

Public Comments and Responses for the Alabama Barrier Island Restoration Assessment Final Report

Comment Number	Commenter Name	Comment Date	Comment Summary	Comment Response
001	Caroline Graves	6/16/2020	<p>Dear Corps of Engineers,</p> <p>I have a question I need answered about the Corps and Elizabeth Godsey talk about facts surrounding the sea level rise of Dauphin Island reported in the internet public meeting for the Barrier Island Report that we were not able to ask questions.</p> <p>Please look at the website https://tidesandcurrents.noaa.gov/sltrends/sltrends.html</p> <p>And please explain if the Ice caps are melting why Bermuda has only a 2.17 mm /year sea level rise and Key West, FL is 2.47 mm/yr.</p> <p>Shouldn't the melted water from the Ice caps get to Bermuda and Key West before having to go around Florida and all of the water is push up in the Gulf, going directly on to Dauphin Island.</p> <p>What else is so strange is Pensacola only has a 2.4 mm/year and Panama City has 2.6mm/yr, why isn't the mammoth amount water from the melting ice caps affecting them?</p> <p>Why is Dauphin Island sea level rise 3.9 mm/year and others are one-half as much?</p> <p>Is it because of the mammoth amount water melting from the polar ice caps is flooding Dauphin Island or is the Corps' dredging eroding and destroying the Island?</p> <p>I would like full explanation of the Corps and NOAA and conflicting facts about the different sea level rise.</p>	<p>Thank you for your comments and interest in gaining a better understanding of the factors that contribute to sea level change. While beyond the scope of this study, there is plenty of publicly available science regarding the matter. A few references, but by no means comprehensive list, are provided below:</p> <p>https://www.ipcc.ch/ https://www.globalchange.gov https://nca2014.globalchange.gov</p> <p>While melting ice from land into the ocean is a factor that contributes to global sea level change, it is not the only factor. Other factors that contribute to global as well a local sea level change include thermal expansion, slowing of the Gulf stream, and land subsidence or rebound.</p> <p>Along the northern Gulf of Mexico, long term water level measurements such as those at National Oceanic Atmospheric Administration's (NOAA) tide stations indicate that the rate of local sea level rise is higher than the global rate. The increase in local rates are documented in literature to be largely influenced by land subsidence associated with natural (i.e. shrinking of soils) as well as man induced (ground water and oil extraction) causes.</p>

			<p>When answering my questions, the Corps and the other Federal and State agencies employees have a duty to speak and not to remain silent and to disclose only the truth to my question and to questions by the public and property owners on the Island, about all information of the past erosion impacts caused the Corps' engineering activities in Mobile Harbor and Channels and all future erosion impacts to Dauphin Island from the massive future expansion to the Mobile Harbor Entrance Channel/Outer Bar Channel for the 2019 SEIS/GRR/Mobile Harbor study.</p>	<p>The team also appreciates your interest in understanding the causes of current and historic erosion on Dauphin Island, Alabama. Please refer to the Alabama Barrier Island Restoration Assessment technical appendices C and D for documentation of shoreline change, sea floor change, and an updated sediment sources and sinks analysis, which includes estimates of natural and man induced littoral transport of sediments within the region of Dauphin Island, Alabama. Dominate signals contributing to the observed change in island resiliency are documented within each.</p>
002	Caroline Graves	6/17/2020	<p>Dear Barrier Island Report Corps' person,</p> <p>My 2nd question.</p> <p>Please answer the following question about the Alabama Barrier Island Restoration Report.</p> <p>Why were significant and critical erosional facts stated in the USGS report omitted in the 2020 FINAL ALABAMA BARRIER ISLAND RESTORATION REPORT.</p> <p>Why did the Corps omit that between 1965 to 2015, USGS concluded, "that five times the amount of sediment is eroded from the island shoreface than is delivered each year."</p> <p>Why did the Corps omit that according to the USGS, the Corps Dredged 915,000 cys of sediment per year which is, "likely reducing the net sediment available to migrate westward into the study area?"</p>	<p>The report was written collaboratively by a multi-disciplinary team comprised of the scientists listed as leading authors in its technical appendices. The final report, which includes its technical appendices and references, stands as an authoritative documentation of the study. Detailed information on erosion is contained in technical appendices C and D. Please refer to these for additional reference and citing of the Final Alabama Barrier Island Restoration Assessment report.</p> <p>The statement "that five times the amount of sediment is eroded from the island shoreface than is delivered each year." is included as a reference in the report. Please refer to the entire paragraph found in Appendix C, page 4, for completeness, which includes reference to Byrnes et. al, 2010 for the data upon which the</p>

			<p>According to Analysis of Seafloor Change around Dauphin Island, Alabama, 1987–2015 By James G. Flocks, Nancy T. DeWitt, and Chelsea A. Stalk Open-File Report 2017–1112 Version 1.1, February 2018.</p> <p>“Over the past half century, [1965-2015] Byrnes and others (2008) estimated that approximately” 60,165 cubic yards/per year of sediment was transported to Dauphin Island. 313,908 cubic yard per year of sediment was eroded from the middle and western portion of the island.</p> <p>Between 1987-2006: 915,565 cubic yards per year “of sediment was dredged from the Mobile ship channel during this time period and placed in offshore sites (Byrnes and others, 2010),” “likely reducing the net sediment available to migrate westward into the study area.</p> <p>When answering my questions, the Corps and the other Federal and State agencies employees have a duty to speak and not to remain silent and to disclose only the truth to my question and to all questions by the public and property owners on the Island, about all information pertaining to the erosion caused the Corps’ engineering activities in Mobile Harbor and Channels and all future erosion impacts to Dauphin Island from the massive future expansion to the Mobile Harbor Entrance Channel/Outer Bar Channel for the 2019 SEIS/GRR/Mobile Harbor study.</p>	<p>statement is based and note that the statement refers to specific sediment sources.</p> <p>The statements regarding the “915,565 cubic yards per year of sediment dredged from the Mobile ship channel during the 1987-2006 time period and placed in offshore sites (Byrnes et. al, 2010), likely reducing the net sediment available to migrate westward into the study area.” Is elaborated further in Appendix B, Dredging History for the Mobile Outer Bar, found within Byrnes et. al, 2010, which is the scientific literature referenced where the dredge quantities were derived. In this report, it is documented that approximately 446,900 cubic yards per year of maintenance material were dredged over this time period, with approximately 200,300 cubic yards per year taken offshore. The remaining 246,600 cubic yards per year of maintenance material was placed within the Sand Island Beneficial Use Areas including the feeder berm site. Additionally, during this time period, approximately 161,100 cubic yards per year of new work material was also placed within the Sand Island Beneficial Use Areas including the feeder berm site.</p> <p>This information should enable the reviewer to better understand the findings found in Appendix C on page 10 that discuss the long-term period of change analyzed (1987-2015): “Mobile Bay ebb-tidal delta experienced only a slight net accretion.</p>
--	--	--	---	--

				<p>Sediment volumes increased 2 percent within the reference subsection (A) at a rate of 3.7×10^3 m³/yr. This rate is relatively negligible when compared to change rates in other areas, suggesting the Mobile ebb-tidal delta cell is in equilibrium. Sediment transported westward to Pelican Island and beyond is replaced by sediment migrating from the eastern lobe of the Mobile ebb-tidal delta, which is separated from the western lobe by the Mobile Outer Bar ship channel. The ebb-tidal delta retains equilibrium despite large volumes of sediment being dredged from the ship channel and removed offshore.”</p>
003	Renee Collini	6/21/2020	<p>There is no way to zoom in/out other than a double click that just keeps moving you closer on the morphological modeling section (Future Possible Conditions, section #2)</p> <ul style="list-style-type: none"> * There also isn't a legend on those specific pages so it is unclear what the colors mean. * The legend is hard to use because it is so small and in meters * What is the elevation in reference to? * What was the resolution for the morphological modeling? * I think they may have mislabeled the maps in the section showing changes in habitat due to future conditions. I think it's supposed to say that it's showing across the top medium storminess with low and then high SLR, then across the bottom high storminess with low and then high SLR - but that's not what the titles say. (Future Possible Conditions, section #5) 	<p>Thank you for your review.</p> <p>For all dynamic maps in the Alabama Barrier Island Restoration Assessment story map the user can use their touch or mouse scroll to zoom in or out. There is also a toggle button in the upper right-hand corner that the user can click to enlarge the dynamic map for better viewing.</p> <p>A legend for the dynamic Future Possible Conditions, section #2 has been incorporated.</p> <p>The modeling was conducted in meters. Post-processing to feet was not done for this effort; therefore, the scales cannot be adjusted without reducing the range of elevations depicted in the maps.</p>

				<p>The elevations are referenced to North American Vertical Datum 1988 (NAVD88). The map was updated with the datum.</p> <p>The headers of the story maps were checked to ensure labeling was accurate. Sub-headers were incorporated to provide the conditions evaluated in the habitat assessment. Text was also added to the side panel of the story map to provide a better explanation of the sea level conditions presented in the maps.</p>
004	Carolyn Graves	6/21/2020	<p>Dear State of Alabama and Mobile District Corps of Engineers,</p> <p>In the ABIRA, the # 1 priority is: The Pelican Island Southeast Nourishment site and to spend \$72.9 million to \$119.0 million dollars of BP money, to dump 4.6 million cys sand into the site.</p> <p>WHY would the Mobile District Corps and the State of Alabama need to supply 4.6 Million cys sand to the littoral system near Pelican Island, if the Corps dredging of the channel is not stopping the sand from getting to Pelican Island and Dauphin Island?</p> <p>WHY would the Mobile District Corps and the State of Alabama need to spend \$72 million dollars to supply 4.6 million cys of sand to the littoral system near Pelican Island, if the Corps dumping of sand in SIBUA, has not stopped the flow of sand getting to Pelican Island and Dauphin Island's western shoreline for the last 21 years?</p> <p>The Corps has been adamant for the last 40 years, they have not stopped the flow of sand to Dauphin Island. Now the GRR/SEIS has revealed that their statements about the sand</p>	<p>Thank you for your comments. A few points of clarification to your opening remarks are provided below followed by the answers to each of your 16 questions.</p> <p>Response to opening remarks:</p> <p>No priorities are identified in the report nor are any recommendations made. The team formulated and evaluated a suite of different restoration measures to address future possible island conditions due to tropical storms and sea level change. The benefits and costs of these measures over a 50-year lifecycle were identified and built into an assessment tool which ranked them relative to how well they met the objectives of the study. See Section 3.6 of the report for further information on the formulation and evaluation process.</p> <p>The general intent of the Pelican Island Southeast Nourishment was to determine if sand dredged from the Mobile Harbor Bar</p>

		<p>flowing from SIBUA to Dauphin Island are not true.</p> <p>Has the Corps been LYING to the public for the last 40 years?</p> <p>The Corps needs to completely answer each question below concerning the flow of sand in the ABIRA report and the Corps previous statements.</p> <ol style="list-style-type: none"> 1. Is it a LIE or the TRUTH that the dredging of the Channel and dumping the sand into SIBUA is supplying sand to the western shoreline of the island? What is the exact amount of the dumped sand from SIBUA that got to Dauphin Island's western shoreline? 2. Is it a LIE or the TRUTH that the Corps dumping the sand the in the offshore sites and SIBUA keeps the sand in the littoral system, and the sand flows to Dauphin Island western shoreline, as stated in the Byrnes 2008 study? What is the exact amount of the dumped sand from SIBUA that got to Dauphin Island's western shoreline? 3. Is it a LIE or the TRUTH that the Corps dumping sand in SIBUA puts sand into the littoral system and the sand flows to the western shoreline and stops the erosion to Dauphin Island's beaches? What is the exact amount of the dumped sand from SIBUA that got to Dauphin Island's western shoreline? 4. Is it a LIE or the TRUTH that the Mobile District's designed 8 different underwater berms to dump the dredge sand in SIBUA/the Pelican Island area, with statements that the sand has flowed to the Dauphin Island's shoreline? What is the exact amount of the dumped sand from SIBUA that got to Dauphin Island's western shoreline? 5. Is it a LIE or the TRUTH that in 1986 the Mobile District's 	<p>Channel could be feasibly and beneficially used, supplemented with sand from other sources, to enhance sediment transport in the area, create sustainable habitat, and provide storm damage reduction to areas along the eastern end of Dauphin Island. The results of this assessment indicated that even by placing sand in extremely shallow depths and rebuilding an above-water island, the sediment transport rates did not increase along the western shoreline between the pier and the road during the 10-year morphological model simulation. In other words, even if a significant quantity of sand is placed in shallower depths of the active sediment transport system along the ebb tidal shoal, the rate at which that sand is delivered to the western shoreline of Dauphin Island did not significantly increase over the 10-year simulation period. This indicates that rates of sediment transport along the ebb tidal shoal are not the result of a sediment starved system but rather a function of the shoreline/shoal orientation and incident wave climate, which provide the energy levels available to move sediment in the system.</p> <p>Responses to questions 1 – 16 are as follows:</p> <ol style="list-style-type: none"> 1. Analysis of dredge material placement records and surveys have shown that sand placed in Sand Island Beneficial Use Area is in the active system. The average annual rate of sediment
--	--	--	---

		<p>National Underwater Berm Demonstration Program, investigated the feasibility and effectiveness of constructing underwater berms with dredged material for providing shore protection and the Mobile District told the Public that the sand in the underwater berms flowed to Dauphin Island’s shoreline? What is the exact amount of the dumped sand from SIBUA that got to Dauphin Island’s western shoreline?</p> <p>6. Is it a LIE or the TRUTH that in 1995 the Mobile District Corps’ document, they state that ADEM “are formulating a letter basically requesting a more environmentally beneficial disposal option.” And the Corps tells ADEM “Erosion has occurred in the vicinity of Dauphin Island and suitable material placed in the proposed Sand Island Beneficial Use Area would aid in beach nourishment through the littoral transport process.” What is the exact amount of the dumped sand from SIBUA that got to Dauphin Island’s western shoreline?</p> <p>7. Is it a LIE or the TRUTH that in 1997, the Mobile District in coordination “with the Alabama Department of Environmental Management (ADEM) proposed the designation of a large area of the subtidal delta as the Sand Island Beneficial Use Area (SIBUA)” and the Corps told ADEM that SIBUA would keep “the dredged material in the littoral zone requires placement in a location where natural processes are able to move the material to the adjacent downdrift shorelines.” What is the exact amount of the dumped sand from SIBUA that got to Dauphin Island’s western shoreline?</p> <p>8. Is it a LIE or the TRUTH that the Corps has produced documents, studies, pictures, and made statements to the press and the public that the sand flows from SIBUA to Dauphin Island’s western beaches? What is the exact amount of the dumped sand from SIBUA that got to</p>	<p>transport toward Dauphin Island’s western shoreline is documented at approximately 276,000 cubic yards per year based on dredge records and bathymetric change analysis for the time period between 1985/88 to 2010/16. For additional information please refer to Appendix C Sediment budget analysis.</p> <p>2. See response to question 1.</p> <p>3. See response to question 1. Please note that placement of dredged material in the nearshore does not stop shoreline erosion. Rather the intent of placement of material in the sand island beneficial use area is to keep the sediment in the littoral zone to naturally provide a source to downdrift shoal systems and shorelines overtime.</p> <p>As documented in Appendix C, the Pelican Island cells used in the seafloor change and sediment budget analysis indicate that sediment transported westward to Pelican Island and beyond to Dauphin Island is replaced by sediment bypassed from the eastern lobe of the Mobile ebb-tidal delta as well as sediment transported south along the western lobe of the ebb-tidal delta as a result of tidal currents. This suggest that over the period of analysis this segment of the Mobile ebb-tidal delta cell has maintained a state of equilibrium.</p>
--	--	--	--

