

## THE CHARLESTON BRANCH NAACP

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**Ms. DOT S. SCOTT  
PRESIDENT**

October 10, 2014

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Mr. Mark Messersmith  
U.S. Army Corps of Engineers, Charleston District  
69 A Hagood Avenue  
Charleston, SC 29403

Dear Mr. Messersmith:

This is written in support of the US Army Corps of Engineers and South Carolina Ports Authority's proposed 52-foot harbor deepening project. This project is essential to South Carolina's economic future, and our state's elected officials, business groups and other stakeholders have demonstrated statewide support for harbor deepening.

As members of the Charleston Branch NAACP, we are supportive of economic development and infrastructure improvements that equitably benefit all of those in and beyond the Greater Charleston community, for the port system is tied to one out of every 11 jobs statewide. The harbor deepening project and the resultant ability for the Port to handle a new and larger generation of ships will create new jobs and new business opportunities.

It is our expectation, and a critical element in our support, that meaningful, tangible and measurable strategies be employed at every point in the process to assure minority employment and opportunities for minority vendor and business participation that go beyond gender to ethnicity. It is equally critical that the project be done in an environmentally sensitive manner that does not damage the quality of life of any community.

We base our support on those expectations, and we look forward to working with the Corps of Engineers and State Ports Authority to assure that our expectations becomes realities.

Sincerely,

Dot S. Scott, President  
The Charleston Branch NAACP

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## United States Department of the Interior



### FISH AND WILDLIFE SERVICE

176 Croghan Spur Road, Suite 200  
Charleston, South Carolina 29407

October 14, 2014

Lt. Colonel John T. Litz  
District Engineer  
U.S. Army Corps of Engineers  
69A Hagood Avenue  
Charleston, SC 29403-5107

Attn: Mark Messersmith

Dear Colonel Litz:

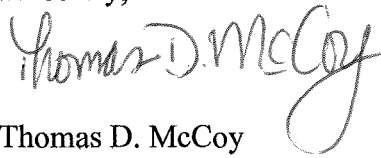
The U.S. Fish and Wildlife Service (Service) is pleased to provide, for your review, the enclosed Final Fish and Wildlife Coordination Act Report (Report) for the Charleston Harbor Post 45 Deepening Project, Charleston, South Carolina. The Service submits the Report in accordance with section 2(b) of the Fish and Wildlife Coordination Act (48 Stat. 401, as amended; 16 U.S.C. 661 *et seq.*). This Report was prepared in cooperation with the U.S. Army Corps of Engineers (USACE), the National Marine Fisheries Service (NMFS), and the South Carolina Department of Natural Resources (SCDNR), which provided valuable review and recommendations.

Charleston Harbor is an Atlantic Coast tidal estuary located at Charleston, South Carolina, approximately 100 miles southeast of Columbia, the State capital, and 140 miles southwest of the entrance to North Carolina's Cape Fear River. Multiple port terminals are established in Charleston Harbor receiving bulk or containerized cargo comprised of many commodities including agricultural products, consumer goods, machinery, metals, vehicles, chemicals, and many other products. In addition to harboring a robust variety of commercial traffic, Charleston Harbor contains bountiful natural resources and offers tremendous recreational opportunities for the general public.

The proposed deepening of Charleston Harbor will provide the opportunity for the Port of Charleston to keep pace with changing shipping technologies and remain competitive in the global market. While the Service understands the need to move forward with the Project, we emphasize the equally important need to protect and conserve the area's abundant resources for the benefit of everyone. The Report includes 16 recommendations intended to balance the impacts resulting from the project with natural resource conservation.

The Service expresses its appreciation to the NMFS, SCDNR, and the USACE in the development of this Report. If you have any questions or wish to discuss our recommendations, please contact Mr. Mark Caldwell at 843-727-4707 ext. 215.

Sincerely,

A handwritten signature in black ink that reads "Thomas D. McCoy". The signature is written in a cursive style with a large, looping "y" at the end.

