

ST. JOHNS COUNTY, FLORIDA
South Ponte Vedra Beach, Vilano
Beach, and Summer Haven Reaches

COASTAL STORM RISK MANAGEMENT PROJECT
INTEGRATED FEASIBILITY STUDY AND
ENVIRONMENTAL ASSESSMENT

APPENDIX G
Environmental

March 2017



**US Army Corps
of Engineers**
Jacksonville District

**U.S. ARMY CORPS OF ENGINEERS
JACKSONVILLE DISTRICT**

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APPENDIX G-1
SECTION 404(B)1 DETERMINATION

St. Johns County, Florida
Coastal Storm Risk Management Project
South Ponte Vedra Beach, Vilano Beach, and Summer Haven Reaches
SECTION 404(B) EVALUATION

I. PROJECT DESCRIPTION

A. Location

The project is located in St. Johns County on the Atlantic Coast of Florida approximately 34 miles south of the mouth of the St. Johns River. The South Ponte Vedra Beach and Vilano Beach study reaches are located north of the St. Augustine Inlet, while the Summer Haven reach is located approximately 14 miles to the south of the inlet, south of Matanzas Inlet.

B. General Description

The Tentatively Selected Plan (TSP) includes dredging shoaled material from within the St. Augustine Inlet and placing that material onto the beach between Florida Department of Environmental Protection range monuments (R-Monuments) 102.5 and 117.5, which includes 1,000 foot tapers at the north and south ends. Several offshore sand sources were also evaluated for potential use in the future.

C. Authority and Purpose

The St. Johns County Coastal Storm Risk Management (CSRМ) feasibility study with integrated Environmental Assessment evaluates the project to determine if there is a Federal interest in cost-sharing in the construction of the project.

D. General Description of Dredged or Fill Material

1) General Characteristics of Material

The materials in the St. Augustine Inlet system are generally moderately well sorted, quartz-rich, fine to medium-grained sand with varying amounts of shell fragments, and grey or light grey in color. The ebb and flood shoals are composed almost entirely of beach-quality sand.

The materials in the North Offshore Borrow Area (NOBA) consist principally of quartz sand, having fine to medium-grained sand-sized particles, with varying amounts of shell fragments. The moist Munsell color of the material is predominately a value of 5 or lighter (gray to grayish brown); occasionally, there are some samples at deeper locations that are darker than 5.

The materials in the South Offshore Borrow Area (SOBA) consist primarily of quartz-rich, fine-grained sand with varying amounts of shell fragments. The moist Munsell color of the materials is predominately a value of 5 or lighter; occasionally there are some samples at deeper locations appear darker than 5.

2) *Quantity of Material*

Approximately 1.31 million cubic yards of material will be placed in the fill template of the TSP for the initial construction, and future nourishments would place approximately 866,000 cubic yards of material every 12 years.

3) *Source of Material*

The TSP uses the St. Augustine Inlet system as the primary sand source for the project.

E. Description of the Proposed Discharge Site

1) *Location and Size*

The project includes nourishment of a 60-foot beach berm over 2.6 miles of shoreline with 1,000-foot tapers. The initial construction includes the reconstruction and planting of the existing dune feature; however, future nourishments do not include dune construction or planting.

2) *Type of Site*

The project site is a sandy beach with some existing, eroding dune features.

3) *Type of Habitat*

The laboratory analyses characterize the existing sediments at South Ponte Vedra Beach and Vilano Beach as shelly, poorly sorted, fine to medium-grained sand-sized quartz and carbonate material. In general, these materials have a high shell content and are coarser than the potential sand source materials. Samples collected at the mid-berm and at mid-tide locations have especially high shell contents caused by deposits from the Anastasia formation, which also cause the typical brownish grey color of St. Johns County beaches.

4) *Timing and Duration of Discharge*

Dredging and disposal is expected to begin as early as the winter of 2020, and is expected to take approximately four months.

F. Description of Disposal Method

Material would likely be discharged from a pipeline attached to a hydraulic dredge; however, a mechanical dredge could also be utilized for the dredge operations.

II. FACTUAL DETERMINATION

A. Physical Substrate Determination

1) *Substrate Elevation and Slope*

Top elevation of the construction beach fill will be +8.0 feet North American Vertical Datum 1988 (NAVD 88). The equilibrium profile for the beach fill will vary along the project beach depending on wave/current distribution of the fill material. Generally, the width of the beach above the mean high water line will narrow over time, and the beach slope will become slightly steeper than the constructed beach as the beach equilibrates.

2) *Sediment Type*

The sediment from the St. Augustine Inlet system is predominantly fine quartz sand with varying amounts of shell. The fines content is less than 2% overall, within the state regulations.

3) *Dredge/Fill Material Movement*

The fill material will be subject to erosion by waves with the net movement of fill material to the south toward St. Augustine Inlet.

4) *Physical Effects on Benthos*

The fill will bury some infaunal benthic organisms in the beach. Most organisms in this high energy wave ecosystem are adapted for existence in an area with considerable substrate movement, and some will be able to burrow up through the fill material. Material placed on the beach will be similar to that of the existing beach, and the fill placement area is relatively small as compared to similar adjacent habitat. This minimizes impacts to infauna such as the coquina clam and mole crab, which play an important role in the food web (specifically to foraging birds). Full recovery should begin within 1 year, as has been documented with previous projects.

B. Water Circulation, Fluctuation and Salinity Determination.

1) *Water*

The placement of fill on the beach will increase turbidity in the nearshore area. Because the immediate nearshore area is a high energy system and subject to naturally-occurring elevated turbidity, increases due to the project will not be significant. Fill placement will have no long-term or significant impacts, if any, on salinity, water chemistry, clarity, color, odor, taste, dissolved gas levels, nutrients or eutrophication.

2) *Current Patterns and Circulation*

Currents in the project area are both tidal and longshore. Net movement of water due to the longshore current is from the north to the south. Placement of the fill on the beach will have no effect on the currents.

3) *Normal Water Level Fluctuations and Salinity Gradients*

Tides in the project area are a mixture of semi-diurnal and diurnal types. During part of each month two high and two low tides occur each day, and during the balance of the month only one high and one low tide occur each day. The mean tide level is 1.8 feet, referenced to mean low water (MLW). Salinity is that of ocean water. Fill placement will not affect normal tide fluctuations or salinity.

C. Suspended Particulate/Turbidity Determinations

1) Expected Changes in Suspended Particulates and Turbidity Levels in the Vicinity of the Disposal Site

There will be a temporary increase in turbidity levels in the project area during discharge. Turbidity will be short term and localized and no significant adverse impacts are expected. Turbidity will be monitored per State standards. If at any time the turbidity standard is exceeded, those activities causing the violation will cease.

2) Effects on the Chemical and Physical Properties of the Water Column

(a) Light Penetration. Light penetration will decrease during discharge in the immediate area where sand is being deposited on the beach. This effect will be temporary and will have no significant adverse impact on the environment.

(b) Dissolved Oxygen. Dissolved oxygen levels will not be altered significantly by this project due to high-energy wave action and associated adequate re-aeration rates.

(c) Toxic Metals, Organics, and Pathogens. No toxic metals, organics, or pathogens will be released by the project.

(d) Aesthetics. Aesthetic quality will be reduced during that period when work is occurring. There will be a long-term increase in aesthetic quality of the beach once the work is completed.

3) Effects on Biota

(a) Primary Productivity and Photosynthesis. Primary productivity is not a recognized, significant phenomenon in the surf zone, where a temporary increased level of suspended particulates will occur. There will be no effect on the nearshore productivity as a result of the proposed beach re-nourishment.

(b) Suspension/Filter Feeders. There will be no long-term adverse impact to suspension/filter feeders.

(c) Sight feeders. There will be no long-term adverse impact to sight feeders.

D. Contaminant Determinations

Deposited fill material will not introduce, relocate, or increase contaminants.

E. Aquatic Ecosystem and Organism Determinations

The fill material that will be placed on the beach will consist primarily of fine to medium grained sand-sized quartz that is similar enough to the existing substrate so that no impacts are expected.

1) Endangered and Threatened Species

Sea turtle nesting could occur in the project area during the time of the dredging and beach disposal. A nest relocation program will be implemented to discover, mark and relocate these nests. All sea turtle nests discovered within the beach disposal area will be removed and relocated to a nearby self-release beach hatchery. All relocation and incubation efforts will

conform to the guidelines in the “Manual of Sea Turtle Research and Conservation Techniques”, Second Edition, 1983, prepared for the Western Atlantic Sea Turtle Symposium and distributed by the Florida Department of Environmental Protection.

2) *Hardbottom Habitat*

No hardbottom habitat is known to exist in the project area.

F. Proposed Disposal Site Determinations

1) *Mixing Zone Determination*

The fill material will not cause unacceptable changes in the mixing zone specified in the Water Quality Certification in relation to depth, current velocity, direction and variability, degree of turbulence, stratification, or ambient concentrations of constituents.

2) *Determination of Compliance with Applicable Water Quality Standards*

The work will be conducted in accordance with the Water Quality Certification that will be issued for this project.

3) *Potential Effects on Human Use Characteristics*

(a) Municipal and Private Water Supplies. No municipal or private water supplies will be impacted by the implementation of the project.

(b) Recreational and Commercial Fisheries. Recreational and commercial fisheries may be temporarily impacted by the dredging of material and the placement of the material on the beach, but these impacts should be minimal and no long-term impacts are anticipated.

(c) Water Related Recreation. Water related recreation will be temporarily impacted during construction, but will be preserved and enhanced by the nourishment of the beach.

Depending on the portion of the St. Augustine Inlet system that is dredged, recreational vessels may benefit from improved navigation.

(d) Aesthetics. The stabilization of an eroding beach will improve aesthetics.

(e) Parks, National and Historic Monuments, National Seashores Wilderness Areas, Research Sites, and Similar Preserves. Anastasia State Park is located along the southern shoreline of the St. Augustine Inlet. Historic dredging of the inlet has caused

G. Determination of Cumulative Effects on the Aquatic Ecosystem

There will be no cumulative impacts that result in a major impairment of water quality of the existing aquatic ecosystem as a result of the placement of fill at the project site. Subsequent re-nourishment events will occur approximately every 12 years. The impact of depositing material on the beach during these events will be minor.

III. FINDINGS OF COMPLIANCE OR NON-COMPLIANCE WITH THE RESTRICTIONS OF DISCHARGE

A. No significant adaptations of the guidelines were made relative to this evaluation.

- B. No practicable alternative exists which meets the objectives of re-nourishment of the beach that does not involve placing fill into waters of the United States.
- C. The discharge of fill materials will not cause or contribute to, after consideration of disposal site dilution and dispersion, violations of any applicable State Water Quality Standards for Class III waters. The discharge operation will not violate the Toxic Effluent Standards of Section 307 of the Clean Water Act.
- D. The disposal of dredged material on the beach will not jeopardize the continued existence of any species listed as threatened or endangered or result in the likelihood of destruction or adverse modification of any critical habitat as specified by the Endangered Species Act of 1973, as amended.
- E. The placement of fill material will not result in significant adverse effects on human health and welfare, including municipal and private water supplies, recreational and commercial fishing, plankton, fish, shellfish, wildlife, and special aquatic sites. The life stages of aquatic species and other wildlife will not be significantly adversely affected. Significant adverse effects on aquatic ecosystem diversity, productivity and stability, and recreational, aesthetic, and economic values will not occur.
- F. On the basis of the guidelines, the proposed disposal site for the discharge of dredged material is specified as complying with the requirements of these guidelines with the inclusion of appropriate and practical conditions to minimize pollution or adverse effects on the aquatic ecosystem.

APPENDIX G-2

**COASTAL ZONE MANAGEMENT CONSISTENCY
DETERMINATION**

FLORIDA COASTAL ZONE MANAGEMENT PROGRAM FEDERAL CONSISTENCY EVALUATION PROCEDURES

1. Chapter 161, Beach and Shore Preservation.

The intent of the coastal construction permit program established by this chapter is to regulate construction projects located seaward of the line of mean high water and which might have an effect on natural shoreline processes.

Response: Dredging of sand from the sand source locations and placing it on the beach for re-nourishment will not violate the intent of this chapter and meets all regulations therein. The proposed plans and information will be submitted to the State in compliance with this chapter.

2. Chapters 186 and 187, State and Regional Planning.

These chapters establish the State Comprehensive Plan, which sets goals that articulate a strategic vision of the State's future. Its purpose is to define, in a broad sense, goals, and policies that provide decision-makers directions for the future and provide long-range guidance for an orderly social, economic, and physical growth.

Response: The proposed work has been planned with the cooperation of the State and will be coordinated with the relevant agencies during the comment period.

3. Chapter 252, Disaster Preparation, Response, and Mitigation.

This chapter creates a State emergency management agency with authority: to provide for the common defense; to protect the public peace, health, and safety; and to preserve the lives and property of the people of Florida.

Response: This chapter is not applicable to the re-nourishment of the St. Johns County Coastal Storm Damage Reduction project.

4. Chapter 253, State Lands.

This chapter governs the management of submerged State lands and resources within State lands. This includes archeological and historic resources; water resources; fish and wildlife resources; beaches and dunes; submerged grass beds and other benthic communities; swamps, marshes and other wetlands; mineral resources; unique natural features; submerged lands; spoil islands; and artificial reefs.

Response: The project is intended to preserve beach resources, provide needed sea turtle nesting beaches, and comply with pertinent State regulations and the intent of this chapter.

5. Chapters 253, 259, 260, and 375, Land Acquisition.

These chapters authorize the State to acquire land to protect environmentally sensitive areas.

Response: The project would not have an adverse effect on environmentally sensitive lands, and does not interfere with the authority set forth in these chapters.

6. Chapter 258, State Parks and Aquatic Preserves.

This chapter authorizes the State to manage State parks and preserves. Consistency with the statute would include consideration of projects that would directly or indirectly adversely impact park property, natural resources, park programs, management, or operations.

Response: This project will have no direct adverse impact on any state parks or preserves. While the Guana Tolomato Matanzas National Estuarine Research Reserve (GTMNERR) is located north of the project area, net transport of sand is to the south in this region. Any indirect adverse impacts resulting from the project are not likely to be observed at the GTMNERR.

7. Chapter 267, Historic Preservation.

This chapter establishes the procedures for implementing the Florida Historic Resources Act responsibilities.

Response: This project has been coordinated with the Florida State Historic Preservation Officer. Historic preservation compliance will be completed to meet all responsibilities under Chapter 267.

8. Chapter 288, Economic Development and Tourism.

This chapter directs the State to provide guidance and promotion of beneficial development through encouraging economic diversification and promoting tourism.

Response: Economic contribution from the project area will not be compromised by this action. The dredging and beach fill project will encourage recreational use of the area, which is consistent with the goals of this chapter.

9. Chapters 334 and 339, Public Transportation.

These chapters authorize the planning and development of a safe, balanced, and efficient transportation system.

Response: There will be no impacts to public transportation systems associated with this action.

10. Chapter 370, Saltwater Living Resources.

This chapter directs the State to preserve, manage, and protect the marine, crustacean, shell, and anadromous fishery resources in State waters; to protect and enhance the marine and estuarine environment; to regulate fishermen and vessels of the State engaged in the taking of such resources within or without State waters; to issue licenses for taking and processing products of fisheries; to secure and maintain statistical records of the catch of each such species; and to conduct scientific, economic, and other studies and research.

Response: Based upon the overall impacts of this work, this project is consistent with the goals of this chapter.

11. Chapter 372, Living Land and Freshwater Resources.

This chapter establishes the Florida Fish and Wildlife Conservation Commission and directs it to manage freshwater aquatic life and wild animal life and their habitat to perpetuate a diversity of species with densities and distributions which provide sustained ecological, recreational, scientific, educational, aesthetic, and economic benefits.

Response: Coordination with the Florida Fish and Wildlife Conservation Commission during the permit process to obtain water quality certification from the state of Florida will determine if this action is consistent with State policies and practices as set forth in this chapter.

12. Chapter 373, Water Resources.

This chapter provides the authority to regulate the withdrawal, diversion, storage, and consumption of water.

Response: This work does not involve water resources as described in this chapter.

13. Chapter 376, Pollutant Spill Prevention and Control.

This chapter regulates the transfer, storage, and transportation of pollutants and the cleanup of pollutant discharges.

Response: This action does not involve the transportation or discharging of pollutants. Environmental protection measures will be employed during construction and operation of the site to avoid inadvertent spills or other sources of pollution. Therefore, this action will be in compliance with this chapter.

14. Chapter 377, Oil and Gas Exploration and Production.

This chapter authorizes the regulation of all phases of exploration, drilling, and production of oil, gas, and other petroleum products.

Response: This work does not involve the exploration, drilling, or production of oil, gas, or other petroleum product; therefore, this Chapter is not applicable to the project.

15. Chapter 380, Environmental Land and Water Management.

This chapter establishes criteria and procedures to assure that local land development decisions consider the regional impact nature of proposed large-scale development.

Response: The proposed work has been determined to be consistent with the intent of this chapter.

16. Chapter 388, Arthropod Control.

This chapter provides for a comprehensive approach for abatement or suppression of mosquitoes and other pest arthropods within the State.

Response: The work would not further the propagation of mosquitoes or other pest arthropods.

17. Chapter 403, Environmental Control.

This chapter authorizes the regulation of pollution of the air and waters of the State by the FDEP.

Response: Water quality certification from the FDEP will be required for this project. No air pollution permits are required for the project. Effects of the operation of construction equipment on air quality will be minor and conform to State of Florida emission standards. Therefore, the work will comply with this chapter.

18. Chapter 582, Soil and Water Conservation.

This chapter establishes policy for the conservation of the State soil and water through the Department of Agriculture. Land use policies will be evaluated in terms of their tendency to cause or contribute to soil erosion, or to conserve, develop, and utilize soil and water resources both on-site and on adjoining properties affected by the work. Particular attention will be given to work on or adjacent to agricultural lands.

Response: This work does not involve agricultural lands as described in this chapter.

APPENDIX G-3
CORRESPONDENCE



United States Department of the Interior

Office of the Secretary
Office of Environmental Policy and Compliance
1849 C Street, NW - MS 5538 - MIB
Washington, D.C. 20240

JUN 26 2017

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Mr. Theodore A. Brown, P.E.
Chief, Planning and Policy Division
Directorate of Civil Works
U.S. Army Corps of Engineers
CECW-P (SA)
7701 Telegraph Road
Alexandria, VA 22315-3860

Re: St. Johns County, Florida – Coastal Storm Risk Management Feasibility Study,
Environmental Assessment and draft Chief of Engineers' Report

Dear Mr. Brown:

The Department of the Interior (Department) would like to thank the U.S. Army Corps of Engineers (USACE) for responding to the Department's comment letter, dated May 15, 2017, on the St. Johns County - Florida Coastal Storm Risk Management Study, Environmental Assessment, and draft Chief of Engineers' Report. We have reviewed the USACE's response letter, dated June 1, 2017, and find that the USACE has adequately addressed our concerns. As stated in the letter, USACE will work with the National Park Service (NPS) as the study proceeds. The NPS contact is Anita Barnett. Anita can be reached at 404-507-5706 or at anita_barnett@nps.gov.