		<p>Dauphin Island's western shoreline?</p> <p>9. Is it a LIE or the TRUTH that the Mobile District added SIBUA to the Regional Sediment Management Plan for the flow of sand to Pelican Island and Dauphin Island? What is the exact amount of the dumped sand from SIBUA that got to Dauphin Island's western shoreline?</p> <p>10. Is it a LIE or the TRUTH that the Mobile District even convinces the DOJ attorneys, the Judge and the Plaintiff's attorney about SIBUA as evidence that the sand was getting to Dauphin Island, during the Corps lawsuit? What is the exact amount of the dumped sand from SIBUA that got to Dauphin Island's western shoreline?</p> <p>11. Is it a LIE or the TRUTH that in 1998 Susan Ivester Rees presentation "Dredging of the Mobile Bay Channels, Corps of Engineers, Mobile District" she stated that SIBUA: "The characteristics of this area are similar to those of the 'feeder berm' site and therefore material placed within this area should augment the littoral drift system of Sand - Pelican Islands as well as western Dauphin Island"? What is the exact amount of sand that has flowed to Dauphin Island's western shoreline from SIBUA since 1998?</p> <p>12. Is the statement a LIE or the TRUTH that that the Corps put in a 2008 FP08-MH14-05 public notice, "The beneficial use area is located west of the navigation channel and is intended to keep valuable sand removed from the bar channel in the local littoral system." What is the exact amount of the dumped sand from SIBUA that got to Dauphin Island's western shoreline?</p> <p>13. Is the statement a LIE or the TRUTH that in 2009, Susan Rees of the Corps testified to the Judge that the dredged sand dumped into SIBUA was "transporting sand to Dauphin Island" during lawsuit settlement hearing? What is the</p>	<p>The erosion on Dauphin Island, in large part, has been due to the natural gradients (change in rates) in sediment transport. The change in transport rates occur as a result of the incident wave climate and the geomorphic features including shoreline and shoal orientation. Increases in southwest orientation along Dauphin Island, when coupled with an incident wave climate from the southeast results in higher transport rates along those segments. Furthermore, low island elevations coupled with sparse vegetation found along the western developed segment of the island combined with high energetic tropical cyclones increases its susceptibility to overtopping and inundation with significant episodic cross-shore transport (erosion of the shoreline on the south) and island breaching.</p> <p>4. Two offshore berms were evaluated as part of the National Nearshore Berm Demonstration Project. These included (1) an offshore stable mound constructed of silts and clay intended to reduce wave energy and provide fishery habitat and (2) a feeder berm constructed of sand intended to attenuate waves and introduce sediment to the littoral zone. Monitoring and evaluation of material migration in the vicinity of the berm sites were conducted in the late 1980s</p>
--	--	---	---

			<p>exact amount of sand has been transported to Dauphin Island western shoreline from SIBUA since 2009?</p> <p>14. Is the statement a LIE or the TRUTH that the DOJ in a brief to the Judge stated that Approval Op. at 6. (“[T]he entire island will benefit from the mitigation and prevention of further erosion.”). “To that aim, in addition to providing money to advance a beach nourishment project, the Second Addendum re-affirms the Corps’ commitment to deposit dredged material in the beneficial use areas designated originally under the LSA. Moreover, these legally binding commitments are consonant entirely with the Corps’ “national policy for both beneficial use and regional sediment management that stresses that [the Corps] identify areas that . . . can keep the sediment in[] the system as much as possible.” Tr. at 148:11- 14 (Rees).” What is the exact amount of sand that has reached Dauphin Island’s western shoreline from SIBUA?</p> <p>15. Is it a LIE or the TRUTH that at a 2018 public meeting for the SEIS/GRR for the Mobile Harbor, the Corps slides showed the dredged sand dumped in SIBUA was transported to Pelican Island, and from there it goes down the western beaches of Dauphin Island? What is the exact amount of sand that has reached Dauphin Island’s western shoreline from SIBUA?</p> <p>16. Is the statement a LIE or the TRUTH from District Colonel Jorns in the letter to Congressman Bonner, 1/25/2010, “Both the SIBUA and the Feeder Berm Sites are considered beneficial use sites in that placement of dredged material in these sites keeps the sandy material in the natural littoral drift system, which is beneficial to Dauphin Island.” What is the exact amount of sand that has reached Dauphin Island’s western shoreline?</p> <p>As a Federal agency, the Mobile District Corps is over the</p>	<p>and early 1990s. As documented in post-monitoring reports, the feeder berm site, which was surveyed 22 times over 5-years, showed clear slow, persistent landward movement of the placed sands, which demonstrated that the placement was within an active zone.</p> <p>The intent of the National Nearshore Berm Demonstration Program was to investigate the cost effective, beneficial use of dredge material for the purposes of environmental and coastal storm damage reduction benefits.</p> <p>See response to question 1 for the average annual rate of sediment transport toward Dauphin Island’s western shoreline.</p> <p>5. The authors of the ABIRA final report don’t have records of the 1995 quotes you reference. See response to question 1 for the average annual rate of sediment transport toward Dauphin Island’s western shoreline.</p> <p>6. The authors of the ABIRA final report don’t have records of the 1997 quotes you reference. See response to question 1 for the average annual rate of sediment transport toward Dauphin Island’s western shoreline.</p> <p>7. See response to question 1.</p>
--	--	--	---	---

			<p>Mobile Harbor and Channels and has special expertise, as such; they cannot remain silent when they know their actions attributed to their maintenance dredging on a Federal project will destroy citizen's property. The State of Alabama and the Corps' employees have a duty to speak and not to remain silent, when giving the public information about the massive expansion to the Mobile Harbor Entrance Channel and the flow of sand to Dauphin Island's western beaches and telling the public the exact amount of sand that has reached Dauphin Island's western shoreline from SIBUA in the past.</p> <p>Do not redact my name.</p>	<p>8. See response to question 1.</p> <p>9. The concept of treating dredged material as a resource, including the material placed in the sand island beneficial use area, is a component of the Regional Sediment Management strategy. See response to question 1.</p> <p>10. See response to question 1.</p> <p>11. Dr. Rees has retired. The authors of the ABIRA final report do not have a copy of the presentation referenced. See response to question 1 for the average annual rate of sediment transport toward Dauphin Island's western end.</p> <p>12. See response to question 1.</p> <p>13. An official transcript of any proceedings in Dauphin Island Property Owners, Inc., et al vs. the United States would best reflect the content of any statement and the context in which it was made. The average annual rate of transport toward the western shoreline of Dauphin Island over the time period (1985/88 to 2010/16) contained within the sediment budget assessment is approximately 276,000 cubic yards per year. The period considered contains good spatial survey data coverage for the study area and captures the bypassing actions, which began within SIBUA in 1999.</p>
--	--	--	--	---

				<p>14. The language in any brief filed in Dauphin Island Property Owners, Inc., et al vs. the United States speaks for itself. See response to question 1 for the average annual rate of sediment transport toward Dauphin Island's western end.</p> <p>15. See response to question 1.</p> <p>16. See response to question 1.</p>
005	Gary Garstecki	6/22/2020	<p>It appears that the Feds have totally ignored the plight of citizens of south Alabama regarding the causes of erosion at Dauphin Island.</p> <p>Please see the suggested steps below (along with page numbers from (Alabama Barrier Island Restoration Assessment Final) to insure the future of this valuable resource in our state and country.</p> <ul style="list-style-type: none"> * Restoration of the Pelican/Sand Island ebb tidal shoal south of Dauphin Island. * Restoration of Dauphin Island's Gulf beaches. * Back-barrier habitat and marsh restoration options on the Mississippi Sound side of Dauphin Island. * Numerous land acquisitions for conservation around Dauphin Island. 	<p>Thank you for your comments and thank you for providing your suggested priority restoration activities.</p>
006	Paul Watson	6/22/2020	<p>Commissioner Blankenship,</p> <p>I hope that you will support the proposed restoration efforts for the island that are under consideration now. My family and I have had a home on the West end for 25 years, my wife's parents had a home before that and her grandmother before that so we wish only the best for the island. Our home is on the north beach West End. As I'm sure any study</p>	<p>Thank you for your comments and thank you for providing your suggested priority restoration activities.</p> <p>To date, multiple projects totaling millions of dollars have been approved for Dauphin Island and the waters adjacent to Dauphin Island utilizing Deepwater Horizon funding.</p>

			<p>would quickly show the north beach is eroding significantly also. We are not too sorry to lose some sand because after the last couple of hurricanes it's almost like we're not even on the water anymore. But the point is the entire island is eroding, it is not just shifting to the north. It is my purely unscientific belief that this is a direct consequence of the mobile shipping channel but there's no point in pursuing that.</p> <p>I am a Mississippi resident and 60 years old so I have some familiarity with situations dominated by an underlying invisible political causality. I do not pretend to understand why this island has so little support from the people and the agencies in this state who would be best positioned to be of help. Every time there seems to be a chance that something good could happen to make up for things like the BP oil spill and the Mobile shipping channel Dauphin Island comes up empty. I hope this time will be different and I ask that you please support beach restoration and anything else that would help this place.</p> <p>Thank you for your consideration.</p>	<p>All funded restoration projects can be found at www.alabamacoastalrestoration.org.</p>
007	Tanya Shows Harrison	6/22/2020	<p>As a resident most of the year and property owner in Dauphin Island I truly hope that the state considers the restoration of our coastal property to be of utmost importance. It is widely known that the erosion of our island is largely due to the ship channel dredging and improper redistribution of that sand. Please help out island by making the five projects attached a priority.</p> <ol style="list-style-type: none"> (1) Pelican Island Southeast Nourishment (2) Sand Island Platform Nourishment and Sand Bypassing (3) East End Beach and Dune Restoration (4) West End and Katrina Cut Beach and Dune Restoration (with No Buyouts) (5) Marsh Habitat Restoration Behind Katrina Cut 	<p>Thank you for your comments and thank you for providing your suggested priority restoration activities.</p>

			Thanks for your time and attention in this matter.	
008	William Roedder	6/22/20	<p>Dear Mr. Blankenship:</p> <p>I understand that four (4) projects intended to benefit Dauphin Island have been proposed:</p> <ol style="list-style-type: none"> 1. Restoration of Pelican/Sand Island ebb tidal shoal south of Dauphin Island; 2. Restoration of Dauphin Island's Gulf beaches; 3. Back-barrier habitat and marsh restoration options on the Mississippi Sound side of Dauphin Island; and 4. Numerous land acquisitions for conservation around Dauphin Island. <p>My family and I have enjoyed the beauty and serenity of Dauphin Island for more than forty (40) years. I am delighted to see that these four (4) projects will hopefully be undertaken. I wholeheartedly support them.</p>	Thank you for your comments and thank you for providing your suggested priority restoration activities.
009	Caroline Graves	6/23/2020	<p>Dear State of Alabama and Mobile District Corps of Engineers,</p> <p>Resources and Ecosystems Sustainability, Tourist Opportunities, and Revived Economies of the Gulf Coast States Act of 2012 (RESTORE Act)</p> <p>THE Federal Law that establishes a Federal Trust Fund managed by the Secretary of the Treasury. Alabama and the Corps must submit reports as prescribed by Treasury and the Treasury Inspector General may conduct audits and reviews of recipient's accounts and activities relating to the Act as deems appropriate. Treasury will develop and apply policies and procedures consistent with this Act and Federal laws and policies on grants.</p>	<p>Thank you for your comments. The State of Alabama, in conjunction with the US Army Corps of Engineers, conducted a public meeting to discuss and take public comment on the Interim Alabama Barrier Islands Restoration Assessment Report and the comments now received are in response to a public comment period for the Final Alabama Barrier Islands Restoration Assessment Report. A few points of clarification to your opening remarks are provided below followed by the answers to each of your questions.</p> <p>Response to opening remarks:</p>

		<p>Since the Corps sent me a letter with the indication that the Corps actions were not subject to the Federal Law and your statement, "it is not subject to the National Environmental Policy Act (NEPA) public involvement/notification requirements", and "While we may not be legally required to have public meetings nor take public comments".</p> <p>If the Corps does not believe their actions are subject to the Federal law, I will be happy to contact the Treasury Inspector General.</p> <p>Questions:</p> <ol style="list-style-type: none"> 1. Will the Mobile District Corps of Engineers certify that that they do not have conflict of interest in the development of the ABIRA Report and will the Corps certify that they have identified all potential consequences of the dumping of sand in the sites outlined in the ABIRA and certify they have mitigated for all engineering activities related to the erosion on Dauphin Island and the dredging the Mobile Harbor Outer Bar, a Federally Authorized Navigation Channel. 2. Did anyone associated with ABIRA Report give any parameters, restrictions, stipulations, guidelines, constraints, or limits to any of the groups or individuals doing the studies for the ABIRA, about not mentioning the Corps engineering activities and the dredging the Mobile Harbor Channel and not mentioning the Corps stopping the flow of sand thereby, causing erosion to the Island, including any statements to not identifying the consequences or the amount of the erosion on Dauphin Island and not identifying the sediment budget and the correct placement of sites for the sand to move on the western shore of Dauphin Island. 3. The ABIRA report states that the Mississippi/Alabama barrier islands have been eroding and that cause of the 	<p>This study was not funded by the RESTORE Act or another federal source. It was funded by the National Fish and Wildlife Foundation through the Gulf Environmental Benefit Fund; therefore, it is not subject to the National Environmental Policy Act (NEPA) public involvement/notification requirements. While the team was not legally required to have public meetings nor take public comments, they did so to ensure the public's questions were fully and completely answered regarding means, methods, and results of the study because it is the right thing to do. The team wants this information to be used in a positive and productive manner and wants to ensure the public is truly informed of the challenges and opportunities for enhancing the long-term resiliency of the island.</p> <p>Responses to questions 1 – 4 are as follows:</p> <ol style="list-style-type: none"> 1. The U.S. Army Corps of Engineers, Mobile District, does not have a conflict of interest in development of the Alabama Barrier Island Restoration Assessment report and has been completely transparent in presenting the results of the various analyses completed by the Corps team and the project partners (i.e., the U.S. Geological Survey and the U.S. Army Engineering Research and Development Center). There are no required Corps mitigation activities for Dauphin Island. This was the subject of a lawsuit which resulted in a
--	--	--	--

