



MARK WILLIAMS  
COMMISSIONER

A.G. 'SPUD' WOODWARD  
DIRECTOR

January 25, 2011

Mr. William Bailey  
Attn: PD, USACE, Savannah District  
100 West Oglethorpe Avenue  
Savannah, Georgia 31401-3640

RE: SHEP Tier II DEIS & GRR, Savannah Harbor Deepening Project, Federal Consistency Determination

Dear Mr. Bailey:

Staff of the Georgia Coastal Management Program (GCMP) has reviewed your November 15, 2010 letter and attached Savannah Harbor Expansion Project (SHEP) Tier II Draft Environmental Impact Statement (DEIS) and General Re-Evaluation Report (GRR) to determine the Savannah Harbor Expansion Project's consistency with the Georgia Coastal Management Program. The Federal Coastal Zone Management Act, 16 USC 1451 et seq., as amended, requires each Federal agency activity performed within or outside of a state's coastal zone boundary that affects land or water uses, or natural resources of the coastal zone, to be carried out in a manner that is consistent to the maximum extent practicable with the enforceable policies of the approved coastal management program.

Georgia Coastal Management Program staff has worked for years with staff of the Corps, Georgia Department of Transportation, stakeholder groups, the City of Tybee and those with a vested interest in the project and especially the disposition of dredged material from the project, and the public. Program staff appreciates the access to Corps staff that has been afforded throughout the project development process.

The documents describe six harbor deepening plans. Alternative A is a No Action Alternative that maintains the current harbor depth at -42 feet mean low water. Alternative B dredges to -44 feet mean low water. Alternative C dredges to -45 feet mean low water. Alternative D dredges to -46 feet mean low water. Alternative E dredges to -47 feet mean low water and is the National Economic Development (NED) plan. Alternative F dredges to -48 feet mean low water and is the recommended plan of the non-federal sponsor of the project, the Georgia Department of Transportation (GaDOT). In addition to the dredging plan alternatives, the documents also describe, in varying levels of detail, dredged material disposal alternatives, positive and adverse impacts of the project, and the mitigation of adverse impacts.

In general, the proposal to deepen the Savannah Harbor by dredging to any of its alternative depths, as described above, is consistent with the enforceable policies of the Georgia Coastal Management Program. The Georgia Coastal Management Program especially supports dredging

the project to -48 feet mean low water, the recommended plan of the non-federal sponsor of the project, GaDOT. However, the disposition of dredge materials is not described with sufficient detail, clarity, or finality for a determination to be made at this time that the dredged material placement portion of the project is consistent with the enforceable policies of the Georgia Coastal Management Program. Also, Georgia DNR's Environmental Protection Division and Wildlife Resource Division are submitting comments that will likely affect the GCMP's final federal consistency determination letter.

A particular concern at this time is that the described project would place **new work dredge material** in nearshore areas that could have adverse affects to the City of Tybee Island's economic and environmental interests. The City has determined that new work dredge material proposed for placement is unsuitable for placement in state waters. The State supports Tybee's position and finds that placement of dredge material at locations in state waters that would be adverse to the quality of the Tybee nearshore environment and/or its beach nourishment borrow site is not acceptable.

Further, placement of **new work dredge material** in federal waters outside of the Environmental Protection Agency (EPA) Approved Ocean Dredge Material Disposal Site (ODMDS) is likely to cause long-term adverse impacts to marine habitat, commercial and recreational offshore fishing, and cultural resources. Enhanced fish habitat benefits will be short lived from placement at sites outside of the ODMDS. Prevailing currents will quickly dissipate the materials. The State's experience with placing concrete rubble on offshore artificial reefs, as proposed, has been that the rubble quickly settles into the sea floor without retaining the mounded sand beneath. Also, two unmarked structures exist in close proximity to proposed dredge disposal Site #11 and Site #12 (a plane and a vessel) that are currently targeted by anglers and could be negatively impacted by shifting dredge materials. Therefore, disposal at Sites #11 and #12 should not occur. It is unknown if other hard bottom habitats exist nearby which could also be negatively impacted by placement of dredge materials.

**New work material** from the Outer Channel Extension (Station -57+000B to Station -98+600B, estimated volume = 4,652,033 cubic yards), located in Federal water but not proposed for beach replenishment, is expected to meet City of Tybee suitability criteria for nearshore placement ( $\leq$  10% fines and minimal marine clays). Nearshore placement and beneficial use of these materials would allow the Corps to accomplish several objectives stated in the DEIS:

- a. Offset deflation of the Tybee shelf and beach caused by historic construction and maintenance of the Harbor;
- b. Meet environmental management and restoration measures set out in the Long Term Maintenance Strategy (LTMP) and Dredge Material Management Plan (DMMP);
- c. Mitigate environmental consequences; and
- d. Improve sustainability of the navigation project and the shore protection project.

The project GRR indicates that all future **maintenance dredging** will be performed by hopper dredge and in all probability taken to the ODMDS. Maintenance material excavated by hopper dredge having overflow capability that separates fine grained fractions could be highly suitable for both nearshore and potentially onshore placement on Tybee Island. The proposal notes that some 325,000 cubic yards of sediment excavated annually between Stations -30+000B and -

40+000B could be recovered and placed in a beneficial manner by a hopper dredge with pump-out capability. The City of Tybee Island has determined that this is acceptable and the State supports that determination and disposal alternative. Further, the possibility of beneficially using material from the Jones/Oysterbed area should be explored.

Based on the above, the project's compliance with the River and Harbor Development Act needs to be redressed. We believe that Outer Channel Extension new work dredged material, and Operation and Maintenance materials from Station -30+000B to -40+000B and Jones/Oysterbed (Station +28+000 to 0+000) are suitable for beach replenishment. To determine the feasibility of using these materials for beach replenishment, the costs or savings to the project, irregardless of how those costs might be met, must be identified and provided to the State.

The Program looks forward to working with the Corps to resolve these matters discussed above and is committed to doing so as quickly as possible. Please feel free to contact Kelie Moore at 912-262-2334 or me at 912-262-3130 if you have questions, need of additional information, or if we can be of additional assistance.

Sincerely,



Brad Gane, Chief  
Ecological Services Section

cc: Mayor Jason Beulterman, City of Tybee Island  
Allen Barnes, Ga DNR EPD  
Dan Forster, Ga DNR WRD