Sincerely,

Michaela E. Noble
Director, Office of Environmental Policy
and Compliance

cc: Joyce Stanley, Department of the Interior, Atlanta, joyce_stanley@ios.doi.gov
Anita Barnett, National Park Service, anita_barnett@nps.gov

Electronic distribution: Aubree Hershoin, USACE, Aubree.G.Hershoin@usace.army.mil



DEPARTMENT OF THE ARMY
U.S. ARMY CORPS OF ENGINEERS
441 G STREET, NW
WASHINGTON, DC 20314-1000

JUN 01 2017

Planning and Policy Division

Ms. Michaela E. Noble
Office of Environmental Policy
United States Department of the Interior
1849 C Street, N.W.
Washington, D.C. 20240

Dear Ms. Noble:

This letter is in response to your comments on the St. Johns County, Florida Coastal Storm Risk Management Integrated Feasibility Study and Environmental Assessment provided on May 12, 2017. The Department of the Interior (DOI) expressed concern that the removal of sand from the ebb shoal would impact the St. Augustine Inlet system. The U.S. Army Corps of Engineers (USACE) understands and acknowledges the DOI's concern that changing one part of the inlet system can potentially affect other parts of the system. A detailed response to your specific comments on the study is enclosed.

We will continue to coordinate with the National Park Service as the study proceeds. We trust that the information in this letter sufficiently addresses any of your unresolved concerns. If you would like to discuss these issues further, please contact Aubree Hershorin at 904-232-2136 or Aubree.G.Hershorin@usace.army.mil.

Sincerely,

A handwritten signature in black ink that reads "Theodore A. Brown".

Theodore A. Brown, P.E.
Chief, Planning and Policy Division
Directorate of Civil Works

Encl

Enclosure: Response to Comments from May 12, 2017 Department of Interior Letter on the St Johns County, Florida Coastal Storm Risk Management Study

St. Augustine Inlet System Cumulative Impacts

Man-made activities that have occurred to the St. Augustine Inlet system include the initial construction of the channel through Vilano with construction of a rock jetty and terminal groin in the early 1940s, periodic maintenance dredging of the inlet and Intracoastal Waterway (IWW), and periodic dredging of the ebb shoal, inlet, and Vilano Point for beach nourishment at St. Augustine Beach (St. Johns County Shore Protection Project). The new change proposed by the Feasibility Study calls for dredging sand from the inlet complex for dune and beach nourishment in Vilano Beach.

Previous USACE sediment budget analyses and Coastal Modeling System modeling efforts investigated the impacts of dredging the ebb shoal on the inlet system. The findings of these previous efforts are documented in three technical reports published in 2012:

(<https://erdc-library.erdc.dren.mil/xmlui/handle/11681/7343>,
<https://erdc-library.erdc.dren.mil/xmlui/handle/11681/7350>,
<https://erdc-library.erdc.dren.mil/xmlui/handle/11681/7322>). These reports are referenced in Appendix G-5 (Responses to Public Comments) of the feasibility report. The reports made recommendations for how to best use the shoal complex as a sand source for beach nourishment without causing large scale morphological change to the ebb shoal and inlet system. These findings were used to update the St. Augustine Inlet Management Implementation Plan, which the Florida Department of Environmental Protection (FDEP) adopted in 2014.

Currently, there is approximately 6.5 million cubic yards of compatible sand available within the inlet system as detailed in the Feasibility Study. This volume is more than adequate to meet the initial construction volume. The periodic nourishment volume is 866,000 cubic yards every 12 years. The inlet management plan states that the bypassing objective is 278,000 cubic yards per year (cy/yr), of which one third (93,000 cy/yr) should go to beaches to the north and the remaining two thirds (185,000 cy/yr) to the south. Over 12 years, 1.1 million cubic yards would be available to meet the 866,000 cubic yard need for a periodic nourishment event (i.e. 93,000 cy/yr times 12 years). Since the volume requirements will not exceed the limitations stated in the St. Augustine Inlet Management Implementation Plan based on previous modeling and analysis, impacts are not anticipated for the additional dredging associated with the recommended plan outlined in the Feasibility Study. The previous modeling and analysis described above and referenced in the Feasibility Study should address the Department's first request regarding cumulative impacts on the inlet system.

Storm Surge Modeling

Monitoring efforts associated with recent dredging events will be used to update the amount of material available in the existing ebb shoal borrow area, and to best manage the sediments in the inlet system for all future projects that use the inlet complex as a borrow source. It is appropriate to complete modeling to assess potential storm surge and wave impacts associated with any future dredging in new areas of the inlet system in the Pre-construction Engineering and Design (PED) phase prior to construction, rather than as part of the Feasibility Study. This allows for additional monitoring of the ebb shoal and of the inlet system's performance following the next nourishment of St. Augustine Beach (anticipated for 2017) and any additional beneficial use or local maintenance work that might occur prior to construction at Vilano Beach. If the required volume for the recommended plan is available in the areas of the south lobe of the ebb shoal and navigation channel previously permitted for the St. Augustine Beach nourishment project, then those impacts have already been modeled as part of previous efforts. Any deviations from past events to dredge new areas of the inlet system or to dredge the existing areas deeper (for either the Vilano Beach or St. Augustine Beach projects) will undergo modeling by USACE during the PED phase to help ensure that negative impacts to the overall inlet system are avoided.

Prior to construction, USACE obtains water quality certification under the Clean Water Act from the FDEP through a Joint Coastal Permit. The FDEP reviews the specific sand source locations and the modeling to ensure that the proposed project complies with state and federal laws, and with the St. Augustine Inlet Management Implementation Plan. The modeling during the PED phase and the additional FDEP review prior to construction should address the Department's second request regarding a modeling study on storm surge and wave impacts.



United States Department of the Interior

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MAY 12 2017

Theodore A. Brown, P.E.
Chief, Planning and Policy Division
Directorate of Civil Works
U.S. Army Corps of Engineers
CECW-P (SA)
7701 Telegraph Road
Alexandria, VA 22315-3860

Re: St. Johns County, Florida – Coastal Storm Risk Management Feasibility Study,
Environmental Assessment and draft Chief of Engineers Report

Dear Mr. Brown:

The Department of the Interior (Department) has reviewed the U.S. Army Corps of Engineers' (USACE) three referenced documents regarding stabilizing beach areas within St. Johns County, Florida. We submit the following comments for USACE's consideration. Our comments pertain to the proposed removal of additional sand and whether that removal would result in impacts to the St. Augustine inlet system, especially the ebb shoal. Potential impacts may include: failing of the inlet system to recover between nourishment events, the ebb shoal reducing in size or becoming deflated, or the change in configuration of the inlet system. Changes to the inlet system and the ebb shoal may have impacts on the Castillo de San Marcos National Monument, a unit of the National Park Service (NPS).

The Castillo de San Marcos National Monument is near the study area and recently suffered significant flooding due to storm surge during Hurricane Matthew in October 2016. Any increase in storm surge or storm wave heights could have consequences for Castillo de San Marcos, the oldest masonry fort and the best-preserved example of a Spanish colonial fortification in the continental United States.

The Department requests that the Draft Integrated Feasibility Study and Environmental Assessment for the St. Johns County Coastal Storm Risk Management Project be revised to include: 1) an analysis of the cumulative impacts on the St. Augustine Inlet system (or shoal complex), which is the designated borrow source in the Tentatively Selected Plan (TSP); and (2) a modeling study to investigate potential effects on storm surge and storm waves that impact the barrier island shoreline adjacent to the Inlet, as well as the shoreline within St. Augustine Inlet including the St. Augustine Harbor waterfront itself.

St. Augustine Inlet System Cumulative Impacts

The St. Augustine Inlet system as described in the Feasibility Study consists of the ebb and flood shoals, Vilano Point shoals, the Federal navigation channel and any associated shoals. This inlet system, particularly the ebb shoal and inlet channel, are also used as a borrow source for the St. Johns County Federal Shore Protection project which places the sand on St. Augustine Beach. Although the Feasibility Study, as detailed in the Geotechnical Appendix D, indicates that there is more than adequate volume of beach quality sand within the inlet system to meet the needs of the TSP, these volume estimates appear to be based on geological cross sections developed from vibrocore borings taken before more recent dredging events that removed significant volumes of sand from the ebb shoal (2.1 million cubic yards) and Federal navigation channel (150,000 cubic yards). Volumes of sand currently available for the TSP will need to be recalculated to reflect the current conditions. The estimates of the available volume of beach quality sand within the ebb shoal apparently include the northern section of the ebb shoal which is not included within the designated borrow area in the St. Augustine Inlet Management Plan. Only the southern portion of the ebb shoal is apparently dredged for material that is placed on the St. Augustine Beach. These factors indicate that the estimates of available volumes of sand, particularly within the ebb shoal need to be updated.

Based upon these factors, which may affect the current quantity of available beach quality sand, especially within the ebb shoal, we recommend that a more complete and thorough analysis of the potential cumulative impacts on the St. Augustine Inlet system from multiple projects be included within the Feasibility Study. Our concern is whether the removal of additional sand volumes for this project will result in the inlet system (especially the ebb shoal) failing to recover between nourishment events, and that it will eventually become reduced in size or deflated, or possibly undergo a change in configuration.

Storm Surge Modeling

The Department also requests that USACE conduct a modeling study to investigate potential effects on storm surge and storm waves that impact the barrier island shoreline adjacent to the Inlet, as well as the shoreline within St. Augustine Inlet including the St. Augustine Harbor waterfront itself. The Feasibility Study indicated that the USACE modeled the sediment transport patterns in the ebb shoal of the inlet and concluded that dredging the ebb shoal in the quantities proposed in the TSP would not increase shoaling rates associated with the inlet. But the Feasibility Study does not discuss any other modeling studies on potential cumulative effects to the ebb shoal or inlet system from multiple projects. If cumulative impacts should result in changes in the volume or configuration of the ebb shoal, then these changes could lead to possible subsequent increases in storm surge and storm wave heights within and adjacent to the inlet. Any increase in storm surge or storm wave heights could have consequences for the St. Augustine waterfront, which includes Castillo de San Marcos National Monument. As noted previously the Castillo de San Marcos National Monument, recently suffered significant flooding due to storm surge during Hurricane Matthew in October 2016.

Thank you for the opportunity to review and provide comments. If you have any questions concerning these comments, please contact Anita Barnett, of the National Park Service, at 404-507-5706 or anita_barnett@nps.gov.

Sincerely,



Michaela E. Noble
Director, Office of Environmental Policy
and Compliance

cc: Joyce Stanley, Department of the Interior, Atlanta, joyce_stanley@ios.doi.gov
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REPLY TO
ATTENTION OF

CECW-PC

APR 13 2017

MEMORANDUM FOR Commander, South Atlantic Division, 60 Forsyth Street, SW,
Atlanta, Georgia 30303

SUBJECT: St. Johns County, Florida, Coastal Storm Risk Management Feasibility
Study

1. Reference page H-9 of ER 1105-2-100, 22 April 2000.
2. Washington level processing of subject report includes mailing letters to state and federal agencies requesting 30-day review of the proposed report of the Chief of Engineers and the report of the district engineer.
3. To expedite review of these reports, we are sending via Express Mail the package of these mailings, with instructions and mailing list, directly to the Jacksonville District. The Headquarter point of contact is Jeremy LaDart, who can be contacted at (202) 734-1861.

THEODORE A. BROWN, P.E.
Chief, Planning and Policy Division
Directorate of Civil Works

CF:
CESAF-PDP (Stratton)



DEPARTMENT OF THE ARMY
U.S. ARMY CORPS OF ENGINEERS
441 G STREET, NW
WASHINGTON, DC 20314-1000

REPLY TO
ATTENTION OF

Planning and Policy Division

APR 13 2017

The Honorable Richard L. Scott
Governor of Florida
Office of the Governor
400 S. Monroe Street
Tallahassee, Florida 32399

Dear Governor Scott:

The purpose of this letter is to notify you of the distribution of the proposed report of the Chief of Engineers and the report of the district engineer on the St. Johns County, Florida, Coastal Storm Risk Management Feasibility Study. In accordance with Executive Order 12372, Intergovernmental Review of Federal Programs, and the State process instituted by Florida; Public Law 78-534 (as amended by Public Law 104-303) pertaining to coordination procedures on water resources reports; and Public Law 85-624 pertaining to fish and wildlife, we have requested comments on the proposed report from single point of contact, Mr. Chris Stahl, Department of Environmental Protection. We will consider State process comments provided by the single point of contact to be the position of the State of Florida regarding the recommendation of the Chief of Engineers.

Comments of the State of Florida will be considered in determining whether the proposed report of the Chief of Engineers should be changed prior to its transmittal to the Secretary of the Army. These comments will be included with the report when it is transmitted to Congress.

Receipt of State views and recommendations within 30 days will facilitate expeditious processing of the final report of the Chief of Engineers.

Sincerely,

A handwritten signature in cursive script that reads "Theodore A. Brown".

Theodore A. Brown, P.E.
Chief, Planning and Policy Division
Directorate of Civil Works



DEPARTMENT OF THE ARMY
U.S. ARMY CORPS OF ENGINEERS
441 G STREET, NW
WASHINGTON, DC 20314-1000

REPLY TO
ATTENTION OF

Planning and Policy Division

APR 13 2017

Office of the Governor
Attn: Ms. Sally Bradshaw
400 S. Monroe Street
Tallahassee, Florida 32399

Dear Ms. Bradshaw:

The purpose of this letter is to notify you of the distribution of the proposed report of the Chief of Engineers and the report of the district engineer on the St. Johns County, Florida, Coastal Storm Risk Management Feasibility Study. In accordance with Executive Order 12372, Intergovernmental Review of Federal Programs, and the State process instituted by Florida; Public Law 78-534 (as amended by Public Law 104-303) pertaining to coordination procedures on water resources reports; and Public Law 85-624 pertaining to fish and wildlife, we have requested comments on the proposed report from single point of contact, Mr. Chris Stahl, Department of Environmental Protection. We will consider State process comments provided by the single point of contact to be the position of the State of Florida regarding the recommendation of the Chief of Engineers.

Comments of the State of Florida will be considered in determining whether the proposed report of the Chief of Engineers should be changed prior to its transmittal to the Secretary of the Army. These comments will be included with the report when it is transmitted to Congress.

Receipt of State views and recommendations within 30 days will facilitate expeditious processing of the final report of the Chief of Engineers.

Sincerely,

A handwritten signature in cursive script that reads "Theodore A. Brown".

Theodore A. Brown, P.E.
Chief, Planning and Policy Division
Directorate of Civil Works



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U.S. ARMY CORPS OF ENGINEERS
441 G STREET, NW
WASHINGTON, DC 20314-1000

REPLY TO
ATTENTION OF

Planning and Policy Division

APR 13 2017

Office of Environmental Policy
and Compliance
Attn: Ms. Lisa Treichel
1849 C Street NW/MS 2442-MIB
Washington, DC 20240

Dear Ms. Treichel:

Enclosed for your review and comment are two electronic copies of the proposed report of the Chief of Engineers and the report of the district engineer on the St. Johns County, Florida, Coastal Storm Risk Management Feasibility Study.

The final feasibility report and technical appendices supporting this Chief's Report are available for download from the following website:

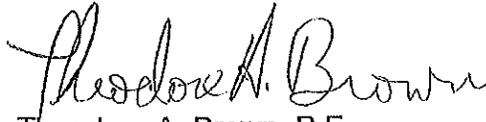
<http://www.saj.usace.army.mil/Missions/Civil-Works/Shore-Protection/St-Johns/>

In accordance with established coordination procedures on water resources reports, please furnish your comments and recommendations on any aspect of the report for which your agency has jurisdiction by law or has special expertise. In order to facilitate processing of this document in a timely manner, you are requested to provide any comments or recommendations within 30 days. Send your reply to me via email at [St. Johns-chiefs-report@usace.army.mil](mailto:St.Johns-chiefs-report@usace.army.mil) or to the following address:

Headquarters
U. S. Army Corps of Engineers
CECW-P (SA)
7701 Telegraph Road
Alexandria, VA 22315-3860

I appreciate your assistance with this review. Any questions on the proposed project or this request can be addressed to Jeremy LaDart at (202) 734-1861.

Sincerely,



Theodore A. Brown, P.E.
Chief, Planning and Policy Division
Directorate of Civil Works

Enclosures



DEPARTMENT OF THE ARMY
U.S. ARMY CORPS OF ENGINEERS
441 G STREET, NW
WASHINGTON, DC 20314-1000

REPLY TO
ATTENTION OF

Planning and Policy Division

APR 13 2017

Environmental Protection Agency
Attn: Ms. Heather McTeer Toney
Regional Administrator, Region 4
61 Forsyth Street SW
Atlanta, Georgia 30303

Dear Ms. Toney:

Enclosed for your review and comment are two copies of the proposed report of the Chief of Engineers and the report of the district engineer on the St. Johns County, Florida, Coastal Storm Risk Management Feasibility Study.

In accordance with established coordination procedures on water resources reports, please furnish your comments and recommendations on any aspect of the report for which your agency has jurisdiction by law or has special expertise. In order to facilitate processing of this document in a timely manner, you are requested to provide any comments or recommendations within 30 days. Send your reply to me at the following address:

Headquarters
U. S. Army Corps of Engineers
CECW-P (SA)
7701 Telegraph Road
Alexandria, VA 22315-3860

Response by email is acceptable at [St. Johns-chiefs-report@usace.army.mil](mailto:St.Johns-chiefs-report@usace.army.mil). I appreciate your assistance with this review. Any questions on the proposed project or this request can be addressed to Jeremy LaDart at (202) 734-1861.

Sincerely,

Theodore A. Brown, P.E.
Chief, Planning and Policy Division
Directorate of Civil Works

Enclosures



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U.S. ARMY CORPS OF ENGINEERS
441 G STREET, NW
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REPLY TO
ATTENTION OF

Planning and Policy Division

APR 13 2017

NOAA Fisheries Southeast Region
Attn: Mr. Noah Silverman
263 13th Avenue South
St. Petersburg, Florida 33701

Dear Mr. Silverman:

Enclosed for your review and comment is a copy of the proposed report of the Chief of Engineers and the report of the district engineer on the St. Johns County, Florida, Coastal Storm Risk Management Feasibility Study.

In accordance with established coordination procedures on water resources reports, please furnish your comments and recommendations on any aspect of the report for which your agency has jurisdiction by law or has special expertise. In order to facilitate processing of this document in a timely manner, you are requested to provide any comments or recommendations within 30 days. Please send your reply to me via email at [St. Johns-chiefs-report@usace.army.mil](mailto:St.Johns-chiefs-report@usace.army.mil) or to the following address:

Headquarters
U. S. Army Corps of Engineers
CECW-P (SA)
7701 Telegraph Road
Alexandria, VA 22315-3860

I appreciate your assistance with this review. Any questions on the proposed project or this request can be addressed to Jeremy LaDart at (202) 734-1861.

Sincerely,

Theodore A. Brown, P.E.
Chief, Planning and Policy Division
Directorate of Civil Works

Enclosures



DEPARTMENT OF THE ARMY
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WASHINGTON, DC 20314-1000

REPLY TO
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Planning and Policy Division

APR 13 2017

National Oceanic and Atmospheric Administration
Attn: Ms. Rachel Lipsy
1315 East West Highway, SSMC3, Room 15123
Silver Spring, Maryland 20910

Dear Ms. Lipsy:

Enclosed for your review and comment is a copy of the proposed report of the Chief of Engineers and the report of the district engineer on the St. Johns County, Florida, Coastal Storm Risk Management Feasibility Study.

