

EPA recommends the Port Everglades Interagency Working Group address these concerns briefly outlined here, along with those itemized in our comments on the Final EIS.

- EPA recommends the Interagency Working Group address operational controls/BMPs to avoid and minimize direct and indirect impacts from the proposed dredging operations per 404(b)(1) Guidelines versus focusing solely on monitoring; agency representatives with appropriate expertise should be engaged;
 - Involve Interagency Working Group in the detailed planning, implementation and decision-making regarding site-specific assessments using sedimentation dispersion models to better identify the geographic extent of indirect impacts, appropriate avoidance, appropriate monitoring zones, and appropriate levels of compensatory mitigation;
 - Develop detailed plans for multiple operational controls/BMPs for the proposed dredging operations, including:
 - overflow elimination and decanting based on pre-defined conditions;
 - use of environmental/enclosed clamshell dredge buckets;
 - cutterhead dredge practices and innovations to minimize sediment suspension;
 - monitoring ullage in use of split hull barges with response plans;
 - prohibiting disposal vessel leakage due to sea conditions and weather;
 - establishing thresholds and stringent reporting and response plans in the event of disposal vessel leakage;
 - controlling the production rate and timing to avoid impacts;
 - environmental stop work windows, including periods of coral stress, water flow direction, coral spawning, etc.; and
 - all operational practices to avoid and minimize impacts.
- Involve the Interagency Working Group in the detailed planning and development of studies to identify and assess all potential zones of impact pre-project/during/post-project construction;
- Involve the Interagency Working Group in the detailed planning and development of studies to determine a pre-project quantification of anticipated mitigation commitments for all potential impact zones, along with an adaptive management plan for unanticipated impacts;
- EPA recommends re-evaluation of the quantification of direct and indirect impacts to the coral community as part of interagency work in developing the monitoring plan; EPA recommends re-evaluation of the quantification of mitigation for both direct and indirect impacts to the coral community consistent with standard practices within the 404 context: addressing the 12 essential components of a mitigation instrument: objectives, site selection, site protection, baseline information, credit calculation, work plan, maintenance plan, performance standards, monitoring plan, long-term management, adaptive management, financial assurances.

Regarding anticipated mangrove impacts and mitigation issues: address the specific concerns identified by EPA in the DEIS and FEIS including the “connected action” of the Turning Notch project and its impacts;

EPA recommends addressing financial assurances for costs including the pre-project ODMDS habitat characterization; appropriate levels of funding for the 103 sediment testing evaluation; and specific information and budgets for alternative upland disposal sites should any portions of the sediment testing determine material is not meeting ocean disposal criteria.