		<p>erosion is rising sea level, storms and engineering activities that all threaten the islands? This includes Dauphin Island.</p> <p>The ABIRA Report discusses the Rising Sea Level on 40 pages out of 93 pages.</p> <p>The ABIRA Report discusses storms on 53 out of 93 pages</p> <p>two questions for #3</p> <p>* WHY WERE THERE NO DISCUSSIONS OR STUDIES ABOUT THE CORPS' ENGINEERING ACTIVITIES CAUSING THE MASSIVE EROSION TO DAUPHIN ISLAND'S WESTERN SHORELINE.</p> <p>* WHY WAS THIS IMPORTANT SUBJECT ABOUT THE CORPS' ENGINEERING ACTIVITIES LEFT OUT OF THE ABIRA REPORT?</p> <p>4. The Corps of Engineers need to:</p> <ul style="list-style-type: none"> · Define the Corps' engineering activities on the future erosional effects to Dauphin Island's shoreline. · Define what has been done to address, all past and future environmental and erosional effects to Dauphin Island's shoreline and explain the Corps' engineering activities for the Mobile Harbor Entrance Channel project, including any significant adverse impacts on fish, turtles and wildlife resources on the Island. · There must be a full detailed disclosure of all projects in the Barrier Island Report and how each project will or will not help to nourish the Western shoreline and each project will or will not cause future erosion to the shoreline, between the pier and the end of the road on Dauphin Island. No more obscuring the facts of a project with 	<p>settlement between the Dauphin Island Property Owner's Association and the U.S. Army Corps of Engineers, Mobile District. During this proceeding, an independent analysis was conducted (i.e., Byrnes et al. 2010) to evaluate the effects of the Corps' dredging of the Mobile Harbor Bar Channel and the findings were that, "there appears to be no measurable negative impacts to ebb-tidal shoals or Dauphin Island beaches associated with historical channel dredging across the Mobile Pass Outer Bar."</p> <p>2. No.</p> <p>3. As stated previously, this was the subject of a lawsuit which resulted in a settlement between the Dauphin Island Property Owner's Association and the U.S. Army Corps of Engineers, Mobile District. Consequently, an independent analysis was conducted (i.e., Byrnes et al. 2010) to evaluate the effects of the Corps' dredging of the Mobile Harbor Bar Channel and the findings were that, "there appears to be no measurable negative impacts to ebb-tidal shoals or Dauphin Island beaches associated with historical channel dredging across the Mobile Pass Outer Bar." Byrnes et al. 2010 is referenced numerous times in the Alabama Barrier Island Restoration Assessment report.</p>
--	--	--	---

		<p>confusing and ambiguous language to make the results of the project difficult to understand.</p> <p>All of my questions are to be entered into the ABIRA Report, and no redaction of my name.</p> <p>The following is a clear definition of the term, engineering activities.</p> <p>O&M Justification Sheet for Coastal Inlets Research Program.</p> <p>“Modifications to coastal inlet channels and jetties can have a profound effect on the integrity of the navigation structures, adjacent beaches, estuaries, ecosystems and regions. Demand for regional sediment management practices and mitigations for engineering activities includes innovative creation of nearshore berms with dredged sediment intended as a source to nourish the neighboring beaches. Renewable, cost-effective placement sites for dredging must also be designed such that sand moves onshore, fine sediments are dispersed offshore and re-deposition into the navigation channel is minimized. Such projects require characterization of hydrodynamics, wave forcing sediment transport and morphology change as well as geomorphologic approaches. Thus, navigation project O&M, structure integrity and implications of ongoing and future dredging actions must be considered within a sediment-sharing inlet system. The Corps needs to advance knowledge and tools to better predict future channel shoaling and to make transparent and uniform decisions on prioritization of funding. This applied research and development is necessary to provide quantitative and practical predictive tools and data to reduce the cost of dredging for Federal navigation projects and maintain inlet jetties, identify potential unintended consequences, mitigate for engineering activities related to navigation</p>	<p>4. Engineering activities referenced in the Alabama Barrier Island Restoration Assessment report were not meant solely to imply the Mobile Harbor Navigation channel. The main report, as well as Appendix C and Appendix D, discuss several engineering activities to include but not limited to dredging, sand placements, revetments, breach closures, groins, and breakwaters. Also discussed are non-engineering man-induced activities such as dredging and filling of wetlands, lowering of dunes, and removal of herbaceous vegetation coverage associated with development.</p> <p>Engineering activities associated with the Mobile Harbor Navigation channel include the removal of material that enters the Bar Channel from the east and the placement of that material on the west side of the channel within Sand Island Beneficial Use Area and the Northwest Extension.</p> <p>The Sand Island Beneficial Use Area was established in 1999 and the Northwest Extension was established in 2019 to accommodate the placement of material dredged from the Mobile Harbor Bar Channel within the active sediment transport system. The ongoing and future dredging and placement actions, as described above, have been vetted with all applicable state and Federal resource</p>
--	--	---	--

			<p>channels, prioritize maintenance options within budget constraints and support national security efforts to protect waterways and ports. The Coastal Inlets Research Program provides tools to engineers and decision makers for developing reliable solutions and practices to reduce the cost maintenance and operation of Federal Navigation projects.”</p>	<p>agencies as well as the general public in accordance with the requirements of the National Environmental Policy Act.</p> <p>The U.S. Army Corps of Engineers, Mobile District, will continue to proactively monitor and manage the placement of material in Sand Island Beneficial Use Area and the Northwest Extension to ensure it is placed in the best locations possible given the availability of funds and capabilities of the dredging industry. Hydrographic surveys of placement areas every six months, along with a comprehensive survey of the complex annually, are being conducted to gain a better understanding of future capacities and coastal processes that move sediment within the region.</p>
010	Amanda Winstead	6/23/2020	<p>Dear Sirs,</p> <p>As a property owner on the East End of Dauphin Island for over twenty years, I have watched over 300 yards of shoreline disappear from Dauphin Island. The recent damage from Tropical Storm Cristobal has leveled what was remaining of the lower dune. The East End beach must be restored and at no delay. I am writing to express my support for the East End Beach and Dune Restoration project outlined beginning on page 49 of the Alabama Barrier Island Restoration Assessment. The East End beach is critically vulnerable right now, more than ever. It needs to be restored, or critical habitat and water supply sources, as well as private homes, will be lost forever.</p>	<p>Thank you for your comments and thank you for providing your suggested priority restoration activities.</p>

011	Caroline Graves	6/23/2020	<p>Chris, does the State of Alabama know that the Corps is misleading State and the Public in the ABIRA Report?</p> <p>Dear Corps of Engineers and State of Alabama,</p> <p>These are my questions that need to be answered about:</p> <p>ABIRA and the Pelican Island Southeast Nourishment site.</p> <p>Question 1. Why would the Corps recommend spending \$72 million dollars of the BP oil-spill money, to put the sand in the Pelican Island Southeast Nourishment site in the ABIRA Report, when the Corps has already agreed to pay to put the dredged sand in the exact same site, the SIBUA Northwestern Extension in the 2019 GRR/SEIS, to mitigate for the erosion to Dauphin Island?</p> <p>Question 2. Why did the Corps recommend the future spending of the total amount of \$3 million dollars for 20 years and 50-year [\$8.5 million], when the Corps had already agreed to pay the costs for the futures dredging of the sand to be put into SIBUA Northwestern Extension?</p> <p>ABIRA Report page 46: “To maintain maximum benefits, nourishments would be needed on an estimated 10-year average cycles. Estimates of total present value cost for nourishments over a 20-year [\$3million] and 50-year [\$8.5 million] project life-cycle (i.e., future operations and maintenance (O&M) costs) are presented in Table 6 and assume the use of sand dredged from Mobile Harbor Bar Channel during routine maintenance activities. “</p> <p>ABIRA Report APP K Costs Page 14 “To maintain maximum benefits, nourishments would be needed on an estimated 10-year average cycles. Estimates of total present value cost for nourishments over a 20-year project life-cycle (i.e., future O&M costs) are estimated at \$3.0 million for a 20-</p>	<p>Again, thank you for your comments. Responses to questions 1 – 4 are provided below.</p> <ol style="list-style-type: none"> 1. Neither the U.S. Army Corps of Engineers nor the State of Alabama make any recommendations in the report about future projects to implement. Furthermore, the Corps is not placing sand dredged from the Mobile Harbor Bar Channel, as part of routine maintenance activities, in the Sand Island Beneficial Use Area Northwest Extension to mitigate for erosion on Dauphin Island. The Corps is placing sand in Sand Island Beneficial Use Area and the Northwest Extension as part of its proactive strategy to maintain dredge material placement capacity and ensure material is maintained in the active transport system along the ebb tidal shoal in the best locations possible given the availability of funds and capabilities of the dredging industry. <p>Another point of clarification is that the quantity documented in the Alabama Barrier Island Restoration Assessment report for sand placed for the Pelican Island Southeast Nourishment measure is approximately four times what is dredged from the Bar Channel on average every two to three years based on the rates documented with the report. Also, the Pelican Island Southeast Nourishment measure</p>
-----	-----------------	-----------	--	--

			<p>year life and assume the use of sand dredged from Mobile Harbor Bar Channel during routine maintenance activities. For the O&M estimate, the only cost included is the additional cost of disposing of the dredged material on the project site for beneficial use.”</p> <p>Question 3. Why did the Corps, appropriate from Congress an extra \$4 million dollars to cover the cost to put the dredged sand into the SIBUA Northwestern extension, when under the ABIRA, the Corps states that future sand dredged from Mobile Harbor Bar Channel during routine maintenance activities for the total 20 year period of the O&M will only cost \$3 million and \$8.5 million for the 50 years. How can the Corps state to Congress, it costs \$4 million dollars to put the sand in the SIBUA extension site, when the Corps states in ABIRA, the total cost of \$3 million will cover the entire 20 years period of dredging, every two years and dumping in the Pelican Island site, the exact same location as SIBUA Extension.</p> <p>Question 4. Since both are the exact same site. will either the Pelican Island Southeast Nourishment site or the SIBUA Northwestern Extension transport the sand to the western shoreline and protect the western shoreline of Dauphin Island from the erosion, between the pier to the end of the road,</p> <p>The ABIRA Reports statements about the Pelican Island site will not stop any of the erosion to the western shoreline of Dauphin Island.</p> <p>“sand in the littoral system near Pelican Island, this measure would provide additional storm damage reduction to beaches located leeward of the island along Dauphin Island’s eastern end.”</p>	<p>consists of actually building an above-water island (to approximately elevation +4.5 ft NAVD88) southeast of the existing Pelican Island along the general 1985 island shoreline position to create important bird and turtle habitat, provide coastal storm damage reduction to the east end of Dauphin Island, and supply additional sand to the littoral system. Bottom line is that, while the routine placement of dredged material from the Bar Channel and the Pelican Island Southeast Nourishment measure may be located in the same general vicinity, the magnitudes and intentions are not the same.</p> <ol style="list-style-type: none"> 2. As stated previously, neither the U.S. Army Corps of Engineers nor the State of Alabama make any recommendations in the report about future projects to implement. Please refer to the Cost Appendix K, which documents the initial construction and O&M costs developed for each restoration measure to identify the life-cycle costs, independent of the funding source(s). 3. The difference in costs is due to a difference in the volume of material currently planned for placement within the Northwest Extension, which is estimated to be upwards of 1.2 million cubic yards for the event referenced in the comment. For cost estimating of the Pelican Island Southeast
--	--	--	--	---

			<ul style="list-style-type: none"> · “the measure generates secondary benefits of risk reduction to hazards associated with storms along the east end of Dauphin Island through a reduction in wave energy and shoreline erosion.” · “During the 10-year model simulation”, there was: <ul style="list-style-type: none"> “no noticeable change in the rates of sediment transport from Pelican Island to Dauphin Island.” “Nor were there significant documented differences in the patterns or magnitude of erosion or deposition around the main portions of Dauphin Island.” “As stated above, the primary benefit seen from this measure is the reduction in shoreline erosion along Dauphin Island’s east end. · “the risk reduction it provided to the eastern end of Dauphin Island by reducing future shoreline erosion.” · “However, increases in the rates of sediment transport from Sand and Pelican Islands to Dauphin Island,... were minimal for both measures,” · “The rates of transport, even in these shallower, more dynamic areas, is significantly less than the rate material is dredged from the navigation channel and deposited on the ebb tidal shoal as part of routine maintenance dredging activities.” <p>Not only does the ABIRA Report state that the Pelican Island Southeast Nourishment site will not help the Western shoreline and will only help the east-end of the Island.</p>	<p>Nourishment measure, the material needed for future maintenance was estimated based on +/- one standard deviation of the annual maintenance dredge rates with a frequency of nourishment occurring once per 10 years.</p> <p>4. Yes, material from the location of the Pelican Island Southeast Nourishment site and the Sand Island Beneficial Use Area Northwest Extension both transport overtime to the western shoreline of Dauphin Island. As indicated within the results section of Appendix F, Application of Decadal Modeling Approach to Forecast Barrier Island Evolution, Dauphin Island Alabama, these processes take decades and there were no noticeable changes in the rate of transport nor the patterns or magnitude of erosion or deposition around the main portions of Dauphin Island from the Pelican Island Southeast Nourishment measure. In other words, material is transporting to the western shoreline but it’s not getting there any faster or at a greater rate by putting more sand in the system along the general 1985 island shoreline position. This indicates that sediment transport rates along the ebb tidal shoal are not due to a sediment starved system but rather a function of the shoreline/shoal orientation and incident wave climate, which bound the energy available to move the sediment in the system.</p>
--	--	--	---	--

			<p>BUT the greatest deception is the Corps statement “that the rate of transport even in these shallower is significantly less” than the Corps normal dredging the Channel and dumping the sand into the original SIBUA, during routine maintenance dredging.</p> <p>The words “significantly less” in this statement, means that no sand at all in the Pelican Island site will be transported to Dauphin Island, because we all know, during the Corps normal dredging of the channel and dumping the sand in the original SIBUA, there is no transport of the sand to Dauphin Island.</p> <p>Please include my full lists of question with full answers in the ABIRA Report.</p> <p>Do not redact my name</p>	
012	Carol Merkel	6/23/2020	<p>To the Corps ABIRA Team;</p> <p>For several decades Island Watch, a community action group composed of Dauphin Island residents and property owners, has witnessed the Corp’s failure to objectively and adequately analyze the negative contribution of maintenance of the Mobile Harbor Bar Channel on the historic erosion of Dauphin Island.</p> <p>Island residents and property owners have watched as studies appear to have been manipulated to disprove the negative effect of any dredging of the channel on the erosion of the island’s southern shore. Historically, any reference to the fact that remediation efforts should be made, have consistently been ignored by all levels of government and politicians. At best, lip service was paid by the Corps at meetings that were supposed to invite public opinion.</p>	Thank you for your comments and thank you for providing your suggested priority restoration activities.

