17, 2012 12:58 PM
To: CESAS-PD, SAS
Subject: intent to prepare draft EIS on AIWW-comment

May 17, 2012

Mr. Charles W. Seyle

US Army Corps of Engineers, Savannah District

ATTN: PD

Post Office Box 889

Savannah, GA 31402

RE: Intent To Prepare a Draft Environmental Impact Statement for a 20-Year Dredged Material Management Plan for the Atlantic Intracoastal

Waterway from Port Royal Sound, South Carolina, to the Georgia-Florida Stateline

Mr. Seyle:

As a representative of the Association of Marina Industries, I am writing to ask that the interests of the recreational boating community be a strong determining factor in the scoping process for maintenance dredging of the Atlantic Intracoastal Waterway from Port Royal Sound, SC southward to the GA/FL state line.

AMI is a non-profit membership organization dedicated exclusively to representing the marinas and the businesses that support them across the United States. In this capacity we are strongly aware of the

needs of recreational boaters who are the lifeline of marina businesses and we often work to ensure their needs are recognized.

The AIWW as a whole is a tremendous boating asset providing safe passage from New England to FL twice each year for those who move their boat to warmer waters in the winter. In addition, each small section of the ICWW is actively traversed by boaters heading out to deeper waters for fishing, or by those just looking for a place to spend the day floating or skiing.

For each of these boats there is a business landside that depends on them for their livelihood. Whether it's a bait & tackle shop, fuel dock, marina, or engine mechanic, each relies on the ICWW boaters to keep them profitable.

As the scoping process continues, please keep the needs of recreational boaters and the businesses that support them in the forefront of decision making and help ensure their safe passage is not impeded.

Sincerely,

Wendy Larimer

Legislative Coordinator

Association of Marina Industries

202/350-9623

www.marinaassociation.org

Classification: UNCLASSIFIED

Caveats: NONE



ATLANTIC INTRACOASTAL WATERWAY ASSOCIATION

May 18, 2012

Mr. Charles W. Seyle
US Army Corps of Engineers, Savannah District
ATTN: PD, Post Office Box 889
Savannah, GA 31402

Sent via email: CESAS-PD.SAS@usace.army.mil

Dear Mr. Seyle:

Greetings from the Atlantic Intracoastal Waterway Association. I am writing you today to discuss the Notice of Intent to conduct a new Draft Environmental Impact Statement (DEIS) for the maintenance dredging of the Atlantic Intracoastal Waterway (AIWW) from Port Royal Sound, South Carolina, southward to the Georgia-Florida state line. It is our understanding that The Corps' Savannah District intends to prepare the DEIS to analyze the impacts of the maintenance dredging of this portion of the AIWW for the next twenty years.

As the study is being prepared, we respectfully request to be added to any and all mailing lists and notices regarding the DEIS. Our association serves as a conduit to a number of users along the waterway and we would like to keep our members informed of any proposed actions so that they are able to provide comments at the appropriate time.

Thank you for your attention to our request and we look forward to learning more about the results of the study as it progresses. I can be reached via email at bpickel@seahavenconsulting.com.

Sincerely,

Brad Pickel
Executive Director

From: [CESAS-PD, SAS](#)
To: [Seyle, Charles W SAS](#)
Subject: FW: Responding comment to the Corps proposed DEIS (UNCLASSIFIED)
Date: Friday, May 18, 2012 3:35:04 PM

Classification: UNCLASSIFIED
Caveats: NONE

-----Original Message-----

From: Jeff Gregg [<mailto:greggjeffrey@bellsouth.net>]
Sent: Friday, May 18, 2012 9:26 AM
To: CESAS-PD, SAS
Subject: Responding comment to the Corps proposed DEIS

Mr. Charles W. Seyle
US Army Corps of Engineers
Savannah District

Sir:

This communication references the proposed DEIS evaluating the impacts of maintenance dredging along the AICW in Georgia. While the focus of your concerns will be with the navigable channels of the ICW, the dredging of which we strongly support as a benefit to recreational boaters, as a small private marina, we would like to take this opportunity to voice our ongoing frustrations with present Corps and Georgia DNR policies regarding permitting and disposal of dredge spoil as it relates to our entity and others like us. The Frederica Yacht Club is comprised of two floating docks with 72 slips located just south of Golden Isles Morning Star Marina on Lanier Island. The owners of these slips have formed an association based on the typical land based condominium model which functions as their representative and common property manager.