Thomas D. McCoy  
Acting Field Supervisor

TDM/MAC



October 24, 2014

Post 45 Comments  
Planning and Environmental Branch  
69-A Hagood Ave.  
Charleston, SC 29403

RE: Charleston Harbor Post 45 – Draft Integrated Feasibility Report and Environmental Impact Statement

Dear Sir/Madam

On October 9, 2014 the U.S. Army Corps of Engineers (USACE), Charleston District published a public notice announcing the availability of the above referenced information pertaining to proposed improvements, modifications and continued operations of the existing Charleston Harbor Federal Navigation Project (CHFNP). Following our review of the documentation, we wish to submit our formal comment(s) to relating to what we believe is an omission in the alternatives analysis for, and proposed plan for compensatory mitigation for wetland impact/loss.

The public notice provides a summary of the overall project feasibility report and environmental impact statement (EIS) and provides a link to the project website<sup>1</sup>. Our review and comment(s) discussed below address topics covered in Appendix P – Mitigation, Monitoring, and Adaptive Management (which we will refer to as the Mitigation Plan), unless otherwise noted.

The EIS serves to provide a highly detailed cost-benefit analysis for the proposed CHFNP. The economic benefits to the Charleston area and South Carolina as a whole is the basis upon which the project focused. The improvements to the Port of Charleston would allow more and larger ships access to port facilities, existing and new, bringing with them the potential for an increase in commerce through the city and state. These benefits come at a cost, with impacts within and adjacent to the harbor associated with the proposed dredging being among the largest according to the EIS. Projected losses to various resources are described throughout the full EIS. Appendix L – Wetland Impact Assessment describes the impacts associated with wetlands, and as proposed, the project would impact a total of 280.96 acres of freshwater forested and emergent/marsh wetland (tidally influenced) adjacent to the Ashley and Cooper rivers. The Mitigation Plan describes the compensatory wetland mitigation options/alternatives considered by the USACE.

In summary, the Mitigation Plan for wetland impacts associated with the CHFNP cites a lack of both available mitigation credits for purchase and available area for in-kind permittee responsible mitigation (PRM) within the target system. The alternatives analysis considers and describes several PRM options that offset impacts through a combination of preservation of existing habitat and potential restoration/enhancement of important wetland systems within the target watersheds. The alternatives considered are described below and include analysis of each based on preliminary cost estimates (where available) to determine the most cost effective option for compensatory wetland mitigation chosen for the Tentatively Selected Plan (TSP).

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<sup>1</sup> <http://www.sac.usace.army.mil/Missions/CivilWorks/CharlestonHarborPost45.aspx>

- 1. Restoration of three candidate sites adjacent to the Ashely River identified by NOAA**
  - Time and expense required to assess these sites precluded further consideration.
- 2. Restoration of Tuxbury Horse Trail in Francis Marion Natl. Forest**
  - Functional lift afforded by the site is not equivalent to functional loss of the project.
- 3. Wetland Creation in Impacted Watersheds**
  - No site available in the Charleston area that could provide the quantity required of restoration required and the functional lift to offset impacts.
- 4. US Forest Service Land Acquisition**
  - \*\*Option Selected for TSP based on cost analysis
- 5. Cainhoy Plantation Protection**
  - Early coordination indicated that high property costs would be prohibitive.
- 6. West Branch Cooper River Easement Purchase**
  - A conservation easement does not provide the high level of protection provided by a land purchase.
  - Inability to purchase adjacent upland buffers to the proposed easements also limits the functional value and gains associated with this option.

As stated above, the preferred mitigation option selected for the TSP and described in the Mitigation Plan is the purchase of property within/adjacent to the Francis Marion National Forest; property which would require some level of restoration work be completed before the land is turned over to the U.S. Forest Service (USFS) to be included in the national forest as well. This alternative was chosen as the most cost efficient means of providing the restoration and preservation of wetlands to offset the impacts associated with the CHFNP. While details on the land acquisition are sparse in the Mitigation Plan, the plan describes the potential ratio of wetland loss:restoration acreage of which would be required to offset the proposed impacts. At present, the USACE has proposed a ratio of 1:1.74 for a mitigation requirement of 484.55 with an additional 70% included for contingency (in the event that part of the initial mitigation fails), bringing their calculated mitigation requirement to 831 acres.