		<p>Islanders have watched as study after study have been conducted and report after report have been produced with no fruitful results to meaningfully remedy Dauphin Island's erosion problem. If the money spent on the reports and studies over the years was utilized toward addressing the erosion problem, we would likely not be having the need for this conversation today. This is evidenced by successful shoreline erosion mitigation projects throughout the country.</p> <p>And yet, here we are with yet a new report that will likely either be ignored or the least costly restoration projects will ultimately be pursued that do not address the island's real need which is to restore and strengthen the island's Gulf shoreline. Three thousand property owners are waiting to see what will be done. If Alabama's only barrier island is not preserved, then the mainland and fragile and vital estuarine habitat in between will be severely damaged and destroyed.</p> <p>Island Watch strongly recommends all five of the following restoration projects be constructed:</p> <ul style="list-style-type: none"> · Pelican Island Southeast Nourishment Ebb Tidal Shoal Restoration · Sand Island Platform Nourishment and Sand Bypassing Ebb Tidal Shoal Restoration · East End Beach and Dune Restoration Gulf Beach Restoration · West End and Katrina Cut Beach and Dune Restoration (with No Buyouts of 225 private parcels) Gulf Beach Restoration · Marsh Habitat Restoration behind Katrina Cut Back-Barrier and Marsh Restoration 	
--	--	--	--

			<p>All five of the above recommended will collectively provide the comprehensive approach necessary to assure the long-term future of Dauphin Island is provided. All five of these measures need to be constructed to insure the island’s sustainability and resilience in the face of rising sea levels and future storms. Island Watch does not believe the buyout of private West End beachfront properties is viable and would add a considerable cost to the measure.</p> <p>On behalf of the three thousand property owners and commercial enterprises that we represent, Island Watch respectfully requests consideration of the above recommended comprehensive approach be adopted for implementation. Please do not sit by and fiddle while Rome burns, time is running out.</p>	
013	Myrt Jones	6/23/2020	<p>Dear Col. Joly,</p> <p>Please pass this information onto the major contact for ABIRA.</p> <p>As a local citizen and Past President of the Mobile Bay Audubon Society, I along with many others tried to protect and save Alabama’s invaluable coastal properties for years. A few of us saved the Perdue Tract, Little Dauphin Island and Little Point Clear right before they were developed, and these properties make up the Bon Secour National Wildlife Refuge.</p> <p>Many of us worked for years within the Corps of Engineers helping to plan or deny badly planned ‘costly destructive projects.’ My books “A Gadfly’s Memoirs, Chronicle of An Eco-Warrior and Hanging By A Thread, Plight of The Alabama Beach Mouse” relate many of these stories.</p> <p>We proved there was a SERIOUS NEED for citizen involvement in the COE and ASPA planning process and we</p>	Thank you for your comments.

		<p>were major partners in helping decide what should be considered or passed over. In the end our involvement helped save monies and time, saved prime coastal resources, we communicated with others as well as having royal battles, but this provided a balance for saving and protecting Alabama's sensitive coastal systems and wildlife. Mobile Bay and its major resources were in better shape during those years!</p> <p>Today I selected articles from my books that are enclosed and may not be in any special order but hopefully hold important facts, ideas for Needs and may provide some direction for areas to be considered in the decision making and planning for protecting Alabama's invaluable coastal resources... at Last! There are numerous NEEDS for these fantastic natural worlds.</p> <p>In the 80's the State Port Authority and the COE misused the littoral drift sands by removing them from the mouth of the bay then dumping these invaluable assets out in the Gulf, for years! This caused major erosion of Dauphin Island that was finally corrected by spending millions of tax-payer dollars, yet barrier islands in Mississippi Sound continue to erode.</p> <p>The State and Port Authority should not be the ones to decide which identified coastal priorities need repairing in spending the BP Spill monies, as Glen Coffee and others have identified areas that need prioritizing... knowledgeable citizens who are involved!</p> <p>There have been enough shenanigans! Attached are pages from my books that should be read and possibly involved in this process.</p> <p>(Note: Ms. Jones' letter and the pages she referenced from her books are shown in Attachment 1 to this document.)</p>	
--	--	--	--

014	Ed & Renee Ingham	6/24/2020	<p>Dear Mr. Blankenship</p> <p>We have read the final report. Although we question the lack of consideration of Mobile Harbor Bar Channel maintenance as a contributing factor to beach erosion, we completely agree restoration measures need to be taken immediately to mitigate the problem. Our self-interests would be to perform the Gulf beach restoration measures first. However, for the welfare of the entire island, we would like to see the following five recommended measures taken in priority order:</p> <ul style="list-style-type: none"> (1) Pelican Island Southeast Nourishment (2) Sand Island Platform Nourishment and Sand Bypassing (3) East End Beach and Dune Restoration (4) West End and Katrina Cut Beach and Dune Restoration (with No Buyouts of 225 private parcels) (5) Marsh Habitat Restoration Behind Katrina Cut <p>Thank you for your consideration in this very important matter.</p>	Thank you for your comments and thank you for providing your suggested priority restoration activities.
015	Jim Harlow	6/24/2020	<p>Mr. Blankenship,</p> <p>My name is Jim Harlow, and I am a resident of Dauphin Island and am using this opportunity to respond via the "public comment" provision as it relates to the newly issued "Alabama Barrier Island Restoration Assessment Final Report".</p> <p>First of all let me thank the Fish and Wildlife Foundation for funding this project and recognizing that the protection of Alabama's Barrier Island and adjacent Gulf Coast area is of paramount importance, not only to the future of Dauphin Island but to the Mississippi Sound habitat and marsh restoration.</p>	Thank you for your comments and thank you for providing your suggested priority restoration activities.

		<p>Unfortunately, the report does not address the effects resulting from the Corps' maintenance of the Mobile Harbor Bar Channel and its impact on sand replenishment to the Dauphin Island's beaches. However, there are restoration projects that are critical and should be undertaken with settlement monies from the 2010 Deepwater Horizon oil spill. These projects are:</p> <p>Ebb Tidal Shoal Restoration Measures, which includes: Pelican Island Southeast Nourishment (p.42) Sand Island Platform Nourishment & Sand Bypassing (p.46)</p> <p>Restoration of Dauphin Island's Gulf Beaches including: East End Dune Restoration (p.49) West End Dune & Katrina Cut Beach and Dune restoration (p.58)</p> <p>Back-barrier habitat & marsh restoration on the Mississippi Sound side of Dauphin Island (p.66)</p> <p>The projects listed above collectively accomplish the essential goal of strengthening Dauphin Island by reversing the effects of years of severe erosion. If these projects are not constructed first, it makes no engineering, ecological, or financial sense to pursue any of the remaining marsh creation or land acquisition measures.</p> <p>Mr. Blankenship, the State needs to come to the realization that its barrier island chain including Dauphin Island are Alabama's Gulf Coast Crown Jewels and need to be protected, not only for their economic impact in the form of tourism dollars but also for their position relative to the maintenance of the Mississippi Sound estuaries and fisheries. Their survival and maintenance is crucial to the commercial future of Mobile and the Port of Mobile.</p>	
--	--	---	--

			Thank you in advance for passing along my comments to the State as it decides how best to allocate the oil spill funds.	
016	Jessica Bizba	6/24/2020	<p>Thank you for requesting input on the Alabama Barrier Island Restoration Assessment (ABIRA). I found the June 9 presentation very informative and well-done. Attached please find my comments on the assessment (see below).</p> <p>Thank you for the opportunity to comment on the proposed amendment to the Alabama Barrier Island Restoration Assessment (ABIRA).</p> <p>The National Wildlife Federation (NWF) has a long history of advocacy in the Gulf of Mexico region. In the wake of the Deepwater Horizon oil disaster and after the passage of the RESTORE Act, we have worked to support the recovery and restoration of the Gulf environment. We work to advance coordinated, strategic, and science-based investments of funds resulting from the spill, with an emphasis on the health of the Gulf's estuaries. I write you in support of the ABIRA as another step to advance ecosystem restoration.</p> <p>I appreciate the collaboration between USGS, U.S. Army Corps of Engineers (USACE), the State of Alabama, and the National Fish and Wildlife Foundation (NFWF) to evaluate restoration options on Dauphin Island through the development of a conceptual ecological model (CEM). Given the challenges of storm events and sea-level rise to coastal communities such as Dauphin Island, it is essential that investments in restoration increase resiliency and sustainability. Incorporating a range of possible future conditions in the model should result in the identification (and implementation) of projects that will be suitable and sustainable even in the most severe of scenarios.</p> <p>Considering 12 different possible future conditions related to storm intensity and sea level rise projections, with a focus</p>	Thank you for your comments.

		<p>on two (one low-moderate and one high conditions) is a prudent approach. I am also pleased that the habitat suitability model focused on oyster and seagrass habitats, as both provide significant ecosystem services and also numerous offer resilience and economic co-benefits.</p> <p>The June 9, 2020 Virtual Public Meeting Presentation was an excellent graphic representation of the process used to develop the ABIRA and the results (measures associated with potential restoration projects). I found the presentation used for the June 9, 2020 Virtual Public Meeting extremely useful and easy to follow. I realize it likely took a lot of time and effort to develop the ‘story map’ but it was a very user-friendly, easy-to-follow format to present fairly technical information. The Measure Summary was especially useful.</p> <p>However, there were some differences in the way the information was conveyed via the story-map presentation and the report itself. For instance, based on the presentation, it appeared that restoration measures were being grouped into two general categories: (1) natural and nature based features (e.g., sand placement, sand bypassing, and/or marsh restoration) and (2) land acquisitions for conservation. However, the report itself identified five restoration measures: ebb tidal shoal south of Dauphin Island, Gulf beach restoration measures, back-barrier measures, marsh restoration measures, and land acquisitions for conservation. I feel the distinction of the five categories is more appropriate than just two. Sand placement and sand by-passing are very different from marsh restoration in terms of ecological function. Likewise, the land acquisition projects will provide very different cobenefits depending on whether they are addressing back-bay areas, beaches and dunes, mid-island properties, and whether they are in remote areas or have more surrounding development.</p>	
--	--	--	--

			<p>Overall, I most appreciated the development and evaluation of quantitative utility scores, and presenting that information relative to different projects. The evaluation process which incorporates benefits and co-benefits for each project, and then yields a quantitative metric is essential to selecting projects using a science-driven process.</p> <p>I encourage you to apply the results of this effort to the selection and implementation of future restoration projects. Science-based prioritization of restoration projects (and in turn, the use of restoration funds) should maximize ecological (and economic) benefits. Application of this model should be incorporated as projects are considered through a multitude of funding sources, such as the Alabama Gulf Coast Recovery Council (AGCRC), NFWF Gulf Environmental Benefit Fund and coastal resilience programs, Gulf of Mexico Energy Security Act (GOMESA), and others. This in turn should produce tangible benefits to the Gulf of Mexico ecosystems and increase the numbers of fish, birds and wildlife as well as provide lasting benefits to the quality of life and the economy on the Gulf Coast. Thank you very much for considering my input.</p>	
017	Mobile Bay Sierra Club	6/24/2020	<p>Dear Commissioner Blankenship:</p> <p>The Mobile Bay Sierra Club welcomes completion of the ABIRA Final Report and appreciates the opportunity to offer our organization's views on that important document which has the potential to positively influence the future of Alabama's western Gulf coastline. Our letter is divided into four sections: (1) comments on the report; (2) identification of a critical deficiency in the report; (3) our recommendations on specific restoration measures that should receive priority for implementation; and (4) what happens next?</p>	<p>Thank you for your comments and thank you for providing your suggested priority restoration activities.</p> <p>Responses to the specific comments on the report are provided below.</p> <ol style="list-style-type: none"> 1. Appendix C has been updated. Please refer to the sediment budget report which documents the modern sediment sources and sinks along with estimates of natural and

			<p>Comments on Report. Since the ABIRA study has been completed and the report finalized, we question the value of submitting comments at this point because we are uncertain as to what actions will be taken to meaningfully address them. For that reason, our comments are limited to pointing out the following areas within the report that would benefit from some additional work to enhance the clarity and adequacy of the information presented:</p> <ol style="list-style-type: none"> 1. <u>Pages 6 and 20.</u> Task 4 was conducted to “...update the Sediment Budget Analysis to calculate Volumetric Changes”. However, Section 3.4 does not provide a focused discussion of the results of the sediment budget analyses, including the identification of the volume and fate of littoral sediments that naturally move from the east into the study area and the west out of the study area. Such a discussion should address the influence of Corps-created historic and continuing sinks for littoral drift sands (i.e., Sand Island Beneficial Use Area, Feeder Berm, and Mobile Ocean Dredged Material Disposal Site). Because of the historic controversy surrounding allegations maintenance of the Mobile Harbor Bar Channel interrupts the littoral drift transport of sands from the Fort Morgan peninsula that would be naturally bypassed across Mobile Pass Dauphin Island in the absence of dredging, the results of the sand budget analysis are critical and merit a clear and thorough explanation in the report. This is emphasized by the fact that the most costly restoration measures are directed at remedying the sediment deficit needs of the ebb tidal delta shoal and Dauphin Island. 	<p>man induced littoral transport of sediments within the region of Dauphin Island, Alabama.</p> <ol style="list-style-type: none"> 2. The study reflected in Appendix D supports multiple objectives including: the evolution of two shorelines to define the width and subsequently area of the island; boundary conditions for subsequent sediment budget analysis; and mapping of key features for validating numerical models. The statement, in full context, is provided to make clear to the readers that the analysis of historical aerial imagery (a two-dimensional product) inherently and alone does not retain the information needed to derive volume (a three-dimensional parameter). Therefore, the data and analysis are appropriate for their intended use in the study. 3. The 2015 Habitat Mapping data can be viewed on both the Alabama Barrier Island Restoration Assessment Story Map (https://cesamusace.maps.arcgis.com/apps/MapSeries/index.html?appid=ea29cd4e1f3b432e8c520df3fb7a9f8b) as well as the interactive web map (https://gom.usgs.gov/DauphinIsland/Viewer/Map.aspx). <p>Subsets of the Habitat Modeling</p>
--	--	--	---	---