We, as the association board, have been working for years to get permission to dredge the near shore area of our facility, which, at low tide, is so shallow that 12 of our slips are rendered useless for anything larger than a small outboard powered skiff. However Corps policy is so onerous that attempting compliance would make it cost prohibitive for our organization. Specifically, we would like to see the Corps grant access to its disposal sites (e.g. Andrews Island) so that we would not be forced to obtain coastal property for this purpose. Alternatively, permission to deposit the silt off shore would be acceptable. It seems to us that evaluating any dredging plan must take into account the needs of all users and to provide them with sensible and affordable means of maintaining the usefulness of their facilities.

Thank you for your attention.

Frederica Yacht Club Owners Association - 912-571-6035
greggjeffrey@bellsouth.net
Craig Rudow-President
Jeff Gregg-Vice President
Phyllis Holeman-Secretary
Joan Lewis-Treasurer
Ben Nelson-At Large

Classification: UNCLASSIFIED
Caveats: NONE

South Carolina Department of Natural Resources



PO Box 12559
Charleston, SC 29422
843.953.9305 Office
843.953.9399 Fax
WendtP@dnr.sc.gov

Alvin A. Taylor
Director
Robert D. Perry
Director, Office of
Environmental Programs

May 21, 2012

Mr. Charles W. Seyle
U.S. Army Corps of Engineers
Savannah District
ATTN: PD, PO Box 889
Savannah, GA 31402

RE: Notice of Intent to Prepare a Draft Environmental Impact Statement for a 20-Year Dredged Material Management Plan for the Atlantic Intracoastal Waterway from Port Royal Sound, South Carolina, to the Georgia-Florida Stateline

Dear Mr. Seyle:

The South Carolina Department of Natural Resources (SCDNR) is submitting this letter in response to the Notice of Intent (NOI) to prepare a Draft Environmental Impact Statement (DEIS) for a 20-Year Dredged Material Management Plan (DMMP) for the Atlantic Intracoastal Waterway (AIWW) from Port Royal Sound, South Carolina, to the Georgia-Florida Stateline. The DEIS will evaluate the anticipated 20-year maintenance dredging needs for this portion of the AIWW, and alternative disposal options, including using existing upland confined disposal areas and Ocean Dredged Material Disposal Sites (ODMDS), establishing new ODMDS sites, constructing new upland confined disposal areas, constructing confining structures on existing marsh disposal areas, and using open-water disposal areas.

Briefly stated, SCDNR is concerned about the entire range of potential direct and indirect impacts the proposed DMMP might have on South Carolina's natural resources, including those in federal waters off the coast of South Carolina and northern Georgia. These include potential impacts to water quality, air quality, marine and estuarine resources, fish and wildlife habitat, threatened and endangered species, and other species of recreational, commercial, or ecological importance. As noted in the NOI, State natural resource agencies have requested that the Corps discontinue placement

Notice of Intent (NOI) to Prepare a Draft Environmental Impact Statement (DEIS) for a 20-Year Dredged Material Management Plan for the Atlantic Intracoastal Waterway from Port Royal Sound, South Carolina, to the Georgia-Florida Stateline

of fine-grained dredged material on unconfined saltmarsh sites. The SCDNR concurs with that request. In addition, SCDNR requests that the Corps consider restoring formerly used unconfined saltmarsh disposal sites to their original pre-disposal condition as possible compensatory mitigation for unavoidable impacts to other wetland areas. It should be noted that SCDNR has generally opposed open-water disposal of dredged material, except in an approved ODMDS or for the purpose of nourishing seriously eroded beaches with beach-compatible sand; however, SCDNR would be willing to consider other beneficial uses of dredged material where appropriate.

The SCDNR looks forward to continuing our coordination with the Corps on this project, and working with the other Federal and State natural resource and regulatory agencies to ensure that all relevant environmental issues are adequately addressed in the DEIS.

Sincerely,

A handwritten signature in cursive script, reading "Priscilla H. Wendt".

Priscilla H. Wendt
Office of Environmental Programs/ MRD

Cc: SCDHEC/ EQC
SCDHEC/ OCRM
NOAA/NMFS
USFWS
USEPA

May 21, 2012

Mr. Charles W. Seyle
Planning Division, Savannah District
U.S. Army Corps of Engineers
P.O. Box 889
Savannah, GA 31402

Via E-Mail: CESAS-PD.SAS@usace.army.mil

Re: Notice of Intent to Prepare a Draft Environmental Impact Statement for a 20-Year Dredged Material Management Plan for the Atlantic Intracoastal Waterway from Port Royal Sound, South Carolina, to the Georgia-Florida Stateline – Docket No. COE-2012-0011.

