

**Brunswick Harbor Modifications Study, Glynn County, GA  
Draft Integrated Feasibility Report and Environmental Assessment**

**Agency Coordination and Correspondence**

**DRAFT Appendix F**

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



**June 2020**

## Table of Contents

<b>A) National Oceanic and Atmospheric Administration (NOAA) National Marine Fisheries Service (NMFS) .....</b>	<b>3</b>
<b>B) U.S. Environmental Protection Agency (EPA) .....</b>	<b>17</b>
<b>C) U.S. Fish and Wildlife Service (USFWS).....</b>	<b>35</b>
<b>D) Georgia Department of Natural Resources (GADNR) .....</b>	<b>62</b>

**A) National Oceanic and Atmospheric  
Administration (NOAA) National Marine  
Fisheries Service (NMFS)**

**From:** [Acree, James S \(Sterling\) CIV \(US\)](#)  
**To:** [Lavecchia, Jason R CIV USARMY CESAS \(USA\)](#); [Henshaw, Susan H CIV USARMY CELRE \(US\)](#); [Bazzle, D Andrew CIV USARMY CESAM \(USA\)](#); [Steinbeiser, Dorothy M CIV USARMY CESAS \(USA\)](#); [Richards, Mary E CIV USARMY CESAS \(US\)](#); [Pratt, Lucas Robert \(Luke\) CIV USARMY CESAS \(US\)](#); [Chartouni, George S CIV USARMY CELRC \(US\)](#); [Mesko, Rachel C CIV USARMY CEMVP \(US\)](#); [Morqan-Ryan, Julie A CIV USARMY CESAS \(US\)](#); [joseph.b.palmquist@uscg.mil](#); [Davis, Spencer W CIV USARMY CESAS \(USA\)](#); [Fischer, Steven A CIV USARMY CESAS \(US\)](#); [Williams, Laura E \(Beth\) CIV USARMY CESAS \(USA\)](#); [Small, Daniel L CIV USARMY CESAD \(USA\)](#); [Otto, Kimberly P CIV USARMY CESAM \(US\)](#); [Moore, John C CIV USARMY CESAS \(USA\)](#); [White, Lisa L CIV USARMY CESAS \(USA\)](#); [Nettles, Todd A CIV USARMY CESAM \(US\)](#); [Morris, Jeffrey S CIV USARMY CESAS \(USA\)](#); [Moore, Kelie; Cynthia Cooksey - NOAA Federal; Purcell, Jennifer D CIV USARMY CESWF \(USA\)](#); [Lavecchia, Jason R CIV USARMY CESAS \(USA\)](#); [Henshaw, Susan H CIV USARMY CELRE \(US\)](#); [Bazzle, D Andrew CIV USARMY CESAM \(USA\)](#); [Steinbeiser, Dorothy M CIV USARMY CESAS \(USA\)](#); [Richards, Mary E CIV USARMY CESAS \(US\)](#); [Pratt, Lucas Robert \(Luke\) CIV USARMY CESAS \(US\)](#); [Chartouni, George S CIV USARMY CELRC \(US\)](#); [Mesko, Rachel C CIV USARMY CEMVP \(US\)](#); [Morqan-Ryan, Julie A CIV USARMY CESAS \(US\)](#); [Fischer, Steven A CIV USARMY CESAS \(US\)](#); [Williams, Laura E \(Beth\) CIV USARMY CESAS \(USA\)](#); [Small, Daniel L CIV USARMY CESAD \(USA\)](#); [Otto, Kimberly P CIV USARMY CESAM \(US\)](#); [Moore, John C CIV USARMY CESAS \(USA\)](#); [White, Lisa L CIV USARMY CESAS \(USA\)](#); [Nettles, Todd A CIV USARMY CESAM \(US\)](#); [Moore, Kelie; Morris, Jeffrey S CIV USARMY CESAS \(USA\)](#); [Cynthia Cooksey - NOAA Federal; Higgins, Jamie; Holliman, Daniel; Purcell, Jennifer D CIV USARMY CESWF \(USA\)](#)  
**Subject:** Brunswick Harbor Charrette Read-Aheads  
**Date:** Wednesday, May 8, 2019 5:25:05 PM  
**Attachments:** [20190516-17 - BHMS Charrette.pptx](#)  
[20110721 SEC 107 BHI Signed Letter Report to GPA.PDF](#)

---

In preparation for the Brunswick Harbor Charrette next week, please see the following attachments:

- 1) Slides - we will be working together to discuss and capture information relevant to these slides during the charrette. The information we identify during our meeting will be used to drive the study.
- 2) 2011 Letter Report - this short report is the origin of our current study and contains pertinent information

Please bring any relevant data/information that you may have relevant to the needs for the study and

Feel free to forward to anyone participating in the charrette or with interest in the project.

Thank you,

J. Sterling Acree  
Project Manager, USACE  
Civil Works Programs & Project Management  
O: 912-652-5860  
C: 912-438-7900

**From:** [Richards, Mary E CIV USARMY CESAS \(USA\)](#)  
**To:** [Cynthia Cooksey - NOAA Federal](#)  
**Subject:** FW: Sediment Evaluations  
**Date:** Wednesday, May 22, 2019 11:50:00 AM  
**Attachments:** [1998 EIS Part 5 \(Encl F\) Sed Analysis.pdf](#)  
[1998 EIS Part 7 Sed Contaminant Eval Part I.PDF](#) [1998 EIS Part 8 Sed Eval Part II.PDF](#)  
[OCR 1998 EIS Part 1.pdf](#)

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Sorry, I forgot that you wanted this data also.

Mary E. Richards  
U.S. Army Corps of Engineers  
Biologist-Planning Branch 100  
W. Oglethorpe Avenue  
Savannah, GA 31401  
(912) 652-5020

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

From: Richards, Mary E CIV USARMY CESAS (USA)  
Sent: Tuesday, May 21, 2019 4:56 PM  
To: Holliman, Daniel <[Holliman.Daniel@epa.gov](mailto:Holliman.Daniel@epa.gov)>; Reid.Jackson@dnr.ga.gov  
Cc: Henshaw, Susan H CIV USARMY CELRE (US) <[Susan.Henshaw@usace.army.mil](mailto:Susan.Henshaw@usace.army.mil)>; Acree, James S (Sterling) CIV (US) <[James.S.Acree@usace.army.mil](mailto:James.S.Acree@usace.army.mil)>; Fischer, Steven A CIV USARMY CESAS (US) <[Steven.A.Fischer@usace.army.mil](mailto:Steven.A.Fischer@usace.army.mil)>  
Subject: Sediment Evaluations

Dan & Reid,

I think you were the only two wanting to see the sediment evaluations. Enclosure F is the analysis report that was included in the '98 EIS, samples taken in Jan 97. The other two (Part I&II) looks like to be for another sampling event in Sep 95. I don't know the history of the project yet, whether it warranted a second sampling event and only the latest one was written up in the EIS. But either, way here are some historical sediment evals. I've also attached the Final EIS (OCR 1998 EIS Part 1), enclosures are separate. Let me know if you would like to see anything else.

Mary E. Richards  
U.S. Army Corps of Engineers  
Biologist-Planning Branch 100  
W. Oglethorpe Avenue  
Savannah, GA 31401  
(912) 652-5020

**From:** [Richards, Mary E CIV USARMY CESAS \(USA\)](#)  
**To:** [pace.wilber@noaa.gov](mailto:pace.wilber@noaa.gov)  
**Cc:** [Cynthia Cooksey - NOAA Federal](#)  
**Subject:** Cooperating Agency Request for the Brunswick Harbor Modification Study  
**Date:** Thursday, May 23, 2019 11:41:00 AM

---

Dear Mr. Wilber,

The U.S. Army Corps of Engineers, Savannah District (Corps) intends to prepare an environmental assessment for the Brunswick Harbor Modification Study (BHMS). This study will investigate two areas in the Brunswick inner harbor navigation channel which have been identified by the Brunswick Harbor pilots as problems for commercial vessel maneuverability. The first area of concern is in the vicinity of Coast Guard buoy 24 at the intersection of the Cedar Hammock Range and the Brunswick Harbor Range. The second area of concern is the South Brunswick River Turning Basin at the convergence of the South Brunswick River and the Turtle River.

Pursuant to Sections 1501.6 and 1508.5, of the Council on Environmental Quality's Regulations for Implementing the Procedural Provisions of the National Environmental Policy Act (NEPA) of 1969, the Corps requests the participation of the National Marine Fisheries Service as a cooperating agency in providing assistance in preparing the environmental assessment for the BHMS.

This request is being made to the following Federal agencies: U.S. Fish and Wildlife Service, National Marine Fisheries Service, Environmental Protection Agency, and Georgia Department of Natural Resources. The purpose of this request is to formalize, via designation as a Cooperating Agency, the continuing coordination and active participation by your agency, and these other agencies, in the BHMS.

If you require further information, please contact me at (912) 652-5020, or via E-Mail at [mary.e.richards@usace.army.mil](mailto:mary.e.richards@usace.army.mil).

Sincerely,

Mary E. Richards  
U.S. Army Corps of Engineers  
Biologist-Planning Branch 100  
W. Oglethorpe Avenue  
Savannah, GA 31401  
(912) 652-5020

## **NMFS-Habitat Conservation Division (HCD)**

**From:** [Cynthia Cooksey - NOAA Federal](#)  
**To:** [Richards, Mary E CIV USARMY CESAS \(USA\)](#)  
**Subject:** [Non-DoD Source] Re: 20" Conversion Rule/Guidance  
**Date:** Friday, August 23, 2019 2:48:28 PM  
**Attachments:** [EPA\\_ShallowWaterScience\\_1995.pdf](#)  
[Kennishetal\\_2014\\_ShallowCoastalPhoticSystems.pdf](#)  
[Reillyetal\\_1999\\_ShallowWater\\_4m.pdf](#)

---

Sorry I didn't get this to you sooner. With both the Wilmington and Charleston Districts we've been proposing a depth contour of -4 meters Mean Low Water to quantify shallow sub-tidal habitat as recommended by the U.S. Environmental Protection Agency (see attached documents).  
Cindy

Cynthia Cooksey  
Fishery Biologist

NOAA  
National Marine Fisheries Service  
Southeast Regional Office - Habitat Conservation Division  
219 Fort Johnson Road  
Charleston, SC 29412  
PH: (843) 460-9922  
E-Mail: [cynthia.cooksey@noaa.gov](mailto:cynthia.cooksey@noaa.gov)

On Fri, Aug 23, 2019 at 2:14 PM Richards, Mary E CIV USARMY CESAS (USA)  
<[Mary.E.Richards@usace.army.mil](mailto:Mary.E.Richards@usace.army.mil)> wrote:  
Hi Cindy.

Do you remember that you said you would send Robin and I the guidance on the 20' conversion to EFH...or whatever it was called? Would you please send that?

Unfortunately for Brunswick, I think that widening the turning basin in that one area I showed you may overlap a little of the shallows. I'm waiting on our engineers to overlay a footprint (one we're reasonably confident will be selected) over the latest bathymetry. But, just going by the NOAA charts, looks like we may have some impacts. So I'll probably be talking to you about that sometime in the near future.

Mary E. Richards  
U.S. Army Corps of Engineers  
Biologist-Planning Branch 100  
W. Oglethorpe Avenue  
Savannah, GA 31401  
(912) 652-5020



## **NMFS-Protected Resources Division (PRD)**

**From:** [Richards, Mary E CIV USARMY CESAS \(USA\)](#)  
**To:** [Nicole Bonine - NOAA Federal](#)  
**Subject:** Small Dredging Project - Brunswick Harbor  
**Date:** Monday, September 30, 2019 12:20:00 PM

---

Hello Nicole.

I remember once not too long ago NFMS came to Savannah District and talked about NEPA policies and procedures regarding consultation requirements. And I specifically remember someone from NMFS stating that if the Corps makes a No Effect determination for a project that you all had no interest in being notified, much less being solicited for consultations, formal or informal. I think I have that right. I even remember Nathan Dayan asking if you all didn't want to know of such projects just as a courtesy and the answer was no.

Okay, so we have begun a study on a small dredging project in Brunswick Harbor where I think we can assume No Effect for T&E (not EFH - we will be having to deal with Cindy C. on those issues). However, with the new SARBO looming near and us here at the District level in the dark on all the changes that may be coming, I wonder if I could talk to you, or someone else, about the project so we don't get too far into the weeds and discover that we should've sought formal consultation weeks ago.

Is that possible?

Mary E. Richards  
U.S. Army Corps of Engineers  
Biologist-Planning Branch  
100 W. Oglethorpe Avenue  
Savannah, GA 31401  
(912) 652-5020

**From:** [Nicole Bonine - NOAA Federal](#)  
**To:** [Richards, Mary E CIV USARMY CESAS \(USA\)](#)  
**Subject:** [Non-DoD Source] Re: Small Dredging Project - Brunswick Harbor  
**Date:** Monday, September 30, 2019 12:57:04 PM

---

Hi Mary,

I'd be happy to talk through this with you. You are correct that if you make a no effect determination, no consultation or notification with NMFS is required. We just suggest that you document your rationale in your records. That being said, I cannot imagine how a dredging project would ever be no effect. SARBO is indeed coming soon and I'd be happy to talk through how to make an effects determination and then you will be able to see those determinations in SARBO when complete. The USACE SAD would also be a good source to discuss what kinds of conditions would need to be followed under the current and upcoming SARBO. I just tried to call and you were not at your desk, but feel free to call me back. I'll be around till 3:30 today.

Nicole Bonine  
ESA Consultation Biologist National Marine Fisheries Service Southeast Regional Office  
Protected Resources Division  
263 13th Avenue South  
St. Petersburg, FL 33701  
PH: (727) 824-5336

On Mon, Sep 30, 2019 at 12:20 PM Richards, Mary E CIV USARMY CESAS (USA)  
<[Mary.E.Richards@usace.army.mil](mailto:Mary.E.Richards@usace.army.mil)> wrote:

Hello Nicole.

I remember once not too long ago NFMS came to Savannah District and talked about NEPA policies and procedures regarding consultation requirements. And I specifically remember someone from NMFS stating that if the Corps makes a No Effect determination for a project that you all had no interest in being notified, much less being solicited for consultations, formal or informal. I think I have that right. I even remember Nathan Dayan asking if you all didn't want to know of such projects just as a courtesy and the answer was no.

Okay, so we have begun a study on a small dredging project in Brunswick Harbor where I think we can assume No Effect for T&E (not EFH - we will be having to deal with Cindy C. on those issues). However, with the new SARBO looming near and us here at the District level in the dark on all the changes that may be coming, I wonder if I could talk to you, or someone else, about the project so we don't get too far into the weeds and discover that we should've sought formal consultation weeks ago.

Is that possible?

Mary E. Richards  
U.S. Army Corps of Engineers  
Biologist-Planning Branch 100  
W. Oglethorpe Avenue

**From:** [Richards, Mary E CIV USARMY CESAS \(USA\)](#)  
**To:** [Nicole Bonine - NOAA Federal](#)  
**Subject:** Expedited Consult Template  
**Date:** Tuesday, October 1, 2019 4:37:00 PM  
**Attachments:** [USACE NMFS Expedited Track Informal Request Template modified ks.docx](#)

---

Nicole,

SAC gave me this template to use for an expedited consult format. No existing language I can use from the template but would you recommend I follow it for the Civil Works project we discussed yesterday (Brunswick Harbor modification)? Or is there anything more appropriate now?

Sorry to bother you again...

Mary E. Richards  
U.S. Army Corps of Engineers  
Biologist-Planning Branch  
100 W. Oglethorpe Avenue  
Savannah, GA 31401  
(912) 652-5020

**From:** [Nicole Bonine - NOAA Federal](#)  
**To:** [Richards, Mary E CIV USARMY CESAS \(USA\)](#)  
**Subject:** [Non-DoD Source] Re: Expedited Consult Template  
**Date:** Wednesday, October 2, 2019 7:20:00 AM

---

If you think the effects are routine, predictable, and NLAA, then yes that is the best and fastest approach. You can borrow language from other dredging projects to complete the effects analysis.

Nicole Bonine  
ESA Consultation Biologist National Marine Fisheries Service Southeast Regional Office  
Protected Resources Division  
263 13th Avenue South  
St. Petersburg, FL 33701  
PH: (727) 824-5336

On Tue, Oct 1, 2019 at 4:38 PM Richards, Mary E CIV USARMY CESAS (USA)

<[Mary.E.Richards@usace.army.mil](mailto:Mary.E.Richards@usace.army.mil)> wrote:

Nicole,

SAC gave me this template to use for an expedited consult format. No existing language I can use from the template but would you recommend I follow it for the Civil Works project we discussed yesterday (Brunswick Harbor modification)? Or is there anything more appropriate now?

Sorry to bother you again... Mary

E. Richards  
U.S. Army Corps of Engineers  
Biologist-Planning Branch 100  
W. Oglethorpe Avenue  
Savannah, GA 31401  
(912) 652-5020

**From:** [Richards, Mary E CIV USARMY CESAS \(USA\)](#)  
**To:** ["Nicole Bonine - NOAA Federal"](#)  
**Subject:** I hate to bother you again  
**Date:** Thursday, October 31, 2019 10:08:00 AM

---

But I must. When you recommended we do an expedited consult with NMFS regarding the Brunswick Harbor Mod Study, I could've sworn you said it could be an informal consult. There are those here who said a MANLAA effects determination has to be formal. So the consult that we discussed (minor dredging project which will most likely be a MANLAA vs. my original no effects guess) would be formal? But still can be expedited? It's a good question because we may be doing another expedite on a different project.

Happy Halloween.  
Boo.

Mary E. Richards  
U.S. Army Corps of Engineers  
Biologist-Planning Branch 100  
W. Oglethorpe Avenue  
Savannah, GA 31401  
(912) 652-5020

**From:** [Nicole Bonine - NOAA Federal](#)  
**To:** [Richards, Mary E CIV USARMY CESAS \(USA\)](#)  
**Subject:** [Non-DoD Source] Re: I hate to bother you again  
**Date:** Thursday, October 31, 2019 10:37:39 AM

---

Hi Mary,

MANLAA (or as we shorten it to NLAA) = may affect, not likely to adversely affect =  
Informal consultation (which can be submitted as an expedited consultation)

MALAA (or as we shorten it to LAA) - may affect, likely to adversely affect= Formal  
consultation

So yes, you are correct! Let me know if you need anything else.