In accordance with established coordination procedures on water resources reports, please furnish your comments and recommendations on any aspect of the report for which your agency has jurisdiction by law or has special expertise. In order to facilitate processing of this document in a timely manner, you are requested to provide any comments or recommendations within 30 days. Please send your reply to me via email at [St. Johns-chiefs-report@usace.army.mil](mailto:St_Johns-chiefs-report@usace.army.mil) or to the following address:

Headquarters
U. S. Army Corps of Engineers
CECW-P (SA)
7701 Telegraph Road
Alexandria, VA 22315-3860

I appreciate your assistance with this review. Any questions on the proposed project or this request can be addressed to Jeremy LaDart at (202) 734-1861.

Sincerely,

Theodore A. Brown, P.E.
Chief, Planning and Policy Division
Directorate of Civil Works

Enclosures



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U.S. ARMY CORPS OF ENGINEERS
441 G STREET, NW
WASHINGTON, DC 20314-1000

REPLY TO
ATTENTION OF

Planning and Policy Division

APR 13 2017.

Federal Emergency Management
Administration, Region IV
Attn: Ms. Chelsea Klein
Senior Environmental Specialist
3003 Chamblee Tucker Road
Atlanta, Georgia 30341

Dear Ms. Klein:

Enclosed for your review and comment are two copies of the proposed report of the Chief of Engineers and the report of the district engineer on the St. Johns County, Florida, Coastal Storm Risk Management Feasibility Study.

In accordance with established coordination procedures on water resources reports, please furnish your comments and recommendations on any aspect of the report for which your agency has jurisdiction by law or has special expertise. In order to facilitate processing of this document in a timely manner, you are requested to provide any comments or recommendations within 30 days. Please send your reply to me via email at [St. Johns-chiefs-report@usace.army.mil](mailto:St.Johns-chiefs-report@usace.army.mil) or to the following address:

Headquarters
U. S. Army Corps of Engineers
CECW-P (SA)
7701 Telegraph Road
Alexandria, VA 22315-3860

I appreciate your assistance with this review. Any questions on the proposed project or this request can be addressed to Jeremy LaDart at (202) 734-1861.

Sincerely,

Theodore A. Brown, P.E.
Chief, Planning and Policy Division
Directorate of Civil Works

Enclosures



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U.S. ARMY CORPS OF ENGINEERS
441 G STREET, NW
WASHINGTON, DC 20314-1000

REPLY TO
ATTENTION OF

Planning and Policy Division

APR 13 2017

The Honorable John Barrasso
Chairman, Committee on Environment
and Public Works
United States Senate
410 Dirksen Senate Office Building
Washington, DC 20510

Dear Mr. Chairman:

Enclosed for your information is a copy of the proposed report of the Chief of Engineers and the report of the district engineer on the St. Johns County, Florida, Coastal Storm Risk Management Feasibility Study. The district engineer's report is currently under review by the Office of Water Project Review. Upon completion of that review and receipt of comments on the proposed report from Federal agencies and the State, the Chief of Engineers will forward his final report to the Secretary of the Army.

Sincerely,

Theodore A. Brown, P.E.
Chief, Planning and Policy Division
Directorate of Civil Works

Enclosures



DEPARTMENT OF THE ARMY
U.S. ARMY CORPS OF ENGINEERS
441 G STREET, NW
WASHINGTON, DC 20314-1000

REPLY TO
ATTENTION OF

Planning and Policy Division

APR 13 2017

Mr. Greg Caldwell
Assistant Public Works Director
2740 Industry Center Road
St. Augustine, Florida 32084

Dear Mr. Caldwell:

For your information, enclosed is a copy of the proposed report of the Chief of Engineers and the report of the district engineer on the St. Johns County, Florida, Coastal Storm Risk Management Feasibility Study.

The district engineer's report is currently under review by the Office of Water Project Review. Upon completion of that review and receipt of comments on the proposed report from Federal agencies and the State, the Chief of Engineers will forward his final report to the Secretary of the Army.

Sincerely,

A handwritten signature in black ink that reads "Theodore A. Brown".

Theodore A. Brown, P.E.
Chief, Planning and Policy Division
Directorate of Civil Works

Enclosures



DEPARTMENT OF THE ARMY
U.S. ARMY CORPS OF ENGINEERS
441 G STREET, NW
WASHINGTON, DC 20314-1000

REPLY TO
ATTENTION OF

Planning and Policy Division

APR 13 2017

State of Florida
Department of Environmental Protection
Attn: Mr. Chris Stahl
2600 Blair Stone Road, Mail Station 47
Tallahassee, Florida 32399

Dear Mr. Stahl:

Enclosed are thirteen copies of the proposed report of the Chief of Engineers and the report of the district engineer on the St. Johns County, Florida, Coastal Storm Risk Management Feasibility Study.

In accordance with Executive Order 12372, Intergovernmental Review of Federal Programs, and the State process instituted by Florida, we request your comments and recommendations, as the State single point of contact, on the proposed report. As set forth in Public Law 78-534 (as amended by Public Law 104-303) pertaining to coordination procedures on water resources reports and Public Law 85-624 pertaining to fish and wildlife, please submit your comments and recommendations (including the views of the agency responsible for fish and wildlife) within 30 days. Please send your reply to me via email to [St. Johns-chiefs-report@usace.army.mil](mailto:St.Johns-chiefs-report@usace.army.mil) or to the following address:

Headquarters
U. S. Army Corps of Engineers
CECW-P (SA)
7701 Telegraph Road
Alexandria, VA 22315-3860

I appreciate your assistance with this review. Any questions on the proposed project or this request can be addressed to Jeremy LaDart at (202) 734-1861.

The position of the State of Florida will be considered in determining whether the proposed report of the Chief of Engineers should be changed prior to its transmittal to the Secretary of the Army. If all State process recommendations cannot be

accommodated in the final report of the Chief of Engineers, you will be so informed. Your comments will be included with the report when it is transmitted to Congress. A copy of the transmittal letter will be provided when the Secretary of the Army transmits the report to Congress.

Sincerely,



Theodore A. Brown, P.E.
Chief, Planning and Policy Division
Directorate of Civil Works

Enclosures



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U.S. ARMY CORPS OF ENGINEERS
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REPLY TO
ATTENTION OF

Planning and Policy Division

APR 13 2017

The Honorable Marcellus W. Osceola, Jr.
Chairman, Seminole Tribe of Florida
6300 Stirling Road
Hollywood, Florida 33024

Dear Chairman:

Enclosed for your information please find included a CD that contains the proposed report of the Chief of Engineers and the report of the district engineer on the St. Johns County, Florida, Coastal Storm Risk Management Feasibility Study. These documents can also be downloaded at:

<http://www.saj.usace.army.mil/missions/civil-works/shore-Protection/St-Johns/>

The district engineer's report is currently under review by the Office of Water Project Review. Upon completion of that review and receipt of comments on the proposed report from federal agencies and the State, the Chief of Engineers will forward his final report to the Secretary of the Army.

Sincerely,

A handwritten signature in black ink, appearing to read "Theodore A. Brown".

Theodore A. Brown, P.E.
Chief, Planning and Policy Division
Directorate of Civil Works

Enclosure

Cc (without enclosure):
Dr. Paul N. Backhouse, Ph.D.
Seminole Tribe of Florida
Tribal Historic Preservation Officer
Ah-Tah-Thi-Ki Museum
30290 Josie Billie Hwy
PMB 1004
Clewiston, Florida 33440

Cherise Maples, Director
Environmental Resource Management
Seminole Tribe of Florida
6300 Stirling Road
Hollywood, FL 33024

Patricia Powers
Bose Public Affairs Group
2000 M Street, N.W., Suite 520
Washington, D.C. 20036

Jim Shore
General Counsel, Seminole Tribe of Florida
6300 Stirling Road
Hollywood, FL 33024

Stephen A. Walker
Outside Counsel
Lewis, Longman and Walker
515 North Flagler Drive, Suite 1500
West Palm Beach, FL 33401

Michelle Diffenderfer
Outside Counsel
Lewis, Longman and Walker
515 North Flagler Drive, Suite 1500
West Palm Beach, FL 33401



DEPARTMENT OF THE ARMY
U.S. ARMY CORPS OF ENGINEERS
441 G STREET, NW
WASHINGTON, DC 20314-1000

REPLY TO
ATTENTION OF

Planning and Policy Division

APR 13 2017

The Honorable Billy Cypress
Chairman, Miccosukee Tribe of Indians
of Florida
Post Office Box 440021
Tamiami Station
Miami, Florida 33144

Dear Chairman:

Enclosed for your information is a hard copy of the proposed report of the Chief of Engineers and of the report of the district engineer on the St. Johns County, Florida, Coastal Storm Risk Management Feasibility Study. These documents can also be downloaded at:

<http://www.saj.usace.army.mil/missions/civil-works/shore-Protection/St-Johns/>

The district engineer's report is currently under review by the Office of Water Project Review. Upon completion of that review and receipt of comments on the proposed report from federal agencies and the State, the Chief of Engineers will forward his final report to the Secretary of the Army.

Sincerely,

Theodore A. Brown, P.E.
Chief, Planning and Policy Division
Directorate of Civil Works

Enclosures

Cc (with hard copy):
Fred Dayhoff
NAGPRA Representative
Consultant to Miccosukee Tribe
HC 61 SR 68 Old Loop Road
Ochopee, FL 34141

Cc (without enclosures):

Kevin Donaldson
Real Estate Services
Miccosukee Tribe of Indians of Florida
P.O. Box 440021
Tamiami Station
Miami, FL 33144

Gene Duncan
Director, Water Resources Department
Miccosukee Tribe of Indians of Florida
P.O. Box 440021
Tamiami Station
Miami, FL 3314



Florida Department of Environmental Protection

Bob Martinez Center
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Rick Scott
Governor

Carlos Lopez-Cantera
Lt. Governor

Ryan E. Matthews
Interim Secretary

February 22, 2017

Aubree Hershorin, Ph.D.
Plan Formulation Branch
Coastal/Nav Section Planning and Policy Division
U.S. Army Corps of Engineers
701 San Marco Blvd.
Jacksonville, FL 32207

RE: Department of the Army - District Corps of Engineers - Integrated Draft Feasibility Study and Environmental Assessment of a Coastal Storm Risk Management Project, St. Johns County, Florida.
SAI # FL201602247563C

Dear Ms. Hershorin:

The Florida State Clearinghouse has coordinated the state's review of the Draft IFS/EA under the following authorities: Presidential Executive Order 12372; Section 403.061(42), *Florida Statutes*; the Coastal Zone Management Act (16 U.S.C. §§ 1451 *et seq.*, as amended); and the National Environmental Policy Act (42 U.S.C. §§ 4321-4347, as amended).

The Florida Department of Environmental Protection and the Florida Fish and Wildlife Conservation Commission submitted comments, concerns and recommendations regarding the Draft IFS/EA in the attached memorandum, letter and Clearinghouse database report, which are incorporated herein by this reference and made an integral part of this letter.

Based on the information contained in the Draft IFS/EA and the enclosed state agency comments, the state has determined that, *at this stage*, the proposed federal activities are consistent with the Florida Coastal Management Program (FCMP) and should not compromise state water quality standards. To ensure the project's continued consistency with the FCMP, the concerns identified by our reviewing agencies must be addressed prior to project implementation. The state's continued concurrence will be based on the activities' compliance with FCMP authorities, including federal and state monitoring of the activities to ensure their continued conformance, and the adequate resolution of issues

Aubree Hershorin
SAI# FL201602247563C
February 22, 2017
Page 2

identified during this and subsequent regulatory reviews. The state's final concurrence of the project's consistency with the FCMP and water quality certification will be determined during the environmental permitting process, in accordance with Section 373.428, *Florida Statutes*.

Thank you for the opportunity to review the draft document. Should you have any questions regarding this letter, please don't hesitate to contact me at Chris.Stahl@dep.state.fl.us or (850) 717-9076.

Yours sincerely,

Chris Stahl

Chris Stahl, Coordinator
Florida State Clearinghouse
Office of Intergovernmental Programs

Enclosures

cc: Roxane Dow, DEP BMESP
Scott Sanders, FWC



Florida Department of Environmental Protection

Bob Martinez Center
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Rick Scott
Governor

Carlos Lopez-Cantera
Lt. Governor

Ryan E. Matthews
Interim Secretary

Memorandum

TO: Chris Stahl, Coordinator, Florida State Clearinghouse
FROM: Roxane Dow, Beaches, Inlets and Ports Program
SUBJECT: Draft Integrated Feasibility Study and Environmental Assessment (EA) for St. John's County.
DATE: February 22, 2017

The Army Corps of Engineers (Corps) examined opportunities to reduce the risk of coastal damages and improve conditions on roughly 9.8 miles of beach. The study area consisted of 3.8 miles in the South Ponte Vedra area, 3.7 miles in Vilano Beach and 2.3 in Summer Haven.

The tentatively selected plan (TSP) includes beach and dune nourishment within the Vilano Beach reach and a small portion of the South Ponte Vedra Beach reach (R103.5-116.5). During the study process, the team screened out the Summer Haven area because St. Johns County is already conducting managed retreat; and, most of the South Ponte Vedra area due to its lack of public parking and access.

The TSP design consists of a 60-foot seaward berm extension and maintenance of the existing dune along 2.6 miles, approximately from the southern end of the Serenata Beach Club to San Pelayo Court. Initial construction would use about 1.3 million cubic yards of material and the periodic nourishments would use roughly 866,000 cubic yards each. The sand source is the St. Augustine Inlet system, in accordance with the St. Augustine Inlet Management Plan.

Staff from the Division of Water Resource Management worked with the Corp on the study and concur that the study and EA are consistent with our authorities under the Coastal Zone Management Plan. Final consistency for construction will be in the form for a permit issued by the Department.

cc. Lainie Edwards



Florida Fish and Wildlife Conservation Commission

Commissioners

Brian Yablonski
Chairman
Tallahassee

Aliese P. "Liesa" Priddy
Vice Chairman
Immokalee

Ronald M. Bergeron
Fort Lauderdale

Richard Hanas
Oviedo

Bo Rivard
Panama City

Charles W. Roberts III
Tallahassee

Robert A. Spottswood
Key West

Executive Staff

Nick Wiley
Executive Director

Eric Sutton
Assistant Executive Director

Jennifer Fitzwater
Chief of Staff

Office of the
Executive Director

Nick Wiley
Executive Director

(850) 487-3796
(850) 921-5786 FAX

Managing fish and wildlife resources for their long-term well-being and the benefit of people.

620 South Meridian Street
Tallahassee, Florida
32399-1600
Voice: (850) 488-4676

Hearing/speech-impaired:
(800) 955-8771 (T)
(800) 955-8770 (V)

MyFWC.com

March 31, 2016

Chris Stahl, Coordinator
Florida State Clearinghouse
Florida Department of Environmental Protection
3900 Commonwealth Blvd, M.S. 47
Tallahassee, FL 32399-3000
Chris.Stahl@dep.state.fl.us

Re: SAI #FL201602247563C, Department of the Army, Jacksonville District Corps of Engineers, Draft Integrated Feasibility Study and Environmental Assessment, Coastal Storm Risk Management Project, St. Johns County

Dear Mr. Stahl:

Florida Fish and Wildlife Conservation Commission (FWC) staff has reviewed the above-referenced project, and provides the following comments and recommendations for your consideration in accordance with Chapter 379, Florida Statutes, and the Coastal Zone Management Act, Florida's Coastal Management Program.

Project Description

The U.S. Army Corps of Engineers (USACE) is conducting a feasibility study to investigate alternatives for coastal storm risk management of three reaches along the Atlantic coast of St. Johns County: 1) South Ponte Vedra from Florida Department of Environmental Protection (FDEP) monuments R-84 to R-104 (3.8 miles), 2) Vilano Beach from R-104 to R-117 (2.6 miles) and R-117 to the St. Augustine Inlet North Sand-trap Groin (1.1 miles), and 3) Summer Haven from R-197 to R-209 (2.3 miles). The USACE has prepared an interim Draft Integrated Feasibility Study and Environmental Assessment report that describes existing conditions of these three areas: projected conditions if a project is not implemented to address impacts from storm-induced beach erosion; formulation of plan alternatives; and environmental effects that may be associated with a plan.

The USACE has examined and conducted modeling of structural and non-structural management measures with the goal of arriving at a plan that would address erosion-related problems while maximizing benefits, including protection and enhancement of natural resources. The tentatively selected plan consists of:

- Construction of a 60-foot berm extension, a portion reflecting the average 2015 dune position, and tapers extending from monument R-102.5 to R-117.5.
- Dune construction material will consist of sand hydraulically dredged from the St. Augustine Inlet system, including the ebb, flood, Vilano Point Shoals, federal navigation channel, and associated shoals.
- Construction will include an initial event and four periodic nourishment events over 12-year intervals.

As discussed in Section 3.8 of the report, the USACE has eliminated the Summer Haven reach from further analysis based in part on the following:

- Major infrastructure, such as State Road A1A, has already been relocated landward due to erosion.
- The project's local sponsor, St. Johns County, has been purchasing properties within the Summer Haven beach area and is precluding them from development.
- With the number of structures in the area getting smaller, the USACE believes it unlikely that damages would justify a federal Coastal Storm Risk Management project.

Potentially Affected Resources

Section 2.3.3 of the draft report identifies the following as species for which the proposed project areas may provide habitat:

- Green sea turtle (*Chelonia mydas*, Federally Endangered [FE])
- Loggerhead sea turtle (*Caretta caretta*, Federally Threatened [FT])
- Leatherback sea turtle (*Dermochelys coriacea*, FE)
- Kemp's ridley sea turtle (*Lepidochelys kempii*, FE)
- Hawksbill sea turtle (*Eretmochelys imbricate*, FE)
- West Indian manatee (Florida manatee, *Trichechus manatus latirostris*, FE)
- Smalltooth sawfish (*Pristis pectinate*, FE)
- Piping plover (*Charadrius melodus*, FT)
- Red knot (*Calidris canutus*, FT)
- Anastasia Island beach mouse (*Peromyscus polionotus phasma*, FE)
- North Atlantic right whale (*Eubalaena glacialis*, FE)

In addition, portions of the proposed project area are known to provide habitat for least terns (*Sterna antillarum*, State Threatened).

Comments

Section 4 of the report addresses anticipated effects that may result from the tentatively selected plan. The USACE has determined that the tentatively selected plan "may affect but is not likely to adversely affect" sea turtles in the water, manatees, right whales, or the smalltooth sawfish. FWC staff recognizes that a number of measures for avoiding and minimizing potential impacts to these species are identified in the report, including:

- Adherence to the terms and conditions of the National Marine Fisheries Service (NMFS) South Atlantic Division Regional Biological Opinions (SARBO) that are intended to minimize incidental take of marine turtles.
- Adherence to the U.S. Fish and Wildlife Service's revised State Programmatic Biological Opinion, dated August 22, 2011, for the USACE planning and regulatory sand placement activities and their effects on sea turtles and beach mice.
- Specific protective measures for manatees and North Atlantic right whales.
- Implementation of USACE migratory bird protection measures if construction occurs in summer months.

FWC staff is available to assist in refining measures discussed in the report, as well as formulating additional avoidance and minimization measures for fish and wildlife resources as project specifications are developed.