Dear Mr. Seyle:

The National Marine Manufacturers Association (NMMA) appreciates the opportunity to comment on the U.S. Army Corps of Engineers plan to prepare a Draft Environmental Impact Statement (DEIS) to analyze the impact of maintenance dredging to a portion of the Atlantic Intracoastal Waterway (AIWW) including the disposal of dredged materials.¹ The waterways under consideration (the AIWW from Port Royal Sound, South Carolina, southward to the Georgia-Florida state line) include popular recreational boating areas.

NMMA encourages the Corps to move forward with dredging the proposed sites and to consider in its DEIS the importance of dredging to recreational boating. Adequate and consistent access to the AIWW is important for recreational boaters and the businesses that support them. Businesses that provide provisions, entertainment, and services to boaters from local and transient vessels are notably stronger when the AIWW can provide consistent and reliable passage at a sufficient depth to accommodate these vessels. Safety is improved when the AIWW is kept at a consistent depth of 12 feet to accommodate a full breadth of recreational vessels.

Recreational boating has an estimated annual economic impact of \$72 billion. Eighty-three million Americans participated in boating in 2011. In 2011, 34.8 percent of adults went boating

¹ [77 Fed. Reg. 23,668](#) (Apr. 20, 2012) (additional information about the DEIS can be found at <http://www.sas.usace.army.mil/op/navigationbranch.html>).

Executive Committee

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NMMA

and retail sales of boats, accessories and marine services were \$32.3 billion. Importantly, an estimated 83 percent of boats sold in the U.S. in 2011 were made in the U.S.²

NMMA is the leading association representing the recreational boating industry in North America. NMMA member companies produce more than 80 percent of the boats, engines, trailers, accessories and gear used by boaters and anglers throughout the U.S. and Canada. The association is dedicated to industry growth through programs in public policy advocacy, market statistics and research, product quality assurance and promotion of the boating lifestyle. Please contact me at 202-737-9766 or csquires@nmma.org for additional information or if you have questions.

Sincerely

A handwritten signature in blue ink that reads "Cindy L. Squires". The signature is fluid and cursive, with the first name "Cindy" being the most prominent.

Cindy L Squires, Esq.
Chief Counsel for Public Affairs and Director of Regulatory Affairs

² The NMMA's 2011 [Recreational Boating Statistical Abstract](#).

From: [CESAS-PD, SAS](#)
To: [Seyle, Charles W SAS](#)
Subject: FW: proposed action and DEIS (UNCLASSIFIED)
Date: Tuesday, May 22, 2012 9:07:08 AM

Classification: UNCLASSIFIED
Caveats: NONE

-----Original Message-----

From: Ben Carswell [<mailto:bcarswell@jekyllisland.com>]
Sent: Monday, May 21, 2012 4:36 PM
To: CESAS-PD, SAS
Cc: C. Jones Hooks
Subject: proposed action and DEIS

Dear Mr. Seyle,

I am writing on behalf of the Jekyll Island Authority (JIA) to express our interest and concerns regarding the proposed maintenance dredging of the Atlantic Intracoastal Waterway (AIWW). The JIA is the Georgia government body that manages Jekyll Island, a public land holding, portions of which are leased by private businesses and residents. The JIA and the businesses that it supports, including Jekyll Harbor Marina and Jekyll Wharf, expect to benefit economically from the proposed dredging of the AIWW in Jekyll Creek. We are therefore in favor of such dredging if it can be done without negatively impacting the marshes and marsh hammocks adjacent to Jekyll Island, including those on both sides of Jekyll Creek, and with utmost care to avoid harmful interactions with wildlife.

Diked material disposal sites alongside Jekyll Creek are an unfavorable option from our perspective, regardless of whether or not these sites would be located on top of formerly disturbed areas because these locations are currently serving as valuable habitat for wildlife and plants. Furthermore, dikes that protrude substantially above the marsh surface would visually intrude upon the westward (sunset) view from the island, an outcome that I believe would be highly undesirable for the JIA, our visitors, residents, and businesses.

We would very much appreciate the opportunity to continue to be engaged in the EIS process for this proposed action. Please add my email and the following emails to your distribution list for this matter.

jhooks@jekyllisland.com
tnorton@jekyllisland.com
egarvey@jekyllisland.com

Kind Regards,

--

Ben Carswell, Conservation Manager
Office: (912) 635-9384 / Mobile: (912) 242-6222 /