Nicole Bonine  
ESA Consultation Biologist National Marine Fisheries Service Southeast Regional Office  
Protected Resources Division  
263 13th Avenue South  
St. Petersburg, FL 33701  
PH: (727) 824-5336

On Thu, Oct 31, 2019 at 10:09 AM Richards, Mary E CIV USARMY CESAS (USA)  
<[Mary.E.Richards@usace.army.mil](mailto:Mary.E.Richards@usace.army.mil)> wrote:

But I must. When you recommended we do an expedited consult with NMFS regarding the  
Brunswick Harbor Mod Study, I could've sworn you said it could be an informal consult.  
There are those here who said a MANLAA effects determination has to be formal. So the  
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my original no effects guess) would be formal? But still can be expedited? It's a good question  
because we may be doing another expedite on a different project.

Happy Halloween.  
Boo.

Mary E. Richards  
U.S. Army Corps of Engineers  
Biologist-Planning Branch 100  
W. Oglethorpe Avenue  
Savannah, GA 31401  
(912) 652-5020

**From:** [Richards, Mary E CIV USARMY CESAS \(USA\)](#)  
**To:** "Holliman, Daniel"  
**Cc:** "[Reid.Jackson@dnr.ga.gov](mailto:Reid.Jackson@dnr.ga.gov)"; "[Cynthia Cooksey - NOAA Federal](#)"  
**Subject:** Brunswick Harbor Modification Study (BHMS) - 1997 Sediment Analysis of New Work Sediments  
**Date:** Wednesday, November 13, 2019 5:43:00 PM  
**Attachments:** [1997 Brunswick Harbor Deepening Sediment Evaluation - Summary.pdf](#)  
[1998 EIS Part 5 \(Encl F\) Sed Analysis.pdf](#)  
[Background and Alternatives.docx](#)

---

Dan (Cindy and Reid - I believe you both wanted to see this summary as well),

As promised, attached is an informal summary of the new work sediment analysis conducted for the 1998 Brunswick Harbor Deepening feasibility study. Sorry I've been a little slow getting it to you. As a reminder, I was to give you this summary in support of Savannah District's decision to forego additional sediment testing for the Brunswick Harbor Modification Study (BHMS).

This summary is really just excerpts from the '97 report that I hope is laid out logically and conveniently for your review. I copied the tables straight from the pdf. They're presented a little differently than I'm used to seeing in more recent reports. So if you need further details/explanations, I pulled the sediment evaluation section from the Final EIS and attached it for reference (1998 EIS Part 5 (Encl F) Sed Analysis). For comparison I also threw in some sediment data from the 2016 Tier III Section 103 sediment evaluation for the Cedar Hammock portion of the inner harbor. That's the reach closest to the bend widener that we would like to expand. It's O&M sediment, but it's the most recent sed eval we have for Brunswick. We coordinated that work with Gary. I can forward the full report if you want but only the Cedar Hammock sampling site is inside enough to be relevant. The rest of the report was for entrance channel sediments destined for disposal into the ODMDS. It may or may not benefit the story to know what we typically see in our O&M sediments but I thought it worth showing. And, of course, there have been a couple of earlier Tier III and miscellaneous sediment evaluations that I can dig up for you if needed. But, again, most if not all of those will be for O&M, not new work material. Oh, and since this little recap is for those with sediment chemistry background, I didn't define all the acronyms.

As we stated earlier, based on the 1997 results, the District does not believe there is need for additional testing of the sediments proposed to be dredged to construct this project. I would like to reiterate that these sediments are NOT going to the Brunswick Harbor ODMDS. Placement is to be upland in the Andrews Island Dredged Material Containment Area (DMCA) or possibly used to fortify an existing bird island in St. Simons Sound. Over 500,000 cubic yards of the '97 new work sediments built that island. We believe that adjacent new work sediments from similar depths, if physically and economically feasible, are safe to use on it again, and/or are suitable for placement upland in the DMCA.

I also attached our latest list of alternatives that show the preliminary site locations in more detail. Final designs will be determined after the ship simulation analysis.

Oh, and I recently talked to Hope Moorer with GPA. She has not forgotten about you and the other agency representatives who were promised a tour of the Brunswick Port. She had tentatively selected some early November dates for me to pass along for consideration but then a big ship fell over on its side in the middle of the channel, and her priorities changed. The tour is still on the books but I have no clue on when it will next be offered.

Let me know if you have any questions or how else I may help in your review.

Mary E. Richards  
U.S. Army Corps of Engineers  
Biologist-Planning Branch  
100 W. Oglethorpe Avenue  
Savannah, GA 31401  
(912) 652-5020



## **B) U.S. Environmental Protection Agency (EPA)**

**From:** [Acree, James S \(Sterling\) CIV \(US\)](#)  
**To:** [Lavecchia, Jason R CIV USARMY CESAS \(USA\)](#); [Henshaw, Susan H CIV USARMY CELRE \(US\)](#); [Bazzle, D Andrew CIV USARMY CESAM \(USA\)](#); [Steinbeiser, Dorothy M CIV USARMY CESAS \(USA\)](#); [Richards, Mary E CIV USARMY CESAS \(US\)](#); [Pratt, Lucas Robert \(Luke\) CIV USARMY CESAS \(US\)](#); [Chartouni, George S CIV USARMY CELRC \(US\)](#); [Mesko, Rachel C CIV USARMY CEMVP \(US\)](#); [Morgan-Ryan, Julie A CIV USARMY CESAS \(US\)](#); [joseph.b.palmquist@uscg.mil](#); [Davis, Spencer W CIV USARMY CESAS \(USA\)](#); [Fischer, Steven A CIV USARMY CESAS \(US\)](#); [Williams, Laura E \(Beth\) CIV USARMY CESAS \(USA\)](#); [Small, Daniel L CIV USARMY CESAD \(USA\)](#); [Otto, Kimberly P CIV USARMY CESAM \(US\)](#); [Moore, John C CIV USARMY CESAS \(USA\)](#); [White, Lisa L CIV USARMY CESAS \(USA\)](#); [Nettles, Todd A CIV USARMY CESAM \(US\)](#); [Morris, Jeffrey S CIV USARMY CESAS \(USA\)](#); [Moore, Kelie; Cynthia Cooksey - NOAA Federal; Purcell, Jennifer D CIV USARMY CESWF \(USA\)](#); [Lavecchia, Jason R CIV USARMY CESAS \(USA\)](#); [Henshaw, Susan H CIV USARMY CELRE \(US\)](#); [Bazzle, D Andrew CIV USARMY CESAM \(USA\)](#); [Steinbeiser, Dorothy M CIV USARMY CESAS \(USA\)](#); [Richards, Mary E CIV USARMY CESAS \(US\)](#); [Pratt, Lucas Robert \(Luke\) CIV USARMY CESAS \(US\)](#); [Chartouni, George S CIV USARMY CELRC \(US\)](#); [Mesko, Rachel C CIV USARMY CEMVP \(US\)](#); [Morgan-Ryan, Julie A CIV USARMY CESAS \(US\)](#); [Fischer, Steven A CIV USARMY CESAS \(US\)](#); [Williams, Laura E \(Beth\) CIV USARMY CESAS \(USA\)](#); [Small, Daniel L CIV USARMY CESAD \(USA\)](#); [Otto, Kimberly P CIV USARMY CESAM \(US\)](#); [Moore, John C CIV USARMY CESAS \(USA\)](#); [White, Lisa L CIV USARMY CESAS \(USA\)](#); [Nettles, Todd A CIV USARMY CESAM \(US\)](#); [Moore, Kelie; Morris, Jeffrey S CIV USARMY CESAS \(USA\)](#); [Cynthia Cooksey - NOAA Federal; Higgins, Jamie; Holliman, Daniel; Purcell, Jennifer D CIV USARMY CESWF \(USA\)](#)  
**Subject:** Brunswick Harbor Charrette Read-Aheads  
**Date:** Wednesday, May 8, 2019 5:25:05 PM  
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[20110721 SEC 107 BHI Signed Letter Report to GPA.PDF](#)

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In preparation for the Brunswick Harbor Charrette next week, please see the following attachments:

- 1) Slides - we will be working together to discuss and capture information relevant to these slides during the charrette. The information we identify during our meeting will be used to drive the study.
- 2) 2011 Letter Report - this short report is the origin of our current study and contains pertinent information

Please bring any relevant data/information that you may have relevant to the needs for the study and

Feel free to forward to anyone participating in the charrette or with interest in the project.

Thank you,

J. Sterling Acree  
Project Manager, USACE  
Civil Works Programs & Project Management  
O: 912-652-5860  
C: 912-438-7900

**From:** [Martin, Molly](#)  
**To:** [Richards, Mary E CIV USARMY CESAS \(USA\)](#)  
**Cc:** [Holliman, Daniel](#); [Collins, Gary](#)  
**Subject:** [Non-DoD Source] RE: Sediment Testing Results from the Golden Ray  
**Date:** Monday, January 13, 2020 2:16:02 PM

---

Noting the distance to the dredge site I agree that data is not necessary.

Molly Martin  
E-mail: [Martin.Molly@epa.gov](mailto:Martin.Molly@epa.gov)  
tel: (404) 562-9405

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

From: Richards, Mary E CIV USARMY CESAS (USA) <[Mary.E.Richards@usace.army.mil](mailto:Mary.E.Richards@usace.army.mil)>  
Sent: Friday, January 10, 2020 4:30 PM  
To: Martin, Molly <[Martin.Molly@epa.gov](mailto:Martin.Molly@epa.gov)>  
Cc: Holliman, Daniel <[Holliman.Daniel@epa.gov](mailto:Holliman.Daniel@epa.gov)>; Collins, Gary <[Collins.Garyw@epa.gov](mailto:Collins.Garyw@epa.gov)>  
Subject: Sediment Testing Results from the Golden Ray

Molly,

We don't think the Golden Ray and all that mess has any bearing on the Brunswick Harbor Mod Study (BHMS), but I just received the results of the few sediment samples they took around the vessel? Would you be interested in seeing those? I'm also about ready to send the graphical displays of the boring data that we spoke of earlier for the BHMS. Will get those to you very soon.

Mary E. Richards  
U.S. Army Corps of Engineers  
Biologist-Planning Branch 100  
W. Oglethorpe Avenue  
Savannah, GA 31401  
Office: (912) 652-5020  
Cell: (912) 346-0066

**From:** [Richards, Mary E CIV USARMY CESAS \(USA\)](#)  
**To:** [Holliman, Daniel](#); [Reid.Jackson@dnr.ga.gov](mailto:Reid.Jackson@dnr.ga.gov)  
**Cc:** [Henshaw, Susan H CIV USARMY CELRE \(US\)](#); [Acree, James S \(Sterling\) CIV \(US\)](#); [Fischer, Steven A CIV USARMY CESAS \(US\)](#)  
**Subject:** Sediment Evaluations  
**Date:** Tuesday, May 21, 2019 4:54:00 PM  
**Attachments:** [1998 EIS Part 5 \(Encl F\) Sed Analysis.pdf](#)  
[1998 EIS Part 7 Sed Contaminant Eval Part I.PDF](#) [1998 EIS Part 8 Sed Eval Part II.PDF](#)  
[OCR 1998 EIS Part 1.pdf](#)

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Dan & Reid,

I think you were the only two wanting to see the sediment evaluations. Enclosure F is the analysis report that was included in the '98 EIS, samples taken in Jan 97. The other two (Part I&II) looks like to be for another sampling event in Sep 95. I don't know the history of the project yet, whether it warranted a second sampling event and only the latest one was written up in the EIS. But either, way here are some historical sediment evals. I've also attached the Final EIS (OCR 1998 EIS Part 1), enclosures are separate. Let me know if you would like to see anything else.

Mary E. Richards  
U.S. Army Corps of Engineers  
Biologist-Planning Branch 100  
W. Oglethorpe Avenue  
Savannah, GA 31401  
(912) 652-5020

**From:** [Richards, Mary E CIV USARMY CESAS \(USA\)](#)  
**To:** [Militscher.Chris@epa.gov](mailto:Militscher.Chris@epa.gov)  
**Cc:** [Holliman, Daniel](#); [Higgins, Jamie](#); [Dayan, Nathan S CIV USARMY CESAS \(US\)](#); [Henshaw, Susan H CIV USARMY CELRE \(US\)](#)  
**Subject:** Cooperating Agency Request for the Brunswick Harbor Modification Study  
**Date:** Thursday, May 23, 2019 11:55:00 AM

---

Dear Mr. Militscher,

The U.S. Army Corps of Engineers, Savannah District (Corps) intends to prepare an environmental assessment for the Brunswick Harbor Modification Study (BHMS). This study will investigate two areas in the Brunswick inner harbor navigation channel which have been identified by the Brunswick Harbor pilots as problems for commercial vessel maneuverability. The first area of concern is in the vicinity of Coast Guard buoy 24 at the intersection of the Cedar Hammock Range and the Brunswick Harbor Range. The second area of concern is the South Brunswick River Turning Basin at the convergence of the South Brunswick River and the Turtle River.

Pursuant to Sections 1501.6 and 1508.5, of the Council on Environmental Quality's Regulations for Implementing the Procedural Provisions of the National Environmental Policy Act (NEPA) of 1969, the Corps requests the participation of the Environmental Protection Agency as a cooperating agency in providing assistance in preparing the environmental assessment for the BHMS.

This request is being made to the following Federal agencies: U.S. Fish and Wildlife Service, National Marine Fisheries Service, Environmental Protection Agency, and Georgia Department of Natural Resources. The purpose of this request is to formalize, via designation as a Cooperating Agency, the continuing coordination and active participation by your agency, and these other agencies, in the BHMS.

If you require further information, please contact me at (912) 652-5020, or via E-Mail at [mary.e.richards@usace.army.mil](mailto:mary.e.richards@usace.army.mil).

Sincerely,

Mary E. Richards  
U.S. Army Corps of Engineers  
Biologist-Planning Branch 100  
W. Oglethorpe Avenue  
Savannah, GA 31401  
(912) 652-5020

**From:** [Militscher, Chris](#)  
**To:** [Richards, Mary E CIV USARMY CESAS \(USA\)](#)  
**Cc:** [Higgins, Jamie](#)  
**Subject:** [Non-DoD Source] RE: Cooperating Agency Request for the Brunswick Harbor Modification Study  
**Date:** Friday, May 24, 2019 10:47:44 AM

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Mary E. Richards  
Biologist-Planning Branch  
Planning and Environmental Division  
U.S. Army Corps of Engineers, Savannah District  
100 W. Oglethorpe Avenue  
Savannah, GA 31401

Subject: EPA Cooperating Agency Request for the Brunswick Harbor Modification Study, Brunswick,  
Georgia

Dear Ms. Richards:

The U.S. Environmental Protection Agency, Region 4, received your e-mail request offering this Agency an opportunity to be a cooperating for an Environmental Assessment (EA) document. As the Lead Federal Agency under the National Environmental Policy Act, the U.S. Army Corps of Engineers (USACE), Savannah District is preparing the EA for the subject project.

We accept the USACE's request to be a cooperating agency with the understanding that this office's limited resources may not allow us to fully participate in all aspects of the study. It should be noted that our status as a cooperating agency has no effect on our review responsibilities under Section 102(2)(C) of the National Environmental Policy Act or Section 309 of the Clean Air Act, and being a cooperating agency does not imply that the EPA will necessarily concur with all aspects of the proposed EA.

The EPA agrees to provide preliminary agency feedback on areas in which we have a level of expertise. The USACE should ensure that information relevant for providing comments will be provided to the agency in a timely manner, allowing sufficient review time, and with levels of detail necessary for meaningful feedback. The EPA also agrees to participate in important project milestones to the extent practicable.

We appreciate your coordination with us and look forward to reviewing the environmental document for the proposed project. If you have any further questions or concerns, you may contact EPA's principle reviewer for this project Ms. Jamie Higgins at (404) 562-9681 or [higgins.jamie@epa.gov](mailto:higgins.jamie@epa.gov). Thank you.

Christopher A. Militscher Chief, NEPA Section Strategic  
Programs Office

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

From: Richards, Mary E CIV USARMY CESAS (USA) <[Mary.E.Richards@usace.army.mil](mailto:Mary.E.Richards@usace.army.mil)>  
Sent: Thursday, May 23, 2019 11:55 AM  
To: Militscher, Chris <[Militscher.Chris@epa.gov](mailto:Militscher.Chris@epa.gov)>  
Cc: Holliman, Daniel <[Holliman.Daniel@epa.gov](mailto:Holliman.Daniel@epa.gov)>; Higgins, Jamie <[Higgins.Jamie@epa.gov](mailto:Higgins.Jamie@epa.gov)>; Dayan, Nathan S CIV USARMY CESAS (US) <[Nathan.S.Dayan@usace.army.mil](mailto:Nathan.S.Dayan@usace.army.mil)>; Henshaw, Susan H CIV USARMY CELRE (US) <[Susan.Henshaw@usace.army.mil](mailto:Susan.Henshaw@usace.army.mil)>  
Subject: Cooperating Agency Request for the Brunswick Harbor Modification Study

Dear Mr. Militscher,

The U.S. Army Corps of Engineers, Savannah District (Corps) intends to prepare an environmental assessment for the Brunswick Harbor Modification Study (BHMS). This study will investigate two areas in the Brunswick inner harbor navigation channel which have been identified by the Brunswick Harbor pilots as problems for commercial vessel maneuverability. The first area of concern is in the vicinity of Coast Guard buoy 24 at the intersection of the Cedar Hammock Range and the Brunswick Harbor Range. The second area of concern is the South Brunswick River Turning Basin at the convergence of the South Brunswick River and the Turtle River.

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If you require further information, please contact me at (912) 652-5020, or via E-Mail at [mary.e.richards@usace.army.mil](mailto:mary.e.richards@usace.army.mil).

Sincerely,

Mary E. Richards  
U.S. Army Corps of Engineers  
Biologist-Planning Branch 100  
W. Oglethorpe Avenue  
Savannah, GA 31401  
(912) 652-5020

**From:** [Richards, Mary E CIV USARMY CESAS \(USA\)](#)  
**To:** [Militscher, Chris](#)  
**Cc:** [Higgins, Jamie](#)  
**Subject:** RE: Cooperating Agency Request for the Brunswick Harbor Modification Study  
**Date:** Friday, May 24, 2019 3:18:00 PM

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Mr. Militscher,

Thank you for your quick reply. We look forward to working with your staff on this study.