			<p>2. <u>Page 15</u>. The statement is made that “...the imagery analysis does not provide the information needed to fully link shoreline change with volumetric gains or losses of island sediment.” That deficiency reflects a critical methodology weakness in the overall study. If analysis of the imagery considered was inadequate to link observed shoreline change with gains or losses of island sediment, it would be reasonable to expect that a more appropriate analysis method would have been selected and applied to more effectively “...link shoreline change with volumetric gains or losses of island sediment...”, an understanding of which is critical to achieving the study’s sustainability objective for Dauphin Island.</p> <p>3. <u>Sections 3.3.2 and 3.5.4</u>. The scale of the habitat figures is too small to allow the information contained therein to be easily interpreted. When the sizes of the present pdf images are expanded, they often lose clarity. If possible, we suggest higher resolution images for the habitat figures be added to the report website to improve the utility of the images.</p> <p>4. <u>Section 3.6.2 and 4</u>. For each of the ebb tidal shoal, Gulf beach restoration, and back-barrier and marsh restoration measures, an estimate is provided for how much of the sand placed during initial construction would remain at the end of 10 years. Those discussions typically state the missing sand “...would be transported to the lee and along the Gulf-side...” of the shoal or Dauphin Island, requiring nourishment at variable time intervals over either</p>	<p>data (High Storminess/High Sea Level Change; Medium Storminess/Lower Sea Level Change) can also be viewed on the Story Map and the interactive web map. Please refer to Appendices E and I to download the complete datasets.</p> <p>4. Material from the location of the Pelican Island Southeast Nourishment site and the Sand Island platform nourishment both transport overtime to the western shoreline of Dauphin Island. However, as indicated within the results section of Appendix F, Application of Decadal Modeling Approach to Forecast Barrier Island Evolution, Dauphin Island Alabama, these processes take decades and there were no noticeable changes in the patterns or magnitude of erosion or deposition around the main portions of Dauphin Island for these measures. In other words, according to the model study, material is transporting to the western shoreline but it’s not getting there any faster or at a greater rate by putting more sand in the system along the general 1985 island shoreline position of Pelican Island. This indicates that sediment transport rates along the ebb tidal shoal are not due to a sediment starved system but rather</p>
--	--	--	---	--

			<p>20- or 50-year project lives. <u>For the two ebb tidal shoal measures, the discussions also state the analyses indicated,</u> “...there was no noticeable change in the rates of sediment transport from...” either Sand or Pelican Island to Dauphin Island. The latter statement does not match with (1) long-term observations of morphodynamic changes in the Dauphin Island system; (2) our understanding how natural sand bypassing across tidal inlets maintain downdrift beaches; or (3) why beach nourishment projects are pursued in many cases to reverse interruptions in littoral drift processes created by either jetties at inlets and/or dredging of navigation channels through inlets. To gain an appreciation of the high volume of littoral drift sands that do in fact move from the Sand/Pelican Island shoal to Dauphin Island on an annual basis, all one has to do is compare the enclosed February 2008 and May 2010 aerial photos of the Dauphin Island fishing pier. Between the dates of those two photos, Sand/Pelican Island became welded to Dauphin Island, resulting in the pier becoming completely enveloped within sand moved from the shoal and producing a tremendous increase in the width of the downdrift shoreline fronting the three condos in this area. Over the last decade, Sand/Pelican Island has continued to erode to the point that less than a mile of the island remains today, while the increased width of the Dauphin Island shoreline has been maintained by the eroding sands that are steadily being transported from the ebb tidal shoal. In a few years when the remnants of Sand/Pelican Island completely merge with Dauphin Island, the erosion of this portion of Dauphin Island will resume, one</p>	<p>a function of the shoreline/shoal orientation and incident wave climate, which bound the energy available to move the sediment in the system. Please also refer to Appendix F, Development of a Modeling Framework for Predicting Decadal Barrier Island Evolution, for details on the sources of model uncertainty contained within the model uncertainty and sensitivity.</p> <p>5. Please refer to Figure 20 on page 44 of the main report, which depicts the locations of the potential Petit Bois Pass Relic Sand Deposits and Mobile Ebb Tidal Shoal (i.e. SIBUA) Borrow Sources. Assessment of potential impacts of the Petit Bois Pass Relic Sand Deposits were evaluated as part of the U.S. Army Corps of Engineers’ Mississippi Coastal Improvements programs. In addition, the proposed mining of the Mobile ebb tidal shoal for this study was limited in quantity and location to areas along the southern shoal in regions where dredged material has been deposited.</p> <p>A few points of clarification to remarks regarding Critical Deficiency in the Report is provided below.</p> <p>Please note that analyzing how the study area’s sand budget would function naturally</p>
--	--	--	--	--

			<p>outcome of which will be a marked reduction in the width of the Gulf shoreline now fronting the condos. This important observation causes us to question the ability of the numerical model(s) used to reflect real world conditions and events.</p> <p>5. <u>Section 3.6.2.</u> Most of the ebb tidal shoal and Gulf beach restoration measures identify the Mobile ebb tidal shoal as a potential source of initial construction sands. However, the report neither identifies the candidate locations within the shoal from which the sands would be mined nor includes an analysis of the consequences that could result to the overall Mobile ebb tidal delta system if sands are mined for placement at another location. Could mining of ebb tidal delta sands cause other unforeseen erosion problems as the system readjusts to the removal of a significant volume of sands? The scientific literature contains many studies documenting the adverse effects sand mining (even in connection with beach nourishment projects) can have on inlet ebb tidal deltas. Because the report fails to analyze the potential effects from mining ebb tidal shoal sands, the Mobile Bay Sierra Club cannot now support those construction options that depend upon the Mobile ebb tidal shoal as the source of initial construction sands. We do not want to trade one known significant erosion problem for another potential problem that has not been adequately evaluated.</p> <p><u>Critical Deficiency in the Report.</u> The report does a credible job in evaluating the role climatic events (i.e., sea level change (SLC) and coastal storms) unquestionably play in the erosion of Dauphin Island’s Gulf shoreline. However, the</p>	<p>in the absence of maintenance of the Bar Channel in order to identify how much of the erosion problem is caused by climatic conditions and events and how much to maintenance of the Bar Channel is beyond the scope, need, and intent of the Alabama Barrier Island Restoration Assessment. Nonetheless, please note that the currently maintained channel was included as a direct influence in the numerical modeling effort documented in Appendix F, Application of Decadal Modeling Approach to Forecast Barrier Island Evolution, Dauphin Island Alabama.</p> <p>Numerous studies have investigated historical shoreline changes and sediment transport in the nearshore coastal areas and along the ebb tidal delta (e.g., Hardin et al., 1976; USACE Draft, 1978; Douglass, 1994; Otvos, 2004; Morton, 2007; Byrnes et al., 2008 and 2010; and Flocks et al., 2017) with many of these suggesting that construction and maintenance dredging in the Bar Channel have produced a deficit of sand in the littoral drift system west of the channel; however, none (with the exception of Byrnes et al. 2010) conducted a detailed evaluation of historical dredging records for the Bar Channel or a quantitative comparison of historical shoreline and bathymetry surveys to document historical sediment transport pathways and net rates of change across the ebb shoal and along the shoreline of Dauphin Island (Byrnes et al. 2010).</p>
--	--	--	---	---

		<p>report fails to evaluate the effects maintenance of the Mobile Harbor Bar Channel has in interrupting the natural transport of littoral drift sands across the Mobile Pass Inlet. That critical deficiency was thoroughly pointed out in our December 20, 2017 letter (copy enclosed) commenting on the August 2017 Interim Report. Our comments on this matter were completely disregarded in the subsequent work to the produce the Final Report.</p> <p>The historic effect that maintenance of the Bar Channel has on the Mobile Pass Inlet littoral drift system can be appreciated by examining the Corps' dredging and disposal records for the 37-year period between 1980 and 2016, during which a total of 29,442,209 yds³ of sands were dredged from the channel. For the 20-year period between 1980 and 1999 alone, a period that included deepening the channel from 42 feet to 49 feet, all of the dredged sands (i.e., 14,672,078 yds³, representing an average annual volume of 733,601 yds³) were transported for disposal in the deep waters of the Gulf. Thus, for two decades, the littoral drift flow of sand across the Mobile Pass Inlet was completely disrupted. After 1999, the Corps began placing the dredged sands in the so-called Sand Island Beneficial Use Area (SIBUA). Over the 17-year period between 1999 and 2016, 13,124,045 yds³ of sands were placed in the SIBUA, representing an average annual volume of 772,003 yds³. At a February 22, 2018 public meeting on further deepening of the Mobile Harbor project, the Corps reported the average annual maintenance dredging volume to be 624,000 yds³. Of major significance, the Corps also acknowledged for the first time that 52% (i.e., 324,480 yds³) of the average annual volume placed in the SIBUA was accumulating within the site instead of being reincorporated into the littoral drift system. Based on these facts, the Mobile Bay Sierra Club believes the Corps' historic maintenance disposal practices over the last 37 years have significantly disrupted Mobile Pass Inlet sand budget. We</p>	<p>The focus of Byrnes et al. 2010 was to quantitatively investigate and document ebb-shoal changes and shoreline responses relative to dredging, storms, and normal conditions/forces during two distinct time periods: one representing conditions prior to significant construction and maintenance dredging activities (1847/48 to 1917/20) and another representing conditions after significant changes were made to the outer Bar Channel (1917/20 to 2002). This analysis was performed as a result of a lawsuit filed in 2000, by the Dauphin Island Property Owners' Association in the United States Court of Federal Claims styled <u>Dauphin Island Property Owners' Association, et al. vs. United States</u>, No. 00-115-L (Fed. Cl.). The suit alleged, among other things, that the United States dredging practices had caused significant shoreline erosion of Plaintiffs' property on Dauphin Island, Alabama. Based on all available information, the Byrnes et al. 2010 concluded "no measurable negative local impacts to ebb-tidal delta or Dauphin Island shorelines associated with historical channel dredging across the Mobile Pass Outer Bar."</p> <p>Appendix C of the Final Alabama Barrier Island Restoration Assessment report incorporated modern data sets containing good spatial survey data coverage for the study area that partially overlaps and extends the time period considered in Byrnes et al., (2010). In all, these studies found that sediment erosion, transport, and</p>
--	--	---	---

		<p>also believe that impact has played a corresponding major role in the steady disappearance of Sand/Pelican Island complex and its associated sub-aerial shoal, as well as the erosion of Dauphin Island’s Gulf shoreline. Our position is supported by Morton’s 2007 U.S. Geological Survey report^{1/} and his 2008 published paper^{2/} and the Corps’ especially relevant 1978 report^{3/}. Since the timeframe evaluated in the ABIRA was limited to the “recent era (i.e. 1987–2015)...” to analyze “...sediment gains and losses in the nearshore areas of Dauphin Island and Mobile Pass...”, all of the data considered reflected a littoral drift system that was significantly disrupted by the Corps’ maintenance activities. No information is presented in the report analyzing how the study area’s sand budget would function naturally in the absence of maintenance of the Bar Channel in order to identify how much of the erosion problem is caused by climatic conditions and events and how much to maintenance of the Bar Channel.</p> <p>Numerous studies published in reputable scientific and coastal engineering journals point out deficiencies in sediment supply resulting from various anthropogenic actions (including dredging) increase the vulnerability of barrier islands and diminish their resilience to the effects of sea level change and coastal storms. We would be more than happy to provide you with a list of such references. What is particularly disturbing is that the ABIRA Team chose to selectively quote the findings of Morton’s 2007 U.S. Geological Survey report^{1/} and 2008 published paper^{2/} both of which stated:</p> <p>_____</p> <p>^{1/} Morton, R.A. 2007. Historical Changes in the Mississippi-Alabama Barrier Islands and the Roles of Extreme Storms, Sea Level, and Human Activities. Open File Report 2007-1161. U.S. Geological Survey, Coastal and Marine Geology Program. St. Petersburg, Florida.</p>	<p>deposition are controlled by storm wave and current processes that produce net littoral transport to the west. Despite differences in time periods and methods of analysis, the technical reports found in Appendix C of the Alabama Barrier Island Restoration Assessment found consistent patterns of erosion and deposition of major features as Byrnes et al., (2010). These reports concluded that the ebb-tidal delta appears to have retained a state of equilibrium over the longer-term period of analysis despite large volumes of sediment being dredged from the ship channel.</p>
--	--	---	---

			<p>^{2/} Morton, R.A. 2008. Historical Changes in the Mississippi-Alabama Barrier-Island Chain and the Roles of Extreme Storms, Sea Level, and Human Activities. <i>Journal of Coastal Research</i>, 24(6), 1587–1600. West Palm Beach (Florida), ISSN 0749-0208.</p> <p>^{3/} USACE. September 1978. Mobile County (Including Dauphin Island) Feasibility Report for Beach Erosion Control and Hurricane Protection. Mobile District, Mobile Alabama.</p> <p>“...The principal causes of land loss [of the Mississippi-Alabama barrier islands, including Dauphin Island] are frequent intense storms, a relative rise in sea level, and a sediment-budget deficit [emphasis added]... Historical land-loss trends and engineering records show that progressive increases in land-loss rate correlate with nearly simultaneous deepening of channels dredged across the outer bars of the three tidal inlets maintained for deep-draft shipping. This correlation indicates that channel-maintenance activities along the MS-AL barriers have impacted the sediment budget by disrupting the alongshore sediment transport system and progressively reducing sand supply. Direct management of this causal factor can be accomplished by strategically placing dredged sediment where adjacent barrier-island shores will receive it for island nourishment and rebuilding.”</p> <p>Further, the ABIRA Team completely ignored both the existence of and findings from the Corps’ 1978 report^{3/} that stated:</p> <p>“...If it assumed that none of the [Mobile Bar Channel maintenance] dredged material returns to shore and that this material would otherwise have</p>	
--	--	--	---	--

			<p>been deposited on the shore of the western part of Dauphin Island, the total recession of the shoreline attributable to maintenance dredging of the bar channel since 1939 would be about 119 feet...Considering maintenance dredging since 1966, the average loss of shoreline width per year attributable to maintenance dredging of the outer bar would be about 4.6 feet per year...It can be surmised that the removal of 264,000 cubic yards of material per year from the outer bar has a significant effect on the shoreline of Dauphin Island...Erosion occurring along the western 11 miles of Dauphin Island is probably attributable mainly to rising sea levels and maintenance dredging of the ship channel through the bar fronting the Mobile Bay entrance channel.”</p> <p>By intentionally ignoring contravening information that maintenance of the Bar Channel contributes to the Dauphin Island erosion problem, we can only conclude that the Corps’ involvement in the ABIRA has adversely influenced the study’s objectivity. We say this because the Corps has a major conflict of interest in view of its role as the agency responsible for constructing and maintaining the Mobile Harbor project, as well as being a defendant in a 2000-2009 lawsuit that alleged erosion of Dauphin Island is caused by the Mobile Harbor project. To settle that lawsuit, in 2009, the Corps agreed to pay the plaintiffs \$1.5 million in exchange for the plaintiffs agreeing to never sue the Corps again over the erosion issue. In reaching that settlement, no finding of fault or innocence was assigned to the Corps. Therefore, it would appear obvious that the Corps is not interested in pursuing any course of action that could result in the potential determination that maintenance of the Bar Channel is contributing to the erosion of Dauphin Island. Hence the ABIRA Final Report assumes sea level change (SLC) and coastal storms are responsible for the erosion</p>	
--	--	--	---	--