While the Summer Haven reach has been excluded from further consideration, FWC staff provides the following information should this beach area be discussed at some future point in the

project study. FDEP issued Joint Coastal Permit (JCP) Number 0313002-001-JC to the St. Augustine Port, Waterway, and Beach District on February 6, 2014, for excavation of sand from the Summer Haven River, placement of the sand onto the adjacent beach for restoration of a dune system between monuments R-200 and R-208, and creation of least tern habitat. In 2008, a breach occurred on the south side of R-200 and natural coastal processes subsequently deposited sand into the river closing the breach in 2011. Since 2010 the beach area between R-200 and R-202 has provided habitat for a nesting colony of least terns. The project authorized by the JCP will result in "take" of the state-listed least tern (as defined in Chapter 68A-27, Florida Administrative Code), and therefore necessitated issuance of an Incidental Take Permit from FWC. Should a project be proposed by the USACE in the Summer Haven reach or any other area within least tern or other listed species habitat, the requirements of Chapter 68A-27 would apply.

We appreciate the opportunity to review the Draft Feasibility Study and EA and we look forward to further coordination during preparation of the final reports to ensure that potential impacts to fish and wildlife resources are minimized. We find the information submitted in this conceptual Draft Integrated Feasibility Study and Environmental Assessment consistent with FWC's authorities under Chapter 379, F.S. We will continue to work with the applicant as new information is incorporated into the Draft Integrated Feasibility Study and Environmental Assessment to help ensure the project remains consistent with Chapter 379, F.S. If you need any further assistance, please do not hesitate to contact Jane Chabre either by phone at (850) 410-5367 or by email at FWCConservationPlanningServices@MyFWC.com. If you have specific technical questions regarding the content of this letter, please contact Laura DiGruttolo by phone at (352) 732-1225 or by email at Laura.DiGruttolo@MyFWC.com.

Sincerely,



Jennifer D. Goff
Land Use Planning Administrator
Office of Conservation Planning Services

jdg/lid
ENV 1-3-2
Coastal Storm Risk Management Project EA_30540_033116

cc: Aubree Hershorin, Ph.D., USACE, Aubree.G.Hershorin@usace.army.mil



DEPARTMENT OF THE ARMY
JACKSONVILLE DISTRICT CORPS OF ENGINEERS
701 SAN MARCO BOULEVARD
JACKSONVILLE, FLORIDA 32207-0019

REPLY TO
ATTENTION OF

Planning and Policy Division
Environmental Branch

FEB 14 2017

Ms. Virginia Fay
Assistant Regional Administrator
Habitat Conservation Division
National Marine Fisheries Service
263 13th Avenue South
St. Petersburg, Florida 33701-5505

Dear Ms. Fay:

This letter acknowledges the U. S. Army Corps of Engineers (Corps), Jacksonville District, receipt of your January 20, 2017 letter regarding the Essential Fish Habitat (EFH) consultation for the Integrated Feasibility Study and Environmental Assessment, Coastal Storm Risk Management Project, South Ponte Vedra Beach, Vilano Beach, and Summer Haven Reaches, St. Johns County, Florida. The National Marine Fisheries Service (NMFS) continues to express concern regarding potential impacts to EFH resulting from this project. The Corps reviewed and considered the remaining concerns presented by NMFS in its most recent letter, and has prepared the enclosed responses as required under the Magnuson-Stevens Fisheries Conservation and Management Act [MSFCMA; 50 CFR § 600.920(k)].

The Corps appreciates the input provided by NMFS on this project to develop measures that avoid impacts to National Oceanic and Atmospheric Association's trust resources. The submission of the enclosed responses completes the Corps' requirements for EFH consultation under the MSFCMA's EFH provisions. Any questions regarding this project should be directed to Dr. Aubree Hershorin at the letterhead address, or by telephoning 904-232-2136.

Sincerely,

Gina Paduano Ralph, Ph.D.
Chief, Environmental Branch

Enclosure

Copy Furnished:

Dr. Ken Riley, 101 Pivers Island Road, Beaufort, North Carolina, 28516-9722

FEB 14 2017

**INTEGRATED FEASIBILITY STUDY AND ENVIRONMENTAL ASSESSMENT
COASTAL STORM RISK MANAGEMENT PROJECT
South Ponte Vedra Beach, Vilano Beach, and Summer Haven Reaches
St. Johns County, Florida**

**U.S. Army Corps of Engineers (Corps) Responses to
National Marine Fisheries Service 10-Day Letter (January 20, 2017)**

National Marine Fisheries Service (NMFS) conservation recommendations are listed below in bold, with their subsequent comments in italics and the U.S. Army Corps of Engineers Jacksonville District (Corps) response is provided for each.

1. Best management practices, such as restricting the time of year that construction activities including sand mining, beach and dune nourishment, and berm erection, should be included to reduce impacts to EFH and vulnerable life stages of federally managed fishery species.

The District's letter indicates the CSR project will implement best management practices during project construction to minimize impacts to EFH while also considering risks to other protected species. The NMFS believes the District's letter minimally addresses the specific timing or environmental window for scheduling in-water construction and dredging. The NMFS believes the CSR project would minimize impacts to larval and juvenile fishes as well as benthic fauna by maintaining the requirement for in-water construction to occur only during the winter months (November 1 to April 30). Adherence to this window would ensure sediment removal and placement occurs before the spring recruitment period for fish and invertebrates and seasonal peaks in biological productivity. The NMFS concludes more information is needed on build plans and construction timing to fully address conservation recommendation 2.

The Corps maintains that the impacts that may occur to larval fishes, juvenile fishes, and benthic fauna are temporary in nature and limited in scope to a small dredge area. Turbidity impacts are anticipated to be minimal and localized in nature due to the coarse sand located in the sand source area. Further, the renourishment interval for this project is 12 years; therefore, impacts will occur infrequently.

The Corps will attempt to manage construction timeframes to minimize impacts to EFH while also considering the risks to other protected species (including sea turtles and shorebirds). Funding restrictions and limitations must also be taken into account when managing construction schedules. The NMFS-recommended windows will be taken into consideration to the maximum extent practicable. The Corps maintains that the temporary, limited, and infrequent dredging proposed at the ebb shoal of the St. Augustine Inlet will have minimal effects on essential fish habitat.

2. A scientifically supported rationale should be provided for concluding impacts to benthic communities at beach nourishment sites would be minimal. Alternatively, best management practices should be included in the design of beach and dune nourishment and a monitoring program should be in place to evaluate the effectiveness of those best management practices.

The District indicates a substantial number of studies demonstrate the effects of beach nourishment on benthic invertebrates. While we generally agree, there is a need for regional appraisal of impacts on nourished beaches and indirect impacts on prey resources and foraging habitat provided by the beach shoreline complex. The District's letter references two peer-reviewed studies that are quite distant from the project location (i.e., North Carolina and Australia). The District should base its recovery rate forecasts on relevant peer-reviewed studies conducted within the same biogeographic province as the project. The CSRMM project should include a biological monitoring and adaptive management plan that reflects substantive input from NMFS to assess degradation of benthic habitats along the 60-foot equilibrated seaward berm extension. Additionally, the NMFS recommends the Jacksonville District consider modifications to engineering and construction practices referenced in Schlacher et al. (2012) to minimize ecological impacts. Most notable is the guidance for sand fill to minimize mortality by burial and preservation of unfilled intertidal areas that foster re-colonization of resident fauna. The NMFS concludes more information and a scientifically supported rationale is needed to conclude impacts to benthic communities at beach nourishment sites would be temporary and minimal.

While the Corps generally agrees that additional site-specific information on impacts to benthic communities at beach nourishment sites would be beneficial, studies conducted at other sites provide adequate basis for concluding that minimal, temporary impacts to the benthic communities at the placement site would occur. While these studies may have limitations, it is outside of the authority provided under the Corps' flood risk management program to conduct research.

In addition to the studies previously cited, Bowen and Marsh (1988) studied benthic faunal colonization of a borrow pit associated with the Delray Beach, Florida, beach nourishment project. They found abundance of organisms peaked at 170 days post-dredging, and species richness peaked at 296 days post-dredging.

The recovery after 296 days was found to mimic that of a five-year-old borrow pit, although they noted differences in species composition between the two pits. Wilber et al. (2003) conducted extensive sampling of surf zone fisheries between 1995 and 1999 on the northern coast of New Jersey. They noted that the impacts of beach nourishment on the species monitored were primarily attraction and avoidance responses to the construction operation. They recommended future studies focus on specific mechanisms of impacts to species of concern. An unpublished study by Lacharmoise, Barrailler, and Horwell (2003) found that *Emerita* and *Donax* spp. populations, while impacted during nourishment, had fully recovered by the year following nourishment. Finally, Hayden and Dolan (1974) suggested that beach nourishment most likely causes the redistribution of sand crabs (*Emerita talpoida*) rather than massive mortality, which is more apparent with higher fines content. Since the time of the Hayden and Dolan study, most states have implemented strict standards and sand grain size and color for sediments intended for beach placement. The sediment located in the St. Augustine Inlet system is within the sand sharing system of the adjacent beaches, and is compatible with the sediment at the placement site.

Sand placement occurs primarily above the mean low water line. Sand movement during the beach equilibration process is gradual, and impacts to benthic species are likely to be similar to those experienced during a large storm event. The purpose of this project is to provide flood protection to coastal infrastructure from coastal storms. While the recommendations made in Schlacher, et al. (2012), may be implementable for projects beneficially using dredged materials, their implementation as part of a coastal storm risk management project would not meet the project's objectives.

REFERENCES:

- Bowen, P. R., & Marsh, G. A. (1988). Benthic faunal colonization of an offshore borrow pit in Southeastern Florida. US Army Corps of Engineers, Environmental Laboratory.
- Hayden, B., & Dolan, R. (1974). Impact of Beach Nourishment on Distribution of *Emerita Talpoia*, the Common Mole Crab. Journal of the Waterways, Harbors and Coastal Engineering Division, 100(2), 123-132.
- Lacharmoise, F., V. Barrailler, and T. Horwell. (2003). Beach Nourishment on Invertebrate Population Densities. (unpublished) Brevard County, Florida.
- Wilber, D. H., Clarke, D. G., Ray, G. L., & Burlas, M. H. (2003). Surf zone fish responses to beach nourishment on the northern coast of New Jersey. *Marine Ecology Progress Series*, 250, 231-246.



United States Senate

WASHINGTON, DC 20510-0905

BILL NELSON
FLORIDA

February 2, 2017

Lieutenant General Todd Semonite
Commanding General and Chief of Engineers
U.S. Army Corps of Engineers
441 G Street NW
Washington, DC 20314

Dear Lieutenant General Semonite,

I urge you to expedite two important beach renourishment projects in St. Johns that are critical to helping the county recover from Hurricane Matthew and protect coastal infrastructure against future storms.

The first project, the St. Johns County Coastal Storm Risk Management Project, needs federal funding for the design phase, which can be paid for with disaster relief funding that Congress provided the Army Corps in the recently passed Continuing Resolution (P.L. 114-254).

The second project, the St. Johns County Beach Erosion Control Project, is scheduled to receive renourishment funding this spring. I ask that you do everything in your power to ensure this renourishment is completed as quickly as possible.

Together, these two projects would bolster the shoreline in St. Johns County, protect the area from future storm damage, and provide important habitat for nesting sea turtles. The Army Corps should work with the local community to complete them in a timely manner.

Thank you for consideration of this request.

Sincerely,

A handwritten signature in blue ink that reads "Bill Nelson". The signature is written in a cursive style with a long, sweeping underline.



UNITED STATES DEPARTMENT OF COMMERCE

National Oceanic and Atmospheric Administration

NATIONAL MARINE FISHERIES SERVICE

Southeast Regional Office

263 13th Avenue South

St. Petersburg, Florida 33701-5505

<http://sero.nmfs.noaa.gov>

January 20, 2017

F/SER47:KR/pw

(Sent via Electronic Mail)

Colonel Jason A. Kirk, Commander
Jacksonville District Corps of Engineers
PO Box 4970
Jacksonville, Florida 32232-0019

Attention: Aubree G. Hershorin

Dear Colonel Kirk:

NOAA's National Marine Fisheries Service (NMFS) reviewed the letter dated, December 28, 2016, from the Jacksonville District regarding the draft *Integrated Feasibility Study and Environmental Assessment, Coastal Storm Risk Management Project, South Ponte Vedra Beach, Vilano Beach, and Summer Haven Reaches, St. Johns County, Florida (CSR)*. The Jacksonville District proposes projects to increase beach and shoreline protection along 9.8 miles of beach in St. Johns County. The letter replies to conservation recommendations the NMFS provided by letter dated April 4, 2016, to protect essential fish habitat (EFH).

The NMFS recommended:

1. A scientifically supported rationale should be provided for assessment of alternative sand sources not included in the TSP; preferably from offshore sources or upland dredged material management areas; and capable of providing the required beach compatible sand while reducing impacts to critically important EFH associated with tidal inlets.
2. Best management practices, such as restricting the time of year that construction activities including sand mining, beach and dune nourishment, and berm erection, should be included to reduce impacts to EFH and vulnerable life stages of federally managed fishery species.
3. A scientifically supported rationale should be provided for concluding impacts to benthic communities at beach nourishment sites would be minimal. Alternatively, best management practices should be included in the design of beach and dune nourishment and a monitoring program should be in place to evaluate the effectiveness of those best management practices.
4. A scientifically supported rationale should be provided for concluding impacts to nearshore hardbottom communities within the project area would be minimal. Alternatively, environmental and geological surveys would assess the extent of nearshore hardbottom habitat that would be impacted and a monitoring program should be in place to avoid and minimize sand placement on nearshore hardbottom habitats.



The District describes the extensive sand search undertaken to locate sand resources suitable for placement at the project site. Available offshore sand sources are distant and insufficient in quantity to be cost effective. The NMFS concludes the rationale provided addresses conservation recommendation 1.

The District's letter indicates the CSRSM project will implement best management practices during project construction to minimize impacts to EFH while also considering risks to other protected species. The NMFS believes the District's letter minimally addresses the specific timing or environmental window for scheduling in-water construction and dredging. The NMFS believes the CSRSM project would minimize impacts to larval and juvenile fishes as well as benthic fauna by maintaining the requirement for in-water construction to occur only during the winter months (November 1 to April 30). Adherence to this window would ensure sediment removal and placement occurs before the spring recruitment period for fish and invertebrates and seasonal peaks in biological productivity. The NMFS concludes more information is needed on build plans and construction timing to fully address conservation recommendation 2.

The District indicates a substantial number of studies demonstrate the effects of beach nourishment on benthic invertebrates. While we generally agree, there is a need for regional appraisal of impacts on nourished beaches and indirect impacts on prey resources and foraging habitat provided by the beach shoreline complex. The District's letter references two peer-reviewed studies that are quite distant from the project location (i.e., North Carolina and Australia). The District should base its recovery rate forecasts on relevant peer-reviewed studies conducted within the same biogeographic province as the project. The CSRSM project should include a biological monitoring and adaptive management plan that reflects substantive input from NMFS to assess degradation of benthic habitats along the 60-foot equilibrated seaward berm extension. Additionally, the NMFS recommends the Jacksonville District consider modifications to engineering and construction practices referenced in Schlacher et al. (2012¹) to minimize ecological impacts. Most notable is the guidance for sand fill to minimize mortality by burial and preservation of unfilled intertidal areas that foster re-colonization of resident fauna. The NMFS concludes more information and a scientifically supported rationale is needed to conclude impacts to benthic communities at beach nourishment sites would be temporary and minimal.

The District's letter indicates there are no known nearshore hardbottom communities located in the project area. In email correspondence with the project manager, dated January 9, 2017, the Jacksonville District provided supplemental information and reports including the 1994 sidescan sonar survey and geological surveys. The NMFS concludes the data and rationale provided fully addresses conservation recommendation 4.

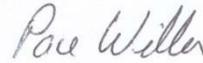
Based on the information provided, the NMFS concludes the Jacksonville District could take additional steps to conserve EFH, and the NMFS continues to recommend the final CSRSM include a focused discussion of EFH and Habitat Areas of Particular Concern (HAPCs) within the project area to satisfy fully the NEPA and complete the EFH consultation. In accordance with the intentions of 50 CFR 600.920(k)(2), the NMFS requests continued coordination

¹ Schlacher, T. A., Noriega, R., Jones, A., and Dye, T. (2012). The effects of beach nourishment on benthic invertebrates in eastern Australia: Impacts and variable recovery. *Science of the Total Environment*, 435, 411-417.

between the Jacksonville District and the NMFS Habitat Conservation Division on the issues pertaining to the EFH recommendations for the reasons provided above.

The NMFS looks forward to further cooperation with the Jacksonville District on this project to ensure conservation and protection of fish habitat. Please direct related questions or comments to the attention of Dr. Ken Riley at our Beaufort Field Office, 101 Pivers Island Road, Beaufort, North Carolina 28516-9722, or at (252) 728-8750.

Sincerely,



/ for

Virginia M. Fay
Assistant Regional Administrator
Habitat Conservation Division

cc: COE, Aubree.G.Hershorin@usace.army.mil
EPA, Miedema.Ron@epa.gov
USFWS, John.Milio@fws.gov
SAFMC, Roger.Pugliese@safmc.net
F/SER4, David.Dale@noaa.gov
F/SER47, Ken.Riley@noaa.gov



DEPARTMENT OF THE ARMY
JACKSONVILLE DISTRICT CORPS OF ENGINEERS
701 SAN MARCO BOULEVARD
JACKSONVILLE, FLORIDA 32207-0019

REPLY TO
ATTENTION OF

DEC 28 2016

Planning and Policy Division
Environmental Branch

Ms. Virginia Fay
Assistant Regional Administrator
Habitat Conservation Division
National Marine Fisheries Service
263 13th Avenue South
St. Petersburg, Florida 33701-5505

Dear Ms. Fay:

This letter acknowledges the U.S. Army Corps of Engineers (Corps) receipt of your April 4, 2016 letter regarding the Essential Fish Habitat (EFH) consultation for the Integrated Feasibility Study and Environmental Assessment, Coastal Storm Risk Management (CSR) Project, South Ponte Vedra Beach, Vilano Beach, and Summer Haven Reaches, St. Johns County, Florida. In that letter, the National Marine Fisheries Service (NMFS) staff expressed concern regarding potential impacts to EFH resulting from this project. The Corps has reviewed and considered the concerns and recommendations presented by NMFS in its letter and has prepared the enclosed responses to these recommendations as required under the Magnuson-Stevens Fisheries Conservation and Management Act [MSFCMA; 50 CFR § 600.920(k)].

The Corps appreciates the input provided by NMFS on this project to develop measures that avoid impacts to NOAA trust resources. The submission of the enclosed responses completes the Corps' requirements for EFH consultation under the MSFCMA's EFH provisions. Any questions regarding this project should be directed to Aubree Hershorin at the letterhead address or by telephoning 904-232-2136.

Sincerely,

Gina Paduano Ralph, Ph.D.
Chief, Environmental Branch

Enclosure

cc:

Dr. Ken Riley, 101 Pivers Island Road, Beaufort, North Carolina 28516-9722

**INTEGRATED FEASIBILITY STUDY AND ENVIRONMENTAL ASSESSMENT
COASTAL STORM RISK MANAGEMENT PROJECT
South Ponte Vedra Beach, Vilano Beach, and Summer Haven Reaches
St. Johns County, Florida**

**U.S. Army Corps of Engineers (Corps) Responses to
National Marine Fisheries Service Conservation Recommendations**

National Marine Fisheries Service (NMFS) conservation recommendations are listed below in italics, and the U.S. Army Corps of Engineers Jacksonville District (Corps) response is provided below each recommendation.