Hope you (and you, Jamie) have a great Memorial Day Weekend!

Mary E. Richards  
U.S. Army Corps of Engineers  
Biologist-Planning Branch 100  
W. Oglethorpe Avenue  
Savannah, GA 31401  
(912) 652-5020

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

From: Militscher, Chris [<mailto:Militscher.Chris@epa.gov>] Sent:  
Friday, May 24, 2019 10:47 AM  
To: Richards, Mary E CIV USARMY CESAS (USA) <Mary.E.Richards@usace.army.mil>  
Cc: Higgins, Jamie <Higgins.Jamie@epa.gov>  
Subject: [Non-DoD Source] RE: Cooperating Agency Request for the Brunswick Harbor Modification Study

Mary E. Richards  
Biologist-Planning Branch  
Planning and Environmental Division  
U.S. Army Corps of Engineers, Savannah District  
100 W. Oglethorpe Avenue  
Savannah, GA 31401

Subject: EPA Cooperating Agency Request for the Brunswick Harbor Modification Study, Brunswick,  
Georgia

Dear Ms. Richards:

The U.S. Environmental Protection Agency, Region 4, received your e-mail request offering this Agency an opportunity to be a cooperating for an Environmental Assessment (EA) document. As the Lead Federal Agency under the National Environmental Policy Act, the U.S. Army Corps of Engineers (USACE), Savannah District is preparing the EA for the subject project.

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The EPA agrees to provide preliminary agency feedback on areas in which we have a level of expertise. The USACE should ensure that information relevant for providing comments will be provided to the agency in a timely manner, allowing sufficient review time, and with levels of detail necessary for meaningful feedback. The EPA also agrees to participate in important project milestones to the extent practicable.



We appreciate your coordination with us and look forward to reviewing the environmental document for the proposed project. If you have any further questions or concerns, you may contact EPA's principle reviewer for this project Ms. Jamie Higgins at (404) 562-9681 or [higgins.jamie@epa.gov](mailto:higgins.jamie@epa.gov). Thank you.

Christopher A. Militscher Chief, NEPA Section Strategic  
Programs Office

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

From: Richards, Mary E CIV USARMY CESAS (USA) <[Mary.E.Richards@usace.army.mil](mailto:Mary.E.Richards@usace.army.mil)>  
Sent: Thursday, May 23, 2019 11:55 AM  
To: Militscher, Chris <[Militscher.Chris@epa.gov](mailto:Militscher.Chris@epa.gov)>  
Cc: Holliman, Daniel <[Holliman.Daniel@epa.gov](mailto:Holliman.Daniel@epa.gov)>; Higgins, Jamie <[Higgins.Jamie@epa.gov](mailto:Higgins.Jamie@epa.gov)>; Dayan, Nathan S CIV USARMY CESAS (US) <[Nathan.S.Dayan@usace.army.mil](mailto:Nathan.S.Dayan@usace.army.mil)>; Henshaw, Susan H CIV USARMY CELRE (US) <[Susan.Henshaw@usace.army.mil](mailto:Susan.Henshaw@usace.army.mil)>  
Subject: Cooperating Agency Request for the Brunswick Harbor Modification Study

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If you require further information, please contact me at (912) 652-5020, or via E-Mail at [mary.e.richards@usace.army.mil](mailto:mary.e.richards@usace.army.mil).

Sincerely,

Mary E. Richards  
U.S. Army Corps of Engineers  
Biologist-Planning Branch 100  
W. Oglethorpe Avenue  
Savannah, GA 31401  
(912) 652-5020

**From:** [Richards, Mary E CIV USARMY CESAS \(USA\)](#)  
**To:** "Holliman, Daniel"  
**Cc:** "[Reid.Jackson@dnr.ga.gov](mailto:Reid.Jackson@dnr.ga.gov)"; "[Cynthia Cooksey - NOAA Federal](#)"  
**Subject:** Brunswick Harbor Modification Study (BHMS) - 1997 Sediment Analysis of New Work Sediments  
**Date:** Wednesday, November 13, 2019 5:43:00 PM  
**Attachments:** [1997 Brunswick Harbor Deepening Sediment Evaluation - Summary.pdf](#)  
[1998 EIS Part 5 \(Encl F\) Sed Analysis.pdf](#)  
[Background and Alternatives.docx](#)

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Dan (Cindy and Reid - I believe you both wanted to see this summary as well),

As promised, attached is an informal summary of the new work sediment analysis conducted for the 1998 Brunswick Harbor Deepening feasibility study. Sorry I've been a little slow getting it to you. As a reminder, I was to give you this summary in support of Savannah District's decision to forego additional sediment testing for the Brunswick Harbor Modification Study (BHMS).

This summary is really just excerpts from the '97 report that I hope is laid out logically and conveniently for your review. I copied the tables straight from the pdf. They're presented a little differently than I'm used to seeing in more recent reports. So if you need further details/explanations, I pulled the sediment evaluation section from the Final EIS and attached it for reference (1998 EIS Part 5 (Encl F) Sed Analysis). For comparison I also threw in some sediment data from the 2016 Tier III Section 103 sediment evaluation for the Cedar Hammock portion of the inner harbor. That's the reach closest to the bend widener that we would like to expand. It's O&M sediment, but it's the most recent sed eval we have for Brunswick. We coordinated that work with Gary. I can forward the full report if you want but only the Cedar Hammock sampling site is inside enough to be relevant. The rest of the report was for entrance channel sediments destined for disposal into the ODMDS. It may or may not benefit the story to know what we typically see in our O&M sediments but I thought it worth showing. And, of course, there have been a couple of earlier Tier III and miscellaneous sediment evaluations that I can dig up for you if needed. But, again, most if not all of those will be for O&M, not new work material. Oh, and since this little recap is for those with sediment chemistry background, I didn't define all the acronyms.

As we stated earlier, based on the 1997 results, the District does not believe there is need for additional testing of the sediments proposed to be dredged to construct this project. I would like to reiterate that these sediments are NOT going to the Brunswick Harbor ODMDS. Placement is to be upland in the Andrews Island Dredged Material Containment Area (DMCA) or possibly used to fortify an existing bird island in St. Simons Sound. Over 500,000 cubic yards of the '97 new work sediments built that island. We believe that adjacent new work sediments from similar depths, if physically and economically feasible, are safe to use on it again, and/or are suitable for placement upland in the DMCA.

I also attached our latest list of alternatives that show the preliminary site locations in more detail. Final designs will be determined after the ship simulation analysis.

Oh, and I recently talked to Hope Moorer with GPA. She has not forgotten about you and the other agency representatives who were promised a tour of the Brunswick Port. She had tentatively selected some early November dates for me to pass along for consideration but then a big ship fell over on its side in the middle of the channel, and her priorities changed. The tour is still on the books but I have no clue on when it will next be offered.

Let me know if you have any questions or how else I may help in your review.

Mary E. Richards  
U.S. Army Corps of Engineers  
Biologist-Planning Branch  
100 W. Oglethorpe Avenue  
Savannah, GA 31401  
(912) 652-5020

**From:** [Richards, Mary E CIV USARMY CESAS \(USA\)](#)  
**To:** [Holliman, Daniel](#); [Martin, Molly](#)  
**Subject:** BHMS Data Request  
**Date:** Thursday, December 12, 2019 2:34:00 PM  
**Attachments:** [EPA Additional Info Request.docx](#)  
[MV Golden Ray Project Location Map.pdf](#)

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Dan/Molly -

I've attached a brief doc on the additional info you requested. You also expressed interest in -

- a pdf depicting the location of the Golden Ray (attached). It also contains other miscellaneous information good through September 13th. I don't have anything more recent as far as spill info (obviously the location of the vessel has not changed) but I'm sure someone there at EPA does.
- a summary of the geo borings from the '97 testing. The PDT (our Savannah District team for the study) wants to review the draft of that write up before I send that out. I should be able to get that to you by the end of next week.

Debbie Scerno thought an email response on whether you concur or not with our determination that no further testing is needed will be sufficient for our documentation/NEPA purposes. And we would appreciate a response by January 31, 2020. If it's determined that there is a requirement for additional testing, we'll have to add that to the economic analysis before we select the Tentatively Selected Plan (TSP), which is scheduled for mid-February.

Call with questions if you have them or if there is something I left out.

Mary E. Richards  
U.S. Army Corps of Engineers  
Biologist-Planning Branch  
100 W. Oglethorpe Avenue  
Savannah, GA 31401  
(912) 652-5020

**From:** [Martin, Molly](#)  
**To:** [Richards, Mary E CIV USARMY CESAS \(USA\)](#)  
**Cc:** [Holliman, Daniel](#); [Collins, Gary](#)  
**Subject:** [Non-DoD Source] RE: Sediment Testing Results from the Golden Ray  
**Date:** Monday, January 13, 2020 2:16:02 PM

---

Noting the distance to the dredge site I agree that data is not necessary.

Molly Martin  
E-mail: [Martin.Molly@epa.gov](mailto:Martin.Molly@epa.gov)  
tel: (404) 562-9405

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

From: Richards, Mary E CIV USARMY CESAS (USA) <[Mary.E.Richards@usace.army.mil](mailto:Mary.E.Richards@usace.army.mil)>  
Sent: Friday, January 10, 2020 4:30 PM  
To: Martin, Molly <[Martin.Molly@epa.gov](mailto:Martin.Molly@epa.gov)>  
Cc: Holliman, Daniel <[Holliman.Daniel@epa.gov](mailto:Holliman.Daniel@epa.gov)>; Collins, Gary <[Collins.Garyw@epa.gov](mailto:Collins.Garyw@epa.gov)>  
Subject: Sediment Testing Results from the Golden Ray

Molly,

We don't think the Golden Ray and all that mess has any bearing on the Brunswick Harbor Mod Study (BHMS), but I just received the results of the few sediment samples they took around the vessel? Would you be interested in seeing those? I'm also about ready to send the graphical displays of the boring data that we spoke of earlier for the BHMS. Will get those to you very soon.

Mary E. Richards  
U.S. Army Corps of Engineers  
Biologist-Planning Branch 100  
W. Oglethorpe Avenue  
Savannah, GA 31401  
Office: (912) 652-5020  
Cell: (912) 346-0066

**From:** [Holliman, Daniel](#)  
**To:** [Richards, Mary E CIV USARMY CESAS \(USA\)](#)  
**Cc:** [Martin, Molly](#); [Kajumba, Ntale](#); [Calli, Rosemary](#)  
**Subject:** [Non-DoD Source] Brunswick Harbor Modification Study - Sediment Testing Data  
**Date:** Monday, January 27, 2020 8:35:03 AM

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Mary,

You made a request for us to weigh in on the use of sediment data from geo borings (analyzed in 1997) and appropriateness for use in the current Brunswick Harbor Modification Study (BHMS). As discussed in our December 11<sup>th</sup> call, the EPA has concerns with using the historical sediment data for the current project. It is our understanding that sediment data was collected in 1997 (33 years ago) and the boring was not collected from the actual dredge footprint, therefore, we are requesting the Corps to provide a Tier 1 analysis that could provide reasonable assurance that the conditions have not likely changed since the last testing. This would include a compilation and analysis of information pertaining to potential sources and/or changes in sources of contaminants which may have been introduced to the dredge material.

Information in a Tier 1 analysis should include new industrial uses, discontinued industrial uses, any new NPDES permits, chemical/oil/pesticide spills, releases from Superfund sites or other hazardous waste sites, or any other available information describing the source of the material to be dredged which would be relevant to the identification of any additions of potential contaminants of concern.

Consideration of Tier 1 results would inform the if further evaluation in higher tiers is appropriate. Let

me know if you would like to have an additional call to discuss.

Thanks,  
Dan

**Dan Holliman**

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

tel 404.562.9531 | [holliman.daniel@epa.gov](mailto:holliman.daniel@epa.gov)

**From:** [Richards, Mary E CIV USARMY CESAS \(USA\)](#)  
**To:** [Holliman, Daniel](#)  
**Subject:** Revised BHMS Plan Alternatives  
**Date:** Friday, January 31, 2020 1:43:00 PM  
**Attachments:** [BHMS\\_Final Array of Alternatives Distributed to USFWS & EPA\\_20200131.pdf](#)

---

Dan,

I wanted to send you these revised BHMS alternatives as they've changed significantly since the ShipSim modeling we did a while back. No action needed on your part. Just wanted to keep you in the loop.

Mary E. Richards  
U.S. Army Corps of Engineers  
Biologist-Planning Branch 100  
W. Oglethorpe Avenue  
Savannah, GA 31401  
Office: (912) 652-5020  
Cell: (912) 346-0066

**From:** [Richards, Mary E CIV USARMY CESAS \(USA\)](#)  
**To:** [Holliman, Daniel](#)  
**Cc:** [Martin, Molly](#)  
**Subject:** RE: Brunswick Harbor Modification Study - Sediment Testing Data  
**Date:** Friday, February 7, 2020 3:12:00 PM

---

Good afternoon, Dan.

Savannah District believes that your request for a Tier I sediment evaluation for the BHMS is reasonable and warranted. However, due to the time that it will require to complete this study, and the additional time that it will take to construct the project IF we're given the appropriations/funding to do so, we propose to conduct the Tier I analysis during the PED (Pre-construction, Engineering and Design) phase of the project. In compliance with the Marine Protection, Research, and Sanctuaries Act (MPRSA), a Tier I sediment evaluation was completed for Brunswick Harbor in August 2019 (EPA concurrence signed August 27, 2019, amended October 17, 2019) for Operations & Maintenance dredging of the Brunswick entrance channel. This evaluation included all of Brunswick Harbor, both the outer and inner channel. During the PED phase of the BHMS, that analysis will be updated to reflect any changes in harbor conditions that may have occurred since.

I have briefly discussed this with Molly and she's in agreement on this approach. [And I apologize for that - I probably broke some protocol or chain-of-command speaking with her first before replying to you.]

Please let me know if you have any questions.

Mary E. Richards  
U.S. Army Corps of Engineers  
Biologist-Planning Branch  
100 W. Oglethorpe Avenue  
Savannah, GA 31401  
Office: (912) 652-5020  
Cell: (912) 346-0066

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

From: Holliman, Daniel [<mailto:Holliman.Daniel@epa.gov>]  
Sent: Monday, January 27, 2020 8:34 AM  
To: Richards, Mary E CIV USARMY CESAS (USA) <Mary.E.Richards@usace.army.mil>  
Cc: Martin, Molly <Martin.Molly@epa.gov>; Kajumba, Ntale <Kajumba.Ntale@epa.gov>; Calli, Rosemary <Calli.Rosemary@epa.gov>  
Subject: [Non-DoD Source] Brunswick Harbor Modification Study - Sediment Testing Data

Mary,

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Consideration of Tier 1 results would inform the if further evaluation in higher tiers is appropriate.

Let me know if you would like to have an additional call to discuss.

Thanks,  
Dan

Dan Holliman

NEPA Section | Strategic Programs Office

USEPA Region 4 | Office of the Regional Administrator

61 Forsyth Street SW | Atlanta, GA 30303

tel 404.562.9531 | holliman.daniel@epa.gov <<mailto:holliman.daniel@epa.gov>>



**From:** [Holliman, Daniel](#)  
**To:** [Richards, Mary E CIV USARMY CESAS \(USA\)](#)  
**Cc:** [Martin, Molly](#); [Kajumba, Ntale](#); [Calli, Rosemary](#)  
**Subject:** [Non-DoD Source] RE: Brunswick Harbor Modification Study - Sediment Testing Data  
**Date:** Friday, February 7, 2020 4:27:18 PM

---

As long as Molly is satisfied with this approach we are good. Thanks for the update Mary!

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

From: Richards, Mary E CIV USARMY CESAS (USA) <Mary.E.Richards@usace.army.mil>  
Sent: Friday, February 7, 2020 3:12 PM  
To: Holliman, Daniel <Holliman.Daniel@epa.gov>  
Cc: Martin, Molly <Martin.Molly@epa.gov>  
Subject: RE: Brunswick Harbor Modification Study - Sediment Testing Data

Good afternoon, Dan.

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Please let me know if you have any questions.

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100 W. Oglethorpe Avenue  
Savannah, GA 31401  
Office: (912) 652-5020  
Cell: (912) 346-0066

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

From: Holliman, Daniel [<mailto:Holliman.Daniel@epa.gov>]  
Sent: Monday, January 27, 2020 8:34 AM  
To: Richards, Mary E CIV USARMY CESAS (USA) <Mary.E.Richards@usace.army.mil>  
Cc: Martin, Molly <Martin.Molly@epa.gov>; Kajumba, Ntale <Kajumba.Ntale@epa.gov>; Calli, Rosemary <Calli.Rosemary@epa.gov>  
Subject: [Non-DoD Source] Brunswick Harbor Modification Study - Sediment Testing Data

Mary,

You made a request for us to weigh in on the use of sediment data from geo borings (analyzed in 1997) and appropriateness for use in the current Brunswick Harbor Modification Study (BHMS). As discussed in our

December 11th call, the EPA has concerns with using the historical sediment data for the current project. It is our understanding that sediment data was collected in 1997 (33 years ago) and the boring was not collected from the actual dredge footprint, therefore, we are requesting the Corps to provide a Tier 1 analysis that could provide reasonable assurance that the conditions have not likely changed since the last testing. This would include a compilation and analysis of information pertaining to potential sources and/or changes in sources of contaminants which may have been introduced to the dredge material.

Information in a Tier 1 analysis should include new industrial uses, discontinued industrial uses, any new NPDES permits, chemical/oil/pesticide spills, releases from Superfund sites or other hazardous waste sites, or any other available information describing the source of the material to be dredged which would be relevant to the identification of any additions of potential contaminants of concern.

Consideration of Tier 1 results would inform the if further evaluation in higher tiers is appropriate.

Let me know if you would like to have an additional call to discuss.