Fax: (912) 717-6454 /
Email: bcarswell@jekyllisland.com

Jekyll Island Authority

100 James Road, Jekyll Island, GA 31527

<http://www.jekyllisland.com/email_sig.jpg>

<http://www.jekyllisland.com> <<http://www.jekyllisland.com/>>

Classification: UNCLASSIFIED
Caveats: NONE

From: [CESAS-PD, SAS](#)
To: [Seyle, Charles W SAS](#)
Subject: FW: Beneficial use of dredged material (UNCLASSIFIED)
Date: Tuesday, May 22, 2012 9:08:41 AM
Attachments: [Draft Umbrella-Dover Cr Propls 28DEC2011\(with ExecSum\).pdf](#)

Classification: UNCLASSIFIED
Caveats: NONE

-----Original Message-----

From: Clay Montague [<mailto:montaguec@earthlink.net>]
Sent: Tuesday, May 22, 2012 8:21 AM
To: CESAS-PD, SAS
Cc: Fred Voigt; Ashish Mehta
Subject: Beneficial use of dredged material

To: Mr. Charles Seyle, Savannah District, USACE

Dear Mr. Seyle,

I just realized your deadline was yesterday for comments on use of dredged material from the Georgia Intracoastal Waterway. However, I would like to mention restoration of fish habitat by filling obsolete navigation cuts as a beneficial use of dredged material. A good example may be Noyes Cut in the Satilla River estuary, which I understand the Savannah District considered closing some years ago.

Attached is a university research proposal for which I have been seeking funding. The purpose is to evaluate the efficacy of closing Noyes Cut to restore fish habitat by re-establishing salinity gradients, flow directions, and redirecting sedimentation in affected nearby tidal creeks and small rivers. The study involves calibrating a well-regarded hydrological model and examining field conditions of sediment movement, salinity, and flow.

If closing obsolete navigation cuts has the beneficial effects on fish habitat that I think are likely in cases like Noyes Cut, it should be a very acceptable use of dredged material.

I wish you would have a brief look at this proposal or share it with others you may know. I think the Savannah District should at least know of our interest in this study, and the district would be a good cooperator.

I would also appreciate your advice on possible funding sources, and if you have technical comments, those would be welcome too.

Yours sincerely,

Clay Montague

--

Clay L Montague, PhD
Associate Professor Emeritus
Howard T. Odum Center for Wetlands
Department of Environmental Engineering Sciences
University of Florida, Gainesville

Mailing Address: 245 Deerwood Creek Estates, Waverly, GA 31565-2301
Telephone and Fax: (912) 265-5435

Classification: UNCLASSIFIED

Caveats: NONE



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

Southeast Regional Office
263 13th Avenue South
St. Petersburg, Florida 33701-5505
(727) 824-5317; FAX (727) 824-5300
<http://sero.nmfs.noaa.gov/>

May 23, 2012

F/SER47:JD/pw

(Sent via Electronic Mail)

Colonel Jeffrey M. Hall, District Engineer
Savannah District Corps of Engineers
100 W. Oglethorpe Avenue
Savannah, Georgia 31402-0889

Attention: Charles Seyle

Dear Colonel Hall:

NOAA's National Marine Fisheries Service (NMFS) reviewed the Federal Register notice announcing the Savannah District's intent to prepare an Environmental Impact Statement (EIS) for a 20-year dredge material management plan for the Atlantic Intracoastal Waterway (AIWW) from Port Royal Sound, South Carolina, to the Georgia-Florida border (77 FR 23668; April 20, 2012). The EIS would examine the impacts of maintenance dredging, including disposal of dredged material, to portions of the AIWW and update the EIS prepared for the project in 1976. As the nation's federal trustee for the conservation and management of marine, estuarine, and anadromous fishery resources, the following comments and recommendations are provided pursuant to authorities of the Fish and Wildlife Coordination Act and the Magnuson-Stevens Fishery Conservation and Management Act (Magnuson-Stevens Act).

Most of this section of the AIWW has an authorized depth of -12 feet mean lower low water and width of 90 to 150 feet. Twenty of the 36 defined reaches from Port Royal Sound to the Georgia-Florida border require periodic dredging and five require dredging every one to five years. In the past, silty dredged material was pumped onto salt marsh and sandy dredged material was placed in open-water disposal areas. The alternatives the Savannah District intends to examine in the EIS would include disposal into existing dredged material containment areas (DMCAs) or newly constructed DMCAs; unconfined disposal into salt marshes; and disposal into existing ocean dredged material disposal sites (ODMDS) or newly established ODMDS. The EIS will also consider mitigation measures to avoid or reduce environmental impacts. A draft of the EIS is planned for release in summer 2012.