- 1) A scientifically supported rationale should be provided for assessment of alternative sand sources not included in the TSP; preferably from offshore sources or upland dredged material management areas; and capable of providing the required beach compatible sand while reducing impacts to critically important EFH associated with tidal inlets.*

The Corps conducted an extensive sand search in an attempt to locate sand resources that would be suitable for placement at the project site. Available offshore sand sources were too far from the project area to be cost effective. There are no dredged material management areas with sufficient sand located in the vicinity of the project area. In addition, the use of the St. Augustine Inlet system is consistent with state guidance for the management of the inlet. The FDEP "Final Order Adopting St. Augustine Inlet Management Implementation Plan," directs that strategies should be implemented to:

- Continue to transfer sediment from the inlet system to the adjacent beaches, meeting a bypassing objective of 278,000 cubic yards per year, as determined by the Inlet Sink Analysis, provided in the document, Regional Sediment Budget for St. Augustine Inlet and St. Johns County, FL, 1998/1999-2010 (USACE, 2012). The material obtained from the inlet system shall be distributed to the adjacent Atlantic Ocean-fronting beaches, with a placement ratio of approximately one-third of material placement to the north and two-thirds of material placement to the south.
- Inlet sand transfer material shall be placed in designated critically eroded areas to the north or south of the inlet between R84 and R152, St. Johns County, in accordance with Implementation Strategy #1.
- Inlet dredge material may be obtained from the Federal navigation channel, the intracoastal waterway channel, and encroaching flood shoals adjacent to the Federal channel, including the Porpoise [Vilano] Point borrow area, for placement in accordance with Implementation Strategies #1 and #2.

Finally, the use of the inlet system implements a Regional Sediment Management (RSM) strategy where maintenance of Federal navigation features can be combined with a Federal CSR project. The beneficial use of maintenance material from the navigation channel minimizes the frequency in which dredging occurs, since the projects are dredged concurrently.

- 2) *Best management practices, such as restricting the time of year that construction activities including sand mining, beach and dune nourishment, and berm erection, should be included to reduce impacts to EFH and vulnerable life stages of federally managed fishery species.*

The Corps will implement best management practices during the construction of the project. The timing of project construction will be managed to minimize impacts to EFH while also considering the risks to other protected species (including sea turtles and shorebirds). Only beach quality sand that is compatible with the native sediment on the existing beach will be used for placement at the project site. The use of beach compatible sand will minimize turbidity impacts associated with fine sediments during dredging and placement operations. Turbidity monitoring will be implemented at the dredge and placement sites to ensure compliance with Florida's state water quality guidelines and confine turbidity values to under 29 NTUs above ambient levels. Additionally, sediment placed on the beach will be managed to reduce turbidity and sedimentation impacts by constructing parallel dikes at the discharge pipe to allow for settling of sediment before return water enters the swash zone.

- 3) *A scientifically supported rationale should be provided for concluding impacts to benthic communities at beach nourishment sites would be minimal. Alternatively, best management practices should be included in the design of beach and dune nourishment and a monitoring program should be in place to evaluate the effectiveness of those best management practices.*

While the Corps generally agrees that additional site-specific information on impacts to benthic communities at beach nourishment sites would be beneficial, studies conducted at other sites provide adequate basis for concluding that minimal, temporary impacts to the benthic communities at the placement site would occur¹². While these studies may have limitations, it is outside of the authority provided under the Corps' flood risk management program to conduct research. Physical monitoring (bathymetric and beach topographic surveys) will occur to monitor the status of the project, including any erosion of placed material in the project area.

¹ Schlacher, T., et al. 2012. The effects of beach nourishment on benthic invertebrates in eastern Australia: Impacts and variable recovery. *Science of the Total Environment*, 435-436: 411-417.

² Stull, K.J., Cahoon, L.B. and Lankford, T.E., 2015. Zooplankton Abundance in the Surf Zones of Nourished and Unnourished Beaches in Southeastern North Carolina, USA. *Journal of Coastal Research*, 32(1), pp.70-77.

- 4) *A scientifically supported rationale should be provided for concluding impacts to nearshore hardbottom communities within the project area would be minimal. Alternatively, environmental and geological surveys would assess the extent of nearshore hardbottom habitat that would be impacted and a monitoring program should be in place to avoid and minimize sand placement on nearshore hardbottom habitats.*

There are no known nearshore hardbottom communities located in the project area. As discussed in the report, a side-scan sonar survey was conducted over 2.7 square miles of nearshore substrate in 1994 to determine the presence and extent of hard bottom areas in the vicinity of the project. There were no distinguishable bottom features that could be classified as exposed hard bottom or outcrops. Based on core borings, there are no rock formations existing within the placement area. The existing geologic formation is covered with approximately 10-20 feet of sand.



United States Department of the Interior

U. S. FISH AND WILDLIFE SERVICE

7915 BAYMEADOWS WAY, SUITE 200
JACKSONVILLE, FLORIDA 32256-7517

IN REPLY REFER TO:

FWS Log No. 04EF1000-2016-E-00081

FWS Log No. 04EF1000-2011-F-0170

December 22, 2016

Ms. Gina Paduano Ralph, Chief
Environmental Branch
Planning and Policy Division
Department of the Army
Jacksonville District Corps of Engineers
P.O. Box 4970
Jacksonville, FL 32232
(Attn: Aubree Hershorin)

Re: St. Johns County Coastal Storm Risk Management Project– Usinas Beach and Vilano Beach, St. Johns County, Florida

Dear Ms. Paduano:

The U.S. Fish and Wildlife Service (Service) has reviewed the U.S. Army Corps of Engineers' (Corps) letter dated May 25, 2016, and its accompanying information. The Corps proposes to construct a 60-foot beach berm along 2.6 miles of beach from Florida Department of Environmental Protection (DEP) monument R-103.5 to R-116.5. One thousand foot tapers at either end connecting the berm to the existing shorelines extend the area of sand placement to between monuments R-102.5 and R-117.5, along 3 miles of shorelines. The project template includes a dune feature that reflects the average 2015 dune season. The initial construction would require approximately 1.3 mcy of sand, which would be obtained from the St. Augustine Inlet System, including the ebb, flood, and Vilano (Porpoise Point) shoals, the Federal navigation channel, and any associated shoals. The anticipated duration of the initial construction would be approximately 3.3 months. Future nourishments would require approximately 866,000 cy of material, and the nourishment interval for this project is about 12 years. The project site is located in the vicinity of the St. Augustine Inlet and Atlantic Ocean shoreline within Sections 4/5/9/16, Township 7 South, Range 30E, and Sections 29/32/44, Township 6S, Range 30E within Usinas and Vilano Beaches, St. Johns County, Florida. We provide the following comments in accordance with Section 7 of the Endangered Species Act of 1973, as amended (Act) (16 U.S.C. 1531 *et seq.*), and the Fish and Wildlife Coordination Act, as amended (16 U.S.C. 661 *et seq.*)

Endangered Species Act

The Corps determined that the proposed project occurs within the range of the federally listed, West Indian (Florida) manatee (*Trichechus manatus latirostris*), the Anastasia Island beach mouse (*Peromyscus polionotus phasma*), piping plover (*Charadrius melodus*), rufa red knot (*Calidris canutus rufa*), and loggerhead (*Caretta caretta*), green (*Chelonia mydas*), leatherback (*Dermochelys coriacea*), and Kemp's ridley, (*Lepidochelys kempii*) sea turtles. The Corps has determined that the proposed work is likely to adversely affect nesting sea turtles, and that the Statewide Programmatic Biological Opinion (SPBO) for beach placement and shore protection is appropriate to apply to this project. The Corps also determined that the project is not likely to adversely affect the manatee, beach mouse, piping plover, and rufa red knot. The determination of effect for the piping plover was based on a review of the Programmatic Piping Plover Biological Opinion, and a finding that the activity will not occur in "optimal" piping plover habitat. The Corps as a conservation measure for the manatee will incorporate the 2011 Standard Manatee Conditions for In-Water Work into the project plans and specifications.

West Indian (Florida) Manatee

We agree, with qualifications, with the Corps' application of the SPBO to this project for the manatee and sea turtles. Regarding the manatee, there are three additional conditions provided in the "Introduction" section of the SPBO that the Corps must incorporate into the project plans and specifications **"for all dredging activities within estuaries and adjacent to the shore, inlets, and/or inshore areas including channels associated with submerged borrow areas and navigation channels"**. Based on the project's proposed sand sources, this stipulation applies to the dredging of all sand sources except for the offshore borrow site and its borrow channel. According to the SPBO, the Service can concur with the Corps' effects determination only if it makes the conditions part of the project plans and specifications. The Corps has agreed to do this, and the Service as a result concurs with the "may affect, not likely to adversely affect" determination for the manatee. The conditions are as follows.

1. Barges shall install mooring bumpers that provide a minimum 4-foot standoff distance under maximum compression between other moored barges and large vessels, when in the vicinity of inlets, river mouths, and large estuaries where manatees are known to congregate.
2. Pipelines shall be positioned such that they do not restrict manatee movement to the maximum extent possible. Plastic pipelines shall be weighted or floated. Pipelines transporting dredged material within the vicinity of inlets, river mouths, and large estuaries where manatees are known to congregate shall be weighted or secured to the bottom substrate as necessary to prevent movement of the pipeline and to prevent manatee entrapment or crushing.
3. In the event that such positioning has the potential to impact submerged aquatic

vegetation (SAV) or nearshore hardbottom, the pipeline may be elevated or secured to the bottom substrate to minimize impacts to SAV.

Sea Turtles

The addition of beach quality sand to a critically eroded shoreline is expected to benefit nesting sea turtles over the project's estimated 12-year nourishment interval. However, it was not clear from the accompanying information if the proposed construction of a dune feature based on the average 2015 dune position will cover existing hardened shoreline stabilization structures such as bulkheads, riprap, etc. within the project footprint. Construction of such structures along ocean shorelines historically has occurred at or near the toe end of a natural dune, or at the waterward end of improved grounds. Such positioning usually places these structures at the landward end of sea turtle nesting habitat. Past and current information within St. Johns County and other Florida coastal counties indicates that sea turtles emerging from the ocean to nest and encountering such structures may abandon the nesting attempt, or false crawl, even if suitable sand occurs contiguous to the structure. False crawls are a form of harassment, which is part of the definition of "take" under the Act. The proposed sand placement is expected to increase the availability of suitable nesting habitat compared to the existing beach. Post-construction monitoring of other renourished beaches has revealed an increase in false crawls during the first nesting season post-construction. Since the distance a nesting turtle crawls on a nourished beach before nesting or abandoning a nesting attempt is variable, it is our view that increased nesting attempts on a nourished beach also increase the probability of a false crawl resulting from an encounter with a hardened shoreline. Landward gaps between hardened shorelines and eroded dune features also may present an entrapment hazard to nesting sea turtles where the height of the beach berm enables turtles to access the top of the hardened structure.

Based on the preceding, the Corps provided additional information that demonstrated that any hardened shoreline would be behind the reconstructed dune crest, which would range in height between 14 and 20 feet to match the 2015 dune profile. The dune face would be constructed at a slope of 5H:1V for approximately 20 feet, ending in a beach berm having a typical slope of between 10:1 and 20:1 and a width of at least 8 feet. These dune and beach profiles are consistent with the relative dimensions of these coastal features north of the St. Augustine Inlet compared to south of the inlet. Although the proposed dune profile is different than that required in Term and Condition 5 of the SPBO for high erosion beaches, following discussion with the Corps, we have concluded that its desire to match the proposed project area to the local natural dune and beach profiles meets the intent of the SPBO.

Regarding potential entrapment, the Corps stated that where gaps exist behind the hardened structure and eroded dune, these gaps would have to be filled in with comparable material by the landowner or St. Johns County, the local sponsor, prior to dune reconstruction. The importance of this fill is to insure that the integrity and position of the hardened structure is not compromised by the weight of material used to construct the beach and dune. If no backfilling occurs, due to the potential liability issue, the Corps is unlikely to place dune and beach material at that location. Based on this scenario, we have concluded that the likelihood of entrapment of a nesting sea turtle behind a hardened structure is insignificant or discountable.

The Corps as part of the project plans and specifications will monitor and maintain the constructed beach and dune throughout the project's estimated lifecycle. The physical monitoring will consist of 7 beach profile surveys; a pre-construction, post-construction, and 5 annual monitoring surveys. After 5 years, survey requirements are extended to every other year or as needed. When 50% of the berm portion of the project template has eroded at any point along the project (if a profile survey at any of the FDEP R-monuments shows that the berm has eroded to within 30 feet of the dune), and the total volume eroded from the entire length of the project has reached 750,000 cubic yards, then a renourishment event takes place. Since the Corps works on a 3-year budget cycle process, regular monitoring is critical to insure that if the monitoring detects erosion trends, a funding request is made before these triggers are reached. If a major storm causes the thresholds to be reached or exceeded, the Corps will pursue an emergency nourishment/dune reconstruction as needed.

In case of delays in funding authorization requests that respond to chronic or acute erosion events that could expose nesting sea turtles to hardened shorelines, it is our view that the following additional take statement addressing this possibility needs to be added to the SPBO for this project. (*italics*). We have also modified the SPBO's reasonable and prudent measure and associated term and condition that address dune reconstruction to reflect the project's response to the presence of hardened shorelines within the dune reconstruction footprint (*italics*).

AMOUNT OR EXTENT OF ANTICIPATED TAKE

Sea Turtles

Take is expected to be in the form of.....(6) behavior modification of nesting females due to escarpment formation and encounters with exposed, *post-construction hardened shoreline stabilization structures within the project area during a nesting season*, resulting in false crawls or situations where they choose marginal or unsuitable nesting areas to deposit eggs;

REASONABLE AND PRUDENT MEASURES for:

A. Projects involving sand placement from beach nourishment, sand bypass, *dune reconstruction*, and sand back pass activities primarily for shore protection (these projects are usually larger scaled) shall include the following measures:

A6. *For dune reconstruction*, the placement and design of the dune shall emulate the natural dune system to the maximum extent possible, including the dune configuration and shape, *and burial of any existing hardened shoreline stabilization structures contiguous to the beach berm*.

TERMS AND CONDITIONS for:

A. Projects involving sand placement from beach nourishment, sand bypass, *dune reconstruction*, and sand back pass activities primarily for shore protection shall include the following conditions:

A5.Dunes and other construction features must be constructible without impacting other resources. If a recommended dune is not possible, the Corps will contact the Service to see if consultation needs to be reinitiated or discuss features incorporated with the profile *that will restore the dune system to pre-storm conditions. If such information is not available*, dune features will include a slope of 1.5:1 followed by a gradual slope of 4:1 for approximately 20 feet seaward on a high erosion beach (**Figure 13**) or a 4:1 slope (**Figure 14**) on a low erosion beach. The seaward toe of the dune should be at least 20 feet from the waterline. *Where a hardened shoreline structure occurs, the recommended dune slopes and distances of the seaward toe of the dune from the waterline may need to be adjusted to insure sufficient burial of the structure beneath the reconstructed dune feature. No part of the top and waterward end of the hardened structure shall to the maximum possible extent be less than three feet beneath the surface of the dune.*

Piping Plover and Red Knot

With respect to the piping plover, the available information indicates that wintering individuals have been observed within and in the immediate vicinity of the St. Augustine Inlet. Their number and frequency of use suggest that this area does not represent a season-long, overwintering location but rather a temporary stopover in route to the species' historic wintering sites along the Florida Atlantic Coast. Habitats within the area affected by the action that represent suitable roosting and/or foraging sites include emergent flood shoals, emergent islands, estuarine, inlet, and ocean shorelines within Anastasia State Park, the inlet shoreline associated with Porpoise Point, and ocean shorelines within Usinas Beach and Vilano Beach. Estimates of linear shoreline lengths and widths (mean low water through the upper beach) of these habitats since 1999 using Google Earth imagery indicated that except for Porpoise Point, shoreline lengths exhibited little change between 1999 and 2015. Changes in width were more pronounced and varied, particularly within the ocean-fronting shorelines north and south of the inlet. At Porpoise Point, both shoreline length and widths varied significantly over the same timeframe, with the length near the end of 2015 approximately 700 feet less than at the beginning of 1999. Although total length fluctuated between 1999 and 2010, a consistent decrease has been occurring since 2011. This trend roughly coincided with the mining of the inner harbor shoal borrow area and navigation channel adjacent to Porpoise Point for the 2012 beach renourishment project. The combined decrease in shoreline length and width at Porpoise Point along the north side of the St. Augustine Inlet represents in our view a decrease in both foraging and roosting habitat for piping plovers.

Regarding the red knot, like the piping plover, emergent shoals and shorelines in the vicinity of inlets represent important roosting and foraging habitats during the species' spring and fall migrations. Red knots also occur along beaches not associated with inlets. Available information revealed a few red knot sightings around the St. Augustine Inlet, and larger numbers on Anastasia Island south of the St. Augustine Beach Pier. Red knots often alternate among different, co-located roosting and foraging sites whose availability is dictated by the local tides. The emergent shoals and shorelines associated with the St. Augustine Inlet represent such alternative habitats.

The proposed project initially is expected to require approximately 1.3 mcv of sand, and take approximately 3.3 months to construct. Unless the construction is limited to the months of June

through August, there is a possibility that construction will temporarily displace foraging and roosting piping plovers and red knots from the sand placement site and emergent flood shoals inside the St. Augustine Inlet. If such displacement does occur, due to the availability of other roosting and foraging habitat within the area affected by the action, it is our view that any such temporary displacement will not rise to the level of “take” of either species.

Proposed dredging of the emergent portions of the flood shoal has the potential to directly impact roosting and foraging piping plovers and red knots that may use this site as a temporary stopover in route to traditional wintering and migratory sites, respectively. Likewise, mining of the Porpoise Point borrow area (shoal) within the inlet may further reduce the length of shoreline along the north shore of the inlet, and represent a further reduction in roosting and foraging habitat for these species. The most recent updated St. Augustine Inlet Management Implementation Plan, which prescribes sand bypass objectives and limits on the annual removal of sand from the south lobe of the ebb tidal shoal, does not include individual removal limits from the other sand sources within the system. It is our view that limits to the removal of the emergent portion of the flood shoal and Porpoise Point shoals are needed to reduce the probability of adverse effects to roosting and foraging piping plovers and migrating red knots from habitat loss. As a result, we recommend that the following conditions be added to the project plans and specifications.

- Restrict dredging of the Porpoise Point borrow area (shoal) along the north side of the St. Augustine Inlet, to that area encroaching on, and expected to encroach on between the maintenance dredging cycles, the authorized navigation channel
- Restrict dredging of the flood tidal shoals to those sections that remain submerged (≥ 1 foot) at mean low lower water (MLLW)

The addition of these conditions will reduce the probability of take of piping plover and red knot through habitat loss, to insignificant or discountable levels. The Corps has agreed to include these conditions in its project plans and specifications. Based on this response, with the inclusion of these conditions, we concur with the Corps’ determination that the project is not likely to adversely affect the piping plover or red knot.

Anastasia Island Beach Mouse

A review of the history of Anastasia Island beach mouse dune habitat within Anastasia State Park (ASP) since reauthorization of the St. Johns County Shore Protection Project (SJCSPP) in 1999, and the subsequent beach renourishments, has revealed the following.

- Stability or increase in such habitat from DEP monument T-129 to R-141, the southern boundary of ASP, through November 2015
- A minor to significant net loss of beach mouse habitat from DEP monument R-123 to T-129.

