

October 23, 2013

Mr. Paul Stodola  
U.S. Army Corps of Engineers Jacksonville District  
Jacksonville, FL 32202

RE: Draft Integrated General Reevaluation Report II and Supplemental Environmental Impact Statement for the Jacksonville Harbor Navigation Study

Dear Mr. Stodola,

Audubon Florida appreciates the opportunity to comment on the Draft Integrated General Reevaluation Report II and Supplemental Environmental Impact Statement for the Jacksonville Harbor Navigation Study (GRR-SEIS). Audubon is Florida's oldest conservation organization, with particular expertise in the conservation of birds, other wildlife and their habitat. While we appreciate the Corps has been directed to move the Jacksonville Harbor Navigation Study forward with all reasonable urgency, Audubon has identified several weaknesses in the GRR-SEIS that warrant resolution in a subsequent Draft prior to releasing a Final EIS.

**The Environmental Impact Study timeline should be lengthened.**

The project timeline for the Jacksonville Harbor Navigation Study has been reduced by 14 months under the Federal "We Can't Wait Initiative." This has restricted the timeframe for environmental assessments and limited the Corps' ability to thoroughly evaluate potential impacts. Rather than risk unnecessary damage to the lower St. Johns River system and the wildlife that depends on it, the Corps should extend the study period by at least another year and engage in more detailed analyses of environmental impacts.

**The GRR-DEIS is too reliant on model simulations, and key information is missing.**

NEPA requires that the Corps undertake a robust analysis of impacts. The tidally impacted reaches of the lower St. Johns River system include the largest and most diverse system of salt marshes on Florida's east coast, as well as very significant fresh water wetlands and SAV beds within the project footprint. These marshes and forested wetlands are important to a wide range of species and exist in a delicate, dynamic equilibrium with the river itself. Although the Corps has noted that threatened and endangered species including manatees, right whales, sea turtles, piping plovers, red knots, wood storks, short-nosed sturgeon and smalltooth sawfish may occur within the project footprint, systematic baseline surveys of birds and other wildlife sufficient to fully understand their numbers, habitat use and vulnerabilities have not been conducted. Audubon recommends that an appropriate level of baseline monitoring with enough coverage to produce an accurate picture of existing conditions should be employed for at least a year before a new Draft EIS is developed. Results can then inform models to improve their performance. Installation of metering devices to track water level, salinity, turbidity, and periodicity of water level changes throughout the project life should be installed now in all areas that might be affected by dredging. Similarly, systematic surveys of birds and other wildlife should be conducted through at least one annual cycle.

**The opportunity for public comment has been limited by the reduced project timeline, missing or incomplete information, and the piecemeal release of supplemental information.**

Largely due to the reduced timeline, the Corps has been forced to revise the DEIS/GRR-DEIS several times. New and often critical information has been released in piecemeal fashion over a period of several months, and some information is still unavailable for review. Constant revisions and addenda to the DEIS/CRR-DEIS and inconsistencies within the document itself have caused an unnecessary level of confusion and hampered the public's ability to provide meaningful input. In order to allow for an appropriate level of public review and participation, the Corps should establish a new deadline for comments only after it has completed and compiled all relevant baseline studies and impact assessments in single, comprehensive document.

**Modeling of impacts requires more supporting data, to ensure mitigation is appropriate and proportional.**

The GRR-SEIS allocates 75% of its mitigation dollars to monitoring for unanticipated project impacts. Monitoring is not equivalent to mitigation, and the uncertainty surrounding project impacts is due to the insufficiency of the supporting information and the Corp's undue reliance on model estimates. The remaining 25% of mitigation dollars are allocated to purchase mitigation bank credits, upland buffer lands, or credits for agricultural nutrient reductions ; without sufficient primary research to better predict project impacts, the Corps cannot demonstrate these mitigation proposals will remedy losses. Audubon recommends the Army Corps undertakes the primary research necessary to more accurately predict environmental impacts as required by NEPA, and propose more appropriate and proportional mitigation before finalizing the EIS.

**The Corps should explore mitigation opportunities to improve or create habitat for imperiled beach dependent birds.**

More than a century of navigational improvements to the LSJR have had a tremendous impact on the quality and availability of habitat for coastal birds. This dredging proposal presents an opportunity to use dredged material to benefit these species impacted by past and proposed activities. Audubon recommends that the Corps consider the effects of proposed dredging on nesting activities by beach-nesting birds, and include the management of Dredged Material Management Areas (DMMA's) for optimal beach-nesting bird habitat in its revised mitigation proposals. This proposal provides the opportunity to improve the outlook for some of Northeast Florida's fastest declining bird species, with activities in aid of the Corps' primary mission.

Thank you for the opportunity to comment on this proposal. In addition to the river itself, Northeast Florida is home to habitat of remarkable size and value at iconic sites like Timucuan National Preserve, the Talbot Islands GeoPark, Huguenot Memorial Park and more. The configuration of this project will have real and lasting impacts to the river, these special places, and the wildlife they support. Audubon is committed to working with you to ensure the project is designed and implemented in the least impactful way while also providing meaningful and lasting mitigation for any resulting impacts.

Sincerely,



Julie Wraithmell  
Director of Wildlife Conservation  
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