

---

# **ENVIRONMENTAL IMPACT STATEMENT**

## **APPENDIX B: Biological Assessment of Threatened and Endangered Species**

**SAVANNAH HARBOR EXPANSION PROJECT**

Chatham County, Georgia and Jasper County, South Carolina

**January 2012**

---

### **ADDENDUM**

Responses to US Fish and Wildlife Service  
Comments



**US Army Corps  
of Engineers**

*Savannah District*

*South Atlantic Division*

**This page intentionally blank**

**RESPONSES TO US FISH AND WILDLIFE SERVICE COMMENTS**  
**BIOLOGICAL ASSESSMENT OF THREATENED AND ENDANGERED SPECIES**

The USFWS provided its views on the Corps' Biological Assessment of Threatened and Endangered Species (BATES) in a letter dated 28 April 2011. That letter is included in Appendix Z of the EIS. This Addendum provides the Corps' responses to the USFWS comments and conditions in that letter.

**COMMENT:** The Service designated the north end of Tybee Island, Georgia, adjacent to the project, as critical habitat for the wintering piping plover. Some dredged sediments were planned to be placed in nearshore areas to migrate on-shore for beach renourishment. The placement may have temporary adverse impacts on foraging habitat. Small portions of the habitat would be directly affected short-term at any point in time and adjacent habitat will be available. Because erosion of the Tybee shoreline would be reduced, the intertidal areas that provide foraging habitat to the piping plover would experience a long-term benefit.

**RESPONSE:** The Corps concurs that placement of dredged material into nearshore sites MLW 200 and MLW 500 which are in Georgia Unit GA-1 would increase and stabilize the shoreline of this wintering habitat for the piping plover. However, the use of the Tybee nearshore dredged sediment placement sites has been removed from project plans. Sediments that would have been placed in these sites would have contained 20% or less fines. The City of Tybee Island and the Georgia DNR-CRD preferred sediments with a fines content of 10% or less. Consequently, they have requested that these sites not be used as placement sites for dredged material.

**COMMENT:** Wood storks feed and loaf in the existing confined disposal facilities (CDFs) for the Savannah Harbor Navigation Project. Continued use of upland CDFs for sediment placement could be considered a minor enhancement of wood stork feeding habitat. Procedures for sediment placement should insure birds would not be exposed to cadmium-laden sediments.

**RESPONSE:** Concur. Wood storks have been observed feeding in the CDFs during the fall months. However, they generally prefer feeding in the CDFs that are in the process of being dried out since they can take advantage of shallow water that increases their ability to catch prey. Sediment placement plans for CDFs 14A and 14B provide for cadmium-laden sediments to remain covered with water until a cover/cap of sediment can be placed that has a cadmium concentration of 4 mg/kg or less. Consequently, the Corps does not believe that many wood storks will use 14A and 14B for feeding during sediment placement because the water depth will be too deep to make them attractive for wood stork feeding.

**COMMENT:** The West Indian Manatee has site fidelity to summer habitat in the Savannah River. Manatees feed in shallow water on saltmarsh cordgrass (*Spartina alterniflora*). As the dredging will occur in the deepest part of the channel, direct effects on manatees from the dredging operation and the placement of sediment should be minor. Additionally, the project would not adversely affect any conditions relating to habitat requirements such as the cordgrass. A large percentage of manatee mortality is due to collisions with watercraft. The dredging operations will involve various vessels presenting the potential for collisions. The USACE will implement “Standard State and Federal Protection Conditions” to insure that the project does not affect manatees.

**RESPONSE:** Concur. These conditions are listed on Pages 84-86 of the BATES, and they would be implemented during project construction.

**COMMENT:** Of the five sea turtle species that may be found in the waters of the project, only the loggerhead nests regularly on the adjacent beaches of Tybee and Daufuskie Islands. Sea turtles have site fidelity to their nesting beaches. The presence of artificial lighting on dredge equipment near nesting beaches is detrimental to critical behavioral aspects of the nesting process, including nesting female emergence, nest site selection, and the nocturnal sea-fining behavior of both hatchlings and nesting females. While still adhering to minimum luminance requirements, light emanating from equipment will be minimized to reduce the potential harmful effects. To minimize risk of sea turtle impacts due to dredges, environmental windows were established which restrict dredging to periods when turtles are least abundant or least likely to be affected by dredging. Environmental windows allow dredging in the winter months when sea turtle abundance is dramatically reduced and generally outside of the nesting period. Turbidity is produced by nearshore placement that can adversely affect sea turtles. The primary concern is disorientation of female turtles trying to reach the nesting beach. There are also concerns about potential impacts to hatchlings entering the ocean. Although ambient turbidities in the nearshore Tybee Island are already high because of the Savannah River, to reduce potential impacts, the USACE would restrict sediment placement in this area to the period from 1 August to 30 April. The proposed nearshore placement of sediments is not expected to adversely impact the beach nesting activities of sea turtles.

**RESPONSE:** Concur. The Corps implements all measures to protect endangered sea turtles including minimizing light emanating from offshore equipment, the use of draghead deflectors on hopper dredges, reduction of hopper dredge pump operations when the dragheads are not firmly on the bottom, and limiting hopper dredge work to the period 1 December through 31

March. As stated previously, the project no longer includes the use of the Tybee nearshore placement sites.

**COMMENT:** Based on the information summarized above, the BATES concludes that the proposed action “may affect, but is not likely to adversely affect” piping plover, wood stork, West Indian manatee, right and humpback whales, sea turtles, and shortnose sturgeon that may be present within the area. The BATES includes conditions that would be followed to protect endangered species during construction and operation of the project. We concur with your determination for the piping plover, wood stork, West Indian manatee, and nesting sea turtles. We believe that the requirements of Section 7 of the ESA have been satisfied for these species when they are under our responsibility. However, obligations under Section 7 of the ESA must be reconsidered if (1) new information reveals impacts of this identified action that may affect listed species or critical habitat in a manner not previously considered in this assessment; (2) this action is subsequently modified in a manner which was not previously considered in this assessment; or (3) a new species is listed or critical habitat determined that may be affected by the identified action.

**RESPONSE:** The Corps acknowledges the concurrence of the USFWS with the findings of the BATES (Appendix B) with respect to piping plover, wood stork, West Indian manatee and nesting sea turtles for the SHEP.