Thanks,  
Dan

Dan Holliman

NEPA Section | Strategic Programs Office

USEPA Region 4 | Office of the Regional Administrator

61 Forsyth Street SW | Atlanta, GA 30303

tel 404.562.9531 | holliman.daniel@epa.gov <<mailto:holliman.daniel@epa.gov>>

## **C) U.S. Fish and Wildlife Service (USFWS)**

**From:** [Richards, Mary E CIV USARMY CESAS \(US\)](#)  
**To:** [Wikoff, Bill](#); [Smith, Bradley](#)  
**Cc:** [Acree, James S \(Sterling\) CIV \(US\)](#)  
**Subject:** FW: Brunswick Harbor Charrette Read-Aheads  
**Date:** Thursday, May 9, 2019 1:46:00 PM  
**Attachments:** [20190516-17 - BHMS Charrette.pptx](#)  
[20110721 SEC 107 BHI Signed Letter Report to GPA.PDF 16 May 19 - BHMS Pilot Charrette and Site Visit Agenda.doc 17 May 19 - BHMS Agency Charrette Agenda.doc](#)  
[FW Brunswick Harbor Modifications Charrette with Environmental Agencies.msg Brunswick Harbor Charrette Read-Aheads.msg](#)

---

Bill & Bradley,

I don't think either of you are aware of a study Savannah District is starting - looking at modifying Brunswick Harbor via deepening/widening a turning basin and bend widener. We're having a kick-off charrette next week with the pilots, GPA and the resource agencies. It started out being a meeting with just the PDT but has grown since and we're adding resource agency folks on the fly. So sorry for the late notice. We'll get a few folks invited and then it's "Oh, should we invite so-n-so?" OF COURSE WE SHOULD!! The more the merrier!

The meetings are on the 16th & 17th. The first day is a site visit (unfortunately, that's just for the USACE PDT) and a meeting with the pilots. The next day (Friday) is a half day meeting/webinar with the resource agencies. It's being held in a meeting facility at the port. Please let me know if you want to attend personally (if not, call in info is in the attached invite) - we need to get a list of names to GPA in order to get you all through port security.

Let me know if you have any questions.

Mary E. Richards  
U.S. Army Corps of Engineers  
Biologist-Planning Branch  
100 W. Oglethorpe Avenue  
Savannah, GA 31401  
(912) 652-5020

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

From: Acree, James S (Sterling) CIV (US)  
Sent: Wednesday, May 8, 2019 5:25 PM  
To: Lavecchia, Jason R CIV USARMY CESAS (USA) <Jason.R.Lavecchia@usace.army.mil>; Henshaw, Susan H CIV USARMY CELRE (US) <Susan.Henshaw@usace.army.mil>; Bazzle, D Andrew CIV USARMY CESAM (USA) <David.A.Bazzle@usace.army.mil>; Steinbeiser, Dorothy M CIV USARMY CESAS (USA) <Dorothy.M.Steinbeiser@usace.army.mil>; Richards, Mary E CIV USARMY CESAS (US) <Mary.E.Richards@usace.army.mil>; Pratt, Lucas Robert (Luke) CIV USARMY CESAS (US) <Lucas.R.Pratt@usace.army.mil>; Chartouni, George S CIV USARMY CELRC (US) <George.S.Chartouni@usace.army.mil>; Mesko, Rachel C CIV USARMY CEMVP (US) <Rachel.C.Mesko@usace.army.mil>; Morgan-Ryan, Julie A CIV USARMY CESAS (US) <Julie.A.Morgan@usace.army.mil>; joseph.b.palmquist@uscg.mil; Davis, Spencer W CIV USARMY CESAS (USA) <Spencer.W.Davis@usace.army.mil>; Fischer, Steven A CIV USARMY CESAS (US) <Steven.A.Fischer@usace.army.mil>; Williams, Laura E (Beth) CIV USARMY CESAS (USA) <Laura.E.Williams@usace.army.mil>; Small, Daniel L CIV USARMY CESAD (USA) <Daniel.L.Small@usace.army.mil>; Otto, Kimberly P CIV USARMY CESAM (US) <Kimberly.P.Otto@usace.army.mil>; Moore, John C CIV USARMY CESAS (USA) <John.C.Moore@usace.army.mil>; White, Lisa L CIV USARMY CESAS (USA) <Lisa.L.White@usace.army.mil>; Nettles, Todd A CIV USARMY CESAM (US) <Todd.A.Nettles@usace.army.mil>; Morris, Jeffrey S CIV USARMY CESAS (USA) <Jeffrey.S.Morris@usace.army.mil>; Moore, Kelie <Kelie.Moore@dnr.ga.gov>; Cynthia Cooksey - NOAA Federal <cynthia.cooksey@noaa.gov>; Purcell, Jennifer D CIV USARMY CESWF (USA) <Jennifer.D.Purcell@usace.army.mil>; Lavecchia, Jason R CIV USARMY CESAS (USA)

<Jason.R.Lavecchia@usace.army.mil>; Henshaw, Susan H CIV USARMY CELRE (US)  
<Susan.Henshaw@usace.army.mil>; Bazzle, D Andrew CIV USARMY CESAM (USA)  
<David.A.Bazzle@usace.army.mil>; Steinbeiser, Dorothy M CIV USARMY CESAS (USA)  
<Dorothy.M.Steinbeiser@usace.army.mil>; Richards, Mary E CIV USARMY CESAS (US)  
<Mary.E.Richards@usace.army.mil>; Pratt, Lucas Robert (Luke) CIV USARMY CESAS (US)  
<Lucas.R.Pratt@usace.army.mil>; Chartouni, George S CIV USARMY CELRC (US)  
<George.S.Chartouni@usace.army.mil>; Mesko, Rachel C CIV USARMY CEMVP (US)  
<Rachel.C.Mesko@usace.army.mil>; Morgan-Ryan, Julie A CIV USARMY CESAS (US)  
<Julie.A.Morgan@usace.army.mil>; Fischer, Steven A CIV USARMY CESAS (US)  
<Steven.A.Fischer@usace.army.mil>; Williams, Laura E (Beth) CIV USARMY CESAS (USA)  
<Laura.E.Williams@usace.army.mil>; Small, Daniel L CIV USARMY CESAD (USA)  
<Daniel.L.Small@usace.army.mil>; Otto, Kimberly P CIV USARMY CESAM (US)  
<Kimberly.P.Otto@usace.army.mil>; Moore, John C CIV USARMY CESAS (USA)  
<John.C.Moore@usace.army.mil>; White, Lisa L CIV USARMY CESAS (USA) <Lisa.L.White@usace.army.mil>;  
Nettles, Todd A CIV USARMY CESAM (US) <Todd.A.Nettles@usace.army.mil>; Moore, Kelie  
<Kelie.Moore@dnr.ga.gov>; Morris, Jeffrey S CIV USARMY CESAS (USA) <Jeffrey.S.Morris@usace.army.mil>;  
Cynthia Cooksey - NOAA Federal <cynthia.cooksey@noaa.gov>; Higgins, Jamie <Higgins.Jamie@epa.gov>;  
Holliman, Daniel <Holliman.Daniel@epa.gov>; Purcell, Jennifer D CIV USARMY CESWF (USA)  
<Jennifer.D.Purcell@usace.army.mil>

Subject: Brunswick Harbor Charrette Read-Aheads

In preparation for the Brunswick Harbor Charrette next week, please see the following attachments:

- 1) Slides - we will be working together to discuss and capture information relevant to these slides during the charrette. The information we identify during our meeting will be used to drive the study.
- 2) 2011 Letter Report - this short report is the origin of our current study and contains pertinent information

Please bring any relevant data/information that you may have relevant to the needs for the study and

Feel free to forward to anyone participating in the charrette or with interest in the project.

Thank you,

J. Sterling Acree  
Project Manager, USACE  
Civil Works Programs & Project Management  
O: 912-652-5860  
C: 912-438-7900

**From:** [Wikoff, Bill](#)  
**To:** [Richards, Mary E CIV USARMY CESAS \(US\)](#)  
**Cc:** [Smith, Bradley](#); [Acree, James S \(Sterling\) CIV \(US\)](#)  
**Subject:** [Non-DoD Source] Re: [EXTERNAL] FW: Brunswick Harbor Charrette Read-Aheads  
**Date:** Thursday, May 9, 2019 3:15:14 PM

---

Mary and Sterling,

I will be the FWS biologist for this project. I would like to attend on Friday May 17.

Bill

[bill\\_wikoff@fws.gov](mailto:bill_wikoff@fws.gov)

U.S. Fish and Wildlife Service  
Ecological Services - Coastal Georgia Sub Office  
4980 Wildlife Drive, NE  
Townsend, Georgia 31331  
912-832-8739 ext.5, 912-832-8744 fax

NOTE: This email correspondence and any attachments to and from this sender is subject to the Freedom of Information Act (FOIA) and may be disclosed to third parties.

On Thu, May 9, 2019 at 1:57 PM Richards, Mary E CIV USARMY CESAS (US)  
<[Mary.E.Richards@usace.army.mil](mailto:Mary.E.Richards@usace.army.mil)> wrote:

Bill & Bradley,

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Let me know if you have any questions.

Mary E. Richards  
U.S. Army Corps of Engineers  
Biologist-Planning Branch 100  
W. Oglethorpe Avenue  
Savannah, GA 31401  
(912) 652-5020

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

**From:** [Wikoff, Bill](#)  
**To:** [Acree, James S \(Sterling\) CIV \(US\)](#); [Kelie Moore](#); [Richards, Mary E CIV USARMY CESAS \(US\)](#); [Cynthia Cooksey](#); [Williams, Laura E \(Beth\) CIV USARMY CESAS \(USA\)](#)  
**Subject:** [Non-DoD Source] FAA - Multi-agency MOA re: Aircraft-wildlife strikes  
**Date:** Friday, May 17, 2019 3:46:28 PM  
**Attachments:** [2003 FAA - Multi Agency Wildlife MOA re Aircraft.pdf](#)

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Greetings all,

Please find the MOA that I referenced attached.

My quick perusal of the MOA indicates that it will remain in effect until all signatory agencies terminate their participation in it. I have seen nothing to indicate that it is not still in effect for all signatory agencies.

Section II General Rules - item E states that the MOA does not impose legally binding requirements and may not apply to a particular situation in certain circumstances.

It does state that the FAA, APHIS, &/or the USAF, as appropriate for the situation, has the expertise to determine if there is a potential for a land use to attract hazardous wildlife.

Bill

[bill\\_wikoff@fws.gov](mailto:bill_wikoff@fws.gov)

U.S. Fish and Wildlife Service

Ecological Services - Coastal Georgia Sub Office

4980 Wildlife Drive, NE

Townsend, Georgia 31331

912-832-8739 ext.5, 912-832-8744 fax

NOTE: This email correspondence and any attachments to and from this sender is subject to the Freedom of Information Act (FOIA) and may be disclosed to third parties.

**From:** [Richards, Mary E CIV USARMY CESAS \(USA\)](#)  
**To:** [donald\\_imm@fws.gov](mailto:donald_imm@fws.gov)  
**Cc:** [Wikoff, Bill](#)  
**Subject:** Cooperating Agency Request for the Brunswick Harbor Modification Study  
**Date:** Thursday, May 23, 2019 11:40:00 AM

---

Dear Mr. Imm,

The U.S. Army Corps of Engineers, Savannah District (Corps) intends to prepare an environmental assessment for the Brunswick Harbor Modification Study (BHMS). This study will investigate two areas in the Brunswick inner harbor navigation channel which have been identified by the Brunswick Harbor pilots as problems for commercial vessel maneuverability. The first area of concern is in the vicinity of Coast Guard buoy 24 at the intersection of the Cedar Hammock Range and the Brunswick Harbor Range. The second area of concern is the South Brunswick River Turning Basin at the convergence of the South Brunswick River and the Turtle River.

Pursuant to Sections 1501.6 and 1508.5, of the Council on Environmental Quality's Regulations for Implementing the Procedural Provisions of the National Environmental Policy Act (NEPA) of 1969, the Corps requests the participation of the United States Fish and Wildlife Service as a cooperating agency in providing assistance in preparing the environmental assessment for the BHMS.

This request is being made to the following Federal agencies: U.S. Fish and Wildlife Service, National Marine Fisheries Service, Environmental Protection Agency, and Georgia Department of Natural Resources. The purpose of this request is to formalize, via designation as a Cooperating Agency, the continuing coordination and active participation by your agency, and these other agencies, in the BHMS.

If you require further information, please contact me at (912) 652-5020, or via E-Mail at [mary.e.richards@usace.army.mil](mailto:mary.e.richards@usace.army.mil).

Sincerely,

Mary E. Richards  
U.S. Army Corps of Engineers  
Biologist-Planning Branch 100  
W. Oglethorpe Avenue  
Savannah, GA 31401  
(912) 652-5020



**From:** [Donald Imm](#)  
**To:** [Richards, Mary E CIV USARMY CESAS \(USA\)](#)  
**Cc:** [Wikoff, Bill](#); [Dayan, Nathan S CIV USARMY CESAS \(US\)](#); [Henshaw, Susan H CIV USARMY CELRE \(US\)](#)  
**Subject:** [Non-DoD Source] Re: [EXTERNAL] Cooperating Agency Request for the Brunswick Harbor Modification Study  
**Date:** Friday, May 24, 2019 4:12:13 PM

---

Thanks, I've forwarded to the region to get their concurrence

Sent from my iPhone

> On May 24, 2019, at 2:58 PM, Richards, Mary E CIV USARMY CESAS (USA)  
<Mary.E.Richards@usace.army.mil> wrote:  
>  
> Dear Mr. Imm,  
>  
> The U.S. Army Corps of Engineers, Savannah District (Corps) intends to prepare an environmental assessment for the Brunswick Harbor Modification Study (BHMS). This study will investigate two areas in the Brunswick inner harbor navigation channel which have been identified by the Brunswick Harbor pilots as problems for commercial vessel maneuverability. The first area of concern is in the vicinity of Coast Guard buoy 24 at the intersection of the Cedar Hammock Range and the Brunswick Harbor Range. The second area of concern is the South Brunswick River Turning Basin at the convergence of the South Brunswick River and the Turtle River.  
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>  
> If you require further information, please contact me at (912) 652-5020, or via E-Mail at mary.e.richards@usace.army.mil.  
>  
> Sincerely,  
>  
> Mary E. Richards  
> U.S. Army Corps of Engineers  
> Biologist-Planning Branch  
> 100 W. Oglethorpe Avenue  
> Savannah, GA 31401  
> (912) 652-5020  
>  
>

**From:** [Imm, Donald](#)  
**To:** [Richards, Mary E CIV USARMY CESAS \(USA\)](#)  
**Cc:** [Wikoff, Bill](#); [Dayan, Nathan S CIV USARMY CESAS \(US\)](#); [Henshaw, Susan H CIV USARMY CELRE \(US\)](#)  
**Subject:** [Non-DoD Source] Re: [EXTERNAL] Cooperating Agency Request for the Brunswick Harbor Modification Study  
**Date:** Friday, June 7, 2019 3:52:58 PM

---

Hi Mary, first, thank you for the opportunity to become a cooperating agency on this project. As you may know, only our Regional Director (SES) can make the decision to become a cooperating agency; that being said, I have shared the information with our regional office, and received word that our Regional Director would like our office to become a cooperating agency on this project, as well as the Savannah River restoration effort. With that said, I am drafting the letters, and should get them up to the regional office by Monday, and after a short period of review, I expect to have them signed. Is there a date in which you must have confirmation (ie. the signed letter)? Let me know, and i can pass that along as well. Again, thanks for the opportunity, we really look forward to working with you and the other partners on this project. Don

On Fri, May 24, 2019 at 2:58 PM Richards, Mary E CIV USARMY CESAS (USA)

<[Mary.E.Richards@usace.army.mil](mailto:Mary.E.Richards@usace.army.mil)> wrote:

Dear Mr. Imm,

The U.S. Army Corps of Engineers, Savannah District (Corps) intends to prepare an environmental assessment for the Brunswick Harbor Modification Study (BHMS). This study will investigate two areas in the Brunswick inner harbor navigation channel which have been identified by the Brunswick Harbor pilots as problems for commercial vessel maneuverability. The first area of concern is in the vicinity of Coast Guard buoy 24 at the intersection of the Cedar Hammock Range and the Brunswick Harbor Range. The second area of concern is the South Brunswick River Turning Basin at the convergence of the South Brunswick River and the Turtle River.

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Sincerely,

Mary E. Richards  
U.S. Army Corps of Engineers  
Biologist-Planning Branch 100  
W. Oglethorpe Avenue

Savannah, GA 31401  
(912) 652-5020

--

Donald W. Imm, PhD.  
State Supervisor/Project Leader  
U.S.Fish & Wildlife Service, Georgia Ecological Service,  
[355 East Hancock Avenue, Room 320](#) Box 7  
[Athens, GA 30601](#)

cell: 850/532-2046  
office: 706/208-7501  
fax: 706/613-6059

NOTE: This email correspondence and any attachments to and from this sender are subject to the Freedom of Information Act and may be disclosed to third parties.

**From:** [Richards, Mary E CIV USARMY CESAS \(USA\)](#)  
**To:** [Imm, Donald](#)  
**Cc:** [Henshaw, Susan H CIV USARMY CELRE \(US\)](#); [Acree, James S \(Sterling\) CIV \(US\)](#); [Dayan, Nathan S CIV USARMY CESAS \(US\)](#); [Wikoff, Bill](#)  
**Subject:** RE: [Non-DoD Source] Re: [EXTERNAL] Cooperating Agency Request for the Brunswick Harbor Modification Study  
**Date:** Friday, June 7, 2019 4:26:00 PM

---

Don,

Thank you for your response. I do not believe we need a certain date on your acceptance letter to become a cooperating agency for the Brunswick Harbor Modification Study. However, I cannot speak to the Savannah River Below Augusta restoration project. I believe the POC for that is Robin Armetta and I'm sure you have her contact information as she's been the individual corresponding with your office on that study.

GADNR and EPA have already sent acceptances for the Brunswick project; however, they sent theirs via email. I do not believe it matters to our office whether the response be email or formal letter. That decision is yours. Either way, we look forward to working with your staff on this study.

Thank you and have a great weekend!