			<p>problem, while completely ignoring any consideration of the potential contribution to the problem from maintenance of the Bar Channel.</p> <p><u>Restoration Measures Recommended for Priority Implementation.</u> Notwithstanding our above stated comments and concern, the Mobile Bay Sierra Club believes the Final Report identifies an appropriate range and scope of restoration measures for consideration. According, our organization wishes to go on record as supporting the following restoration measures for the highest priority for implementation:</p> <ul style="list-style-type: none"> • Ebb Tidal Shoal Restoration <ul style="list-style-type: none"> ➤ Pelican Island Southeast Nourishment ➤ Sand Island Platform Nourishment and Sand Bypassing • Gulf Beach Restoration <ul style="list-style-type: none"> ➤ West End and Katrina Cut Beach and Dune Restoration (with No Buyouts) ➤ East End Beach and Dune Restoration • Back-Barrier and Marsh Restoration <ul style="list-style-type: none"> ➤ Marsh Habitat Restoration Behind Katrina Cut <p>Since a major objective of the ABIRA was the identification of restoration measures that “....ensure the sustainability of the barrier island feature”, we strongly believe the above five measures taken together provide the most appropriate approach to accomplish that objective. Strengthening Dauphin Island’s Gulf shoreline should be paramount to allow the island to continue to serve as the mainland’s first line of defense from tropical storms, while continuing to be the sheltering barrier necessary for the survival and propagation of the many critical estuarine habitats and resources occurring within Mississippi Sound. It is our view that these five measures must receive high priority for</p>	
--	--	--	--	--

		<p>implementation. It also must be recognized that the success of all the other marsh creation and many of the land acquisition measures considered depend upon a strengthened Dauphin Island if they are to have any chance of long-term success. Pursuing such measures in the absence of strengthening the island would not represent prudent decision-making.</p> <p>As you are aware, as a guiding policy, the Sierra Club does not favor development of fragile barrier islands. Nevertheless, we have elected to support the “no buyout” option for the West End and Katrina Cut Beach and Dune Restoration measure. Our position is primarily based upon our concern that the “voluntary buyout” of the 225 private properties could create an inordinate delay in the design and implementation of this measure, as well as our concern that too many property owners may elect not to sell, thus compromising the eventual extent of the planned dune restoration work. Further, we are concerned that the estimated \$90,000,000 cost to acquire and demolish all structures could be a “deal killer”.</p> <p>Based upon the initial construction cost presented for these five measures in Tables 6, 7, 8, 11, and 14, the combined total cost to construct all five measures could be around \$358,000,000, depending upon the source of construction sands selected. While we fully appreciate this is a significant sum, we would like to remind you that the Federal government recently spent almost a half billion dollars to restore the eroding neighboring Mississippi barrier islands as a result of the effective leadership at all levels of that state’s elected officials and agencies. In that connection, we would like to ask you to consider the question: Is Alabama’s only barrier island and the numerous important functions it provides any less important looking forward into the future than Mississippi’s four barrier islands? Lastly, it appears the most appropriate source of funds to implement these five</p>	
--	--	--	--

			<p>measures are the oil spill monies controlled by the Alabama Gulf Coast Recovery Council. To date, many projects have already been funded with those monies, many of which had absolutely nothing to do with 2010 Deepwater Horizon Oil Spill event. Of Alabama’s coastal resources, Dauphin Island was the most directly affected by the oil spill and its clean-up activities. As a result, the Mobile Bay Sierra Club strongly believes the Council should proactively move forward to expeditiously fund and construct all five above named restoration measures.</p> <p><u>What Happens Next?</u> We understand the State of Alabama has the leadership role in deciding which of the restoration measures will be funded and constructed. However, to date, the State has provided no information explaining the strategy and processes that will be followed to select projects for implementation and what role the public will be allowed to play in the decision-making process. Therefore, we respectfully request that such information be developed and widely distributed soon.</p> <p>In conclusion, the Mobile Bay Sierra Club greatly appreciates the opportunity to review and comment on the ABIRA Final Report. Because of our intense interest in the restoration of Dauphin Island, we stand ready to assist in any way we can to help the State move the project selection process forward.</p> <p>(Note: A copy of the Mobile Bay Sierra Club’s Letter is provided in Attachment 2 to this document.)</p>	
018	Stan Graves	6/25/2020	Attached is my letter of specific comments for the Alabama Barrier Island Restoration Assessment (ABIRA) Final Report and attachments referenced in the letter of comments and as CC’s. Due the size limitation that I can send in an e-mail, several documents that are listed in the CC’s will follow in a second e-mail: Scott Douglass’ 2011 Study for the Town of	Thank you for your comments and thank you for providing your suggested priority restoration activities. Responses to the specific questions presented in your letter are shown below.

			<p>Dauphin Island which is referred to, but not described in the AIBRA Report; the Town of Dauphin Island's Town Crier that references the Tropical Storm Cristobal and the ABIRA report: News 5 article about Sea Turtle nests lost due to Christobal; O&M Excerpt for a Coastal Inlets Research program. Though the report is comprehensive, and provides good information, I believe the report lacks answers to some very important questions identified in the letter. The letter of comments also provides my recommendation of projects that should be implemented to restore Dauphin Island's shoreline and to act as the first line of defense for Dauphin Island, Mobile County and our important bird sanctuary, endangered species such as sea turtles, and the piping clover.</p> <p>I look forward to receiving the responses to my public comments.</p> <p>(Note: Mr. Graves' letter and described reference documents are provided in Attachment 3 to this document)</p>	<p>Response to the question under comment #6: Numerous restoration measures (including shoreline restoration) were developed and evaluated as part of the Alabama Barrier Island Restoration Assessment to address future possible island conditions due to storms and sea level change. The benefits and costs of these measures over a 50 year life-cycle were identified and built into an assessment tool which ranked them relative to how well they met the objectives of the study. See Section 3.6 of the report for further information on the formulation and evaluation process.</p> <p>The Alabama Barrier Island Restoration Assessment report is not a federal recommendation nor was it funded from a federal source (see response to Comment # 009 for additional information); therefore, the requirements of the National Environmental Policy Act are not applicable. All Corps' dredging and placement actions for routine maintenance of the Mobile Harbor Bar Channel are in full compliance with federal and state laws and no mitigation is required.</p> <p>Response to the question under comment #7: See response to the previous comment.</p> <p>Response to your request for information under comment # 8: The paragraph you referenced from the report speaks for itself.</p>
--	--	--	--	--

				<p>Response to the questions under comment #11:</p> <ol style="list-style-type: none"> 1. The hydrodynamic and morphological change model developed by the U.S. Geological Survey (USGS) for the Alabama Barrier Island Restoration Assessment (see Section 3.5.1 of the final ABIRA report) was also used for the Mobile Harbor GRR/SEIS to assess relative changes in sediment pathways and morphological response on the ebb tidal shoal and adjacent coastal areas due to the proposed deepening and widening of the navigation channel. A summary is provided in Section 6.3.2 of Appendix A of the GRR/SEIS. The USGS modeling report for that effort is provided in Attachment A – 2 of the GRR/SEIS. 2. See response to the previous question. 3. See response to question 1. 4. Yes. Yes. August 2020.
019	Stan Graves	6/25/2020	<p>As noted in the subject line this is e-mail #2 providing the additional documents mentioned in e-mail #1: Scott Douglass’ 2011 Study for the Town of Dauphin Island which is referred to, but not described in the AIBRA Report; the Town of Dauphin Island’s Town Crier that references the Tropical Storm Cristobal and the ABIRA report: News 5 article about Sea Turtle nests lost due to Christobal; O&M Excerpt for a Coastal Inlets Research program.</p> <p>I apologize in having to send two e-mails due to the size limitations required by my service provider.</p> <p>(Note: The documents described in Mr. Graves email are provided for reference in Attachment 3 to this document.)</p>	See responses to the previous comment.

020	Barbara & Roy Price	6/25/2020	<p>As property owners on Dauphin Island west end for over 40 years, we have written several times about our concerns as they relate to the new ship Channel. We are however in favor of the new AI Barrier Island Restoration Project but suggest that the Island must be made more stable before the Restoration can progress. The key to success is the replacement of beach sands that will result from the proper placement of dredge. The stability of the Island must come first. Not doing so could result in the loss of habitat we now have. If we provide a stable habitat, future habitat will follow.</p> <p>We all want the same thing, a stable Island for humans and a stable Island for our wildlife.</p> <p>That should be our goal. We hope it is yours as well.</p>	<p>Thank you for your comments and thank you for providing your suggested priority restoration activities.</p>
021	Caroline Graves	6/26/2020	<p>Dear Corps of Engineers and State of Alabama,</p> <p>How can anyone believe the Corps' statements about helping Dauphin Island, when for the last 40 years, the Corps have been doing everything possible to cover-up their extreme erosion to Dauphin Island?</p> <p>"The U.S. Army Corps of Engineers (USACE), South Atlantic Division (SAD), Mobile District (SAM) is tasked with leading a multi-agency effort to restore sediment to the Dauphin Island Barrier system." (appendix B)</p> <p>If this statement is true, why did the Corps leave out the erosion/land loss rates in the 2019 GRR/SEIS about Dauphin Island?</p> <p>The USGS study shows the Corps has eroded away over 507 feet of the gulf shoreline on Dauphin Island since 1985 and the Corps left out all of the USGS erosion rates in the 2019 GRR/SEIS, including the statement in ABIRA about the Corps'</p>	<p>Thank you for finding the value in this report and using its content to formulate questions and promote important dialogue.</p> <p>As stated in response to one of your previous comments (comment # 009), the effects of previous Corps' dredging actions on the erosion of Dauphin Island was the subject of a lawsuit which resulted in a settlement between the Dauphin Island Property Owner's Association and the U.S. Army Corps of Engineers, Mobile District. During this proceeding, an independent analysis was conducted (i.e., Byrnes et al. 2010) to evaluate the effects of the Corps' dredging of the Mobile Harbor Bar Channel and the findings were that, "there appears to be no measurable negative impacts to ebb-tidal shoals or Dauphin Island beaches</p>

		<p>engineering activities was causing the erosion/land loss on the Island, thereby the Mobile District ignores all of the scientific data by stating they aren't causing any impacts to Dauphin Island.</p> <p>How can anyone believe any statements about their effort to restore sediment to Dauphin Island, when the Corps has lied about the erosion to the people of Dauphin Island since 1978, including lying about the 10 underwater berms, the Corps said would protect the Island's shoreline from erosion?</p> <p>Did the Corps impose restrictions or limits on the USGS about what could or could not discuss in their studies, relating to the Corps dredging of the channel and the sand/land loss on Dauphin Island, because it is strange there is only one statement in the ABIRA Report or any of the other studies for the Report about the Corps engineering activities causing the erosion to Dauphin Island?</p> <p>How can the statement be true that the whole Corps of Engineers, from Headquarters down is involved in the "effort to restore sediment to the Dauphin Island Barrier system."? (App B)</p> <p>Did the Corps intentionally leave out about their engineering activities, their dredging was causing the erosion, in the statement below?</p> <p>"In addition to land loss due to ongoing barrier island processes, this island is a high risk due to rising sea level and the associated increased magnitude and frequency of coastal storms resulting from climate change." (App B)</p> <p>How can the Corps even consider adding the words "the precious" when referring to coastal protection, when the Corps has destroyed Dauphin Island and has never thought</p>	<p>associated with historical channel dredging across the Mobile Pass Outer Bar."</p> <p>Our intent is not to discount or discredit the work done by Morton or others prior to Byrnes et al. 2010. However, those efforts were largely qualitative and observational in nature and did not quantify the actual volumetric changes along the ebb tidal shoal and nearshore coastal areas prior to and after dredging of the Mobile Harbor Bar Channel as was done by Byrnes et al., 2010.</p> <p>The Alabama Barrier Island Restoration Assessment report was written collaboratively by a multi-disciplinary team comprised of the scientist listed as leading authors in its technical appendices. The Corps and its project partners have been fully transparent and the final report, which includes its technical appendices, stand with merit. We encourage you to read the entire report and the various technical appendices that discuss the means, methods, and results of the analyses.</p> <p>In doing so, the reviewer will find that the team used the spatial data from the shoreline change analysis in Appendix D within the footprint of the proposed measure to determine the erosion rates for each measure. This is appropriate to reduce spatial variability when georeferenced spatial data sets are available with adequate resolution.</p>
--	--	---	--

			<p>of any “coastal protection” for the Island, for the last 40 years?</p> <p>“Sponsored by the National Fish and Wildlife Foundation (NFWF) and the State of Alabama, this study was performed by the USACE in conjunction with United States Geological Survey (USGS) to evaluate and quantify the wave and current environment in the vicinity of the precious coastal protection resources of Dauphin Island.” (App B)</p> <p>Is it a true statement in the ABIRA Report that the Corps’ engineering activities are the cause of erosion on Dauphin Island?</p> <p>“Dauphin Island and the remainder of the barrier islands fronting the Mississippi Sound have been historically eroding and their capacity to protect mainland natural resources and infrastructure is diminishing (Byrnes et al., 2010). Rising sea level, severe and frequent storms, and engineering activities all threaten the sustained subaerial presence (Twichell et al., 2013, Byrnes et al., 2012, Morton, 2008)”.</p> <p>Below, isn’t the Morton 2008 study confirming the statement in the ABIRA, that the Corps’ engineering activities, their dredging was causing the erosion/land loss to Dauphin Island?</p> <p>“Historical trends of increasing land loss, for each of the five islands, show a remarkable temporal correlation to dredging activities within the region. This correlation indicates that sediment-budget deficits stem from long-term reductions in sand supply caused by progressively deeper dredging of navigation channels across the outer bars of three tidal inlets. “</p>	
--	--	--	--	--

			<p>Are Morton's 2007 statements below true? that the</p> <p>"three primary causes of land loss, the one that experienced the greatest change was the reduction in sand supply related to dredging the navigation channels through the outer bars of the tidal inlets" of the Mobile Pass.</p> <p>"Sand supply is the only factor contributing to barrier island land loss that can be managed directly to mitigate the losses by placement of dredged material so that the adjacent barrier island shores receive it for island nourishment and rebuilding."</p> <p>Are Morton's 2007 statements, below true that referring Dauphin Island?</p> <p>"when sediment supply is reduced, then land loss is exacerbated because the sediment redistributed by storms is not replenished by the sediment transport system."</p> <p>"In 2006, Dauphin Island was 28% smaller than in 1958"</p> <p>Did the Corps ever try to mitigate the sediment losses or erosion/land losses to Dauphin Island related to Corps' engineering activities, their dredging, the Mobile Harbor Outer Bar navigation channel?</p> <p>In the ABIRA Report, why did the Corps leave out all the statements in the Morton's studies about the sand/Land losses to Dauphin Island that were caused by the Corps' engineering activities?</p> <p>Mr. McDonald, the engineer on this project, sent me an email on June 18, 2020 with the following statement in quotes:</p>	
--	--	--	--	--

		<p>“While we may not be legally required to have public meetings nor take public comments,”</p> <p>Is that true statement Mr. McDonald is inferring in the email to me that the Federal and State Agencies and the Barrier Island Report are not subject to any Federal Law, therefore it was not subject to any Federal rules for open meetings and transparency by fully answering the public questions about the report?</p> <p>Is Mr. McDonald’s following statement to me true?</p> <p>“the team is doing so to ensure we fully and completely answer the public's questions regarding means, methods, and results of the study because it is the right thing to do”</p> <p>Mr. McDonald, who recommended the projects, if the Corps did not?</p> <p>“Another point to emphasize is that the team did not make recommendations for which projects should be implemented”?</p> <p>Mr. McDonald, did the Corps team disclose all information about the Corps’ engineering activities were causing the erosion to Dauphin Island to the USGS and the public in the studies for the ABIRA?</p> <p>“The team wants this information disseminated in the public domain and encourages any feedback, positive or negative, so we can make sure the public is truly informed of the challenges and opportunities for enhancing the long-term resiliency of the island.”</p> <p>Mr. McDonald, how can your following statement be true, if the Corps is not disclosing the past scientific evidence that</p>	
--	--	--	--