While the Mitigation Plan states that the alternatives analysis followed the USACE guidance for preference hierarchy for wetland mitigation, it is our opinion that consideration of Mitigation Bank Credits (the most preferred method) was not explored in depth. Analysis provided in the Mitigation Plan states that, while considering the preferred mitigation alternative of purchasing credits from an approved mitigation bank or in-lieu fee program, an internal review *"revealed that the type and amount of credits necessary to compensate for the proposed impacts are not available"*. The Mitigation Plan does not provide any calculations for number of mitigation credits required for the wetland impacts. In order to get an idea of the credits, we could reasonably estimate that an average of eight (8) credits/acre may be required across all the varying types and impacts. With 281 acres of wetland impacts, we could estimate that mitigation would require the purchase of 2,248 credits. We understand that there are many factors that can affect the mitigation calculations dramatically, but for the purpose of our comments, we will use this 2,248 credit number as a conservative estimate in the absence of a provided credit calculation.

The Mitigation Plan states that a review of the USACE Regulatory In-Lieu Fee and Bank Information Tracking System (RIBITS)<sup>2</sup> along with internal discussion revealed that the type and number of credits required for the

<sup>2</sup> <https://rsgisias.crrel.usace.army.mil/ribits/f?p=107:2:9698305623143::NO:RP:>

project were not available in the target area. We would like to point out that a review of RIBITS on October 21, 2014 shows the availability of 2,458 freshwater wetland restoration/enhancement credits from the combination of two mitigation banks in the target mitigation area (634 from Congaree Carton and 1,824 from Pigeon Pond), likely enough to provide most if not all of the required credits. Although it is understood that RIBITS is not up to date, with no credit transactions shown at either bank in the past 15 months, it highlights what we feel is a lack of a thorough consideration of a credit purchase alternative in the Mitigation Plan. The internal review would have had access to current credit availability records from the banks in the target area, which may or may not be sufficient to satisfy all of the required mitigation. According to the Congaree Carton Mitigation Bank (CCMB) official credit ledger and sales records with the USACE, our bank should show the availability of approximately 516 credits as of this date. We would also suggest that the number of credits available at present is not a very dependable indicator of the credits that may be available several years from now when the project would actually require they be purchased. CCMB has not received a credit release for the previous two monitoring years (20% pending, representing approx. 350 credits) and is approaching the end of its primary monitoring period when the remaining credits would be made available. Although we have several credit sales, which are set to be finalized in the near future, and a purchase option on a large number of those credits, we can confirm that no one involved with the Ports EIS and Mitigation Plan has been in contact to discuss any credit availability or pricing. The lack of any figures or information provided in section 2.5 of the Mitigation Plan would seem to indicate that there was no effort was made to seek mitigation for this project through the purchase of credits as per USACE compensatory guidelines.

The Mitigation Plan does mention credit type availability, with impacts predominantly affecting forested and emergent wetlands along the river flood plain, which are tidal in nature; the majority of these wetlands are Freshwater systems. Current mitigation guidelines do not provide many levels of distinction between credit types in the USACE Charleston District. Although the mitigation banks with credits available are made up of mostly bottomland hardwood forest wetland, being freshwater systems, and in the immediate impact watershed (where functional lift is most beneficial) the small difference in wetland type can be offset through the credit calculations so that these banks offering Freshwater Restoration/Enhancement credits are capable of offsetting the projected losses under the guidelines currently in place.