Essential Fish Habitat in the Project Area

Essential fish habitat (EFH) for several fishery species (e.g., white shrimp, brown shrimp, and estuarine-dependent species of the snapper-grouper complex) occurs along the entire AIWW from Port Royal Sound to the Georgia-Florida border, and specifically includes estuarine emergent vegetation (e.g., *Spartina*), intertidal mudflats, unconsolidated bottom, tidal creeks, and oyster aggregations. These habitats are designated EFH because larvae and juvenile fish concentrate, feed extensively, and shelter in these habitats. As a consequence, growth rates are high and predation rates are low, which makes these



habitats effective nursery areas. SAFMC provides detailed information on these species-habitat associations in *Fishery Ecosystem Plan of the South Atlantic Region* (which is available at www.safmc.net).

Recommendations

NMFS recommends the Savannah District conduct field studies to assess the impacts from past disposal activities so that study results can inform selection of options for managing the dredged material from the AIWW. In particular, NMFS would recommend the District analyze the direct, indirect, and cumulative impacts of disposing dredged material in salt marsh and open waters. Parameters that may inform the study include vegetation density, benthic infaunal diversity and abundance, sediment composition, and marsh surface elevation. NMFS would be happy to work with the Savannah District and other resource agencies on study plans that would meet these needs.

Designation of a new ODMDS would be a joint effort by the Savannah District and U.S. Environmental Protection Agency, and that effort would normally be done through a separate environmental review process. NMFS will refrain from commenting on a new ODMDS designation until that separate coordination is initiated.

Finally, in accordance with section 7 of the Endangered Species Act of 1973, as amended, it is the responsibility of the lead federal agency to review and identify any proposed activity that may affect endangered or threatened species and their habitat. Determinations involving species under NMFS jurisdiction should be reported to our Protected Resources Division at the letterhead address.

We appreciate the opportunity to provide these comments. Please direct related correspondence to the attention of Ms. Jaclyn Daly at our Charleston Area Office. She may be reached at (843)762-8610 or by e-mail at Jaclyn.Daly@noaa.gov.

Sincerely,



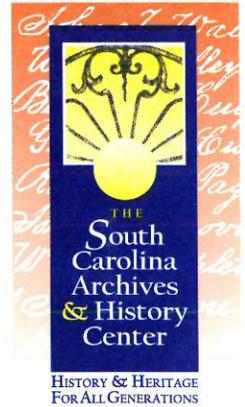
/ for

Virginia M. Fay
Assistant Regional Administrator
Habitat Conservation Division

cc:

COE, CESAS-PD.SAS@usace.army.mil
GADNR CRD, Karl.Burgess@gadnr.org
GADNR EPD, Dale.caldwell@dnr.state.ga.us
SAFMC, Roger.Pugliese@safmc.net
EPA, Lord.Bob@epa.gov
FWS, Karen_Mcgee@fws.gov
F/SER4, David.Dale@noaa.gov
F/SER47, Jaclyn.Daly@noaa.gov

September 12, 2012



Mr. William Bailey
Chief, Planning Division
Corps of Engineers, Savannah District
100 W. Oglethorpe Ave.
Savannah, GA 31401-3640

Re: Atlantic Intracoastal Waterway Dredged Material Management Plan
Beaufort County, South Carolina
SHPO Project No. 12-RD0274

Dear Mr. Bailey:

Thank you for your letter of August 28, which we received on August 29, regarding the above-referenced project. We also received a draft programmatic agreement as supporting documentation for this undertaking. The State Historic Preservation Office is providing comments to the Corps of Engineers pursuant to Section 106 of the National Historic Preservation Act and its implementing regulations, 36 CFR 800. Consultation with the SHPO is not a substitution for consultation with Tribal Historic Preservation Offices, other Native American tribes, local governments, or the public.

The Savannah District is responsible for the maintenance of a small portion of the Atlantic Intracoastal Waterway (AIWW) in Beaufort County, South Carolina. We understand that the Savannah District is proposing a long-term management plan for the dredging of the AIWW. Since the majority of the AIWW has not undergone any sort of historic property identification, the Savannah District is proposing a programmatic agreement to assist in its Section 106 responsibilities for this project. Our office concurs with the proposed development of an agreement to address any potential adverse effects that may occur during dredging activities. We have attached our technical comments on the draft agreement to this letter.

We look forward to continuing consultation with your office on this project. If you have any questions, please contact me at (803) 896-6183 or dobrasko@scdah.state.sc.us.

Sincerely,

Rebekah Dobrasko

Rebekah Dobrasko
Supervisor of Compliance, Tax Incentives, and Survey
State Historic Preservation Office

Atlantic Intracoastal Waterway Dredged Material Management Plan
Programmatic Agreement (PA)
Technical Comments

Our office has a Memorandum of Understanding with the South Carolina Institute of Archaeology and Anthropology (SCIAA) governing the management of underwater archaeological resources. We rely on the expertise of their underwater archaeologists for projects such as this one. We recommend that the Corps of Engineers consult with SCIAA on this project as well and invite them to sign the PA as an interested party or a concurring party, whichever is appropriate.