			<p>the Corps' engineering activities caused the erosion/land loss to Dauphin Island?</p> <p>"Our intent was to conduct a science-driven study to inform future restoration decisions for Dauphin Island."</p> <p>Mr. McDonald statement, "These decisions will not be made by the Corps or the USGS. They will be made by the State of Alabama, Town of Dauphin Island, or any other suitable organization/entity."</p> <p>Is your statement referring to the same entities that have stated in their documents about the western beach re-nourishment as "renourishment vs. "let go". If I am not mistaken the document was produced by Mississippi Alabama Sea Grant Consortium, Alabama Department of Conservation and Natural Resources, State Lands Division-Coastal Section, Mobile Bay National Estuary Program?</p> <p>Further statements by Mr. McDonald to me:</p> <ul style="list-style-type: none"> * "We simply evaluated a suite of different restoration options for the island and identified their benefits and costs over a 50 year life-cycle." * "Again, I encourage you to read the report and supporting appendices to learn more about the processes governing the past, present, and future evolution of the island, and potential solutions to enhance its resilience, including solutions for the West End." * "We are very proud of this work and hope it will be used to acknowledge the realities and opportunities for creating a more sustainable island feature." 	
--	--	--	--	--

		<p>Mr. McDonald, can you tell me where in each document is there anything about the Corps' engineering activities causing the erosion/land loss as stated in Morton's studies?</p> <p>Mr. McDonald, can you tell me where in each restoration option, is there any statement referring to the Corps' engineering activities and the massive amount of erosion/land loss to the western shoreline as stated in the ABIRA Report?</p> <p>Is Mr. McDonald statement to me true, "We simply evaluated a suite of different restoration options for the island and identified their benefits and costs over a 50 year life-cycle"?</p> <p>Did the Corps in the ABIRA evaluate the past 50 years restoration options about any benefits or costs of their past decisions that caused the erosion to the Western shoreline and identify any detriments they caused to Dauphin Island?</p> <p>Past and Present erosion on the Island for the past 50 years.</p> <p>Let's discuss the Mobile Districts Corps of Engineers "past and present evolution of the Island" for the past 50 Years life-cycle of the Corps' engineering activities causing the land loss on Dauphin Island.</p> <p>The Corps' 1978 study stated that in the future, 10.3 feet per year would erode on the west shoreline if nothing was done to stop the erosion. This erosion rate would add up to be a loss of 432 feet of gulf shoreline for the last 42 years.</p> <p>1978 Study "...along the westernmost 11 miles of Dauphin Island. At present, this section of the island is losing about 13.5 acres of property per year to erosion." This erosion rate would add up to be a land loss of 567 Acres for the last 42 years</p>	
--	--	---	--

		<p>It looks like the Corps' prediction in 1978 has come true.</p> <p>The Corps' 1978 Study also stated:</p> <p>"The No Action alternative .. erosion along the western end of the island could be expected to continue at its present pace. Erosion would continue to claim valuable property on the island, ultimately causing hardships for island property owners and a lessening of the area's attractiveness for recreational activities."</p> <p>The "No Action" alternative is not considered to be a viable course of action since it would not solve the existing erosion problem. Material dredged from the Mobile Bay entrance channel would continue to be placed in deep water, thereby contributing to the erosion problem on the gulf shoreline of Dauphin Island."</p> <p>Morton 2007 study, "In 2006, Dauphin Island was 28% smaller than in 1958". Which he correlated with the deepening of the Mobile Bar Channel.</p> <p>USGS Appendix D study reported that the Morton 2008 study reported that the 49 years between 1958 and 2007 the Island loss 603 acres of land</p> <p>The USGS statement means almost 1/6 of the island has eroded away since the Corps first started dredging in 1958.</p> <p>Using the past USGS Morton's calculations plus adding 602 acres to the future 50 years of land loss on the Island would add up to be 1206 acres of land loss.</p> <p>The whole island is only 3500 acres of land that means the past land loss and the future land loss would equal almost</p>	
--	--	---	--

		<p>1/3 of the island which would erode away after the Corps started dredging the channel to greater depth.</p> <p>USGS Appendix D study also, states that between 1998-2012 the western gulf shoreline has eroded 15.64 feet a year, which means that the western gulf shoreline, has eroded 344 feet in the last 22 years, just from the pier to the end of the road.</p> <p>Future 50 years: Did the Corps take in consideration the erosion/land loss from their dredging on the western gulf shoreline in the future, using the present USGS erosion rate of 15.64 feet per year, means the island would erode over 782 feet in the next 50 years.</p> <p>So, the Corps' Grand total of erosion to Dauphin Island's western gulf shoreline from 1998 to 2070 will be 1126 thousand feet, just from the pier to the end of the road.</p> <p>A large section of the western part of the island is only 700 feet wide.</p> <p>This means the Corps' dredging will destroy the whole western side of the Island, way before the sea level even has a chance.</p> <p>Rating the different projects</p> <p>Now we find the Corps has been using questionable methods to rate or rank the different projects in the study.</p> <p>Pelican Island Southeast Nourishment</p> <p>Place 4.5 million cubic yards (cy) of sand SE of existing Pelican Island. Supply sand to nearshore littoral system.</p>	
--	--	--	--

			<p>Create 240 acres of intertidal beach and barrier flat. Reduce loss of managed lands and piping plover critical habitat.</p> <p>Reduce wave energy and shoreline erosion along East End of Dauphin Island</p> <p>The Corps wants \$72 million dollars to put sand in the Pelican Island site, even though the study says that the sand would not go to either the East or the Western shoreline.</p> <p>“However, increases in the rates of sediment transport from Sand and Pelican Islands to Dauphin Island, as predicted by the morphological modeling simulations (for both the ST2SL1 and ST3SL3 scenarios), were minimal for both measures,</p> <p>The Corps has known since 1995, putting the sand in the Pelican Island site would not stop the erosion to the East End, according to a Corps’ internal document.</p> <p>Dauphin Island Dec 1995. “Many of the participants urged the Corps to place the material on the Sand Island shoals even though they understood that this would not ‘fix’ the erosion problems, would not provide immediate (or possibly even long term) relief to the erosive areas on the eastern end of the island.”</p> <p>Questions: what is the reason the Corps is pushing the \$72 Million-dollar, Pelican Island project if it will not transport sediment to Dauphin Island?</p> <p>* Does the Corps want the money to put sand in this site because the Corps made the commitment to Dauphin Island to put sand into the SIBUA Northwestern Extension and does not want to pay for it?</p>	
--	--	--	--	--

		<p>* Is the Corps recommending this site and rating it high so the Corps will not have to use the Corps' money in the future to dredge the Bar channel and dump the sand at the location?</p> <p>* Or will placing the sand in this site, assure it will flow to the Mississippi Barrier Islands that the Corps has spent Billions of dollars restoring, and to hide the fact that the Corps cut off the sand to the Islands, because of dredging the Mobile Pass according to the National Park Service statements?</p> <p>Gulf Beach projects</p> <p>East End Beach and Dune Restoration</p> <p>Place 1.2 million cy of sand along shoreline to construct a beach and frontal dune (7 ft height x 25 ft width) with native vegetation. Install 3,200 ft of sand fencing.</p> <p>Restore 35 acres of beach and dune habitat. Reduce loss of managed lands. Reduce storm risk to an additional 50 acres of beach, dune, woody vegetation, and freshwater lake habitats.</p> <p>West End Beach and Dune Restoration (No Buyouts)</p> <p>Place 4.2 million cy of sand along shoreline. Construct frontal dune (7 ft height x 25 ft width) with native vegetation. Install 14,000 ft of sand fencing.</p> <p>Restore 200 acres of beach and dune habitat. Reduce loss of piping plover critical habitat.</p> <p>Reduce storm risk to an additional 100+ acres of beach, dune, intertidal flat, and intertidal marsh habitats.</p>	
--	--	--	--

		<p>Something is wrong with the Corps' high ranking of the East End Beach compared with the West End Beach</p> <p>West End Beach and Dune Restoration</p> <p>The Corps has eroded over 507 feet of western gulf shoreline on 4 miles of beach, since 1985, thereby destroying all of the wildlife habitat that depends on the four miles of sandy beach to live.</p> <p>The West end is four times as long and four times as much of sandy shoreline for wild-life habit, compare with the East-end project.</p> <p>How can the Corps compare the West End Beach to the East-end, when West End project will restore 4 miles of beach and dune habitat that is listed as the piping plover's critical habitat?</p> <p>How can the Corps compare 4 miles of restored sandy beach for turtles' nests, to one mile on the east end? Just after the oil-spill and the protective berm being put on the shoreline, the turtles nested in the sand in front of my house.</p> <p>How can the Corps compare the East end to West End beach, when the Town and the other business on the Island relies on income from the rental houses that are on the West End of the Island? The Town would make no money from occupational taxes and property taxes on the East-end.</p> <p>The East End just got a beach restoration in 2016, so why is the Ranking higher? Why is the Ranking for the East-end higher than the West end, when it is only restoring 35 acres of shoreline?</p>	
--	--	---	--

		<p>Is the Corps using the old trick of lying by statistics and the deceitful practice of giving false erosion rates and distorted graphs in the ABIRA, for each end of the Island?</p> <p>Why did the Corps put false erosion rates for the East End into the ABIRA Report?</p> <p>“erosion rates of approximately 8.5 feet per year based on USGS long-term weighted linear regression shoreline change rates (1940–2015) as documented in Appendix D.”</p> <p>How did the Corps come up with the false erosion rate of 8.5 feet per year when according to the USGS, the accurate erosion rate for 1940–2015 is -0.38 m/per year= 1.2 feet/year?</p> <p>Why did the Corps put false erosion rate for the West End in the ABIRA Report?</p> <p>“erosion rates of approximately 7.8 feet per year based on 2018 USGS mid-term weighted linear regression shoreline change rates (1998–2015), as documented in Appendix D”</p> <p>How did the Corps come up with the erosion rate of 7.8 feet/year?</p> <p>Why didn't the Corps use the accurate rate from the USGS study that states from 1998-2012 the erosion rate was 4.77 meter= 15.64 feet per year?</p> <p>Especially. when the Corps admits to their engineering activities causing the erosion.</p> <p>Question: Is picture and the statement true that the whole 4 miles of the West end will erode away, under the high “no action plan” in 10 years?</p>	
--	--	---	--

		<p>Since the 10-year, high no action model shows that the whole East end is still intact including part of Pelican Island.</p> <p>Is it more important to protect the 11 miles of the whole western part of Dauphin Island when it would protect all of the ecological areas of the Mississippi Sound and the Alabama mainland, rather than spending \$72 million dollars to dump sand in the Pelican Island site, which the Corps has stated over and over since the 1990's, that the site would not protect or stop the erosion to either the East or the West shoreline of the Island.</p> <p>Is the Corps of Engineers willing to utterly destroy all traces of the West-end of Dauphin Island, and eradicate it, by totally eroding it away?</p> <p>The Corps has already caused so much damage to the western shoreline, by their past erosion of 507 feet in the last 35 year, according to the USGS figures, just from the pier to the end of the road.</p> <p>How can the US Corps of Engineers Headquarters, the South Atlantic Division and the Mobile District live with themselves and educate the next generation of Corps' employees about how proud they were to destroy American lives for the Chinese shipping industry?</p> <p>The Corps claims in the ABIRA are supported by unsound comparisons, and the Corps ranking of the different projects was done on unsubstantiated assertions of facts. Just another Corps' conflict of interest and the perpetuation of policies, based on false information.</p> <p>When answering my questions, the Corps and the other Federal and State agencies employees have a duty to speak and not to remain silent and to disclose only the truth to my question and to all questions by the public and property</p>	
--	--	--	--

			<p>owners on the Island, especially pertaining to all information about the erosion caused the Corps' engineering activities in Mobile Harbor and Channels and all future erosion impacts to Dauphin Island from the massive future expansion to the Mobile Harbor Entrance Channel/Outer Bar Channel for the 2019 SEIS/GRR/Mobile Harbor study.</p> <p>Please answer all of my questions and add the full email to the ABIRA Report.</p> <p>Do not redact my name or my email address.</p>	
022	Michael Krumpelt	6/26/2020	<p>Dear Mr. Blankenship:</p> <p>The recently issued Alabama Barrier Island Restoration Assessment final report contains many good elements but also a glaring example how political considerations can distort a scientific analysis.</p> <p>The many potential restoration projects are well identified and analyzed, and the Sandcastle Condominium Association, where I am an officer, supports</p> <ol style="list-style-type: none"> 1. Pelican Island Southeast Ebb Tidal Shoal Restoration 2. Sand Island Platform Nourishment and Sand Bypassing Ebb Tidal Shoal Restoration 3. East End Beach and Dune Restoration and Gulf Beach Restoration 4. West End and Katrina Cut Beach and Dune Restoration 5. Marsh Habitat Restoration Behind Katrina Cut Back-Barrier 6. Steiner Property Acquisition 7. Gorgas Swamp Acquisition 8. Tupelo Gum Swamp Acquisition 	<p>Thank you for your comments and thank you for providing your suggested priority restoration activities.</p>

			<p>The glaring political distortion is the statement that “more frequent storms” have caused the erosion of Pelican, Sand, and Dauphin Island. It is well understood and accepted that littoral drift of sediment is the mechanism of transport of sand along the Alabama gulf coast. Storms increase the rate of transport, they “accelerate” the transport but they are not the cause of the erosion.</p> <p>The cause of the erosion is the interruption of the littoral drift from dredging of the shipping channel</p> <p>The Corps of Engineers, which gains hundreds of millions of dollars for maintaining the shipping channel, does not want this to be said and has been allowed to muzzle the conclusions of the report.</p> <p>It is a shame.</p>	
023	Garrett Mangum	6/26/2020	<p>Please consider doing the RIGHT thing regarding the restoration of Dauphin Island and the marshes surrounding it. The beaches, marshland, Pelican Island, and the areas in and around Dauphin Island serve as a buffer for Mobile as you know. Please do what is right for the island and it's inhabitants as well as the citizens of Mobile. I hope that the restorations can begin ASAP and that the Army Corp takes into consideration how much effect they have had on the Island as well as Nature. Thank you.</p>	Thank you for your comments.
024	Glenn Coffee	6/26/2020	<p>Chris:</p> <p>This message submits my comments on the ABIRA Final Report. I am also including the Corps' Mobile District Office on the distribution since I understand the Corps staff will be responsible for assembling the comments received and coordinating the preparation of responses.</p> <p>Since the ABIRA Study has been completed and the concluding report finalized, I am restricting my comments to the following three important topics.</p>	<p>Thank you for your comments and thank you for providing your suggested priority restoration activities.</p> <p>Please refer to Appendix C of the final report, which has been updated with the sediment budget report that documents the modern sediment sources and sinks along with estimates of natural and man induced littoral transport of sediments within the region of Dauphin Island, Alabama.</p>