Our concern with the Mitigation Plan at present is based upon the perceived lack of adherence by the USACE in following their own regulations pertaining to wetland mitigation. While we understand many of the questions surrounding the credit type and availability, we are able to see why the USACE would choose to consider other mitigation alternatives for the CHFNP. The USACE has made the purchase of credits from a bank in a given projects primary service area a priority consideration for compensatory mitigation. The current USACE, Charleston District **Guidelines for Preparing a Compensatory Mitigation Plan** (sect 2.3 Mitigation Rule) states that *"If a proposed project is located within the primary service area of an existing mitigation bank or in-lieu fee program, the permit applicant will normally be required to purchase the necessary mitigation credits."*

With no details provided in section 2.5 of the Mitigation Plan for a serious consideration of using a bank for mitigation (and lack of attempted coordination with our bank), we feel as though the USACE fails to acknowledge the amount of time and effort involved in the creation and operation of a mitigation bank. Private individuals and business risk a lot of time and money in the attempt to establish a mitigation bank. The USACE benefits from having operational mitigation banks, and as such they attempted to encourage development of new banks with the pay off of an approved bank being that the agency will heavily prefer impacts be mitigated through credit sales. By failing to thoroughly investigate the option to purchase credits for this project by the



very agency that is supposed to enforce these regulations, the current and prospective mitigation bankers lose faith that the investment into a bank will be worth it if the USACE themselves fail to consider credit purchases.

Our opinion that a combination of this land acquisition in conjunction with a purchase of a percentage of the required credits from approved mitigation banks in the target area would serve to show that the USACE holds themselves accountable to follow the same regulatory guidelines it enforces upon the public. We believe that purchasing a percentage of credits for the project mitigation would also present an opportunity for the USACE to enhance the agency's public image and promote interest (and incentive) for potential investors to pursue the development of new mitigation banks throughout the state.

As fellow stewards of the environment, we support the general aim of the TSP for larger/landscape scale conservation. CCMB was established with the goal to help provide conservation to the greater Charleston area that it serves. Our bank sponsor continues to work with several conservation interests, including the USFS, to help promote preservation of large tracts on the historic Fairlawn Plantation property. The TSP described in the Mitigation Plan and preliminary work currently underway for the establishment of additional conservation of an additional  $\pm 1,200$  acres of land within and adjacent to the Francis Marion National Forest are mutually beneficial in the assuring that continued large-scale preservation of critical wetland habitat is achieved in Charleston area watersheds; providing offsets to inevitable wetland impacts within the area as well.

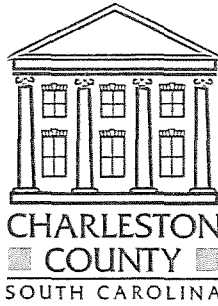
Our comments do not seek to prohibit the USACE from pursuing the mitigation efforts described in the TSP. Rather, we feel that the addition of a purchase of mitigation credits from Congaree Carton would enhance the Mitigation Plan by exhibiting a degree of adherence to regulations and by promoting conservation/preservation through analogous private ventures. We would like the opportunity to discuss the details of a potential credit purchase with USACE staff to enhance the proposed Mitigation Plan and TSP. Please feel free to give me a call if you have any questions about our comments or should you wish to discuss credit purchase information at Congaree Carton.

Sincerely,

A handwritten signature in black ink, appearing to read "G. Alan Wood". The signature is fluid and somewhat stylized, with a long horizontal stroke at the end.

G. Alan Wood

The EARTHWORKS Group (on behalf of Fairlawn Partners, LLC)



843.202.7600  
Fax 843.202.7601  
jneal@charlestoncounty.org  
Lonnie Hamilton, III  
Public Services Building  
4045 Bridge View Drive, Suite A301  
North Charleston, SC 29405-7464

James R. Neal  
Director

Public Works Department  
October 10, 2014

Mark Messersmith  
U. S. Army Corps of Engineers  
Planning and Environmental Branch, Charleston District  
69A Hagood Avenue  
Charleston, SC 29403

RE: DRAFT INTEGRATED FEASIBILITY REPORT AND  
ENVIRONMENTAL IMPACT STATEMENT (FR/EIS) CHARLESTON HARBOR  
FEDERAL NAVIGATION PROJECT


Dear Mr. Messersmith:

The Charleston County Mosquito Control Program (CCMCP) wishes to comment regarding the draft FR/EIS for the proposed Charleston Harbor Federal Navigation Project.