The two SJCSPP projects completed in January 2003 and September 2012 removed 6.3 mcy of material from the St. Augustine Inlet sand system. An additional project authorized due to storm impacts in 2004, and completed in November 2005, removed 2.8 mcy from the system. The

southern lobe of the ebb tidal shoal was used as a sand source in each of those projects. The total amount of sand removed from that location for all three projects is undetermined. The north lobe of the ebb tidal shoal also was used in the 2003 and 2005 projects, but not the 2012 project due to concerns over impacts to the inlet and north beach shorelines, as well as a reduction in natural bypassing of inlet sediment. Some of the sand placement occurred within ASP for all three projects, but not north of T-132. Subsequent nourishments in 2012 and 2013 from maintenance dredging of the AICW and inlet navigation channels resulted in additional sand placement of approximately 300,000 cy within ASP, including between R-127 and R-131A. No sand had been placed north of the R-127, yet some net accretion occurred between R-127 and R-123 through November 2015 following these events. This was likely the result of northward sand transport typical along a shoreline immediately south of an inlet, and the eventual advancement of sand landward from the north and south lobes of the ebb shoal following Hurricane Sandy and nor'easters.

The significant net loss of beach mouse habitat at the northern end of ASP began about a year and a half after the unplanned 2005 beach renourishment event, and continued at certain locations through the beginning of 2014. The assumed high volumes of sand removed from the south lobe of the ebb tidal shoal in 2003, 2005, and 2012, coupled with the lack of significant storms aiding natural beach sand recruitment from 2005 through October 2012, and the incomplete infilling of that offshore sand source likely combined to contribute to the severe net erosion of habitat along the northernmost section of ASP. The DEP in its 2104 updated St. Augustine Inlet Management Implementation Plan (SAIMIP) admitted its concern about potential erosion impacts to the beaches adjacent to the inlet from exceedance of the original, average annual bypass objective of 510,000 cy of sand from the inlet shoals. As a result, and consistent with the 1998/1999 – 2010 U.S. Army Corps of Engineers' regional sediment budget and analysis, and the DEP's 2011 Inlet Management Restudy for the St. Augustine Inlet, the updated plan adopted strategies that reduced the annual average bypassing objective to 278,000 cy, and limited (except for maintenance dredging of the federal navigation channel) the amount of sand removed from the south lobe of the ebb shoal and that channel to a maximum of 179,000 cy per year times the number of years between beach nourishment events. The DEP also recognized that the future sediment budget is dependent upon meteorological conditions and the resulting wave climate, which cannot be predicted with any reasonable accuracy, and that it is not appropriate to modify the fill placement protocol as a result of the impact of major storms or short term influences (< 5 years). It is our view, however, that it is the frequency, extent, and timing of such meteorological conditions that combined with the sand bypass strategies, can significantly influence the accretion/erosion cycle of beach mouse habitat at the northern end of ASP.

Based on the preceding, it is our position that the proposed reductions in the annual sand bypassing volume and sand removal from the south lobe of the ebb tidal shoal for the proposed project cannot guarantee under all circumstances that a loss of beach mouse habitat within the northern section of ASP, will not re-occur during the project's approximate 12-year nourishment interval. In addition, the observed and projected renourishment intervals for sand placement south of the inlet have been seven and five to eight years, respectively. Shorter sand retention intervals than projected suggest a potential for a modification of the SAIMIP to allow for more frequent use of the St. Augustine Inlet shoal system. More frequent use, especially of the south lobe of the ebb tidal shoal, could under certain meteorological conditions, result in additional net loss of beach mouse habitat at the northern end of ASP.

In order to reduce the probability of future habitat loss from the northernmost section of ASP under certain meteorological conditions, we recommend periodic beach placement of about 225,000 cy of state-qualified sand between DEP monuments R-127 and R-131A. This recommendation is identical to the 2013 beach placement of 184,000 cy of material from the Federal navigation channel between R-127 and R-131A. Since the SAIMIP allows additional sand above the annual, two-source limit to be removed from the authorized navigation channel when necessary for required interim navigation channel maintenance dredging, we further recommend that this be the source for this additional beach sand placement. The frequency of placement therefore would coincide with the approximate need for interim navigation channel maintenance dredging. The expectation is that some of this placement would both increase the dune structure within the placement area, and also enter the northward littoral drift, eventually moving towards and onto the northernmost beaches landward and enhancing or stabilizing the existing dune structure in that area.

It is our view that the recommendation to periodically renourish the beach within the northern section of ASP will reduce to insignificance or discountability, the probability of take of occupied beach mouse habitat from the coincidence of certain meteorological conditions with the dredging of the south lobe of the ebb tidal shoal as part of the proposed project. The Corps has agreed to include this recommendation in its project plans and specifications. We as a result concur with the Corps' determination that the proposed project is not likely to adversely affect the Anastasia Island beach mouse.

Fish and Wildlife Coordination Act

The proposed project will relocate sand in and around the St. Augustine Inlet. The actions will remove submerged sand from the flood and ebb (south lobe) tidal shoals, the inlet and Intracoastal Waterway navigation channels, and a portion of the Porpoise Point/Vilano inlet shoal encroaching on the inlet, and transport it to a critically eroded beach beginning approximately one mile north of the inlet, for a distance of 3.1 miles. This action is consistent with the Corps' 2010 sediment budget analysis of the St. Augustine Inlet area, and the Florida Department of Environmental Protection's updated 2014 St. Augustine Inlet Management Plan.

The proposed actions and the habitat impact minimization requirements described in the ESA section of this letter are expected to result in only temporary effects on beach and benthic invertebrates, and foraging and loafing shorebirds and seabirds. Beneficial effects are expected for nesting sea turtles within the renourished section of critically eroded beach, as well as to Anastasia Island beach mouse habitat within the northern section of Anastasia State Park.

Based on the preceding analysis, we have concluded that the proposed project will not result in significant temporary or permanent negative impacts to other Federal Trust and natural resources within the area affected by the action.

This concludes section 7 consultation and FWCA comment on subject action. If you have any questions regarding this response, please contact Mr. John F. Milio of my staff at john_milio@fws.gov, or by calling 904-731-3098.

Sincerely,

for Annie Dziergowski
Jay B. Herrington
Field Supervisor

cc: FWC, Tallahassee, Florida (Ron Mezich)
DEP, Parks and Recreation, Tallahassee (Parks Small)



United States Department of the Interior

U. S. FISH AND WILDLIFE SERVICE

7915 BAYMEADOWS WAY, SUITE 200
JACKSONVILLE, FLORIDA 32256-7517

IN REPLY REFER TO:

FWS Log No. 04EF1000-2016-CPA-0042

October 25, 2016

Gina P. Ralph, Ph.D.
Jacksonville District Corps of Engineers
Planning and Policy Division Environmental Branch
701 San Marco Boulevard
Jacksonville, FL 32207

Re: St. Johns County Storm Risk Feasibility Study CBRA Consistency

Dear Dr. Ralph:

Thank you for your email correspondence and attachments received on May 25, 2016 and October 12, 2016 requesting the U.S. Fish and Wildlife Service determine whether the U.S. Army Corps of Engineers (USACE) St. Johns County Storm Risk Feasibility Study (Recommended Plan) is consistent with the Coastal Barrier Resources Act (CBRA).

Your request of October 12, 2016 stated: "The Recommended Plan includes the construction of a 60 ft. berm along 2.6 miles of beach from R-103.5 to R-116.5. The project template will include a dune feature that reflects the average 2015 dune position. One thousand foot tapers will extend from the northern and southern ends of the berm extension, connecting the extension to the existing shoreline. The addition of tapers results in sand placement from R102.5 to R117.5 along three miles of shoreline. The initial construction would require approximately 1.3 mcy of sand, which would be obtained from the St. Augustine Inlet system, including the ebb, flood, and Vilano Point shoals, the Federal navigation channel, and any associated shoals. The anticipated duration of the initial construction would be approximately 3.3 months. Future nourishments would require approximately 866,000 cy of material, and the nourishment interval for this project is approximately 12 years.

Your May 25, 2016, consultation request stated: "The placement site is located adjacent to and within two designated units of the John H. Chafee Coastal Barrier Resources System (CBRS), including Usinas Beach (Unit P04A) and Conch Island (Unit P05; see enclosed map of the CBRS units). The Coastal Barrier Resources Act (CBRA) of 1982 and the Coastal Barrier Resources Improvement Act (CBRIA) of 1990 limit federally subsidized development in CBRS Units to limit the loss of human life by discouraging development in high risk areas, to reduce wasteful expenditures of Federal resources, and to protect the natural resources associated with coastal barriers."

USACE included a map of the CBRS unit boundaries with the consultation letter using the boundaries found on the USFWS website. However, the USACE noted that the GIS layers did

not extend to the -30 ft. contour, which is the actual extent of the CBRS unit. We have reviewed the revised map that shows the full extent of the CBRS unit boundary and the inclusion of the inlet system sand source in CBRS unit P05.

The USACE has indicated the Recommended Plan is consistent with the current St. Augustine Inlet Management Plan, which has been ongoing since it was first approved by the Florida Department of Environmental Protection (FDEP) in 2014.

The St. Augustine Inlet was created and stabilized in the early 1940s. Since the stabilization and prior to the CBRA of 1982, maintenance of the inlet and associated Federal navigation channel has affected transport of sand in the surrounding areas. The south lobe of the ebb shoal and the inlet complex have been used for the Federal St. Augustine Beach project since its authorization in 1998. Since the initial nourishment, St. Augustine Beach has stabilized and the seawall has been almost constantly buried by sand, ensuring the beach is resilient to storm events. Following the removal of sediment from the ebb shoal in the early 2000s, FDEP and USACE have conducted significant modeling of the inlet system to identify its sediment transport mechanisms.

As a result, sea turtle nesting habitat has improved at St. Augustine Beach due to beach nourishment. Similarly, material placed at Anastasia Island State Park has helped the formation of dune habitat through direct placement (during initial project construction) and through Aeolian transport of beach sand. Cooperation between State and Federal agencies has improved sand management of the inlet complex in a way that contributes to habitat for protected species, while mitigating for the change to sediment transport caused by the creation of the inlet in the early 1940s.

After careful review of the June 12, 1995 letter from the Department of the Interior to the USACE regarding CBRA and a beach renourishment project at Folly Beach, SC; section 6 of CBRA which allows nonstructural projects for shoreline stabilization that are designed to mimic, enhance, or restore a natural stabilization system; and the best available scientific information regarding the history of sand management, renourishment, and its effects on trust resources, the Service has determined that the Recommended Plan is consistent with CBRA. The Service, in accordance with section 7 of the Endangered Species Act of 1973, will continue to work with the USACE to ensure that impacts will be minimized and benefits maximized in regard federally threatened and endangered species.

If you have any questions or concerns about this consultation, please feel free to contact Zakia Williams of my staff at 904-731-3119.

Sincerely,



105 Jay B. Herrington
Field Supervisor



FLORIDA DEPARTMENT *of* STATE

RICK SCOTT
Governor

KEN DETZNER
Secretary of State

Ms. Gina P. Ralph, Ph.D.
Chief, Environmental Branch
Jacksonville District USACE
701 San Marco Boulevard
Jacksonville, Florida 32207-8175

October 24, 2016

RE: DHR Project File No.: 2016-3627 / Received by DHR: September 6, 2016
Project: St. Johns County Shoreline Risk Management Study
Tentatively Selected Plan (TSP) Beach and Dune Nourishment within Vilano Beach Reach and
Small Portion of South Ponte Vedra Reach, St. Johns County

Dr. Ralph:

The Florida State Historic Preservation Officer reviewed the referenced project for possible effects on historic properties listed, or eligible for listing, on the *National Register of Historic Places*. The review was conducted in accordance with Section 106 of the *National Historic Preservation Act of 1966*, as amended, and its implementing regulations in *36 CFR Part 800: Protection of Historic Properties*.

This office concurs that the proposed project will have no adverse effect on historic properties if the following conditions are met:

- Buffer areas are maintained around any untested targets during dredging activities.
- 150 Foot buffer is maintained around the Dixie Crystal shipwreck site 8SJ4889.
- 300 foot buffer is maintained around the North Shoals Vessel, 8SJ4784.

For questions, please contact Robin Jackson, Historic Preservationist, Compliance and Review at Robin.Jackson@dos.myflorida.com, or by telephone at 850.245.6496 or 800.847.7278.

Sincerely,

Timothy A. Parsons, Ph.D., RPA
Director, Division of Historical Resources and
State Historic Preservation Officer

From: [John Milio](#)
To: [Hershorin, Aubree SAJ](#)
Cc: [Heath Rauschenberger](#); [Billy Brooks](#); [AnnMarie Lauritsen](#)
Subject: [EXTERNAL] RE: St. Johns County Coastal Storm Risk Management Project
Date: Friday, August 05, 2016 2:49:58 PM

Aubree:

I have reviewed the U.S. Army Corps of Engineers' (Corps) letter, dated May 25, 2016, and its accompanying information, regarding the Corps' determination of effects on federally-listed species from the proposed St. Johns County Coastal Storm Risk Management project. The Corps proposes to dredge approximately 1.3 million cubic yards (mcy) of beach quality sand (bqs) from the St. Augustine Inlet sand system for the purpose of constructing a 60-foot beach berm with 1000-foot tapers at each end, and dune features reflecting the average 2015 dune position, along a three-mile long section of beach north of the St. Augustine Inlet. This work will be done in accordance with the State of Florida's St. Augustine Inlet Management Implementation Plan (SAIMIP). The SAIMIP includes implementation strategies that call for a sand bypassing objective of 278,000 cubic yards per year, with no more than 179,000 cubic yards per year times the number of years between nourishment events, coming from the south lobe of the ebb tidal shoal and federal navigation channel. This was based on a 2011 inlet restudy that recommended no sand be removed from the north lobe of the ebb shoal, and dredging of the south lobe of the ebb shoal be limited. According to the Draft Integrated Feasibility Study and Environmental Assessment for this project, dated February 2016, the estimated quantities of dredgeable beach quality sand within the St. Augustine Inlet system is 2mcy each for the flood shoal and south lobe of the ebb shoal, 0.1-0.2 mcy from the federal navigation channel, and an undetermined quantity from the Vilano Point shoals.

Based on the above, the progressive loss of Anastasia Island beach mouse habitat within the northern third of Anastasia State Park (ASP) over the last 10-12 years that roughly coincides with ebb shoal dredging and beach placement within central and southern sections of ASP and St. Augustine Beach, and concerns over the impacts of the project on shoreline stabilization structures within the project footprint and sea turtle nesting, we request the Corps provide the following additional information.

- quantitative estimates of the amount of material dredged from the south lobe of the ebb tidal shoal during the 2003 and 2005 dredging and beach nourishment events
- quantitative estimates of the amounts (and location in the case of the flood shoal) of sand from the St. Augustine inlet system proposed to be dredged from the flood shoal, Federal navigation channel, Vilano Point shoals, and south lobe of the ebb shoal for the currently proposed project
- statement as to the use/non-use of the north lobe of the ebb shoal for this project, and if used, how many mcy of bqs
- rationale for using the average 2015 dune position as the reference point for construction of a dune feature
- how dune feature construction will occur where shoreline stabilization structures are present

Please don't hesitate to call me if you need any clarification regarding these requests. Thanks.

John

John F. Milio
U.S. Fish and Wildlife Service
North Florida Ecological Services Office
7915 Baymeadows Way, Suite 200
Jacksonville, Florida 32256-7517

Phone: (904)-731-3098
Email: john_milio@fws.gov

-----Original Message-----

From: Hershorin, Aubree SAJ [<mailto:Aubree.G.Hershorin@usace.army.mil>]
Sent: Friday, July 29, 2016 3:01 PM
To: John Milio
Cc: Spinning, Jason J SAJ; Williams, Zakia
Subject: RE: St. Johns County Coastal Storm Risk Management Project

Hi John,

I just wanted to touch base with you on the status of the consultation for the St. Johns Feasibility Study. Zakia and I had coordinated on the CBRS unit concerns, which I think we have finalized. We do not plan to cost-share in the portion of the project located in the CBRS unit.

For the ESA species, we plan to use the SPBO for impacts to marine turtles. We determined the project was not likely to adversely affect plovers or red knots.

Please let me know if there's anything else we need to do to complete consultation.

Thanks, and have a great weekend!
Aubree

-----Original Message-----

From: Hershorin, Aubree SAJ
Sent: Wednesday, May 25, 2016 1:22 PM
To: John Milio <john_milio@fws.gov>; Williams, Zakia <zakia_williams@fws.gov>
Cc: Spinning, Jason J SAJ <Jason.J.Spining@usace.army.mil>
Subject: St. Johns County Coastal Storm Risk Management Project

John/Zakia,

Please find attached the ESA/CBRA consultation letter for the St. Johns County Coastal Storm Risk Management project. This project proposes to dredge material from the St. Augustine Inlet complex and place it north of the inlet. The 2015 dune profile will also be maintained as part of this project.

If you have any questions, please let me know.

Thanks,
Aubree

~~~~~

Aubree Hershorin, Ph.D.  
Environmental Branch, Coastal Section  
Planning and Policy Division  
U.S. Army Corps of Engineers  
701 San Marco Blvd.  
Jacksonville, FL 32207  
Office: (904) 232-2136

**From:** [Hershorin, Aubree SAJ](#)  
**To:** [chris.stahl@DEP.state.fl.us](mailto:chris.stahl@DEP.state.fl.us)  
**Subject:** St. Johns County Feasibility Study  
**Date:** Monday, August 01, 2016 11:15:35 AM  
**Attachments:** [Review Request for 16-7563C.pdf](#)

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Chris,

We have not yet received a response from the Clearinghouse for the St. Johns County Feasibility Study on our determination of consistency with the state's Coastal Management Program per the CZMA. The SAI# is FL201602247563C (see attached), and comments were due on 3/25/2016. Would it be possible to get an update on it? We're finalizing the document now.

Thank you for your assistance,  
Aubree

~~~~~  
Aubree Hershorin, Ph.D.
Plan Formulation Branch, Coastal/Nav Section
Planning and Policy Division
U.S. Army Corps of Engineers
701 San Marco Blvd.
Jacksonville, FL 32207
Office: (904) 232-2136



DEPARTMENT OF THE ARMY
JACKSONVILLE DISTRICT CORPS OF ENGINEERS
701 San Marco Boulevard
JACKSONVILLE, FLORIDA 32207-8175

REPLY TO
ATTENTION OF

Planning and Policy Division
Environmental Branch

MAY 25 2016

Mr. Jay Herrington
U.S. Fish and Wildlife Service
North Florida Ecological Services Office
1339 20th Street
Vero Beach, FL 32960-3559

Dear Mr. Herrington:

The U.S. Army Corps of Engineers, Jacksonville District (USACE), is evaluating the feasibility of providing coastal storm risk management to the shores of St. Johns County, Florida. The most immediate and critical needs of the local communities are to address beach and dune erosion and to protect State Road A1A and environmental attributes. The Federal interest in participating in a locally supported, cost-shared shore protection project to address St. Johns County's coastal issues is under consideration.

The Tentatively Selected Plan (TSP) includes the construction of a 60 ft. berm along 2.6 miles of beach from R-103.5 to R-116.5. The project template will include a dune feature that reflects the average 2015 dune position. One thousand foot tapers will extend from the northern and southern ends of the berm extension, connecting the extension to the existing shoreline. The addition of tapers results in sand placement from R102.5 to R117.5 along 3 miles of shoreline. The initial construction would require approximately 1.3 mcy of sand, which would be obtained from the St. Augustine Inlet system, including the ebb, flood, and Vilano Point shoals, the Federal navigation channel, and any associated shoals. The anticipated duration of the initial construction would be approximately 3.3 months. Future nourishments would require approximately 866,000 cy of material, and the nourishment interval for this project is approximately 12 years.

