



April 16, 2019

The Savannah District  
U.S. Army Corps of Engineers Planning Division  
ATTN: Ms. Robin Armetta (PM-P)  
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VIA: Email: [CESAS-PD@usace.army.mil](mailto:CESAS-PD@usace.army.mil).

RE: Comments regarding the Draft Integrated Post Authorization Analysis Report and Supplemental Environmental Assessment for Savannah Harbor Expansion Project, Georgia and South Carolina: Fish Passage at New Savannah Bluff Lock and Dam

Dear Sir/Madam:

The Augusta Metro Chamber of Commerce serves a member constituency of 1,200 businesses and organizations throughout the Augusta Region. We serve as the voice of the business community by educating our members and advocating for public policy that supports a thriving economy.

For nearly 20 years, the Chamber has played a vital role in developing a long-term solution to the Savannah river conditions created by the New Savannah Bluff Lock and Dam. In its deteriorated state, the NSBLD threatens the sustainability of existing river elevations up-stream. The conditions of the pool play an important role for our industries and municipalities to draw water as well as significantly contribute to the existing and increasing use of the river for recreation, tourism and adjacent land use for both residential and commercial development.

From 2000 to 2014, the Chamber's efforts were largely concentrated on working with our members of congress to secure funding for its rehabilitation. When the NSBLD became the site of a fish mitigation project for SHEP in 2014, we were very engaged in understanding how the project would impact the NSBLD. With the passage of the WIIN Act in 2016, our efforts refocused on monitoring the implementation of the requirements set forth in the Act including the development of a final project and its impact to the pool.

**WIIN ACT Project Modifications as Described Section 1319 (c)(1)(A)(i)(I)(II)**

It is the opinion of the Chamber that the Corps has not met the requirements of the WIIN Act by failing to fully study and examine an Alternative 1 project modification as specified in this section of the law.

**Question:** How many project concepts were developed during the planning period that repaired and modified the NSBLD so as to maintain the pool and meet other requirements including fish passage? We were told it was one concept in order to meet the minimum standard of the law. Is this accurate?

**Question:** What weight was given to the Chamber’s letter of May 26<sup>th</sup>, 2017, (exhibit A) which emphasized the continued need for navigation so that the Augusta Region was not cut off from areas down river and that the recreational value of the park should not diminish? How were the Chamber’s concerns about the engineering complexities of both impounding water and the passage of high flows considered in the formulation of project concepts, especially weirs?

**Question:** Please describe the Corps interpretation of (c) (1)(A)(II) that describes safe fish passage *over* the structure.... Was the language in the WIIN act to require a rock ramp to the crest of the dam for fish passage or around the dam/gates?

**Question:** Given that alternative 1-1 received a total score of 4 but a neutral rating on fish passage, what variations of alternative 1-1 were considered that improved fish passage? In reference to the previous question, did the Corps consider fish passage in channel, as a bypass or as a rock ramp over the dam? Additionally, did the Corps consider the 2014 fish bypass design, which met the requirements of the BO, as a feature of an Alternative 1 design?

**Question:** In a communication posted by the Corps on May 5<sup>th</sup>, 2017 (exhibit B) please clarify and further explain the Corps opinion that “The large costs for repair make the NSBLD a poor investment from the national perspective”?

**Question:** In the same communication posted by the Corps on May 5<sup>th</sup>, 2017, it is stated that the cost to rehabilitate the NSBLD would cost approximately \$30 million. In a communication posted March 18, 2019 by the Corps (exhibit C), the cost to rehabilitate the NSBLD is now estimated to be \$93,711,000. Please provide details on the certified cost and factors relating to an increase in cost of approximately \$60 million.

**Question:** In the March 18, 2019 communication, please further explain the following comment. Does this statement mean that the final project has already been specified by the Corps as a full-river fish passage and weir without consideration of any Alternative 1 concept? What is the purpose of public comment on the Draft Plan if the Corps has pre-determined the outcome?

***“We are open to conversations with our non-federal sponsors and our water policy experts on other alternatives that would provide water surface elevations similar to Alt 1-1, but that include a full-river fish passage and weir”.***

**Question:** The Evaluation Matrix utilized to compare and contrast alternatives specifies a cost of the No Action Alternative to be \$62,734,742. Is this a parametric or certified cost? What portion of the cost would have been investment for the project and what portion of the cost would have been rehabilitation to the NSBLD?

#### **Draft Plan Recommendation 2-6d**

It is the opinion of the Chamber that the current project modification proposed, 2-6D, does not meet the requirements of the WIIN Act because it fails to preserve an elevation adequate for water supply and recreational activities as in existence on the date of enactment of the Act.

**Question:** The Corps has interpreted the WIIN Act for depth of the pool to mean the functionality of the pool as of the date of enactment. Please state the minimum depth/range of water surface functionality the Corps has determined that will be required by the final project?

**Question:** Please explain if there are any plans to remove/deconstruct the training wall?

## **Summary and Chamber Resolution**

On February 21<sup>st</sup>, the Chamber issued the following resolution so that our members could be better informed about the Draft Plan and participate in the public comment period. The names of 280 individuals and their affiliations are listed below. We urge the Corps of Engineers to develop a project that meets the needs of our community.

- Adhere to the implementation guidelines as set forth in the WIIN Act, without bias, which requires maintaining the pool for navigation, water supply and recreational activities as in existence on the date of the enactment and to allow for safe passage of shortnose sturgeon, Atlantic sturgeon and other migratory fish to historic spawning grounds. As of the date of enactment, the water level of the Savannah River at the 5th Street Bridge was between 113.5 and 114.5 feet.
- Reassessment of the evaluation matrix and disqualification of the proposed project 2-6d based on significant losses in pool elevation for water supply and recreational activities. The loss of recreational activities includes the construction of a detention pond approximately 275 feet wide and 10 feet deep in the New Savannah Bluff Lock and Dam Park adjacent to the project rendering a significant portion of the park unadaptable for public use and jeopardizing the health, safety and welfare of the public.
- Ensure a fair and good faith process that supports the local community's desire to participate in the final project design and provide full disclosure and supporting documentation of the construction and management and operational costs of project 1-1.
- Conduct a comprehensive comparison and evaluation of the No Action Alternative (WRDA 2014) to projects 1-1 and 2-6d.