Mary E. Richards  
U.S. Army Corps of Engineers  
Biologist-Planning Branch  
100 W. Oglethorpe Avenue  
Savannah, GA 31401  
(912) 652-5020

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

From: Imm, Donald [[mailto:donald\\_imm@fws.gov](mailto:donald_imm@fws.gov)]  
Sent: Friday, June 7, 2019 3:52 PM  
To: Richards, Mary E CIV USARMY CESAS (USA) <Mary.E.Richards@usace.army.mil>  
Cc: Wikoff, Bill <bill\_wikoff@fws.gov>; Dayan, Nathan S CIV USARMY CESAS (US) <Nathan.S.Dayan@usace.army.mil>; Henshaw, Susan H CIV USARMY CELRE (US) <Susan.Henshaw@usace.army.mil>  
Subject: [Non-DoD Source] Re: [EXTERNAL] Cooperating Agency Request for the Brunswick Harbor Modification Study

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On Fri, May 24, 2019 at 2:58 PM Richards, Mary E CIV USARMY CESAS (USA) <Mary.E.Richards@usace.army.mil <<mailto:Mary.E.Richards@usace.army.mil>> > wrote:

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Sincerely,

Mary E. Richards  
U.S. Army Corps of Engineers  
Biologist-Planning Branch 100 W.  
Oglethorpe Avenue Savannah, GA  
31401  
(912) 652-5020

--

Donald W. Imm, PhD.  
State Supervisor/Project Leader  
U.S.Fish & Wildlife Service, Georgia Ecological Service  
355 East Hancock Avenue, Room 320 <Blocked<https://maps.google.com/?q=355+East+Hancock+Avenue,+Room+320+Athens,+GA+30601&entry=gmail&source=g>> Box 7 Athens, GA  
30601 <Blocked<https://maps.google.com/?q=355+East+Hancock+Avenue,+Room+320+Athens,+GA+30601&entry=gmail&source=g>>

cell: 850/532-2046

office: 706/208-7501  
fax: 706/613-6059

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**From:** [Richards, Mary E CIV USARMY CESAS \(USA\)](#)  
**To:** [Imm, Donald](#)  
**Cc:** [Wikoff, Bill](#); [Davis, Spencer W CIV USARMY CESAS \(USA\)](#); [Henshaw, Susan H CIV USARMY CELRE \(US\)](#); [Dayan, Nathan S CIV USARMY CESAS \(USA\)](#)  
**Subject:** FW: [Non-DoD Source] Re: [EXTERNAL] Cooperating Agency Request for the Brunswick Harbor Modification Study  
**Date:** Friday, October 25, 2019 2:06:00 PM

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Mr. Imm,

I believe we've all let this matter fall onto the back burner, but Savannah District wants to confirm your desire to participate as a cooperating agency in the Brunswick Harbor Modification Study (see email below). If we do not hear from your office within the next 10 business days, we will assume the USFWS does not wish to participate as a cooperating agency. If that is the case, please be assured that Savannah District will still be closely coordinating with the USFWS as this study progresses.

In a separate action, we are currently developing a Scope of Work requesting USFWS support to aid us in identifying problems and opportunities related to potentially impacted fish and wildlife resources. This is in fulfillment of the statutory requirements under the Fish and Wildlife Coordination Act. Your office should be receiving that document early next week.

Thank you for your time and we look forward to working with you and your staff on this study!

Sincerely,

Mary E. Richards  
U.S. Army Corps of Engineers  
Biologist-Planning Branch 100  
W. Oglethorpe Avenue  
Savannah, GA 31401  
(912) 652-5020

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

From: Imm, Donald [[mailto:donald\\_imm@fws.gov](mailto:donald_imm@fws.gov)]  
Sent: Friday, June 7, 2019 3:52 PM  
To: Richards, Mary E CIV USARMY CESAS (USA) <Mary.E.Richards@usace.army.mil>  
Cc: Wikoff, Bill <bill\_wikoff@fws.gov>; Dayan, Nathan S CIV USARMY CESAS (US) <Nathan.S.Dayan@usace.army.mil>; Henshaw, Susan H CIV USARMY CELRE (US) <Susan.Henshaw@usace.army.mil>  
Subject: [Non-DoD Source] Re: [EXTERNAL] Cooperating Agency Request for the Brunswick Harbor Modification Study

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On Fri, May 24, 2019 at 2:58 PM Richards, Mary E CIV USARMY CESAS (USA) <Mary.E.Richards@usace.army.mil <<mailto:Mary.E.Richards@usace.army.mil>> > wrote:

Dear Mr. Imm,

The U.S. Army Corps of Engineers, Savannah District (Corps) intends to prepare an environmental assessment for the Brunswick Harbor Modification Study (BHMS). This study will investigate two areas in the Brunswick inner harbor navigation channel which have been identified by the Brunswick Harbor pilots as problems for commercial vessel maneuverability. The first area of concern is in the vicinity of Coast Guard buoy 24 at the intersection of the Cedar Hammock Range and the Brunswick Harbor Range. The second area of concern is the South Brunswick River Turning Basin at the convergence of the South Brunswick River and the Turtle River.

Pursuant to Sections 1501.6 and 1508.5, of the Council on Environmental Quality's Regulations for Implementing the Procedural Provisions of the National Environmental Policy Act (NEPA) of 1969, the Corps requests the participation of the United States Fish and Wildlife Service as a cooperating agency in providing assistance in preparing the environmental assessment for the BHMS.

This request is being made to the following Federal agencies: U.S. Fish and Wildlife Service, National Marine Fisheries Service, Environmental Protection Agency, and Georgia Department of Natural Resources. The purpose of this request is to formalize, via designation as a Cooperating Agency, the continuing coordination and active participation by your agency, and these other agencies, in the BHMS.

If you require further information, please contact me at (912) 652-5020, or via E-Mail at [mary.e.richards@usace.army.mil](mailto:mary.e.richards@usace.army.mil) <<mailto:mary.e.richards@usace.army.mil>> .

Sincerely,

Mary E. Richards  
U.S. Army Corps of Engineers  
Biologist-Planning Branch 100 W.  
Oglethorpe Avenue Savannah, GA  
31401  
(912) 652-5020

--

Donald W. Imm, PhD.  
State Supervisor/Project Leader  
U.S. Fish & Wildlife Service, Georgia Ecological Service  
355 East Hancock Avenue, Room 320 <Blocked<https://maps.google.com/?q=355+East+Hancock+Avenue,+Room+320+Athens,+GA+30601&entry=gmail&source=g>> Box 7 Athens, GA  
30601 <Blocked<https://maps.google.com/?q=355+East+Hancock+Avenue,+Room+320+Athens,+GA+30601&entry=gmail&source=g>>

cell: 850/532-2046

office: 706/208-7501  
fax: 706/613-6059

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**From:** [Richards, Mary E CIV USARMY CESAS \(USA\)](#)  
**To:** ["Imm, Donald"](#)  
**Cc:** ["Wikoff, Bill"](#); [Dayan, Nathan S CIV USARMY CESAS \(USA\)](#)  
**Subject:** FWCA Coordination for the Brunswick Harbor Modification Study  
**Date:** Monday, November 4, 2019 12:57:00 PM  
**Attachments:** [BHMS SOW FWCA 20191104.docx](#)  
**Importance:** High

---

Don,

As you know, under Section 1201 of the Water Resources Development (WRDA) Act of 2016, Savannah District has been authorized to study potential modifications to Brunswick Harbor with the intent to improve navigation conditions for the larger Roll-on/Roll-off (Ro/Ro) cargo vessels in the existing commercial fleet. For years harbor pilots have expressed safety and efficiency concerns with navigation through a bend widener between Brunswick Point and Cedar Hammock Ranges, and the turning basin at the confluence of the South Brunswick and Turtle Rivers. The purpose of this Brunswick Harbor Modification Study (BHMS) is to investigate existing and future conditions in the harbor and to formulate alternatives which contribute to the national economy while protecting the environment and maintaining safety for navigating vessels.

The alternatives tentatively selected are:

- \* The No Action Alternative - no change to the federal channel.
- \* Widen the existing bend widener between Brunswick Point and Cedar Hammock Ranges.
- \* Widen the existing turning basin.
- \* Widen both the bend widener and turning basin.
- \* Widen some section of the channel to allow a meeting area for vessels to safely pass.
- \* Widen all three - the bend widener, turning basin, and a portion of the channel for a meeting area.

In order to fulfil the statutory requirements under the Fish and Wildlife Coordination Act, Savannah District requests USFWS aid in identifying problems and opportunities related to potentially impacted fish and wildlife resources. Attached is the Scope of Work for the BHMS, to include budget and schedule. Please let us know if you agree to these terms no later than Monday, November 11.

If you have any questions or need further clarification, please do not hesitate to contact me. Bill and I have already had brief conversations regarding the study so he is situationally aware.

As always, we look forward to coordinating this study with you and your staff!

Sincerely,

Mary E. Richards  
U.S. Army Corps of Engineers  
Biologist-Planning Branch 100  
W. Oglethorpe Avenue  
Savannah, GA 31401  
(912) 652-5020



**From:** [Imm, Donald](#)  
**To:** [Dayan, Nathan S CIV USARMY CESAS \(USA\)](#)  
**Cc:** [Wikoff, Bill](#); [Richards, Mary E CIV USARMY CESAS \(USA\)](#)  
**Subject:** [Non-DoD Source] Re: [EXTERNAL] RE: FWCA Coordination for the Brunswick Harbor Modification Study  
**Date:** Wednesday, November 20, 2019 2:17:02 PM

---

Sorry Nathan and Mary, yes, we accept the SOW for the FWCA, Bill is out until the end of the week, my apologies for not being quicker to respond. Don

On Tue, Nov 19, 2019 at 9:03 AM Dayan, Nathan S CIV USARMY CESAS (USA) <[Nathan.S.Dayan@usace.army.mil](mailto:Nathan.S.Dayan@usace.army.mil)> wrote:

Don/Bill

We did not hear back from you on this SOW for FWCA for the Brunswick Harbor Modification Study. Do you except this SOW? We would like to MIPIR you money so please let us know.

Thank You

Nathan Dayan

Environmental Team Leader

Planning Branch - Planning, Programs, and Project Management Division USACE -

Savannah District

912-652-5172

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

From: Richards, Mary E CIV USARMY CESAS (USA)

Sent: Monday, November 4, 2019 12:57 PM

To: Imm, Donald <[donald\\_imm@fws.gov](mailto:donald_imm@fws.gov)>

Cc: Wikoff, Bill <[bill\\_wikoff@fws.gov](mailto:bill_wikoff@fws.gov)>; Dayan, Nathan S CIV USARMY CESAS (USA) <[Nathan.S.Dayan@usace.army.mil](mailto:Nathan.S.Dayan@usace.army.mil)>

Subject: FWCA Coordination for the Brunswick Harbor Modification Study

Importance: High

Don,

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As always, we look forward to coordinating this study with you and your staff!

Sincerely,

Mary E. Richards  
U.S. Army Corps of Engineers  
Biologist-Planning Branch 100  
W. Oglethorpe Avenue  
Savannah, GA 31401  
(912) 652-5020

--

Donald W. Imm, PhD.  
Field Supervisor  
U.S. Fish & Wildlife Service, Georgia Ecological Service,  
[355 East Hancock Avenue, Room 320](#) Box 7  
[Athens, GA 30601](#)

cell: 850/532-2046  
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fax: 706/613-6059

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**From:** [Richards, Mary E CIV USARMY CESAS \(USA\)](#)  
**To:** [Wikoff, Bill](#)  
**Subject:** BHMS Alternatives  
**Date:** Friday, January 31, 2020 1:37:00 PM  
**Attachments:** [BHMS\\_Final Array of Alternatives Distributed to USFWS & EPA\\_20200131.pdf](#)

---

Hi Bill.

Finally! Attached are the BHMS revised alternatives based on the SHIPSIM models. Now, you'll notice that the title states 'Final', well, that's always a relative term for the Corps. We have an In Progress Review meeting with SAD in a couple of weeks to make sure that they're all on board with our reasoning and alternatives formulation. We've already had the AMM where they approved of our old alternatives, but I guess now that get another shot at approving them since they've changed so much. Having said all that, I doubt they'll change much, if at all, after the meeting.

Anyway, you can at least include these in your report. If the alts change again, it can be corrected in the your final report.

Mary E. Richards  
U.S. Army Corps of Engineers  
Biologist-Planning Branch 100  
W. Oglethorpe Avenue  
Savannah, GA 31401  
Office: (912) 652-5020  
Cell: (912) 346-0066

**From:** [Wikoff, Bill](#)  
**To:** [Moore, Kelie](#); [McCoy, Clayton A CIV USARMY CESAJ \(USA\)](#)  
**Cc:** [Andrews, Jill](#); [Richards, Mary E CIV USARMY CESAS \(USA\)](#)  
**Subject:** Re: [Non-DoD Source] Assistance Request: Beneficial Use Valuation or Cost/Benefit Evaluation Studies/Papers  
**Date:** Friday, February 14, 2020 4:22:06 PM

---

Thank you Clay and Kelie!

After management review, I hope to submit FWS draft comments to the Corps SAS Planning recommending beneficial use of the dredge material that may result from the Brunswick Harbor Modification Study.

Bill Wikoff fish & wildlife biologist

bill\_wikoff@fws.gov  
U.S. Fish and Wildlife Service  
Ecological Services - Coastal Georgia Sub Office  
4980 Wildlife Drive, NE  
Townsend, Georgia 31331  
912-832-8739 ext.5

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---

**From:** Moore, Kelie <Kelie.Moore@dnr.ga.gov>  
**Sent:** Friday, February 14, 2020 11:19 AM  
**To:** clay.a.mccoy@usace.army.mil <Clay.A.Mccoy@usace.army.mil>  
**Cc:** Wikoff, Bill <bill\_wikoff@fws.gov>; Andrews, Jill <Jill.Andrews@dnr.ga.gov>; Richards, Mary E CIV USARMY CESAS (USA) <Mary.E.Richards@usace.army.mil>  
**Subject:** [EXTERNAL] RE: [Non-DoD Source] Assistance Request: Beneficial Use Valuation or Cost/Benefit Evaluation Studies/Papers

Thank you for sending these along and offering to assist. I am not sure of the timeline - I want to say 2 years until construction - an these papers will help bolster support for a beneficial use project.

Kelie Moore  
Federal Consistency Coordinator  
Coastal Resources Division (912)  
264-7218 | (912) 262-2334  
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GEORGIA DEPARTMENT OF NATURAL RESOURCES

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

From: McCoy, Clayton A CIV USARMY CESAJ (USA) <Clay.A.Mccoy@usace.army.mil>  
Sent: Friday, February 14, 2020 11:05 AM

To: Moore, Kelie <Kelie.Moore@dnr.ga.gov>; Richards, Mary E CIV USARMY CESAS (USA) <Mary.E.Richards@usace.army.mil>  
Cc: Wikoff, Bill <bill\_wikoff@fws.gov>; Andrews, Jill <Jill.Andrews@dnr.ga.gov>  
Subject: RE: [Non-DoD Source] Assistance Request: Beneficial Use Valuation or Cost/Benefit Evaluation Studies/Papers

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.

Kelie,

We (RSM RCX) don't have much on the lost benefits side but we have done a bit of work on the true project lifecycle costs that are often omitted. I think the overall community is starting to come around on the ecosystem services and value component. I've attached a couple of papers highlighting our general approach and some examples. Please know these papers are NOT official USACE policy or guidelines. The papers are simply some RCX concepts we've explored to develop more efficient projects.

We're available at the RCX to support SAS in developing creative solutions at Brunswick Harbor moving forward.

Clay McCoy, PhD

Acting Director

Regional Sediment Management Regional Center of Expertise US Army Corps of Engineers -  
Jacksonville District Clay.A.McCoy@usace.army.mil O - 904-232-3657 C - 904-708-9496

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

From: Moore, Kelie [<mailto:Kelie.Moore@dnr.ga.gov>]

Sent: Thursday, February 13, 2020 2:33 PM

To: McCoy, Clayton A CIV USARMY CESAJ (USA) <Clay.A.Mccoy@usace.army.mil>; Richards, Mary E CIV USARMY CESAS (USA) <Mary.E.Richards@usace.army.mil>

Cc: Wikoff, Bill <bill\_wikoff@fws.gov>; Andrews, Jill <Jill.Andrews@dnr.ga.gov>

Subject: [Non-DoD Source] Assistance Request: Beneficial Use Valuation or Cost/Benefit Evaluation Studies/Papers

Good Afternoon Clay:

Savannah District COE began looking at alternatives for widening some of the bends in the Brunswick Harbor last January that potentially includes beneficial use of the material removed from the channel (refer to last paragraph of attached Alternatives document). FWS is currently preparing a CAR (coordination act report) that will "provide input into identification and development of beneficial use opportunities, if practicable." Historically beneficial use is not necessarily the "least cost environmentally acceptable alternative" primarily because it is difficult to calculate the "benefit" of beneficial uses in the cost/benefit analysis.

Does the Regional Sediment Management Center for Excellence have any materials (reports, studies, etc.) or recommendations for capturing the loss of benefit when sediments are removed from the sand sharing system and/or their beneficial value as feeder berms or bird islands? DNR has

traditionally commented on FWS CARs (refer to attached 1998 DNR comments on the last Brunswick Harbor Deepening project) and DNR intends to provide comments on beneficial use options once we receive the Draft CAR. Any help you could provide would be greatly appreciated and thank you for your time Clay.

Good Afternoon Mary:

These attachments are also for your files if you do not have copies of them. We discussed potential beneficial use at the January 4, 2019 charette, but I don't know if I specifically pointed out that the River and Harbor Development Act (O.C.G.A. 52-9-1 & 52-9-2) was incorporated into Georgia's Coastal Management Program in 2005 as an Enforceable Policy subject to federal consistency. The law requires, at a minimum, that material removed from harbors (new work and O&M) must be analyzed to determine if it is suitable for beneficial use (i.e. majority of sand) and if it is suitable material, whether it is "feasible" for it to be used beneficially (i.e. a cost analysis between the least cost alternative and a beneficial use alternative).