Endangered Species Act

This letter notifies your office that the Corps has determined that the Statewide Programmatic Biological Opinion (SPBO) for beach placement and shore protection is appropriate to apply to the St. Johns County Coastal Storm Risk Management project. The Corps determination is that the proposed activity is likely to adversely affect nesting sea turtles, and is not likely to adversely affect manatees or beach mice. There are no identified terms and conditions, or any other criteria outlined in the SPBO, that would not be followed. Standard manatee protection measures would be imposed on activities in the water. With respect to sea turtles, all other terms and conditions of the SPBO would be followed.

This letter also notifies your office with respect to the Programmatic Piping Plover Biological Opinion (P3BO). The activity will not occur in “optimal” Piping Plover habitat and is not likely to adversely affect the Piping Plover.

Finally, the Corps has determined that the project is not likely to adversely affect the *rufa* red knot.

Should you determine that the proposed activity is not within the scope of the SPBO or the P3BO, please consider this letter initiation of consultation pursuant to Section 7 of the Endangered Species Act. For consultation on the red knot, we request that you review our determination and provide your concurrence as appropriate.

Coastal Barrier Resources Act

The placement site is located adjacent to and within two designated units of the John H. Chafee Coastal Barrier Resources System (CBRS), including Usinas Beach (Unit P04A) and Conch Island (Unit P05; see enclosed map of the CBRS units). The Coastal Barrier Resources Act (CBRA) of 1982 and the Coastal Barrier Resources Improvement Act (CBRIA) of 1990 limit federally subsidized development in CBRS Units to limit the loss of human life by discouraging development in high risk areas, to reduce wasteful expenditures of Federal resources, and to protect the natural resources associated with coastal barriers.

The TSP includes placement of sand on P04A to protect Highway A1A from storm-related damages. Highway A1A is the primary hurricane evacuation route for the island, and is an essential link to the larger hurricane evacuation network. As the project is intended to maintain this roadway and prevent it from being undermined as a result of storm damage, federal expenditures in this area would be excepted from the requirements under CBRA pursuant to 16 U.S.C. § 3505(a)(3).

In addition to protecting and maintaining Highway A1A, the proposed project is a nonstructural project that is designed to mimic and restore the natural stabilization system. The project includes the maintenance of the 2015 dune profile, which is important for nesting green turtles. The beach profile will be sloped to reduce the likelihood of escarpments from forming and to more closely mimic the natural beach profile.

For the reasons stated above, USACE determined that the project is consistent with the three purposes of CBRA, which are to minimize: (1) the loss of human life; (2) wasteful expenditure of federal revenues; and (3) the damage to fish, wildlife, and other natural resources associated with coastal barriers. As such, the project meets the criteria outlined in 16 U.S.C. § 3505(a)(6).

Therefore, Corps has determined that the proposed project is consistent with CBRA and CBRIA, and we request your confirmation of this determination.

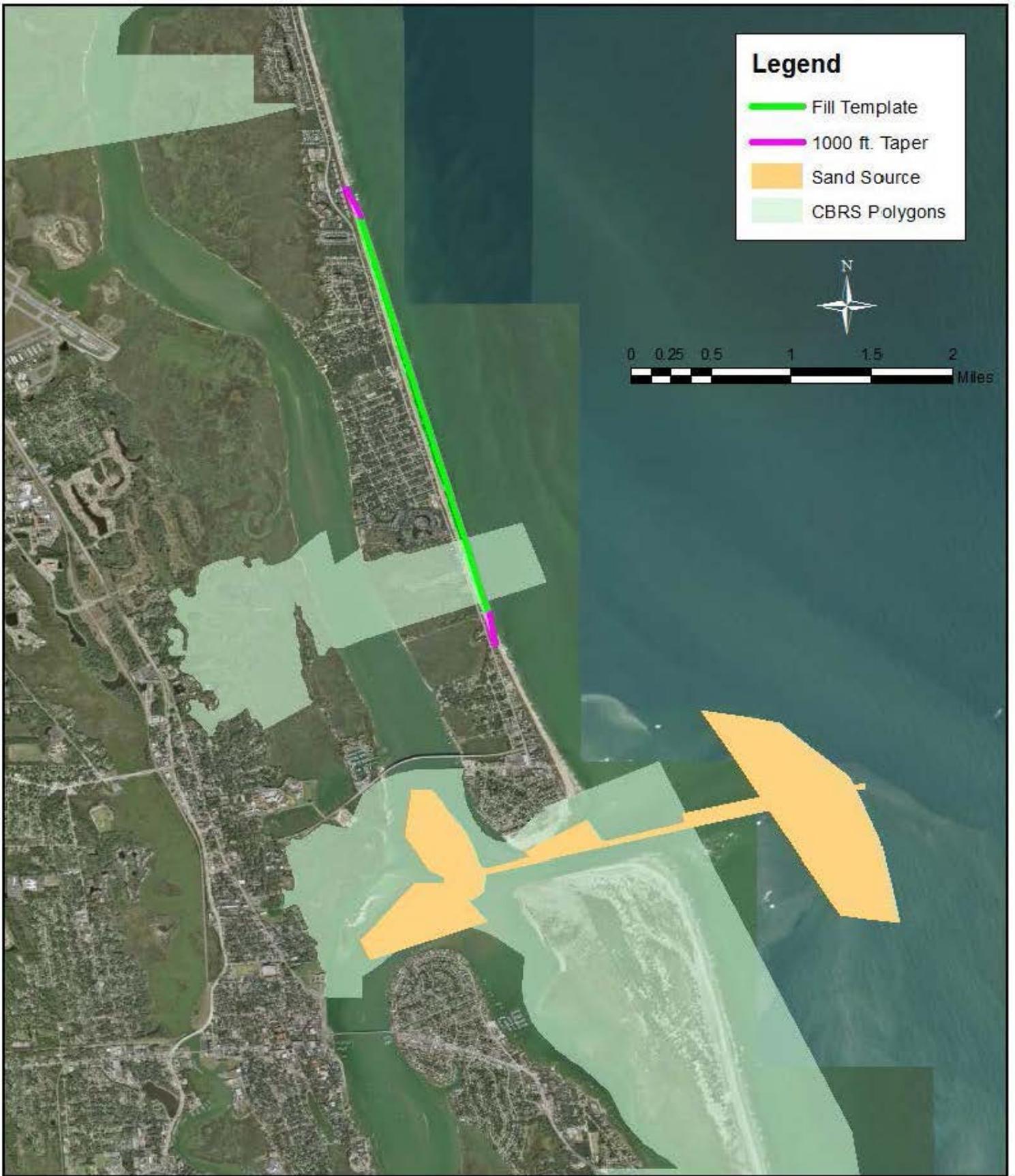
If you have any questions, please contact me at (904) 232-2336 or the technical point of contact. The technical point of contact for this action is Aubree Hershorin, who can be reached at (904) 232-2136.

Sincerely,

A handwritten signature in black ink, appearing to read "Gina Paduano. Ralph". The signature is fluid and cursive, with a large initial "G" and a long, sweeping tail.

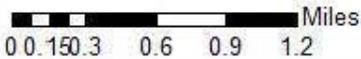
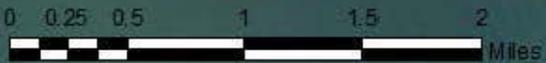
Gina Paduano. Ralph, Ph.D.
Chief, Environmental Branch

Enclosures



Legend

- Fill Template
- 1000 ft. Taper
- Sand Source
- CBRS Polygons



DEPARTMENT OF THE ARMY
 U.S. Army Engineer District, Jacksonville, Florida
St. Johns County Coastal Storm Risk Management Project
Coastal Barrier Resources System



®



DEPARTMENT OF THE ARMY
JACKSONVILLE DISTRICT CORPS OF ENGINEERS
P.O. BOX 4970
JACKSONVILLE, FLORIDA 32232-0019

REPLY TO
ATTENTION OF

Planning and Policy Division
Environmental Branch

MAY 20 2015

Geoffrey Wikel, Chief
Branch of Environmental Coordination
Division of Environmental Assessment
Office of Environmental Programs
Bureau of Ocean Energy Management
45600 Woodland Road, VAM OEP
Sterling VA 20166

Dear Mr. Wikel:

In accordance with regulations pertaining to the National Environmental Policy Act (Title 40 of the Code of Federal Regulations, part 1501.6), I am formally inviting your agency to become a cooperating agency for an Environmental Assessment for evaluation of the feasibility of providing shoreline erosion protection, hurricane and storm damage reduction, and related purposes to the shores of St. Johns County, Florida.

Please note that cooperating agency status involves actions and responsibilities beyond that normally associated with a commenting or permitting agency. Your agency is being specifically requested to provide special expertise on natural resources in this area.

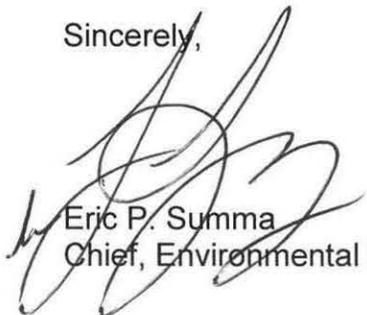
The formulation of the project, alternatives, and mitigation will be in accordance with Engineer Regulation ER 1105-2-100 and will fully consider a range of environmental, economic, and social factors. As a cooperating agency, you must fully consider the views, needs, and benefits of competing interests.

No cooperating agency will have "veto" over the selection of the project plan, alternatives, or mitigation measures. Under your status as a commenting agency, you may recommend actions not ultimately adopted or implemented by the lead agency. You may also impose requirements to the extent allowed under your legal authority as a permitting agency. Conflict with the lead agency may be resolved through mediation, placing a dissenting opinion in the EA, withdrawing your cooperating agency status, or the Lead agency pursuing an EA without you as a cooperating agency.

For additional information see the enclosed "Rights and Responsibilities of Lead and Cooperating Agencies" (Forty Most Asked Questions Concerning CEQ's National Environmental Policy Act Regulations, Council on Environmental Quality, 1981).

Please indicate whether you accept this invitation to become a cooperating agency (as described above) within 30 days of the date of this letter. If you have any questions, please contact Mr. Paul DeMarco at 904-232-1897.

Sincerely,



Eric P. Summa
Chief, Environmental Branch

Enclosure

Dinkens/CESAJ-PD/1867
DeMarco/CESAJ-PD-EC/1897
Spinning/CESAJ-PD-EC
Burch/CESAJ-DP-C
Summa/CESAJ-PD-E

L: group/pdec/DeMarco/St. Johns Co/BOEM St. Johns GI CoopAgency ltr.docx

**Excerpt: Forty Most Asked Questions Concerning CEQ's
National Environmental Policy Act Regulations
(Council on Environmental Quality, 1981)**

14a. Rights and Responsibilities of Lead and Cooperating Agencies. What are the respective rights and responsibilities of lead and cooperating agencies? What letters and memoranda must be prepared?

A. After a lead agency has been designated (Sec. 1501.5), that agency has the responsibility to solicit cooperation from other federal agencies that have jurisdiction by law or special expertise on any environmental issue that should be addressed in the EIS being prepared. Where appropriate, the lead agency should seek the cooperation of state or local agencies of similar qualifications. When the proposal may affect an Indian reservation, the agency should consult with the Indian tribe. Section 1508.5. The request for cooperation should come at the earliest possible time in the NEPA process.

After discussions with the candidate cooperating agencies, the lead agency and the cooperating agencies are to determine by letter or by memorandum which agencies will undertake cooperating responsibilities. To the extent possible at this stage, responsibilities for specific issues should be assigned. The allocation of responsibilities will be completed during scoping. Section 1501.7(a)(4).

Cooperating agencies must assume responsibility for the development of information and the preparation of environmental analyses at the request of the lead agency. Section 1501.6(b)(3). Cooperating agencies are now required by Section 1501.6 to devote staff resources that were normally primarily used to critique or comment on the Draft EIS after its preparation, much earlier in the NEPA process -- primarily at the scoping and Draft EIS preparation stages. If a cooperating agency determines that its resource limitations preclude any involvement, or the degree of involvement (amount of work) requested by the lead agency, it must so inform the lead agency in writing and submit a copy of this correspondence to the Council. Section 1501.6(c).

In other words, the potential cooperating agency must decide early if it is able to devote any of its resources to a particular proposal. For this reason the regulation states that an agency may reply to a request for cooperation that "other program commitments preclude any involvement or the degree of involvement requested in the action that is the subject of the environmental impact statement." (Emphasis added). The regulation refers to the "action," rather than to the EIS, to clarify that the agency is taking itself out of all phases of the federal action, not just draft EIS preparation. This means that the agency has determined that it cannot be involved in the later stages of EIS review and comment, as well as decision making on the proposed action. For this reason, cooperating agencies with jurisdiction by law (those which have permitting or other approval authority) cannot opt out entirely of the duty to cooperate on the EIS. See also Question 15, relating specifically to the responsibility of EPA.

14b. How are **disputes resolved between lead and cooperating agencies** concerning the scope and level of detail of analysis and the quality of data in impact statements?

A. Such disputes are resolved by the agencies themselves. A lead agency, of course, has the ultimate responsibility for the content of an EIS. But it is supposed to use the environmental analysis and recommendations of cooperating agencies with jurisdiction by law or special expertise to the maximum extent possible, consistent with its own responsibilities as lead agency. Section 1501.6(a)(2).

If the lead agency leaves out a significant issue or ignores the advice and expertise of the cooperating agency, the EIS may be found later to be inadequate. Similarly, where cooperating agencies have their own decisions to make and they intend to adopt the environmental impact statement and base their decisions on it, one document should include all of the information necessary for the decisions by the cooperating agencies. Otherwise they may be forced to duplicate the EIS process by issuing a new, more complete EIS or Supplemental EIS, even though the original EIS could have sufficed if it had been properly done at the outset. Thus, both lead and cooperating agencies have a stake in producing a document of good quality. Cooperating agencies also have a duty to participate fully in the scoping process to ensure that the appropriate range of issues is determined early in the EIS process.

Because the EIS is not the Record of Decision, but instead constitutes the information and analysis on which to base a decision, disagreements about conclusions to be drawn from the EIS need not inhibit agencies from issuing a joint document, or adopting another agency's EIS, if the analysis is adequate. Thus, if each agency has its own "preferred alternative," both can be identified in the EIS. Similarly, a cooperating agency with jurisdiction by law may determine in its own ROD that alternative A is the environmentally preferable action, even though the lead agency has decided in its separate ROD that Alternative B is environmentally preferable.

14c. What are the specific responsibilities of federal and state **cooperating agencies to review draft EISs**?

A. Cooperating agencies (i.e., agencies with jurisdiction by law or special expertise) and agencies that are authorized to develop or enforce environmental standards, must comment on environmental impact statements within their jurisdiction, expertise or authority. Sections 1503.2, 1508.5. If a cooperating agency is satisfied that its views are adequately reflected in the environmental impact statement, it should simply comment accordingly. Conversely, if the cooperating agency determines that a draft EIS is incomplete, inadequate or inaccurate, or it has other comments, it should promptly make such comments, conforming to the requirements of specificity in section 1503.3.

14d. How is the lead agency to treat the comments of another agency with jurisdiction by law or special expertise which has **failed or refused to cooperate or participate in scoping or EIS preparation**?

A. A lead agency has the responsibility to respond to all substantive comments raising significant issues regarding a draft EIS. Section 1503.4. However, cooperating agencies are generally under an obligation to raise issues or otherwise participate in the EIS process during scoping and EIS preparation if they reasonably can do so. In practical terms, if a cooperating agency fails to cooperate at the outset, such as during scoping, it will find that its comments at a later stage will not be as persuasive to the lead agency.



United States Department of the Interior

BUREAU OF OCEAN ENERGY MANAGEMENT
WASHINGTON, DC 20240-0001

JUN 04 2015

Mr. Eric Summa, Chief
Environmental Branch
U.S. Army Corps of Engineers-Jacksonville District
P.O. Box 4970
Jacksonville, Florida 32232-0019

Dear Mr. Summa:

Thank you for your May 20, 2015, letter requesting that the Bureau of Ocean Energy Management (BOEM) become a cooperating agency during the preparation of an Environmental Assessment (EA) for evaluation of the feasibility of providing shoreline erosion protection and hurricane and storm damage reduction along the shores of St. Johns County, Florida. The U.S. Army Corp of Engineers Jacksonville District (Corps) is currently evaluating alternatives, consisting of an array of various structural and non-structural measures, to accomplish the identified project planning goals and objectives. Beach nourishment and dune construction were included among the structural measures carried forward within the final array of alternative plans being evaluated. These measures may require use of federal sand resources located within the Outer Continental Shelf (OCS). Section 8(k) of the Outer Continental Shelf Lands Act (OCSLA) grants BOEM the authority to convey, on a noncompetitive basis, the rights to OCS sand, gravel, or shell resources for shore protection, beach or wetlands restoration, or for use in construction projects funded in whole or part or authorized by the federal government.

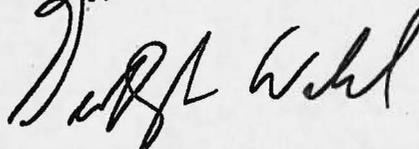
BOEM welcomes the opportunity to participate in this National Environmental Policy Act (NEPA) effort and agrees to serve as a cooperating agency since BOEM has sole jurisdiction over mineral leasing on the OCS. As a cooperating agency, BOEM expects to: participate and provide input in the NEPA process at the earliest possible time; assume, on the request of the Corps, responsibility for developing information and preparing environmental analyses for which BOEM has special expertise; make available staff support, at the lead agency's request, to enhance the interdisciplinary capability of the Corps; provide comment on draft versions of the EA when requested; and use our own funds to accomplish these responsibilities. Several NEPA documents have been previously prepared by the Corps and/or BOEM considering the potential environmental effects of dredging offshore sand resources within the vicinity of the project area. BOEM expects to collaborate with the Corps to identify the existing NEPA analyses that can be used to ensure the most efficient and effective treatment of potential effects, while also considering and incorporating new information and science when appropriate.

BOEM recognizes the importance of initiating and agrees to participate in the required Endangered Species Act (ESA) Section 7 consultation; the Magnuson-Stevens Fishery and Conservation Management Act Essential Fish Habitat (EFH) consultation (Section 305); the National Historic Preservation Act Section (NHPA) Section 106 process; and the Coastal Zone Management Act (CZMA) Section 307 consistency process. The lead agency in ESA Section 7

consultation for potential impacts on protected species will be designated by jurisdiction and in accordance with 50 CFR §402.07. BOEM is a joint consulting agency with the Corps in the ongoing re-initiated consultation for the South Atlantic Regional Biological Opinion (SARBO), for which this project would be included as a component of the proposed action. BOEM anticipates that this consultation will be concluded prior to any planned construction date for this project and will serve as the consultation mechanism for the in-water dredging and placement activities of both agencies. The Corps would be the lead agency and consult with the U.S. Fish and Wildlife Service (FWS) concerning effects from placement activities for species under their purview (i.e., nesting sea turtles) and will notify FWS of BOEM's interconnected action and cooperating role. BOEM and the Corps will consult jointly with NMFS Habitat Conservation Division on essential fish habitat. BOEM anticipates that the Corps will be the lead federal agency for ensuring NHPA Section 106 compliance. BOEM expects to act in a consulting role, especially when coordinating with the Florida State Historic Preservation Officer (SHPO) concerning the use of OCS sand resources and all related cultural resource survey activities. BOEM requests that the Corps involve BOEM in all deliberations with the SHPO or Tribal Historic Preservation Officers so that BOEM's involvement in the undertaking is understood. The Corps will be following Subpart C procedures to obtain a consistency concurrence from the Florida Department of Environmental protection through the Joint Coastal Permit process in compliance with Section 307 of the Coastal Zone Management Act (CZMA).