The agreement is proposed for a length of ten years, although the supporting documentation states that the Dredged Material Management Plan (DMMP) will be in force for about twenty years. Should the PA mirror the length of the DMMP?

How will unanticipated discoveries of cultural materials during dredging activities be handled? Should that be a part of this PA?

We recommend a definitions page, or at least the definition of certain words within the text: "reaches" (2nd Whereas clause), MLLW (5th Whereas clause)

The programmatic agreement should have maps showing the location of the overall project, the locations of the 71 disposal tracts, and the location of identified cultural resources or the extent of the remote sensing surveys.

The signatory for our office is Elizabeth M. Johnson, Deputy State Historic Preservation Officer.



REPLY TO
ATTENTION OF:

Planning Division

DEPARTMENT OF THE ARMY
SAVANNAH DISTRICT, CORPS OF ENGINEERS
100 W. OGLETHORPE AVENUE
SAVANNAH, GEORGIA 31401-3640

SEP 26 2012

Mr. David Bernhart
Assistant Regional Administrator
Protected Resources Division
NOAA Fisheries
Southeast Regional Office
263 13th Avenue South
St. Petersburg, Florida 33701

Dear Mr. Bernhart:

Enclosed with this letter is a Draft Biological Assessment for Threatened and Endangered Species (BATES) to initiate Section 7 Endangered Species Act consultation for the effects of implementing a 20-year Dredged Materials Management Plan (DMMP) for the Savannah District portion of the Atlantic Intracoastal Waterway (AIWW) between Port Royal Sound, South Carolina and Cumberland Sound, Georgia. The Savannah District's AIWW segment is 161 miles long and is divided into 36 reaches of varying lengths.

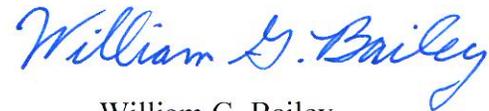
The proposed DMMP would result in placement of dredged materials in a) existing diked disposal areas (material from 15 reaches), b) ocean disposal areas (material from 17 reaches), and c) open water inshore disposal for coarse sediments with confined disposal of fine sediments (three reaches).

The Savannah District has determined that implementing the DMMP may affect, but is not likely to adversely affect, the following listed species: North Atlantic right, humpback, and sperm whales; leatherback, loggerhead, Kemp's ridley, hawksbill, and green sea turtles; Shortnose and Atlantic sturgeons. The District further determined that the action may affect, but is not likely to adversely affect, critical habitat for North Atlantic right whale (Southeastern United States Critical Habitat Area).

We request your concurrence with our determination that the action may affect, but is not likely to adversely affect the ten species identified above, and that no critical habitat for any species would be adversely affected by the action.

Point of contact for this action is Mr. Charles W. Seyle, Jr., of our Planning Division. He may be reached at (912) 652-6017 or by e-mail at charles.w.seyle@usace.army.mil.

Sincerely,



William G. Bailey
Chief, Planning Division

Enclosure



REPLY TO
ATTENTION OF:

DEPARTMENT OF THE ARMY
SAVANNAH DISTRICT, CORPS OF ENGINEERS
100 W. OGLETHORPE AVENUE
SAVANNAH, GEORGIA 31401-3640

Planning Division

SEP 26 2012

Mr. Strant Colwell
Field Supervisor
U.S. Fish and Wildlife Service
Georgia Ecological Services
Coastal Georgia Sub-office
4890 Wildlife Drive NE
Townsend, Georgia 31331

Dear Mr. Colwell:

Enclosed with this letter is a Draft Biological Assessment for Threatened and Endangered Species (BATES) to initiate Section 7 Endangered Species Act consultation for the effects of implementing a 20-year Dredged Materials Management Plan (DMMP) for the Savannah District portion of the Atlantic Intracoastal Waterway (AIWW) between Port Royal Sound, South Carolina and Cumberland Sound, Georgia. The Savannah District's AIWW segment is 161 miles long and is divided into 36 reaches of varying lengths.

The proposed DMMP would result in placement of dredged materials in a) existing diked disposal areas (material from 15 reaches), b) ocean disposal areas (material from 17 reaches), and c) open water inshore disposal for coarse sediments with confined disposal of fine sediments (three reaches).