Kelie Moore  
Federal Consistency Coordinator  
Coastal Resources Division <BlockedBlocked<http://coastalgadnr.org/>>  
(912) 264-7218 | (912) 262-2334

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Buy a fishing license today! <BlockedBlocked<http://georgiawildlife.com/licenses-permits-passes>>

-----  
A division of the  
GEORGIA DEPARTMENT OF NATURAL RESOURCES

**From:** [Wikoff, Bill](#)  
**To:** [Richards, Mary E CIV USARMY CESAS \(USA\)](#)  
**Cc:** [Cynthia Cooksey - NOAA Federal](#); [Kelie Moore](#); [Lee, Jason](#); [Ben Carswell](#)  
**Subject:** [Non-DoD Source] draft FWCA comments on Brunswick Harbor Modification Project  
**Date:** Tuesday, February 18, 2020 9:04:35 AM  
**Attachments:** [20200214\\_dFWCA Evaluation\\_BW-MRichards\\_BwkHarborModStudy\\_DI\\_signed.pdf](#)

---

Hi Mary,

Please find attached our draft FWCA comments on the Brunswick Harbor Modification Project. We await your input on it before requesting comments from other agencies.

Bill Wikoff    fish & wildlife biologist

[bill\\_wikoff@fws.gov](mailto:bill_wikoff@fws.gov)

U.S. Fish and Wildlife Service

Ecological Services - Coastal Georgia Sub Office

4980 Wildlife Drive, NE

Townsend, Georgia 31331

912-832-8739 ext.5

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**From:** [Richards, Mary E CIV USARMY CESAS \(USA\)](#)  
**To:** ["Imm, Donald"](#)  
**Cc:** ["Wikoff, Bill"](#); [Dayan, Nathan S CIV USARMY CESAS \(USA\)](#); [Fox, Stephen M CIV USARMY CESAD \(USA\)](#)  
**Subject:** RE: draft FWCA comments on Brunswick Harbor Modification Project  
**Date:** Thursday, March 5, 2020 4:26:00 PM  
**Attachments:** [BHMS\\_Final Array of Alternatives\\_RA.PDF](#)

---

Don,

Thank you for your comments on the BHMS. We agree with the Service's assessment of fish and wildlife resources present in the project area and appreciate your recommendations aimed to reduce potential impacts to those resources during project construction. Since the submittal of your draft report we have modified the alternatives to include varying combinations of the original list. We do not believe those changes will alter the Service's position on the project's implementation as the scope of dredging in regards to location and sediments removed remain unchanged. The final array of alternatives is attached for inclusion in your reviews with the other resource agencies and in your final report. We also recognize and understand the Service's desire to see dredged sediments used beneficially when possible and are evaluating those potential options.

We look forward to continuing to work with you and your office during this study effort. If you have any questions, please feel free to contact to me.

Sincerely,

Mary E. Richards  
U.S. Army Corps of Engineers  
Biologist-Planning Branch 100  
W. Oglethorpe Avenue  
Savannah, GA 31401  
Office: (912) 652-5020  
Cell: (912) 346-0066

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

From: Wikoff, Bill [[mailto:bill\\_wikoff@fws.gov](mailto:bill_wikoff@fws.gov)]  
Sent: Tuesday, February 18, 2020 9:00 AM  
To: Richards, Mary E CIV USARMY CESAS (USA) <Mary.E.Richards@usace.army.mil>  
Cc: Cynthia Cooksey - NOAA Federal <cynthia.cooksey@noaa.gov>; Kelie Moore <kelie.moore@dnr.ga.gov>; Lee, Jason <Jason.Lee@dnr.ga.gov>; Ben Carswell <bcarswell@jekyllisland.com>  
Subject: [Non-DoD Source] draft FWCA comments on Brunswick Harbor Modification Project

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Bill Wikoff fish & wildlife biologist

[bill\\_wikoff@fws.gov](mailto:bill_wikoff@fws.gov)

U.S. Fish and Wildlife Service

Ecological Services - Coastal Georgia Sub Office



**From:** [Wikoff, Bill](#)  
**To:** [Richards, Mary E CIV USARMY CESAS \(USA\)](#)  
**Subject:** [Non-DoD Source] Re: draft FWCA comments on Brunswick Harbor Modification Project  
**Date:** Thursday, March 5, 2020 5:14:52 PM

---

Thanks Mary. Do you have indicators to tell what type of sediments would be dredged from each of the areas; St. Simon's sound meeting area (the document indicates no dredging here), bend widener, Sidney Lanier Bridge meeting area, and the turning basin? General descriptions would suffice. Would the sediments from each of the areas be good enough for the uses I describe; bird island creation or maintenance, artificial shell rake, offshore bar, feeder berm for Jekyll Island?

Thanks,

Bill Wikoff fish & wildlife biologist

bill\_wikoff@fws.gov  
U.S. Fish and Wildlife Service  
Ecological Services - Coastal Georgia Sub Office  
4980 Wildlife Drive, NE  
Townsend, Georgia 31331  
912-832-8739 ext.5

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---

**From:** Richards, Mary E CIV USARMY CESAS (USA) <Mary.E.Richards@usace.army.mil>  
**Sent:** Thursday, March 5, 2020 4:26 PM  
**To:** Imm, Donald <donald\_imm@fws.gov>  
**Cc:** Wikoff, Bill <bill\_wikoff@fws.gov>; Dayan, Nathan S CIV USARMY CESAS (USA) <Nathan.S.Dayan@usace.army.mil>; Fox, Stephen M CIV USARMY CESAD (USA) <Stephen.M.Fox@usace.army.mil>  
**Subject:** [EXTERNAL] RE: draft FWCA comments on Brunswick Harbor Modification Project

Don,

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We look forward to continuing to work with you and your office during this study effort. If you

have any questions, please feel free to contact to me.

Sincerely,

Mary E. Richards  
U.S. Army Corps of Engineers  
Biologist-Planning Branch 100  
W. Oglethorpe Avenue  
Savannah, GA 31401  
Office: (912) 652-5020  
Cell: (912) 346-0066

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

From: Wikoff, Bill [[mailto:bill\\_wikoff@fws.gov](mailto:bill_wikoff@fws.gov)]

Sent: Tuesday, February 18, 2020 9:00 AM

To: Richards, Mary E CIV USARMY CESAS (USA) <Mary.E.Richards@usace.army.mil> Cc:  
Cynthia Cooksey - NOAA Federal <cynthia.cooksey@noaa.gov>; Kelie Moore  
<kelie.moore@dnr.ga.gov>; Lee, Jason <Jason.Lee@dnr.ga.gov>; Ben Carswell  
<bcarswell@jekyllisland.com>

Subject: [Non-DoD Source] draft FWCA comments on Brunswick Harbor Modification Project

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Bill Wikoff fish & wildlife biologist

bill\_wikoff@fws.gov

U.S. Fish and Wildlife Service

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4980 Wildlife Drive, NE

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**From:** [Imm, Donald](#)  
**To:** [Richards, Mary E CIV USARMY CESAS \(USA\)](#)  
**Cc:** [Wikoff, Bill](#); [Dayan, Nathan S CIV USARMY CESAS \(USA\)](#); [Fox, Stephen M CIV USARMY CESAD \(USA\)](#)  
**Subject:** [Non-DoD Source] Re: draft FWCA comments on Brunswick Harbor Modification Project  
**Date:** Friday, March 6, 2020 8:20:10 AM

---

Thanks Mary, we'll take a look at your modifications and let you know whether we have any additional concerns. Don

---

**From:** Richards, Mary E CIV USARMY CESAS (USA) <Mary.E.Richards@usace.army.mil>  
**Sent:** Thursday, March 5, 2020 4:26 PM  
**To:** Imm, Donald <donald\_imm@fws.gov>  
**Cc:** Wikoff, Bill <bill\_wikoff@fws.gov>; Dayan, Nathan S CIV USARMY CESAS (USA) <Nathan.S.Dayan@usace.army.mil>; Fox, Stephen M CIV USARMY CESAD (USA) <Stephen.M.Fox@usace.army.mil>  
**Subject:** [EXTERNAL] RE: draft FWCA comments on Brunswick Harbor Modification Project

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Sincerely,

Mary E. Richards  
U.S. Army Corps of Engineers  
Biologist-Planning Branch 100  
W. Oglethorpe Avenue  
Savannah, GA 31401  
Office: (912) 652-5020  
Cell: (912) 346-0066

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

**From:** Wikoff, Bill [[mailto:bill\\_wikoff@fws.gov](mailto:bill_wikoff@fws.gov)]  
**Sent:** Tuesday, February 18, 2020 9:00 AM  
**To:** Richards, Mary E CIV USARMY CESAS (USA) <Mary.E.Richards@usace.army.mil> Cc: Cynthia Cooksey - NOAA Federal <cynthia.cooksey@noaa.gov>; Kelie Moore <kelie.moore@dnr.ga.gov>; Lee, Jason <Jason.Lee@dnr.ga.gov>; Ben Carswell <bcarswell@jekyllisland.com>  
**Subject:** [Non-DoD Source] draft FWCA comments on Brunswick Harbor Modification Project

**From:** [Richards, Mary E CIV USARMY CESAS \(USA\)](#)  
**To:** [Wikoff, Bill](#)  
**Subject:** RE: draft FWCA comments on Brunswick Harbor Modification Project  
**Date:** Tuesday, March 10, 2020 5:01:00 PM

---

Hey Bill.

We used sediment borings from the last Brunswick deepening that were adjacent to the BHMS project areas as a proxy for the type of sediments we can expect when we dredge those areas - for study purposes. I have boring logs I can give you but in general the sediment characteristics are -  
bend widener - poorly graded sands, silty sands and highly weathered limestone  
turning basin - poorly graded sands, clayey sands, sandy clays, highly weathered limestone and highly plastic clays  
meeting area at the bridge - highly plastic clays and silts to moderately-highly weathered limestone with intermittent sandy clay and clayey sand deposits

These descriptions came from a review of the boring logs by one of our geologists. The only area he thought could possibly be used as beneficial use for a bird island was the bend widener and only then because 'its proxy' was somewhat similar to the boring logs of the channel sediments that were used to build the existing bird island. I told Tim Keyes a while back that if it ends up we do pump material from the widener onto the bird island, we cannot guarantee what will come out of the pipe. There will be some new borings done in the areas to be dredged prior to construction because we have to include material descriptions in the contract specs. Things like that affect a contractor's bid on a dredging project, aka he'll want more \$\$ to dig clay than he will to dig fluff. But that won't be done till PED, after the study has been approved and IF we get the appropriations to construct it.

As for if the sediments would be suitable for the other options you mention, you would have to help me by telling what type of sediments you would require for those purposes. I honestly don't know what type of sediment would be suitable for a shell rake. I talked a little about this with the PM and he said it would be useful, not just now but for future beneficial use considerations, if the agencies could put a table together on what type of sediment could be best used where. Know what I mean? It may already exist. Heck, we (maybe ERDC) may have something like that and I'm just not aware of it.

Call if you want to talk more on this. I have a few graphics I could send you.

Mary E. Richards  
U.S. Army Corps of Engineers  
Biologist-Planning Branch  
100 W. Oglethorpe Avenue  
Savannah, GA 31401  
Office: (912) 652-5020  
Cell: (912) 346-0066

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

From: Wikoff, Bill [[mailto:bill\\_wikoff@fws.gov](mailto:bill_wikoff@fws.gov)]

Sent: Thursday, March 5, 2020 5:14 PM

To: Richards, Mary E CIV USARMY CESAS (USA) <Mary.E.Richards@usace.army.mil>

Subject: [Non-DoD Source] Re: draft FWCA comments on Brunswick Harbor Modification Project

Thanks Mary. Do you have indicators to tell what type of sediments would be dredged from each of the areas; St. Simon's sound meeting area (the document indicates no dredging here), bend widener, Sidney Lanier Bridge meeting area, and the turning basin? General descriptions would suffice. Would the sediments from each of the areas be good enough for the uses I describe; bird island creation or maintenance, artificial shell rake, offshore bar, feeder berm for Jekyll Island?

**To:** Richards, Mary E CIV USARMY CESAS (USA)  
**Cc:** Cynthia Cooksey - NOAA Federal; Kelie Moore; Lee, Jason; Ben Carswell  
**Subject:** [Non-DoD Source] Brunswick Harbor Modification Study - final FWCA comments  
**Date:** Wednesday, May 20, 2020 9:34:42 AM  
**Attachments:** [20200520\\_fFWCA EvaluationCmts\\_BwkHarborModStudy-BHMS.pdf](#)

Please find attached the U.S. Fish and Wildlife Service's final comments made under the Fish & Wildlife Coordination Act for the Brunswick Harbor Modification Study.

Thank you for considering them. We support and are open to discussions on implementing beneficial use alternatives.

Bill Wikoff fish & wildlife biologist

[bill\\_wikoff@fws.gov](mailto:bill_wikoff@fws.gov)  
U.S. Fish and Wildlife Service  
Ecological Services - Coastal Georgia Sub Office  
4980 Wildlife Drive, NE  
Townsend, Georgia 31331  
912-832-8739 ext.5

NOTE: This email correspondence and any attachments to and from this sender is subject to the Freedom of Information Act (FOIA) and may be disclosed to third parties.

## **D) Georgia Department of Natural Resources (GADNR)**

**From:** [Acree, James S \(Sterling\) CIV \(US\)](#)  
**To:** [Lavecchia, Jason R CIV USARMY CESAS \(USA\)](#); [Henshaw, Susan H CIV USARMY CELRE \(US\)](#); [Bazzle, D Andrew CIV USARMY CESAM \(USA\)](#); [Steinbeiser, Dorothy M CIV USARMY CESAS \(USA\)](#); [Richards, Mary E CIV USARMY CESAS \(US\)](#); [Pratt, Lucas Robert \(Luke\) CIV USARMY CESAS \(US\)](#); [Chartouni, George S CIV USARMY CELRC \(US\)](#); [Mesko, Rachel C CIV USARMY CEMVP \(US\)](#); [Morgan-Ryan, Julie A CIV USARMY CESAS \(US\)](#); [joseph.b.palmquist@uscg.mil](#); [Davis, Spencer W CIV USARMY CESAS \(USA\)](#); [Fischer, Steven A CIV USARMY CESAS \(US\)](#); [Williams, Laura E \(Beth\) CIV USARMY CESAS \(USA\)](#); [Small, Daniel L CIV USARMY CESAD \(USA\)](#); [Otto, Kimberly P CIV USARMY CESAM \(US\)](#); [Moore, John C CIV USARMY CESAS \(USA\)](#); [White, Lisa L CIV USARMY CESAS \(USA\)](#); [Nettles, Todd A CIV USARMY CESAM \(US\)](#); [Morris, Jeffrey S CIV USARMY CESAS \(USA\)](#); [Moore, Kelie](#); [Cynthia Cooksey - NOAA Federal](#); [Purcell, Jennifer D CIV USARMY CESWF \(USA\)](#); [Lavecchia, Jason R CIV USARMY CESAS \(USA\)](#); [Henshaw, Susan H CIV USARMY CELRE \(US\)](#); [Bazzle, D Andrew CIV USARMY CESAM \(USA\)](#); [Steinbeiser, Dorothy M CIV USARMY CESAS \(USA\)](#); [Richards, Mary E CIV USARMY CESAS \(US\)](#); [Pratt, Lucas Robert \(Luke\) CIV USARMY CESAS \(US\)](#); [Chartouni, George S CIV USARMY CELRC \(US\)](#); [Mesko, Rachel C CIV USARMY CEMVP \(US\)](#); [Morgan-Ryan, Julie A CIV USARMY CESAS \(US\)](#); [Fischer, Steven A CIV USARMY CESAS \(US\)](#); [Williams, Laura E \(Beth\) CIV USARMY CESAS \(USA\)](#); [Small, Daniel L CIV USARMY CESAD \(USA\)](#); [Otto, Kimberly P CIV USARMY CESAM \(US\)](#); [Moore, John C CIV USARMY CESAS \(USA\)](#); [White, Lisa L CIV USARMY CESAS \(USA\)](#); [Nettles, Todd A CIV USARMY CESAM \(US\)](#); [Moore, Kelie](#); [Morris, Jeffrey S CIV USARMY CESAS \(USA\)](#); [Cynthia Cooksey - NOAA Federal](#); [Higgins, Jamie](#); [Holliman, Daniel](#); [Purcell, Jennifer D CIV USARMY CESWF \(USA\)](#)  
**Subject:** Brunswick Harbor Charrette Read-Aheads  
**Date:** Wednesday, May 8, 2019 5:25:05 PM  
**Attachments:** [20190516-17 - BHMS Charrette.pptx](#)  
[20110721 SEC 107 BHI Signed Letter Report to GPA.PDF](#)

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In preparation for the Brunswick Harbor Charrette next week, please see the following attachments:

- 1) Slides - we will be working together to discuss and capture information relevant to these slides during the charrette. The information we identify during our meeting will be used to drive the study.
- 2) 2011 Letter Report - this short report is the origin of our current study and contains pertinent information

Please bring any relevant data/information that you may have relevant to the needs for the study and

Feel free to forward to anyone participating in the charrette or with interest in the project.

Thank you,

J. Sterling Acree  
Project Manager, USACE  
Civil Works Programs & Project Management  
O: 912-652-5860  
C: 912-438-7900

**From:** [Richards, Mary E CIV USARMY CESAS \(US\)](#)  
**To:** [Wikoff, Bill](#); [Smith, Bradley](#)  
**Cc:** [Acree, James S \(Sterling\) CIV \(US\)](#)  
**Subject:** FW: Brunswick Harbor Charrette Read-Aheads  
**Date:** Thursday, May 9, 2019 1:46:00 PM  
**Attachments:** [20190516-17 - BHMS Charrette.pptx](#)  
[20110721 SEC 107 BHI Signed Letter Report to GPA.PDF 16 May 19 - BHMS Pilot Charrette and Site Visit Agenda.doc 17 May 19 - BHMS Agency Charrette Agenda.doc](#)  
[FW Brunswick Harbor Modifications Charrette with Environmental Agencies.msg Brunswick Harbor Charrette Read-Aheads.msg](#)

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Bill & Bradley,

I don't think either of you are aware of a study Savannah District is starting - looking at modifying Brunswick Harbor via deepening/widening a turning basin and bend widener. We're having a kick-off charrette next week with the pilots, GPA and the resource agencies. It started out being a meeting with just the PDT but has grown since and we're adding resource agency folks on the fly. So sorry for the late notice. We'll get a few folks invited and then it's "Oh, should we invite so-n-so?" OF COURSE WE SHOULD!! The more the merrier!