The CCMCP is currently reimbursed by the controlling agencies for mosquito suppression activities on the existing dredged material disposal sites (also referred to as "Confined Disposal Facilities") pertaining to Charleston Harbor. Dredged material disposal sites can produce up to 80 million mosquitoes per acre per rainfall event. The mosquito species breeding on these sites can easily fly several miles and adversely affect quality of life and public health and disrupt commerce, military, tourism, and other significant activities in Charleston, Berkeley, and neighboring counties.

Without continued reimbursement for mosquito suppression activities on the existing and/or any newly created sites, an undue burden would be placed on the taxpaying citizens of the previously mentioned counties to provide mosquito control, if, in fact, funds could be acquired. Failure to fund mosquito control for these man-made sites will cause the aforementioned severe adverse impacts.

If you need further assistance, please call Ed Harne at (843) 202-7886.

Sincerely,  
  
Donna J. Odom, Superintendent  
Mosquito Control Division



DJO:eh  
c:Jim Neal, P.E., Public Works Director

American Public Works Association

F:\Permit Letters\US Army Corps of Eng\Charleston Harbor\Federal Navigation Project\comments

www.charlestoncounty.org





843.202.7880  
Fax 843.202.7893  
4370 Azalea Drive  
N. Charleston, SC 29405-7409

*Mosquito Control Division*

***Public Works Department***

October 10, 2011

Mark Messersmith  
U. S. Army Corps of Engineers  
Planning and Environmental Branch, Charleston District  
69A Hagood Avenue  
Charleston, SC 29403

RE: DRAFT EIS, CHARLESTON HARBOR DEEPENING STUDY  
(POST-45 STUDY)

Dear Mr. Messersmith:


The Charleston County Mosquito Control Program (CCMCP) wishes to comment regarding the scoping process for the Post-45 Study.

The CCMCP is currently reimbursed by the controlling agencies for mosquito suppression activities on the existing dredged material disposal sites (also referred to as "Confined Disposal Facilities") pertaining to Charleston Harbor. Dredged material disposal sites can produce up to 80 million mosquitoes per acre per rainfall event. The mosquito species breeding on these sites can easily fly several miles and adversely affect quality of life and public health and disrupt commerce, military, tourism, and other significant activities in Charleston, Berkeley, and neighboring counties.

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If you need further assistance, please call Ed Harne at (843) 202-7886.

Sincerely,



Donna J. Odom, Superintendent  
Mosquito Control Division

DJO:eh  
c:Jim Neal, P.E., Public Works Director

# CHARLESTON HARBOR DEEPENING STUDY

Please print your comment below: Please format your comment to address the following key points: 1. Issue you are concerned about; 2. Reason for its importance; and 3. Recommendations to address the concern.

For additional information, please visit: <http://www.sac.usace.army.mil/Missions/CivilWorks/CharlestonHarborPost45>

① Concerned deeper Cooper will become congested with larger ships. ② Sat at Dockside dock last night and watched 2 huge ships maneuver into BMW dock area. What next?! A bigger ship would not fit? ③ Limit larger ships when Panama canal finishes.

Please provide contact information should a clarification and/or further information on your comment be needed (optional):

Jesse Sullivan

Name / Title / Business / Individual / Organization

elizabethsullivan8@gmail.com

Mailing Address / Telephone / E-mail address

# CHARLESTON HARBOR DEEPENING STUDY

Please print your comment below: Please format your comment to address the following key points: 1. Issue you are concerned about; 2. Reason for its importance; and 3. Recommendations to address the concern.