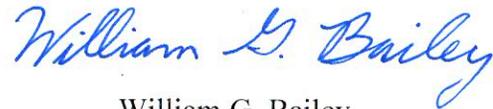
The Savannah District has determined that implementing the DMMP would have No Effect on the Red-cockaded woodpecker, American chaffseed, Pondberry, Canby's dropwort, Kirtland's warbler, Bachman's warbler, Eastern indigo snake, Altamaha spinymussel, and Flatwoods salamander.

The Savannah District has determined that implementing the DMMP may affect, but is not likely to adversely affect, the following listed species: Wood stork; Piping plover; West Indian manatee; leatherback, loggerhead, Kemp's ridley, hawksbill, and green sea turtles. The District further determined that the action may affect, but is not likely to adversely affect, critical habitat for Piping plover (Georgia Units 1-16; South Carolina Units 12-15).

We request your concurrence with our determination that the action would have no effect on nine listed species not occurring in the project area and may affect, but is not likely to adversely affect eight species identified above, and that no critical habitat for any species would be adversely affected by the action.

Point of contact for this action is Mr. Charles W. Seyle, Jr., of our Planning Division. He may be reached at (912) 652-6017 or by e-mail at charles.w.seyle@usace.army.mil.

Sincerely,

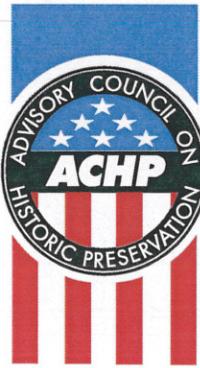


William G. Bailey
Chief, Planning Division

Enclosure

Milford Wayne Donaldson
Chairman

John M. Fowler
Executive Director



Preserving America's Heritage

November 16, 2012

Lieutenant General Thomas P. Bostick
Commanding General
U.S. Army Corps of Engineers
441 G. Street, NW
Washington, DC 20314-1000

REF: Development of a Dredge Material Management Plan for portions of the Atlantic
Intracoastal Waterway in Georgia and South Carolina

Dear General Bostick:

The Savannah District of the Corps of Engineers has invited the Advisory Council on Historic Preservation (ACHP) to participate in the development of a Programmatic Agreement to help ensure that historic properties are fully considered as the Savannah District implements its dredge material maintenance strategy for portions of the Intracoastal Waterway. Pursuant to the Criteria for Council Involvement in Reviewing Individual Section 106 Cases (Appendix A to our regulations, 36 CFR Part 800) we believe the criteria are met for our participation in this undertaking. Dredging, and activities associated with it (including dike construction and selection and use of disposal sites) have the potential to adversely affect important historic properties. Accordingly, the ACHP will participate in consultation with the Savannah District on this undertaking.

By copy of this letter we are also notifying Mr. William G. Bailey, Chief of the Savannah District's Planning Division, of our decision to participate in consultation.

Our participation will be handled by Dr. Tom McCulloch, who can be reached at 202-606-8554 or at tmcculloch@achp.gov. We look forward to working with the Corps on this important project.

Sincerely,

John M. Fowler
Executive Director

ADVISORY COUNCIL ON HISTORIC PRESERVATION

1100 Pennsylvania Avenue NW, Suite 803 • Washington, DC 20004
Phone: 202-606-8503 • Fax: 202-606-8647 • achp@achp.gov • www.achp.gov



REPLY TO
ATTENTION OF:

DEPARTMENT OF THE ARMY
SAVANNAH DISTRICT, CORPS OF ENGINEERS
100 W. OGLETHORPE AVENUE
SAVANNAH, GEORGIA 31401-3640

Planning Division

DEC 10 2012

David Crass, Ph.D.
Director, Historic Preservation Division
Department of Natural Resources
254 Washington Street, SW
Ground Level
Atlanta, Georgia 30334

Dear Dr. Crass:

The Savannah District, US Army Corps of Engineers (Corps) is proposing to develop a Dredged Material Management Plan (DMMP) for the portion of the Atlantic Intracoastal Waterway (AIWW) that extends between Port Royal Sound/Hilton Head Island (AIWW Mile 552) and the Cumberland Sound/Florida state line (AIWW Mile 713), approximately 161 miles in Georgia and South Carolina. One hundred thirty-seven (137) miles of the waterway are located in Georgia. In addition to the channel, there are nearly 13,434 acres (68 tracts) of sediment disposal tracts.

The DMMP will outline a 20-yr dredged material maintenance strategy based on dredging projections and dredging frequencies for the Savannah District portion of the AIWW. In addition to a dredging schedule for the navigation channel, this plan will likely require the creation of confined disposal facilities for the dredged material.