The meetings are on the 16th & 17th. The first day is a site visit (unfortunately, that's just for the USACE PDT) and a meeting with the pilots. The next day (Friday) is a half day meeting/webinar with the resource agencies. It's being held in a meeting facility at the port. Please let me know if you want to attend personally (if not, call in info is in the attached invite) - we need to get a list of names to GPA in order to get you all through port security.

Let me know if you have any questions.

Mary E. Richards  
U.S. Army Corps of Engineers  
Biologist-Planning Branch  
100 W. Oglethorpe Avenue  
Savannah, GA 31401  
(912) 652-5020

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

From: Acree, James S (Sterling) CIV (US)  
Sent: Wednesday, May 8, 2019 5:25 PM  
To: Lavecchia, Jason R CIV USARMY CESAS (USA) <Jason.R.Lavecchia@usace.army.mil>; Henshaw, Susan H CIV USARMY CELRE (US) <Susan.Henshaw@usace.army.mil>; Bazzle, D Andrew CIV USARMY CESAM (USA) <David.A.Bazzle@usace.army.mil>; Steinbeiser, Dorothy M CIV USARMY CESAS (USA) <Dorothy.M.Steinbeiser@usace.army.mil>; Richards, Mary E CIV USARMY CESAS (US) <Mary.E.Richards@usace.army.mil>; Pratt, Lucas Robert (Luke) CIV USARMY CESAS (US) <Lucas.R.Pratt@usace.army.mil>; Chartouni, George S CIV USARMY CELRC (US) <George.S.Chartouni@usace.army.mil>; Mesko, Rachel C CIV USARMY CEMVP (US) <Rachel.C.Mesko@usace.army.mil>; Morgan-Ryan, Julie A CIV USARMY CESAS (US) <Julie.A.Morgan@usace.army.mil>; joseph.b.palmquist@uscg.mil; Davis, Spencer W CIV USARMY CESAS (USA) <Spencer.W.Davis@usace.army.mil>; Fischer, Steven A CIV USARMY CESAS (US) <Steven.A.Fischer@usace.army.mil>; Williams, Laura E (Beth) CIV USARMY CESAS (USA) <Laura.E.Williams@usace.army.mil>; Small, Daniel L CIV USARMY CESAD (USA) <Daniel.L.Small@usace.army.mil>; Otto, Kimberly P CIV USARMY CESAM (US) <Kimberly.P.Otto@usace.army.mil>; Moore, John C CIV USARMY CESAS (USA) <John.C.Moore@usace.army.mil>; White, Lisa L CIV USARMY CESAS (USA) <Lisa.L.White@usace.army.mil>; Nettles, Todd A CIV USARMY CESAM (US) <Todd.A.Nettles@usace.army.mil>; Morris, Jeffrey S CIV USARMY CESAS (USA) <Jeffrey.S.Morris@usace.army.mil>; Moore, Kelie <Kelie.Moore@dnr.ga.gov>; Cynthia Cooksey - NOAA Federal <cynthia.cooksey@noaa.gov>; Purcell, Jennifer D CIV USARMY CESWF (USA) <Jennifer.D.Purcell@usace.army.mil>; Lavecchia, Jason R CIV USARMY CESAS (USA)



<Jason.R.Lavecchia@usace.army.mil>; Henshaw, Susan H CIV USARMY CELRE (US)  
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Cynthia Cooksey - NOAA Federal <cynthia.cooksey@noaa.gov>; Higgins, Jamie <Higgins.Jamie@epa.gov>;  
Holliman, Daniel <Holliman.Daniel@epa.gov>; Purcell, Jennifer D CIV USARMY CESWF (USA)  
<Jennifer.D.Purcell@usace.army.mil>

Subject: Brunswick Harbor Charrette Read-Aheads

In preparation for the Brunswick Harbor Charrette next week, please see the following attachments:

- 1) Slides - we will be working together to discuss and capture information relevant to these slides during the charrette. The information we identify during our meeting will be used to drive the study.
- 2) 2011 Letter Report - this short report is the origin of our current study and contains pertinent information

Please bring any relevant data/information that you may have relevant to the needs for the study and

Feel free to forward to anyone participating in the charrette or with interest in the project.

Thank you,

J. Sterling Acree  
Project Manager, USACE  
Civil Works Programs & Project Management  
O: 912-652-5860  
C: 912-438-7900

## **GADNR -Coastal Resources Division (CRD)**

**From:** [Moore, Kelie](#)  
**To:** [Wikoff, Bill](#); [Acree, James S \(Sterling\) CIV \(US\)](#); [Richards, Mary E CIV USARMY CESAS \(US\)](#); [Cynthia Cooksey; Williams, Laura E \(Beth\) CIV USARMY CESAS \(USA\)](#)  
**Subject:** [Non-DoD Source] RE: FAA - Multi-agency MOA re: Aircraft-wildlife strikes  
**Date:** Monday, May 20, 2019 11:17:23 AM  
**Attachments:** [FAA LTR 6 Aug 07.pdf](#)  
[FAA LTR 10 Sep 07.pdf](#)  
[FAA Wildlife Attractant Circular.pdf](#)

---

Here is the FAA info I have on the Brunswick Harbor bird island and guidance we use for CZM review.

Kelie Moore  
Federal Consistency Coordinator  
**Coastal Resources Division**  
(912) 264-7218 | (912) 262-2334  
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---

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GEORGIA DEPARTMENT OF NATURAL RESOURCES

---

**From:** Wikoff, Bill [mailto:bill\_wikoff@fws.gov]  
**Sent:** Friday, May 17, 2019 3:42 PM  
**To:** Acree, James S (Sterling) CIV (US) <James.S.Acree@usace.army.mil>; Moore, Kelie <Kelie.Moore@dnr.ga.gov>; Richards, Mary E. SAS <Mary.E.Richards@usace.army.mil>; Cynthia Cooksey <Cynthia.Cooksey@noaa.gov>; Williams, Laura E (Beth) SAS <Laura.E.Williams@usace.army.mil>  
**Subject:** FAA - Multi-agency MOA re: Aircraft-wildlife strikes

**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.

Greetings all,

Please find the MOA that I referenced attached.

My quick perusal of the MOA indicates that it will remain in effect until all signatory agencies terminate their participation in it. I have seen nothing to indicate that it is not still in effect for all signatory agencies.

Section II General Rules - item E states that the MOA does not impose legally binding requirements and may not apply to a particular situation in certain circumstances.

It does state that the FAA, APHIS, &/or the USAF, as appropriate for the situation, has the expertise to determine if there is a potential for a land use to attract hazardous wildlife.

Bill

[bill\\_wikoff@fws.gov](mailto:bill_wikoff@fws.gov)  
U.S. Fish and Wildlife Service  
Ecological Services - Coastal Georgia Sub Office  
4980 Wildlife Drive, NE

**From:** [Moore, Kelie](#)  
**To:** [Acree, James S \(Sterling\) CIV \(US\)](#); [Lavecchia, Jason R CIV USARMY CESAS \(USA\)](#); [Henshaw, Susan H CIV USARMY CELRE \(US\)](#); [Bazzle, D Andrew CIV USARMY CESAM \(USA\)](#); [Steinbeiser, Dorothy M CIV USARMY CESAS \(USA\)](#); [Richards, Mary E CIV USARMY CESAS \(USA\)](#); [Pratt, Lucas Robert \(Luke\) CIV USARMY CESAS \(US\)](#); [Chartouni, George S CIV USARMY CELRC \(US\)](#); [Mesko, Rachel C CIV USARMY CEMVP \(US\)](#); [Morgan-Ryan, Julie A CIV USARMY CESAS \(US\)](#); [joseph.b.palmquist@uscg.mil](#); [Davis, Spencer W CIV USARMY CESAS \(USA\)](#); [Fischer, Steven A CIV USARMY CESAS \(US\)](#); [Williams, Laura E \(Beth\) CIV USARMY CESAS \(USA\)](#); [Small, Daniel L CIV USARMY CESAD \(USA\)](#); [Otto, Kimberly P CIV USARMY CESAM \(USA\)](#); [Moore, John C CIV USARMY CESAS \(USA\)](#); [White, Lisa L CIV USARMY CESAS \(USA\)](#); [Nettles, Todd A CIV USARMY CESAM \(US\)](#); [Morris, Jeffrey S CIV USARMY CESAS \(USA\)](#); [Cynthia Cooksey - NOAA Federal](#); [Purcell, Jennifer D CIV USARMY CESWF \(USA\)](#); [Lavecchia, Jason R CIV USARMY CESAS \(USA\)](#); [Henshaw, Susan H CIV USARMY CELRE \(US\)](#); [Bazzle, D Andrew CIV USARMY CESAM \(USA\)](#); [Steinbeiser, Dorothy M CIV USARMY CESAS \(USA\)](#); [Richards, Mary E CIV USARMY CESAS \(USA\)](#); [Pratt, Lucas Robert \(Luke\) CIV USARMY CESAS \(US\)](#); [Chartouni, George S CIV USARMY CELRC \(US\)](#); [Mesko, Rachel C CIV USARMY CEMVP \(US\)](#); [Morgan-Ryan, Julie A CIV USARMY CESAS \(US\)](#); [Fischer, Steven A CIV USARMY CESAS \(US\)](#); [Williams, Laura E \(Beth\) CIV USARMY CESAS \(USA\)](#); [Small, Daniel L CIV USARMY CESAD \(USA\)](#); [Otto, Kimberly P CIV USARMY CESAM \(USA\)](#); [Moore, John C CIV USARMY CESAS \(USA\)](#); [White, Lisa L CIV USARMY CESAS \(USA\)](#); [Nettles, Todd A CIV USARMY CESAM \(US\)](#); [Morris, Jeffrey S CIV USARMY CESAS \(USA\)](#); [Cynthia Cooksey - NOAA Federal](#); [Higgins, Jamie](#); [Holliman, Daniel](#); [Purcell, Jennifer D CIV USARMY CESWF \(USA\)](#)  
**Cc:** [Andrews, Jill](#)  
**Subject:** [Non-DoD Source] RE: Brunswick Harbor Charrette Slides - Please Review by COB 22 May 2019  
**Date:** Tuesday, May 21, 2019 3:32:47 PM  
**Attachments:** [20190516-17 - BHMS Charrette - Updated at 051719 Meeting - DNR CRD Comments.pptx](#)

---

Attached are a few DNR/CRD comments (in red).

Kelie Moore  
Federal Consistency Coordinator  
Coastal Resources Division (912)  
264-7218 | (912) 262-2334  
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a fishing license today!

-----  
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GEORGIA DEPARTMENT OF NATURAL RESOURCES

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

From: Acree, James S (Sterling) CIV (US) [<mailto:James.S.Acree@usace.army.mil>]  
Sent: Monday, May 20, 2019 8:59 AM  
To: Lavecchia, Jason R CIV USARMY CESAS (USA) <[Jason.R.Lavecchia@usace.army.mil](mailto:Jason.R.Lavecchia@usace.army.mil)>; Henshaw, Susan H CIV USARMY CELRE (US) <[Susan.Henshaw@usace.army.mil](mailto:Susan.Henshaw@usace.army.mil)>; Bazzle, D Andrew CIV USARMY CESAM (USA) <[David.A.Bazzle@usace.army.mil](mailto:David.A.Bazzle@usace.army.mil)>; Steinbeiser, Dorothy M CIV USARMY CESAS (USA) <[Dorothy.M.Steinbeiser@usace.army.mil](mailto:Dorothy.M.Steinbeiser@usace.army.mil)>; Richards, Mary E CIV USARMY CESAS (US) <[Mary.E.Richards@usace.army.mil](mailto:Mary.E.Richards@usace.army.mil)>; Pratt, Lucas Robert (Luke) CIV USARMY CESAS (US) <[Lucas.R.Pratt@usace.army.mil](mailto:Lucas.R.Pratt@usace.army.mil)>; Chartouni, George S CIV USARMY CELRC (US) <[George.S.Chartouni@usace.army.mil](mailto:George.S.Chartouni@usace.army.mil)>; Mesko, Rachel C CIV USARMY CEMVP (US) <[Rachel.C.Mesko@usace.army.mil](mailto:Rachel.C.Mesko@usace.army.mil)>; Morgan-Ryan, Julie A CIV USARMY CESAS (US) <[Julie.A.Morgan@usace.army.mil](mailto:Julie.A.Morgan@usace.army.mil)>; [joseph.b.palmquist@uscg.mil](mailto:joseph.b.palmquist@uscg.mil); Davis, Spencer W CIV USARMY CESAS (USA) <[Spencer.W.Davis@usace.army.mil](mailto:Spencer.W.Davis@usace.army.mil)>; Fischer, Steven A CIV USARMY CESAS (US) <[Steven.A.Fischer@usace.army.mil](mailto:Steven.A.Fischer@usace.army.mil)>; Williams, Laura E (Beth) CIV USARMY CESAS (USA) <[Laura.E.Williams@usace.army.mil](mailto:Laura.E.Williams@usace.army.mil)>; Small, Daniel L CIV USARMY CESAD (USA) <[Daniel.L.Small@usace.army.mil](mailto:Daniel.L.Small@usace.army.mil)>; Otto, Kimberly P CIV USARMY CESAM (USA) <[Kimberly.P.Otto@usace.army.mil](mailto:Kimberly.P.Otto@usace.army.mil)>; Moore, John C CIV USARMY CESAS (USA) <[John.C.Moore@usace.army.mil](mailto:John.C.Moore@usace.army.mil)>; White, Lisa L CIV USARMY CESAS (USA) <[Lisa.L.White@usace.army.mil](mailto:Lisa.L.White@usace.army.mil)>; Nettles, Todd A CIV USARMY CESAM (US) <[Todd.A.Nettles@usace.army.mil](mailto:Todd.A.Nettles@usace.army.mil)>; Morris, Jeffrey S CIV USARMY CESAS (USA) <[Jeffrey.S.Morris@usace.army.mil](mailto:Jeffrey.S.Morris@usace.army.mil)>; Moore, Kelie <[Kelie.Moore@dnr.ga.gov](mailto:Kelie.Moore@dnr.ga.gov)>; Cynthia Cooksey - NOAA Federal <[cynthia.cooksey@noaa.gov](mailto:cynthia.cooksey@noaa.gov)>; Purcell, Jennifer D CIV USARMY CESWF (USA) <[Jennifer.D.Purcell@usace.army.mil](mailto:Jennifer.D.Purcell@usace.army.mil)>; Lavecchia, Jason R CIV USARMY CESAS (USA) <[Jason.R.Lavecchia@usace.army.mil](mailto:Jason.R.Lavecchia@usace.army.mil)>; Henshaw, Susan H CIV USARMY CELRE (US)

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Holliman, Daniel <Holliman.Daniel@epa.gov>; Purcell, Jennifer D CIV USARMY CESWF (USA)  
<Jennifer.D.Purcell@usace.army.mil>  
Subject: Brunswick Harbor Charrette Slides - Please Review by COB 22 May 2019

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.

Good morning,

Attached are updated slides from the Brunswick Harbor Modifications Study Charrette held 16-17 May 2019. Please review the slides by COB Wednesday, 22 May 2019, and make any suggested edits/changes in RED and return to me.

Additionally, below is a list of data identified as needed and assignments (from slides 39-42). Please begin collecting, sending, and reviewing data as soon as possible.

Thank you all for your participation in the charrette and your continued support going forward.

HOPE

GPA presentation given 16 May - Hope to send GPA to have site tour for agencies - Hope to work with Kelie Order books - for future vessel size Trade development - have there been vessels interested in calling on Brunswick but not able to Fuel spill related to 2008 spill? - Hope to find data Delay data/information - pilots have no data, Hope to check with GPA Ship Operations Pilots to begin collecting delay data? Frequency, reason, vessel size, tides, etc. - Hope to work with pilots, Andrew to suggest data Vessel information from shipping lines - Hope to put Andrew in touch with shipping lines Invite for Pilots at AMM - Hope - Sterling is scheduling with SAD SHPO correspondence - Mary/Hope Joint public notice for Berth 4 - Hope (received)

ANDREW

Andrew to suggest some data to collect starting now Delays due to speed reduction GPA Website - For overview harbor information

JASON

Bathymetry data - what do we have?  
Hydrodynamic data does not exist - check?  
Other sediment transport modeling for in-channel shoaling patterns/beneficial use?

JULIE

Cultural resources surveys - Julie

RACHEL

Ship Sim POC - Rachel to Susan

**MARY**

Water quality standards (EPA) - Mary to lead

1997 sediment data from Mary to Cindy, Dan, and Bill - use existing data and decide about sediment sampling based on alternatives...but likely Sediment transport study - Mary GAEPD partnering with GP for DO model for Turtle River- Liz Booth coordinating - will be complete by July - Mary to get with Liz Booth SHPO correspondence - Mary/Hope Will be 401 certification process - Confirm

**KELIE**

Climate change data and model? - Jennifer Kline contact info - USACE to determine who to reach out NOAA Coastal Survey June 1 - GADNR to send Sterling (received), Hope to send Kyle Ward (received), Kelie to send Christopher Hare contact information

**BILL**

FAA Memo of Agreement USFWS & USACE - bird attractions - will not create within 5 miles of an airport - Bill to send to Mary (received)

**STERLING**

Names of estimators to George - Sterling to send Access to drive - Sterling GIS Specialist, Ops, & Geotech on PDT - Sterling Schedule AMM PDT - Thursday mornings at 9am-10am Eastern (scheduled) Project Management Plan out Monday for 1 week

**SUSAN**

Ship simulation meetings - Susan to set up Design vessel meetings - Susan to set up

J. Sterling Acree  
Project Manager, USACE  
Civil Works Programs & Project Management  
O: 912-652-5860  
C: 912-438-7900

**From:** [Richards, Mary E CIV USARMY CESAS \(USA\)](#)  
**To:** [Holliman, Daniel](#); [Reid.Jackson@dnr.ga.gov](mailto:Reid.Jackson@dnr.ga.gov)  
**Cc:** [Henshaw, Susan H CIV USARMY CELRE \(US\)](#); [Acree, James S \(Sterling\) CIV \(US\)](#); [Fischer, Steven A CIV USARMY CESAS \(US\)](#)  
**Subject:** Sediment Evaluations  
**Date:** Tuesday, May 21, 2019 4:54:00 PM  
**Attachments:** [1998 EIS Part 5 \(Encl F\) Sed Analysis.pdf](#)  
[1998 EIS Part 7 Sed Contaminant Eval Part I.PDF](#) [1998 EIS Part 8 Sed Eval Part II.PDF](#)  
[OCR 1998 EIS Part 1.pdf](#)

---

Dan & Reid,

I think you were the only two wanting to see the sediment evaluations. Enclosure F is the analysis report that was included in the '98 EIS, samples taken in Jan 97. The other two (Part I&II) looks like to be for another sampling event in Sep 95. I don't know the history of the project yet, whether it warranted a second sampling event and only the latest one was written up in the EIS. But either, way here are some historical sediment evals. I've also attached the Final EIS (OCR 1998 EIS Part 1), enclosures are separate. Let me know if you would like to see anything else.