For additional information, please visit: <http://www.sac.usace.army.mil/Missions/CivilWorks/CharlestonHarborPost45>

Really appreciated seeing the soil samples, dredge samples, and testing vids - made the information truly tangible and informative

Please provide contact information should a clarification and/or further information on your comment be needed (optional):

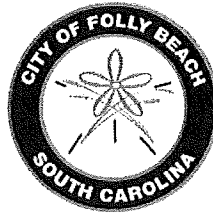
Julie Hussey

Name / Title / Business / Individual / Organization

329 North Shelburne Blvd Mt Pleasant, SC 29464

Mailing Address / Telephone / E-mail address

20 NOV 2014



# City of Folly Beach

21 Center Street, P.O. Box 48,  
Phone: 843-588-2447

Folly Beach, South Carolina 29439  
fax: 843-588-7016

John T. Litz, PMP  
Lieutenant Colonel, U. S. Army  
Commander and District Engineer  
Charleston District, Corps of Engineers  
69 A Hagood Avenue  
Charleston, S. C. 29403

Re: Charleston Harbor Post 45  
Feasibility Report and Environmental Impact Statement (FR/EIS)  
Public Comment Submittal

Dear Colonel Litz:

In response to the October 9, 2014 Public Notice announcing publication of the subject study, the City of Folly Beach requests Implementation of a **Regional Sediment Management Study to Reduce Downdrift Impacts to Morris and Folly Islands**. Please consider the sand management measures described herein.

## Background: The Charleston Harbor and Folly Island

It is undisputed that manipulation and maintenance of the Charleston Harbor, in order to facilitate shipping traffic and commerce, has negatively impacted Folly Island. In August 1987, a Section 111 report was prepared by the Charleston District and determined that 57% of the erosion occurring at Folly Beach was attributable to the Charleston Harbor jetties.<sup>1</sup> In the Section 111 report, the USACE estimated that as a result of the completion of the jetties a net

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<sup>1</sup> USACE, 1987. Evaluation of the Impact of Charleston Harbor Jetties on Folly Island, South Carolina, Coastal Engineering Research Center, Vicksburg, MS.

southerly alongshore drift of approximately 122,000 to 152,000 m<sup>3</sup>/year has been permanently blocked. In response to the channel stabilization begun in 1878, the offshore shoals have lost roughly 200 million m<sup>3</sup> of sand resulting in an increase of the wave energy of 100%.<sup>2</sup> It was this report that directly connected the Corps' operation and maintenance of Charleston Harbor with the chronic erosion problem that has plagued Folly Beach and which led to a 50-year federal renourishment project begun with an initial renourishment in 1993.<sup>3</sup>

Previous efforts to deepen the shipping channel in Charleston Harbor in 1999 may have intensified the erosion at Folly Beach by creating a sink for any sediment that might slip past the jetties. As with the present EIS, there was no mention of downdrift impacts to Folly Beach in the 1996 Environmental Assessment for the previous deepening project. The City is concerned that another effort to deepen and widen Charleston Harbor, with no consideration of downdrift impacts, will exacerbate the already significant shoreline erosion at Folly Beach.

#### Concerns Over Feasibility Report and Environmental Impact Statement

The Feasibility Report and Environmental Impact Statement (“FR/EIS”) gives no consideration or weight to the erosion that completely destroyed a county park facility on one end of the island and continues to threaten multiple structures along the coast. The City is surprised, particularly in light of the history recounted above, that the FR/EIS only mentions Folly Beach seemingly in passing: “[t]his action. *i.e.*, the 2014 renourishment project, is noted here due to its relevance to the Section 111 study findings by USACE (1987) that indicated *an effect* of navigation channel jetties on downdrift communities.”<sup>4</sup> This reference is not merely an understatement of the problems that construction of the jetties created for Folly Island, but also contains no analysis of any potential impact that the proposed project may cause. It is inexplicable that the USACE would conduct FR/EIS on improvements, modifications, and continued operations of Charleston Harbor without studying how the proposed changes might adversely affect Folly Beach. Engineering Appendix A of the FR/EIS, where one might expect

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<sup>2</sup> Edge, B., M. Dowd, R. Dean and P. Johnson, 1994. The Reconstruction of Folly Beach, Coastal Engineering, Chapter 252

<sup>3</sup> Kana, T, 2012. A Brief History of beach nourishment in South Carolina, Shore & Beach, Vol. 80, No. 4.