Few cultural resources investigations have been conducted of the Savannah District portion of the AIWW. Texas A&M University conducted reconnaissance level terrestrial and underwater investigations of selected portions of the navigation channel and the sediment disposal tracts in 1979-1980 (Garrison and Tribble 1981). Several new and previously recorded archaeological sites were identified at that time. No follow up or other investigations have been conducted of the AIWW project since. A copy of the report is included for your reference.

The Savannah District recognizes the activities that may be proposed in the dredged material management plan may have an effect upon historic properties included in or eligible for inclusion in the National Register of Historic Places. The district also recognizes that the large size of the project area necessitates a phased approach for identification of resources. Therefore, to comply with the Section 106 of the National Historic Preservation Act, the district would like to consult with your agency to develop a Programmatic Agreement (PA) pursuant to 36CFR800.14(b). The PA would outline a plan for the survey, determination of significance and mitigation of resources that may be affected by the proposed undertaking. A draft copy of the PA with supporting documentation is enclosed.

In accordance with Section 106 of the National Historic Preservation Act and 36CFR800, we ask that you review and comment on the draft Programmatic Agreement. If you have any questions, contact Ms. Julie Morgan, 706-856-0376, or email, julie.a.morgan@usace.army.mil. This document is also being coordinated with the Georgia State Historic Preservation Office and federally recognized tribes. This document is also being coordinated with the South Carolina Department of Archives and History and the Advisory Council on Historic Preservation. To date no tribes have expressed interest in this project.

Sincerely,



William G. Bailey
Chief, Planning Division

Enclosure



REPLY TO
ATTENTION OF:

DEPARTMENT OF THE ARMY
SAVANNAH DISTRICT, CORPS OF ENGINEERS
100 W. OGLETHORPE AVENUE
SAVANNAH, GEORGIA 31401-3640

DEC 11 2012

Planning Division

Mr. Don Klima, Director
Office of Federal Agency Programs
Advisory Council on Historic Preservation
1100 Pennsylvania Avenue, NW, Suite 809
Washington, DC 20004

RE: Development of a Dredged Material Management Plan for portions of the Atlantic Intracoastal Waterway in Georgia and South Carolina

Dear Mr. Klima:

Please reference correspondence from your office dated November 16, 2012, stating the Council's intent to participate in the subject project. In accordance with the comments received the Georgia and South Carolina State Historic Preservation Offices, Savannah District has prepared a draft copy of the Programmatic Agreement for your review and comment.

We request that you review the revised draft PA document and provide comments to this office within 30 calendar days of receipt of this letter. Please notify us of the appropriate signature block for this document. If you have any questions regarding this matter, please contact Ms. Julie Morgan, archaeologist, at email, julie.a.morgan@usace.army.mil, or phone, 706-856-0378. A copy of the programmatic agreement is also being sent to the Georgia Historic Preservation Division and the South Carolina Department of Archives and History for review and comment. No tribes have expressed interest in this project.

Sincerely,

A handwritten signature in blue ink that reads "William G. Bailey".

William G. Bailey
Chief, Planning Division

Enclosure

 **GEORGIA**
DEPARTMENT OF NATURAL RESOURCES
HISTORIC PRESERVATION DIVISION

MARK WILLIAMS
COMMISSIONER

DR. DAVID CRASS
DIVISION DIRECTOR

January 9, 2013

William G. Bailey
Chief, Planning Division
Savannah District, Corps of Engineers
100 W. Oglethorpe Avenue
Savannah, Georgia 31401
Attn: Julie Morgan

**RE: Dredged Material Management Plan: Atlantic Intracoastal Waterway between Port Royal Sound and Cumberland Sound, 161 miles
Chatham, Bryan, Liberty, McIntosh, Glynn, and Camden Counties, Georgia
HP-121015-001**

Dear Mr. Bailey:

The Historic Preservation Division (HPD) has reviewed the draft Programmatic Agreement (PA) for the above referenced undertaking. Our comments are offered to assist the US Army Corps of Engineers (USACE) in complying with the provisions of Section 110 and Section 106 of the National Historic Preservation Act of 1966 (NHPA), as amended.

As previously stated, HPD agrees that the draft PA for the dredging of the Atlantic Intercoastal Waterway is adequate to address effects to historic properties that may be located in the project's area of potential effects.

We look forward to receiving the PA for signature when available. Please refer to project number **HP-121015-001** in any future correspondence concerning this project. If we may be of further assistance, please do not hesitate to contact Elizabeth Shirk, Environmental Review Coordinator, at (404) 651-6624.

Sincerely,



Karen Anderson-Cordova
Program Manager
Environmental Review & Preservation Planning

KAC/ECS