Mary E. Richards  
U.S. Army Corps of Engineers  
Biologist-Planning Branch 100  
W. Oglethorpe Avenue  
Savannah, GA 31401  
(912) 652-5020

**From:** [Richards, Mary E CIV USARMY CESAS \(USA\)](#)  
**To:** [Moore, Kellie](#); [Rusty.Garrison@dnr.ga.gov](mailto:Rusty.Garrison@dnr.ga.gov)  
**Cc:** [Dayan, Nathan S CIV USARMY CESAS \(US\)](#); [Henshaw, Susan H CIV USARMY CELRE \(US\)](#)  
**Subject:** Cooperating Agency Request for the Brunswick Harbor Modification Study  
**Date:** Thursday, May 23, 2019 11:39:00 AM

---

Dear Ms. Moore and Mr. Garrison,

The U.S. Army Corps of Engineers, Savannah District (Corps) intends to prepare an environmental assessment for the Brunswick Harbor Modification Study (BHMS). This study will investigate two areas in the Brunswick inner harbor navigation channel which have been identified by the Brunswick Harbor pilots as problems for commercial vessel maneuverability. The first area of concern is in the vicinity of Coast Guard buoy 24 at the intersection of the Cedar Hammock Range and the Brunswick Harbor Range. The second area of concern is the South Brunswick River Turning Basin at the convergence of the South Brunswick River and the Turtle River.

Pursuant to Sections 1501.6 and 1508.5, of the Council on Environmental Quality's Regulations for Implementing the Procedural Provisions of the National Environmental Policy Act (NEPA) of 1969, the Corps requests the participation of the Georgia Department of Natural Resources as a cooperating agency in providing assistance in preparing the environmental assessment for the BHMS.

This request is being made to the following Federal agencies: U.S. Fish and Wildlife Service, National Marine Fisheries Service, Environmental Protection Agency, and Georgia Department of Natural Resources. The purpose of this request is to formalize, via designation as a Cooperating Agency, the continuing coordination and active participation by your agency, and these other agencies, in the BHMS.

If you require further information, please contact me at (912) 652-5020, or via E-Mail at [mary.e.richards@usace.army.mil](mailto:mary.e.richards@usace.army.mil).

Sincerely,

Mary E. Richards  
U.S. Army Corps of Engineers  
Biologist-Planning Branch 100  
W. Oglethorpe Avenue  
Savannah, GA 31401  
(912) 652-5020



**From:** [Moore, Kelie](#)  
**To:** [Richards, Mary E CIV USARMY CESAS \(USA\)](#)  
**Cc:** [Dayan, Nathan S CIV USARMY CESAS \(US\)](#); [Garrison, Rusty](#); [Henshaw, Susan H CIV USARMY CELRE \(US\)](#)  
**Subject:** [Non-DoD Source] RE: Cooperating Agency Request for the Brunswick Harbor Modification Study  
**Date:** Tuesday, May 28, 2019 8:42:17 AM

---

DNR will be a cooperating agency and I will serve as CRD's point of contact. Please let me know who the WRD point of contact is once it is determined. Thank you.

Kelie Moore  
Federal Consistency Coordinator  
Coastal Resources Division (912)  
264-7218 | (912) 262-2334  
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-----Original Message-----

From: Richards, Mary E CIV USARMY CESAS (USA) [<mailto:Mary.E.Richards@usace.army.mil>]  
Sent: Thursday, May 23, 2019 11:39 AM  
To: Moore, Kelie <[Kelie.Moore@dnr.ga.gov](mailto:Kelie.Moore@dnr.ga.gov)>; Garrison, Rusty <[Rusty.Garrison@dnr.ga.gov](mailto:Rusty.Garrison@dnr.ga.gov)>  
Cc: Dayan, Nathan S CIV USARMY CESAS (US) <[Nathan.S.Dayan@usace.army.mil](mailto:Nathan.S.Dayan@usace.army.mil)>; Henshaw, Susan H CIV USARMY CELRE (US) <[Susan.Henshaw@usace.army.mil](mailto:Susan.Henshaw@usace.army.mil)>  
Subject: Cooperating Agency Request for the Brunswick Harbor Modification Study

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.

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Sincerely,

**From:** [Garrison, Rusty](#)  
**To:** [Moore, Kelie](#); [Richards, Mary E CIV USARMY CESAS \(USA\)](#)  
**Cc:** [Dayan, Nathan S CIV USARMY CESAS \(US\)](#); [Henshaw, Susan H CIV USARMY CELRE \(US\)](#); [Lee, Jason](#); [Ambrose, Jon](#)  
**Subject:** [Non-DoD Source] RE: Cooperating Agency Request for the Brunswick Harbor Modification Study  
**Date:** Tuesday, May 28, 2019 9:30:04 AM

---

Good morning Kelie,

The WRD point of contact will be Jason Lee. He is copied on this email. Let me know if you need anything else.

Thanks,

Rusty

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

From: Moore, Kelie <Kelie.Moore@dnr.ga.gov>  
Sent: Tuesday, May 28, 2019 8:42 AM  
To: Richards, Mary E CIV USARMY CESAS (USA) <Mary.E.Richards@usace.army.mil>  
Cc: Dayan, Nathan S CIV USARMY CESAS (US) <Nathan.S.Dayan@usace.army.mil>; Garrison, Rusty <Rusty.Garrison@dnr.ga.gov>; Henshaw, Susan H CIV USARMY CELRE (US) <Susan.Henshaw@usace.army.mil>  
Subject: RE: Cooperating Agency Request for the Brunswick Harbor Modification Study  
Importance: High

DNR will be a cooperating agency and I will serve as CRD's point of contact. Please let me know who the WRD point of contact is once it is determined. Thank you.

Kelie Moore  
Federal Consistency Coordinator  
Coastal Resources Division (912)  
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-----Original Message-----

From: Richards, Mary E CIV USARMY CESAS (USA) [<mailto:Mary.E.Richards@usace.army.mil>]  
Sent: Thursday, May 23, 2019 11:39 AM  
To: Moore, Kelie <Kelie.Moore@dnr.ga.gov>; Garrison, Rusty <Rusty.Garrison@dnr.ga.gov>  
Cc: Dayan, Nathan S CIV USARMY CESAS (US) <Nathan.S.Dayan@usace.army.mil>; Henshaw, Susan H CIV USARMY CELRE (US) <Susan.Henshaw@usace.army.mil>  
Subject: Cooperating Agency Request for the Brunswick Harbor Modification Study

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Sincerely,

Mary E. Richards  
U.S. Army Corps of Engineers  
Biologist-Planning Branch 100  
W. Oglethorpe Avenue  
Savannah, GA 31401  
(912) 652-5020

**From:** [Richards, Mary E CIV USARMY CESAS \(USA\)](#)  
**To:** "Holliman, Daniel"  
**Cc:** "[Reid.Jackson@dnr.ga.gov](mailto:Reid.Jackson@dnr.ga.gov)"; "[Cynthia Cooksey - NOAA Federal](#)"  
**Subject:** Brunswick Harbor Modification Study (BHMS) - 1997 Sediment Analysis of New Work Sediments  
**Date:** Wednesday, November 13, 2019 5:43:00 PM  
**Attachments:** [1997 Brunswick Harbor Deepening Sediment Evaluation - Summary.pdf](#)  
[1998 EIS Part 5 \(Encl F\) Sed Analysis.pdf](#)  
[Background and Alternatives.docx](#)

---

Dan (Cindy and Reid - I believe you both wanted to see this summary as well),

As promised, attached is an informal summary of the new work sediment analysis conducted for the 1998 Brunswick Harbor Deepening feasibility study. Sorry I've been a little slow getting it to you. As a reminder, I was to give you this summary in support of Savannah District's decision to forego additional sediment testing for the Brunswick Harbor Modification Study (BHMS).

This summary is really just excerpts from the '97 report that I hope is laid out logically and conveniently for your review. I copied the tables straight from the pdf. They're presented a little differently than I'm used to seeing in more recent reports. So if you need further details/explanations, I pulled the sediment evaluation section from the Final EIS and attached it for reference (1998 EIS Part 5 (Encl F) Sed Analysis). For comparison I also threw in some sediment data from the 2016 Tier III Section 103 sediment evaluation for the Cedar Hammock portion of the inner harbor. That's the reach closest to the bend widener that we would like to expand. It's O&M sediment, but it's the most recent sed eval we have for Brunswick. We coordinated that work with Gary. I can forward the full report if you want but only the Cedar Hammock sampling site is inside enough to be relevant. The rest of the report was for entrance channel sediments destined for disposal into the ODMDS. It may or may not benefit the story to know what we typically see in our O&M sediments but I thought it worth showing. And, of course, there have been a couple of earlier Tier III and miscellaneous sediment evaluations that I can dig up for you if needed. But, again, most if not all of those will be for O&M, not new work material. Oh, and since this little recap is for those with sediment chemistry background, I didn't define all the acronyms.

As we stated earlier, based on the 1997 results, the District does not believe there is need for additional testing of the sediments proposed to be dredged to construct this project. I would like to reiterate that these sediments are NOT going to the Brunswick Harbor ODMDS. Placement is to be upland in the Andrews Island Dredged Material Containment Area (DMCA) or possibly used to fortify an existing bird island in St. Simons Sound. Over 500,000 cubic yards of the '97 new work sediments built that island. We believe that adjacent new work sediments from similar depths, if physically and economically feasible, are safe to use on it again, and/or are suitable for placement upland in the DMCA.

I also attached our latest list of alternatives that show the preliminary site locations in more detail. Final designs will be determined after the ship simulation analysis.

Oh, and I recently talked to Hope Moorer with GPA. She has not forgotten about you and the other agency representatives who were promised a tour of the Brunswick Port. She had tentatively selected some early November dates for me to pass along for consideration but then a big ship fell over on its side in the middle of the channel, and her priorities changed. The tour is still on the books but I have no clue on when it will next be offered.

Let me know if you have any questions or how else I may help in your review.

Mary E. Richards  
U.S. Army Corps of Engineers  
Biologist-Planning Branch  
100 W. Oglethorpe Avenue  
Savannah, GA 31401  
(912) 652-5020

**From:** [Moore, Kelie](#)  
**To:** [McCoy, Clayton A CIV USARMY CESAJ \(USA\)](#); [Richards, Mary E CIV USARMY CESAS \(USA\)](#)  
**Cc:** [Wikoff, Bill](#); [Andrews, Jill](#)  
**Subject:** [Non-DoD Source] Assistance Request: Beneficial Use Valuation or Cost/Benefit Evaluation Studies/Papers  
**Date:** Thursday, February 13, 2020 2:41:41 PM  
**Attachments:** [20191104 Bwk Harbor Modification Alternatives.pdf](#)  
[011398 FWS DCAR Brunswick Harbor Deepening Comments.pdf](#) [020298 Brunswick Harbor Deepening DEIS Comments.pdf](#) [BrunswickDeepeningFEIS 071698 Response to FEIS Comments.pdf](#) [2005 CZM Program Change Approval HB727.pdf](#)

---

Good Afternoon Clay:

Savannah District COE began looking at alternatives for widening some of the bends in the Brunswick Harbor last January that potentially includes beneficial use of the material removed from the channel (refer to last paragraph of attached Alternatives document). FWS is currently preparing a CAR (coordination act report) that will “provide input into identification and development of beneficial use opportunities, if practicable.” Historically beneficial use is not necessarily the “least cost environmentally acceptable alternative” primarily because it is difficult to calculate the “benefit” of beneficial uses in the cost/benefit analysis.

Does the Regional Sediment Management Center for Excellence have any materials (reports, studies, etc.) or recommendations for capturing the loss of benefit when sediments are removed from the sand sharing system and/or their beneficial value as feeder berms or bird islands? DNR has traditionally commented on FWS CARs (refer to attached 1998 DNR comments on the last Brunswick Harbor Deepening project) and DNR intends to provide comments on beneficial use options once we receive the Draft CAR. Any help you could provide would be greatly appreciated and thank you for your time Clay.

Good Afternoon Mary:

These attachments are also for your files if you do not have copies of them. We discussed potential beneficial use at the January 4, 2019 charette, but I don’t know if I specifically pointed out that the River and Harbor Development Act (O.C.G.A. 52-9-1 & 52-9-2) was incorporated into Georgia’s Coastal Management Program in 2005 as an Enforceable Policy subject to federal consistency. The law requires, at a minimum, that material removed from harbors (new work and O&M) must be analyzed to determine if it is suitable for beneficial use (i.e. majority of sand) and if it is suitable material, whether it is “feasible” for it to be used beneficially (i.e. a cost analysis between the least cost alternative and a beneficial use alternative).

**Kelie Moore**  
Federal Consistency Coordinator  
**[Coastal Resources Division](#)**  
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**From:** [McCoy, Clayton A CIV USARMY CESAJ \(USA\)](#)  
**To:** [Moore, Kelie](#); [Richards, Mary E CIV USARMY CESAS \(USA\)](#)  
**Cc:** [Wikoff, Bill](#); [Andrews, Jill](#)  
**Subject:** RE: [Non-DoD Source] Assistance Request: Beneficial Use Valuation or Cost/Benefit Evaluation Studies/Papers  
**Date:** Friday, February 14, 2020 11:04:49 AM  
**Attachments:** [True Cost of Dredging Revised 8 June 2017.docx](#)  
[RSM ImplementationReport\\_SAJ ManateeHarbor\\_Final\\_2018\\_0302.docx](#)

---

Kelie,

We (RSM RCX) don't have much on the lost benefits side but we have done a bit of work on the true project lifecycle costs that are often omitted. I think the overall community is starting to come around on the ecosystem services and value component. I've attached a couple of papers highlighting our general approach and some examples. Please know these papers are NOT official USACE policy or guidelines. The papers are simply some RCX concepts we've explored to develop more efficient projects.

We're available at the RCX to support SAS in developing creative solutions at Brunswick Harbor moving forward.

Clay McCoy, PhD  
Acting Director  
Regional Sediment Management Regional Center of Expertise  
US Army Corps of Engineers - Jacksonville District  
[Clay.A.McCoy@usace.army.mil](mailto:Clay.A.McCoy@usace.army.mil)  
O -904-232-3657  
C -904-708-9496

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

From: Moore, Kelie [<mailto:Kelie.Moore@dnr.ga.gov>]  
Sent: Thursday, February 13, 2020 2:33 PM  
To: McCoy, Clayton A CIV USARMY CESAJ (USA) <[Clay.A.McCoy@usace.army.mil](mailto:Clay.A.McCoy@usace.army.mil)>; Richards, Mary E CIV USARMY CESAS (USA) <[Mary.E.Richards@usace.army.mil](mailto:Mary.E.Richards@usace.army.mil)>  
Cc: Wikoff, Bill <[bill\\_wikoff@fws.gov](mailto:bill_wikoff@fws.gov)>; Andrews, Jill <[Jill.Andrews@dnr.ga.gov](mailto:Jill.Andrews@dnr.ga.gov)>  
Subject: [Non-DoD Source] Assistance Request: Beneficial Use Valuation or Cost/Benefit Evaluation Studies/Papers

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Kelie Moore  
Federal Consistency Coordinator  
Coastal Resources Division <Blocked<http://coastalgadnr.org/>>  
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**From:** [Moore, Kelie](#)  
**To:** [McCoy, Clayton A CIV USARMY CESAJ \(USA\)](#)  
**Cc:** [Wikoff, Bill](#); [Andrews, Jill](#); [Richards, Mary E CIV USARMY CESAS \(USA\)](#)  
**Subject:** RE: [Non-DoD Source] Assistance Request: Beneficial Use Valuation or Cost/Benefit Evaluation Studies/Papers  
**Date:** Friday, February 14, 2020 4:18:42 PM

---

Thank you for sending these along and offering to assist. I am not sure of the timeline - I want to say 2 years until construction - an these papers will help bolster support for a beneficial use project.

Kelie Moore  
Federal Consistency Coordinator  
Coastal Resources Division (912)  
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-----Original Message-----

From: McCoy, Clayton A CIV USARMY CESAJ (USA) <Clay.A.Mccoy@usace.army.mil>  
Sent: Friday, February 14, 2020 11:05 AM  
To: Moore, Kelie <Kelie.Moore@dnr.ga.gov>; Richards, Mary E CIV USARMY CESAS (USA) <Mary.E.Richards@usace.army.mil>  
Cc: Wikoff, Bill <bill\_wikoff@fws.gov>; Andrews, Jill <Jill.Andrews@dnr.ga.gov>  
Subject: RE: [Non-DoD Source] Assistance Request: Beneficial Use Valuation or Cost/Benefit Evaluation Studies/Papers

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Clay McCoy, PhD  
Acting Director  
Regional Sediment Management Regional Center of Expertise US Army Corps of Engineers - Jacksonville District  
Clay.A.McCoy@usace.army.mil O - 904-232-3657 C - 904-708-9496

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

From: Moore, Kelie [<mailto:Kelie.Moore@dnr.ga.gov>]  
Sent: Thursday, February 13, 2020 2:33 PM  
To: McCoy, Clayton A CIV USARMY CESAJ (USA) <Clay.A.Mccoy@usace.army.mil>; Richards, Mary E CIV USARMY CESAS (USA) <Mary.E.Richards@usace.army.mil>  
Cc: Wikoff, Bill <bill\_wikoff@fws.gov>; Andrews, Jill <Jill.Andrews@dnr.ga.gov>  
Subject: [Non-DoD Source] Assistance Request: Beneficial Use Valuation or Cost/Benefit Evaluation Studies/Papers



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