<sup>4</sup> Appendix O, Cumulative Impacts Analysis, Section 2.2.2.5, Downdrift Beach Renourishment (emphasis added).

negative impacts on Folly Beach to be discussed, makes no mention of Folly Beach. This Appendix includes an analysis of shoreline changes *within* Charleston Harbor “where channel modifications of deepening and widening have occurred.”

The FR/EIS states that the following navigation improvements are tentatively planned for the entrance channel (*ocean*) portion of the harbor:

- 1) Deepen the existing entrance channel from a project depth of -47 feet to -54 feet mean lower low water (MLLW) over the existing 800-foot bottom width, while reducing the existing stepped 1,000-foot width to 944 feet from an existing depth of -42 feet to a depth of -49 feet.
- 2) Extend the entrance channel approximately three miles seaward from the existing location to a depth contour including a -54-foot MLLW project depth plus overdepths.

#### Solution: Require Detailed Study of Mitigation for Harms Caused to Folly Beach

The entrance channel of Charleston Harbor is responsible for most of the downdrift erosion on Morris and Folly Islands.<sup>5</sup> Therefore, improvements or modifications to this entrance channel are likely to exacerbate downdrift erosion. Increased environmental impacts to protected species including Loggerhead Turtles and Piping Plover are also possible. The FR/EIS should acknowledge these impacts and offer mitigation measures, particularly through a study of Regional Sediment Management.

There are several specific RSM approaches that should be considered. The first is potential beneficial uses for the dredged material. In the main FR/EIS, Section 4.2.1, **Material Placement Options**, does not include any consideration of downdrift placement either on the beach or in the nearshore. It appears that up to 12 million cubic yards of material may have the potential to be considered for beneficial use placement downdrift. However, all entrance channel material is presently slated to be disposed in the Ocean Dredged Material Disposal Site (ODMDS).

The brief mention of considering nearshore placement is almost completely overshadowed by the reference to the difficulty of such an effort. Section 4.2.6.6 **Nearshore**

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<sup>5</sup> See FN 1.

**Placement off Morris Island** states, “Dredged material could be placed offshore of Morris Island where natural processes could sort and transport it. However, this alternative would require extensive modeling and coordination with multiple resource agencies to resolve major and complex concerns. It would also be expensive and complicated from an environmental permitting perspective. The size, scope, and benefits associated with this option would be determined during the PED phase and would depend on a source of suitable material.”

However, such a study is consistent with USACE policy (WRRDA 2014, Section 1038; WRDA 1976, Section 148; ER 1105-2-100; EM 1110-2-5027; EC 1105-2-411) and the Federal Standard to analyze the feasibility of sound engineering practices that retain dredged material in the littoral system and conserve space in the Confined Disposal Areas (CDFs) and the ODMDS. The City of Folly Beach contends that offshore disposal of littoral material does not constitute sound engineering in a coastal system as deprived of sand as the islands downdrift of Charleston Harbor. Instead, the study should carefully consider existing sediment grain size and other geotechnical data for the Charleston Harbor Entrance Channel maintenance and new work dredged material. The City encourages the District to collaborate with state regulatory agencies to carefully review the geotechnical data to avoid disposing of valuable littoral material offshore.

The Study should also consider more effective methods to bypass sediment trapped by the Charleston Harbor jetties by investigating the potential for:

- a) Modifications to the existing jetties, which are responsible for most of the downdrift erosion, and
- b) Bypassing sediment trapped on the north side of the jetties at Sullivan's Island.