		<p>The Final Report Failed to Analyze the Contribution Maintenance of the Mobile Harbor Bar Channel Has on the Erosion Problem. Following a careful review of the Main Report, I was very disappointed that it completely ignores the role of the Corps' channel maintenance program in contributing the erosion of the Sand/Pelican Island shoal and Dauphin Island. Instead, the erosion problem is attributed solely to Sea Level Rise (SLR) and storms, without reporting on any analysis of the fact that the long history of channel maintenance that has unquestionably disrupted the natural east-west drift of beach quality sands across the Mobile Pass Inlet.</p> <p>See the attached table demonstrating this fact for the 37-year period between 1980 and 2016. Half of the almost 30 million cyds dredged from the Bar Channel was disposed in the Ocean Disposal Area which means that those sands were completely removed from the nearshore littoral drift system (i.e. natural sand budget). Further, the Sand Island Beneficial Use Area (SIBUA) (first used in 1999) has turned out to be a "sink" for the sands placed in that site -- contradicting the Corps' original promise that sands placed in the SIBUA would be returned to the littoral drift system. When the accumulation of sands became severe enough to interfere with the operation of hopper dredges, the Corps was forced to expand the SIBUA in 2008 and again in 2018. The Corps has also admitted that as of 2018, 52% of the 624,000 cyds of sands dredged on an average annual basis from the Bar Channel and placed in the SIBUA are accumulating therein, instead of moving out of the site. To date, the Corps has not "promised" the new 2018 expansion of the SIBUA will work any better. Further, the Corps refuses to make a long-term commitment to dispose of all future dredged sands along the Sand/Pelican Island shoal in waters less than 15 feet deep to better promote the reincorporation of the sands into the littoral drift system to</p>	<p>Appendix C of the Final Alabama Barrier Island Restoration Assessment incorporated data sets containing good spatial survey data coverage for the study area that partially overlaps and extends the time period considered in Byrnes et. al, 2010. In all, the studies in Appendix C of the final report found that sediment erosion, transport, and deposition are controlled by storm wave and current processes that produce net littoral transport to the west. Despite differences in time periods and methods of analysis, the technical reports found in Appendix C of the Alabama Barrier Island Restoration Assessment found consistent patterns of erosion and deposition of major features that were documented in Byrnes et. al, 2010. Over the longer-term change period of analysis, the studies conducted as part of the Alabama Barrier Island Restoration Assessment found that “despite large volumes of sediment being dredged from the ship channel, the ebb-tidal delta appears to have retained a state of equilibrium.”</p>
--	--	--	--

			<p>counter the erosion of Dauphin Island. The Final Report does not analyze any of these facts that have and continue to make a material contribution to the erosion of Dauphin Island. No reasonably informed individual would disagree that SLR and storms play a major role in the erosion problem, but that same reasonable individual would also understand when the barrier island system's natural sand budget is disrupted, the downdrift shoreline becomes "sand-starved" and erodes in response to the deficit in the littoral drift sands.</p> <p>I am a retired Mobile District Corps employee who specialized during much of my career in analysis of the environmental effects of Corps projects. Over the last 12 years, I have devoted a lot of effort to studying the Dauphin Island erosion problem and conducted an extensive review of the scientific literature on coastal erosion. It is inexcusable for the ABIRA Final Report not to have: (1) seriously considered the views IN FULL contained in the 2007 Morton USGS report on MS-AL barrier islands; (2) ignored completely the Mobile District's own 1978 report that concluded channel maintenance contributed to the Dauphin Island erosion problem; and (3) avoid altogether considering the September 30, 2007 and March 7, 2008 independent reviews conducted by Dr. Robert G. Dean of the report prepared by Mark R. Byrnes, Sarah F. Griffee, and Mark S. Osler entitled "Evaluation of Channel Dredging on Shoreline Response at and Adjacent to Mobile Bay Entrance, Alabama" in which Dr. Dean concluded:</p> <p style="padding-left: 40px;">"...My Draft Report review and the review herein have raised valid questions regarding some of the arbitrary methodology applied and findings to the degree that I regard the findings inconclusive with regard to any impact of dredging and channel maintenance of Mobile Bay Entrance. Thus, I respectfully dissent from concurring 'that the Corps' construction, operation and Maintenance</p>	
--	--	--	---	--

			<p>Dredging Practices of and at the Channel have not resulted in at least Minimum Measurable Erosion of Dauphin Island's shoreline."</p> <p>Recommended restoration projects. While all of the restoration measures considered in the Final Report have some value, in my view, five projects stand out in importance because of the cumulative contribution they would make in strengthening Dauphin Island's Gulf shoreline by restoring not only the width of the island, but large areas of the island that have experienced elevation losses. If the below five projects are not constructed, many of the remaining less significant projects will have a low long-term chance of surviving on an island that is being allowed to continue to erode away:</p> <ol style="list-style-type: none"> 1. Pelican Island Southeast Nourishment Ebb Tidal Shoal Restoration 2. Sand Island Platform Nourishment and Sand Bypassing Ebb Tidal Shoal Restoration 3. West End and Katrina Cut Beach and Dune Restoration (with No Buyouts) 4. East End Beach and Dune Restoration Gulf Beach Restoration 5. Back-Barrier Marsh Habitat Restoration Behind Katrina Cut <p>I realize the total cost of constructing all five projects will be large. But it is time for the State of Alabama to start thinking "big". The necessary monies are available in the State's portion of the oil spill monies that have all too often to date been spent on questionable endeavors not affected by the oil spill. Now is the time for the State to step forward and do the right thing to strengthen Dauphin Island so as to preserve Alabama's entire western Gulf Coastline.</p>	
--	--	--	--	--

			<p>Inform the Public. Now is the time for the State to tell the public how project implementation decisions will be made, identify the decision schedule, and inform the public if we will be allowed to play a role in the decision process.</p> <p>(Note: The table Mr. Coffee referenced in his comments is shown in Attachment 4 to this document.)</p>	
025	Lynn Hinrichs	6/26/2020	<p>All – This email pertains to the Final Report on the Alabama Barrier Island Restoration Assessment (Dauphin Island) that was prepared for the State of Alabama by the U.S. Geological Survey and the U.S. Army Corps of Engineers.</p> <p>The report fails to consider the effects resulting from the Corps' maintenance of the Mobile Harbor Bar Channel. To address the erosion problem, the report evaluates potential restoration projects to protect and restore the coastal and marine resources of Dauphin Island, Mississippi Sound, and Mobile Bay.</p> <p>Based upon a careful review of the report, all five of the following restoration projects should be constructed:</p> <p>(1) Pelican Island Southeast Nourishment (page 42);</p> <p>(2) Sand Island Platform Nourishment and Sand Bypassing (page 46);</p> <p>(3) East End Beach and Dune Restoration (page 49);</p> <p>(4) West End and Katrina Cut Beach and Dune Restoration (with No Buyouts of 225 private parcels) (page 58); and</p> <p>(5) Marsh Habitat Restoration Behind Katrina Cut (page 66)</p> <p>The above five projects collectively accomplish the essential goal of strengthening Dauphin Island by reversing the</p>	<p>Thank you for your comments and thank you for providing your suggested priority restoration activities.</p>

			<p>effects of 70 years of severe erosion. If these five projects are not constructed first, the long-term chances of the intended objectives being achieved will be low.</p> <p>Thank you in advance for your consideration of this matter.</p>	
026	Caroline Graves	6/26/2020	<p>Dear Corps and State of Alabama,</p> <p>The picture was left out of my last email for the below statement.</p> <p>Question: Is picture and the statement true that the whole 4 miles of the West end will erode away, under the high “no action plan” in 10 years?</p> <p>Since the 10-year, high no action model shows that the whole East end is still intact including part of Pelican Island.</p> <p>Is it more important to protect the 11 miles of the whole western part of Dauphin Island when it would protect all of the ecological areas of the Mississippi Sound and the Alabama mainland, rather than spending \$72 million dollars to dump sand in the Pelican Island site, which the Corps has stated over and over since the 1990’s, that the site would not protect or stop the erosion to either the East or the West shoreline of the Island.</p> <p>Is the Corps of Engineers willing to utterly destroy all traces of the West-end of Dauphin Island, and eradicate it, by totally eroding it away?</p> <p>The Corps has already caused so much damage to the western shoreline, by their past erosion of 507 feet in the last 35 year, according to the USGS figures, just from the pier to the end of the road.</p>	<p>Again, thank you for your comments. As stated in response to your previous comment (comment #004), no priorities are identified in the report nor are any recommendations made. The team formulated and evaluated a suite of different restoration measures to address future possible island conditions due to storms and sea level change. The benefits and costs of these measures over a 50 year life-cycle were identified and built into an assessment tool which ranked them relative to how well they met the objectives of the study. See Section 3.6 of the report for further information on the formulation and evaluation process. Thank you for finding the value in this report and using its content to formulate questions and promote important dialogue.</p>

			<p>How can the US Corps of Engineers Headquarters, the South Atlantic Division and the Mobile District live with themselves and educate the next generation of Corps' employees about how proud they were to destroy American lives for the Chinese shipping industry?</p> <p>The Corps claims in the ABIRA are supported by unsound comparisons, and the Corps ranking of the different projects was done on unsubstantiated assertions of facts. Just another Corps' conflict of interest and the perpetuation of policies, based on false information.</p> <p>When answering my questions, the Corps and the other Federal and State agencies employees have a duty to speak and not to remain silent and to disclose only the truth to my question and to all questions by the public and property owners on the Island, especially pertaining to all information about the erosion caused the Corps' engineering activities in Mobile Harbor and Channels and all future erosion impacts to Dauphin Island from the massive future expansion to the Mobile Harbor Entrance Channel/Outer Bar Channel for the 2019 SEIS/GRR/Mobile Harbor study.</p> <p>Please answer all of my questions and add the full email to the ABIRA Report.</p> <p>Do not redact my name.</p>	
027	Christian Wagley	6/26/2020	<p>Dear Commissioner Blankenship:</p> <p>Healthy Gulf is a nonprofit organization committed to uniting and empowering people to protect and restore the natural resources of the Gulf of Mexico. One of our priority focus areas is on maintaining and improving the natural resiliency of coastal systems such as coastal barriers and wetlands. On behalf of our members and supporters in Alabama and along the Gulf coast, we wish to comment on</p>	<p>Thank you for your comments and thank you for providing your suggested priority restoration activities.</p>

			<p>the Alabama Barrier Island Restoration Assessment Final Report.</p> <p>All three of the restoration measures outlined in the Report (Ebb tidal shoal, Gulf beach and Back barrier/marsh) could be viable under the right circumstances. However, decisions about restoration projects must acknowledge the reality that certain restoration projects will be more likely to survive the rapid rate of sea level rise that is expected to rise even faster as the 21st century progresses.</p> <p>The current rate of sea level rise is more than double the rate of just a few decades ago. The forecast for continued rise through 2100 as reported by the National Climate Assessment is for anywhere from 1' to 8' of additional rise through 2100. Even the mid-range scenario presents exceptional challenges for Dauphin Island.</p> <p>The ability to hold Dauphin Island in one place in the face of such rapidly rising seas is not likely. The island has never remained in one place during its existence, as barrier islands naturally ebb and flow with changes in sea level, supply of sand, and storm activity, and it is unrealistic to think that it can be kept in one place in the face of historic rates of sea level rise. With each successive project designed to hold the island firm rather than allowing it to move, Dauphin Island becomes even more out of equilibrium with existing conditions.</p> <p>This will likely mean that restoration projects that do not take this into account will face a shorter lifespan than those preceding them. We recommend that projects that can show the greatest longevity in the face of sea level rise, and that most closely restore natural processes such as the restoration of sediment transport interrupted by the Mobile ship channel, be prioritized for funding.</p>	
--	--	--	--	--

			<p>As you know, the Island has long suffered from severe erosion due in part to the dredging of the Mobile ship channel. Correcting the man-made deficiency this has created should be a high priority for restoration, as the erosion induced by channel dredging limits the viability of future restoration projects. The impacts of channel dredging are noted in Historical Changes in the Mississippi-Alabama Barrier-Island Chain and the Roles of Extreme Storms, Sea Level, and Human Activities by Robert A. Morton</p> <p>Journal of Coastal Research (2008) 24 (6 (246)): 1587–1600:</p> <p>“Historical land-loss trends and engineering records show that progressive increases in land-loss rate correlate with nearly simultaneous deepening of channels dredged across the outer bars of the three tidal inlets maintained for deep-draft shipping. This correlation indicates that channel-maintenance activities along the MS-AL barriers have impacted the sediment budget by disrupting the alongshore sediment transport system and progressively reducing sand supply. Direct management of this causal factor can be accomplished by strategically placing dredged sediment where adjacent barrier-island shores will receive it for island nourishment and rebuilding.”</p> <p>We are very happy to see land acquisition considered as part of the report, as it offers a permanent solution in a way that the recommended restoration projects do not. The viability of land acquisition in circumstances similar to those on Dauphin Island has been reported in similar locations such as North Topsail Beach, North Carolina. A report by the Program for the Study of Developed Shorelines at Western Carolina University outlines such a strategy there: Blockedhttps://psds.wcu.edu/coastal-hazards-targeted-acquisitions-a-reasonable-shoreline-management-alternative/</p>	
--	--	--	--	--

			<p>We encourage state and federal officials to establish a clear set of criteria for selecting projects for funding, to include cost-benefit analyses and a long-term look over decades rather than individual years that takes into account the accelerating rise in sea level.</p> <p>Thank you for considering our comments.</p>	
028	Deborah Coffee	6/26/2020	<p>Mr. Blankenship:</p> <p>After reading the ABIRA Final Report, this is to recommend the State of Alabama to construct the following five restoration projects</p> <ol style="list-style-type: none"> 1. Pelican Island Southeast Nourishment Ebb Tidal Shoal Restoration 2. Sand Island Platform Nourishment and Sand Bypassing Ebb Tidal Shoal Restoration 3. West End and Katrina Cut Beach and Dune Restoration (with No Buyouts) 4. East End Beach and Dune Restoration Gulf Beach Restoration 5. Back-Barrier Marsh Habitat Restoration Behind Katrina Cut <p>I believe all five projects should be constructed because of the extremely weakened condition that now characterizes Dauphin Island and the threat that condition poses for western Gulf Coastline. For the first time, the State of Alabama has the opportunity to do something really important for Alabama's coastal environment by reversing the adverse effects created by the long term erosion of Alabama's only barrier island.</p> <p>Thank you for considering my comments and I hope you will lead actions to see that they are implemented.</p>	Thank you for your comments and thank you for providing your suggested priority restoration activities.