Finally, the study should develop a sediment management and monitoring plan for the Charleston Harbor Entrance Channel. A routine monitoring program should assess the responses of the downdrift (or adjacent) beaches to the newly implemented sediment management plan. Similar planning and monitoring is common at other U.S. harbors with federal channels managed by the USACE.

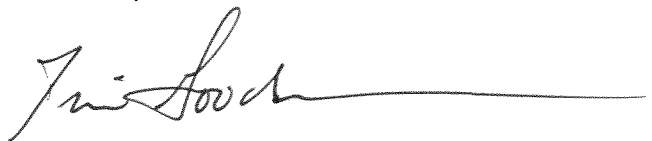
To address these omissions the City of Folly Beach requests that the title of Section 4.2.6.6 be changed to “**Implementation of a Regional Sediment Management Study to Reduce Downdrift Impacts.**” We also request that the text be revised as follows, “*A 1987 Section 111 Study determined that approximately 57 percent of the erosion of Folly Beach was*

*due to the construction and continued operation of the Charleston Harbor Federal navigation project. Mitigation for these impacts will be addressed during the PED phase through a Regional Sediment Management (RSM) study that will consider options for reducing downdrift impacts. The study will consider options such as beneficial use of both new work and maintenance dredged material in the downdrift littoral system, jetty modifications, and sand sharing or bypassing from the updrift side of the harbor downdrift.”*

The City of Folly Beach requests that funds to implement the recommendations of the RSM study should come from the Post 45 budget. While RSM practices may increase costs slightly in one business line, they have the potential for significant cost savings in other business lines; thereby, resulting in significant increased value to the nation. In this example, manageable increases in navigation funding could potentially result in substantial cost savings to the navigation and flood damage reduction business lines (which fund 57 & 43% of the project, respectively) by reducing the frequency and costs of expensive shore protection projects at Folly Beach, where the 2014 renourishment project cost over \$30 million.

The City of Folly Beach values our close connection with the Charleston District of the USACE, and we feel this comment is necessary ensure that all current and future harms from the Charleston Harbor be adequately mitigated using all available means. The City of Folly Beach will oppose the deepening project and consider legal action, including challenge to any permits issued for the deepening project and challenge to the sufficiency of the EIS, unless it receives a written agreement that the project will include sand management measures as described herein. Ultimately, we hope that implementing a Regional Sediment Management program will benefit both Folly Beach and the USACE by lowering the cost of periodic renourishments under the Federal Shore Protection Project.

Sincerely,

A handwritten signature in black ink, appearing to read "Tim Goodwin", followed by a long horizontal line extending to the right.

Mayor Tim Goodwin  
City of Folly Beach

Annette Lewis  
345 Shadow Race Lane  
P.O. Box 1380  
Folly Beach, SC 29439  
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Tel: (843) 588-6557  
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November 20, 2014

John T. Litz, PMP  
Lieutenant Colonel, U.S. Army  
Commander and District Engineer  
Charleston District, Corps of Engineers  
69 A Hagood Avenue  
Charleston, SC 29403

Re: Charleston Harbor Post 45  
Feasibility Report and Environmental Impact Statement (FR/EIS)  
Public Comment Submittal

Dear Colonel Litz:


As a 21 year residents of Folly Beach, the first 12 years on front beach, and 9 years beside the Folly River, my husband and I are very familiar with the problems caused on our beach by the effects of the harbor jetties.

In view of the proposal to deepen the channel for shipping, I wish to add my my very strong request to that of the City of Folly Beach in Implementation of a **Regional Sediment Management Study to Reduce Downdrift Impacts to Morris and Folly Islands.**

The reasons and management measures are fully explained in the enclosed copy of the City's request to you on this issue.

I respectfully request your action to implement this vital Management Study. The many members of the Folly Beach Civic Club also have these same concerns and will be making the same request.

Sincerely,



Annette Lewis

Past Editor of the Sandspur Newsletter



Christopher J.G. Lewis  
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Christopher J.G. Lewis

Past President Folly Beach Civic Club