BOEM looks forward to working with the Corps during this process. We would greatly appreciate it if the Corps would include us on all public notices and correspondence to other federal and state agencies concerning this project. If you would like to discuss any of these items further, please contact Doug Piatkowski at (703) 787-1833 or by e-mail at douglas.piatkowski@boem.gov.

Sincerely,



Geoffrey Wikel
Chief, Branch of Environmental Coordination
Division of Environmental Assessment

cc: Jeffrey Reidenauer, Leasing Division
Bureau of Ocean Energy Management



Florida Department of Environmental Protection

Marjory Stoneman Douglas Building
3900 Commonwealth Boulevard
Tallahassee, Florida 32399-3000

Rick Scott
Governor

Carlos Lopez-Cantera
Lt. Governor

Jonathan P. Steverson
Interim Secretary

June 24, 2015

Mr. Eric P. Summa, Chief
Environmental Branch, Jacksonville District
U.S. Army Corps of Engineers
P.O. Box 4970
Jacksonville, FL 32232-0019

RE: Department of the Army, Jacksonville District Corps of Engineers –
Draft Supplemental Environmental Assessment, North Beach and
Nearshore Placement, Maintenance Dredging St. Augustine Inlet and
Adjacent Intracoastal Waterway – St. Johns County, Florida.
SAI # FL201505017280C

Dear Mr. Summa:

The Florida State Clearinghouse has coordinated a review of the subject Draft Supplemental Environmental Assessment (SEA) under the following authorities: Presidential Executive Order 12372; § 403.061(42), *Florida Statutes*; the Coastal Zone Management Act, 16 U.S.C. §§ 1451-1464, as amended; and the National Environmental Policy Act, 42 U.S.C. §§ 4321-4347, as amended.

The following agencies submitted comments, concerns and recommendations regarding the Draft SEA, all of which (memorandum and letters) are attached hereto, incorporated herein by this reference, and made an integral part of this letter:

- Florida Department of Environmental Protection
- Florida Fish and Wildlife Conservation Commission
- Florida Department of State, Division of Historical Resources

Based on the information contained in the Draft SEA and enclosed state agency comments, the state has determined that, at this stage, the proposed federal action is consistent with the Florida Coastal Management Program (FCMP). To ensure the project's continued consistency with the FCMP, the concerns identified by our reviewing agencies must be addressed prior to project implementation. The state's continued concurrence will be based on the activities' compliance with FCMP authorities, including federal and state monitoring of the activities to ensure their continued conformance, and the adequate resolution of issues

Mr. Eric P. Summa
Page 2 of 2
June 24, 2015

identified during this and any subsequent reviews. The state's final concurrence of the project's consistency with the FCMP will be determined during the environmental permitting process, in accordance with Section 373.428, *Florida Statutes*.

Thank you for the opportunity to review the draft document. Should you have any questions regarding this letter, please don't hesitate to contact me at Lauren.Milligan@dep.state.fl.us or (850) 245-2170.

Yours sincerely,



Lauren P. Milligan, Coordinator
Florida State Clearinghouse
Office of Intergovernmental Programs

Enclosures

ec: Roxane Dow, DEP, DWRM
Rebecca Prado, DEP, FCO
Cheri Albin, DEP, FPS
Scott Sanders, FWC
Timothy Parsons, DOS



Florida

Department of Environmental Protection

"More Protection, Less Process"



Categories

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Project Information	
Project:	FL201505017280C
Comments Due:	06/12/2015
Letter Due:	06/30/2015
Description:	DEPARTMENT OF THE ARMY, JACKSONVILLE DISTRICT CORPS OF ENGINEERS - DRAFT SUPPLEMENTAL ENVIRONMENTAL ASSESSMENT, NORTH BEACH AND NEARSHORE PLACEMENT, MAINTENANCE DREDGING ST. AUGUSTINE INLET AND ADJACENT INTRACOASTAL WATERWAY - ST. JOHNS COUNTY, FLORIDA.
Keywords:	ACOE - MAINTENANCE DREDGING ST. AUGUSTINE INLET AND IWW - ST. JOHNS CO.
CFDA #:	12.107
Agency Comments:	
ENVIRONMENTAL PROTECTION - FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION	
<p>The DEP's Division of Water Resource Management finds the Draft SEA to be consistent with its authorities under the FCMP. The document addresses recommendations in the St. Augustine Inlet Management Plan, and one nearshore placement event has already been permitted under Joint Coastal Permit Modification No. 0251706-006-JN. The DEP's Florida Coastal Office also offers the following specific comments: The proposed South Ponte Vedra placement areas (between R-84 and R-98) are within the Guana River Marsh Aquatic Preserve and the Guana Tolomato Matanzas NERR. This area is a State Sea Turtle Index beach with a monitoring dataset beginning in 1987; any artificial manipulation during sea turtle nesting season could compromise the integrity of this long-standing data. The waters of the aquatic preserve are also classified as an OFW. The Draft SEA uses data collected between 2001 and 2008. Since that time, the area has seen a significant increase in nesting. Staff suggests that more recent data be used, including this year's nests: a Leatherback nest documented near R-105 on May 17, 2015, and a Kemp's Ridley nest documented near R-102 on May 23, 2015. It is likely that the "nest per kilometer" ranking has changed as well. Although alterations to the beach could compromise the beach as an index beach, staff will defer to the FWC's recommendations, as they are the lead agency for protected species. The beaches within the Guana River Marsh Aquatic Preserve have not been previously nourished. Therefore, it is recommended that that sand placed on these beaches be carefully selected and monitored to ensure that the original grain size is preserved. Sediment samples used to determine the native beach grain size should be obtained from beaches within the aquatic preserve that have not been previously nourished....</p>	
FISH and WILDLIFE COMMISSION - FLORIDA FISH AND WILDLIFE CONSERVATION COMMISSION	
<p>The FWC notes that Section 4 of the draft SEA addresses environmental effects, proposed minimization measures, and environmental commitments. The USACE has determined that the nearshore placement "may affect but is not likely to adversely affect" sea turtles in the water, manatees, right whales, or the smalltooth sawfish, and that the north beach placement is "not likely to adversely affect" these species. FWC staff offers the following additional recommendations for consideration in the final SEA. Placement of sand in the nearshore along a marine turtle nesting beach from May 1 through October 31 can interfere with nesting or hatchling marine turtles. Vessels operating along the nesting beach at night can block access to or from the beach. Lights on the dredge and other vessels operating in proximity to the nesting beach could be visible for miles along the shoreline, causing disorientation of nesting and/or hatchling sea turtles. Minimization measures need to be proposed to ensure that nesting and hatchling marine turtles are protected if nearshore placement occurs at night during the nesting season. FWC staff may provide more specific recommendations once project specifications have been finalized, such as during the permit review process. The draft SEA states that the USACE would implement its migratory bird protection policy should dredged sand be placed on the beach during the April 1 through August 31 seabird and shorebird nesting season. It is stated that the policy requires monitoring and a buffer of at least 200 feet around nests. FWC's standard shorebird conditions recommend a buffer distance of 300 feet. Buffer zones and other avoidance measures can be used to reduce the potential for "take" of state-listed species, as defined in Chapter 68A-27, F.A.C., which would eliminate the need to obtain an Incidental Take Permit from the FWC. Staff is available to assist with determining avoidance and minimization measures or discuss permitting alternatives.</p>	
STATE - FLORIDA DEPARTMENT OF STATE	
<p>The DOS notes that a new cultural resource assessment survey will be conducted by the USACE of the South Ponte Vedra (SPV) Near Shore Placement Area. Staff looks forward to receiving a copy of this survey for review. Regarding the proposed maintenance dredging activities, the DOS' May 8, 2015 comments concerning the maintenance of buffers around known targets and magnetic anomalies are still applicable. DOS notes that these concerns are addressed in the Draft SEA (April 2015). If the above conditions are met, the DOS concurs with the USACE's determination that the proposed undertakings will have no adverse effect on historic properties.</p>	
ST. JOHNS RIVER WMD - ST. JOHNS RIVER WATER MANAGEMENT DISTRICT	
SJRWMD has no comments.	
NE FLORIDA RPC - NORTHEAST FLORIDA REGIONAL PLANNING COUNCIL	
The NEFRC and St. Johns County have no comments on the proposal.	



Florida Department of Environmental Protection

Marjory Stoneman Douglas Building
3900 Commonwealth Boulevard
Tallahassee, Florida 32399-3000

Rick Scott
Governor

Carlos Lopez-Cantera
Lt. Governor

Jonathan P. Steverson
Interim Secretary

MEMORANDUM

TO: Lauren Milligan, Office of Intergovernmental Programs

FROM: Roxane Dow, Division of Water Resource Management
Rebecca Prado, Florida Coastal Office
Cheri Albin, Florida Park Service

SUBJECT: Department of the Army, Jacksonville District Corps of Engineers –
Draft Supplemental Environmental Assessment (SEA), North Beach and
Nearshore Placement, Maintenance Dredging St. Augustine Inlet and
Adjacent Intracoastal Waterway – St. Johns County, Florida.
SAI # FL201505017280C

DATE: June 15, 2015

Staff of the Department's Division of Water Resource Management finds the Draft SEA to be consistent with its authorities under the Florida Coastal Management Program. The document addresses recommendations in the St. Augustine Inlet Management Plan (IMP), and one nearshore placement event has already been permitted under Joint Coastal Permit Modification No. 0251706-006-JN.

The Department's Florida Coastal Office also offers the following specific comments:

The proposed South Ponte Vedra placement areas (between range monuments R-84 and R-98) are within the Guana River Marsh Aquatic Preserve and the Guana Tolomato Matanzas National Estuarine Research Reserve. This area is a State Sea Turtle Index beach with a monitoring dataset beginning in 1987; any artificial manipulation during sea turtle nesting season could compromise the integrity of this long-standing data. The waters of the aquatic preserve are also classified as Outstanding Florida Waters (OFW).

The Draft SEA uses data collected between 2001 and 2008. Since that time, the area has seen a significant increase in nesting. Staff suggests that more recent data be used, including this year's nests: a Leatherback sea turtle nest documented near monument R-105 on May 17, 2015, and a Kemp's Ridley sea turtle nest documented near R-102 on May 23, 2015. It is

Memorandum
SAI # FL201505017280C
Page 2 of 2
June 15, 2015

likely that the “nest per kilometer” ranking has changed as well. Although alterations to the beach could compromise the beach as an index beach, staff will defer to the Florida Fish and Wildlife Conservation Commission’s recommendations, as they are the lead agency for protected species.

The beaches within the Guana River Marsh Aquatic Preserve have not been previously nourished. Therefore, it is recommended that that sand placed on these beaches be carefully selected and monitored to ensure that the original grain size is preserved. Sediment samples used to determine the native beach grain size should be obtained from beaches within the aquatic preserve that have not been previously nourished. This should not only help reduce turbidity to the OFW classified waters, but also lead to quicker stabilization of the beach profile, reduce erosion and serve to maximize the interval between future nourishments.

For further information and assistance, please contact Mr. Mike Shirley or Ms. Andrea Noel in the Florida Coastal Office’s East Coast Region at (904) 823-4500.

The following comments are provided by the Department’s Florida Park Service (FPS):

The FPS recognizes the St. Augustine IMP and will work with the Division of Water Resource Management to provide support and further the objectives of the plan, particularly optimizing the protection of beach habitat and beach front recreation at Anastasia State Park.

In recent years, FPS staff has observed increased erosion on the north end of Anastasia State Park following dredging projects north of and offshore the park. These alterations have led to the loss of significant beach front, and endangered beach mouse and shorebird nesting habitat in the northernmost strand of the park. The FPS, therefore, requests that sand transfer material be placed south of the inlet between R-125 and R-127 in an effort to replace loss of this significant habitat and recreational area on the park’s north end. Placement of sand as noted above would further the objective to replicate the natural drift of sand that has been interrupted or altered, and to place sand on adjacent eroding beaches put forward in the IMP.

If you have any questions, please contact Ms. Cheri Albin in the FPS Bureau of Natural and Cultural Resources at (850) 245-3105.



**Florida Fish
and Wildlife
Conservation
Commission**

Commissioners

Richard A. Corbett
Chairman
Tampa

Brian Yablonski
Vice Chairman
Tallahassee

Ronald M. Bergeron
Fort Lauderdale

Richard Hanas
Oviedo

Aliese P. "Liesa" Priddy
Immokalee

Bo Rivard
Panama City

Charles W. Roberts III
Tallahassee

Executive Staff

Nick Wiley
Executive Director

Eric Sutton
Assistant Executive Director

Jennifer Fitzwater
Chief of Staff

**Office of the
Executive Director
Nick Wiley
Executive Director**

(850) 487-3796
(850) 921-5786 FAX

*Managing fish and wildlife
resources for their long-term
well-being and the benefit
of people.*

620 South Meridian Street
Tallahassee, Florida
32399-1600
Voice: (850) 488-4676

Hearing/speech-impaired:
(800) 955-8771 (T)
(800) 955-8770 (V)

MyFWC.com

June 16, 2015

Lauren P. Milligan, Coordinator
Florida State Clearinghouse
Florida Department of Environmental Protection
3900 Commonwealth Blvd, M.S. 47
Tallahassee, FL 32399-3000
Lauren.Milligan@dep.state.fl.us

Re: SAI #FL201505017280C, Department of the Army, Jacksonville District Corps of Engineers, Draft Supplemental Environmental Assessment (SEA), Maintenance Dredging of St. Augustine Inlet with Beach and Nearshore Placement, St. Johns County

Dear Ms. Milligan:

Florida Fish and Wildlife Conservation Commission (FWC) staff has reviewed the above-referenced project, and provides the following comments and recommendations for your consideration in accordance with Chapter 379, Florida Statutes, and the Coastal Zone Management Act, Florida's Coastal Management Program.

Project Description

The U.S. Army Corps of Engineers (USACE) proposes to conduct periodic maintenance dredging of the St. Augustine Inlet, including Intracoastal Waterway (IWW) Cuts SJ-28 to SJ-30, a portion of the inlet flood shoal, and a portion of the inlet entrance channel along Porpoise Point. The proposed project includes placement of beach-compatible dredge spoil along the shorelines of: 1) Anastasia State Park and St. Augustine Beach from Florida Department of Environmental Protection (FDEP) monuments R-132 to R-152 located south of the inlet, 2) South Ponte Vedra from R-84 to R-98 located north of the inlet, and 3) Vilano Beach from R-109 to R-117 north of the inlet. Dredge spoil that is not beach-compatible is proposed to be placed in near-shore placement areas from FDEP monuments R-141 to R-146 south of the inlet or from R-84 to R-98 and R-109 to R-117 north of the inlet.

An Environmental Assessment was completed in 2011 for the proposed maintenance dredging with spoil disposal on the beach and nearshore areas south of the inlet with a Finding of No Significant Impact. In 2014 the FDEP issued the "Critically Eroded Beaches in Florida" report, which identified 11.5 miles of critically eroded shoreline in St. Johns County and a revision to the St. Augustine Inlet Management Plan. The plan recommended placement of dredged beach-compatible dredge spoil on designated critically eroded shorelines to the north or south of the inlet. The subject draft SEA is intended to only evaluate placement of dredge spoil north of the inlet. It is noted that the FDEP issued Joint Coastal Permit (JCP) Modification No. 0251706-006-JN on April 21, 2015, for nearshore placement of dredge spoil at Vilano Beach.

Potentially Affected Resources

As discussed in Section 3.3 of the draft SEA, the project areas may provide habitat for the following federally listed species:

- Green sea turtle (*Chelonia mydas*, Federally Endangered [FE])
- Loggerhead sea turtle (*Caretta caretta*, Federally Threatened [FT])
- Leatherback sea turtle (*Dermochelys coriacea*, FE)
- Kemp's ridley sea turtle (*Lepidochelys kempii*, FE)
- Florida manatee (*Trichechus manatus latirostris*, FE)
- Smalltooth sawfish (*Pristis pectinate*, FE)
- Piping plover (*Charadrius melodus*, FT)
- Anastasia Island beach mouse (*Peromyscus polionotus phasma*, FE)
- North Atlantic right whale (*Eubalaena glacialis*, FE)

The draft SEA notes that the project area is located within critical habitat for the loggerhead sea turtle, designated by the U.S. Fish and Wildlife Service and the National Marine Fisheries Service (NMFS) in July 2014. It is also noted that the project site is located within NMFS-designated critical habitat for the North Atlantic right whale. Section 3.6 of the draft SEA notes that species common to northeast Florida may be found within the dredge spoil placement areas, including wading birds, shorebirds and other colonial nesting birds, gopher tortoises, and benthic organisms.

Comments and Recommendations

Section 4 of the draft SEA addresses environmental effects, proposed minimization measures, and environmental commitments. The USACE has determined that the nearshore placement “may affect but is not likely to adversely affect” sea turtles in the water, manatees, right whales, or the smalltooth sawfish, and that the north beach placement is “not likely to adversely affect” these species.

Marine Turtles

The draft SEA notes that the terms and conditions of the NMFS South Atlantic Division Regional Biological Opinions (SARBO) that are intended to minimize incidental take of marine turtles will be followed. The draft SEA also includes measures to minimize potential adverse impacts to marine turtles. FWC staff offers the following additional recommendations for consideration in preparing the final SEA. Placement of sand in the nearshore along a marine turtle nesting beach from May 1 through October 31 can interfere with nesting or hatchling marine turtles. Vessels operating along the nesting beach at night can block access to or from the beach. Lights on the dredge and other vessels operating in proximity to the nesting beach could be visible for miles along the shoreline, causing disorientation of nesting and/or hatchling sea turtles. Minimization measures need to be proposed to ensure that nesting and hatchling marine turtles are protected if nearshore placement occurs at night during the nesting season. FWC staff

may provide more specific recommendations once project specifications have been finalized, such as during the permit review process.

Seabirds and Shorebirds

The draft SEA states that the USACE would implement its migratory bird protection policy should dredged sand be placed on the beach during the April 1 through August 31 seabird and shorebird nesting season. It is stated that the policy requires monitoring and a buffer of at least 200 feet around nests. The FWC standard shorebird conditions recommends a buffer distance of 300 feet. Buffer zones and other avoidance measures can be used to reduce the potential for "take" of state-listed species, as defined in Chapter 68A-27, Florida Administrative Code (Rules Relating to Endangered or Threatened Species), which would eliminate the need to obtain an Incidental Take Permit from the FWC. FWC staff is available to assist with determining avoidance and minimization measures or to discuss permitting alternatives.

We appreciate the opportunity to review the draft SEA and FWC staff is available to provide technical assistance as needed in preparation of the final SEA to ensure that potential impacts to fish and wildlife resources are minimized. We find the information submitted in the draft SEA consistent with FWC's authorities under Chapter 379, F.S. If you need any further assistance, please do not hesitate to contact Jane Chabre either by phone at (850) 410-5367 or by email at FWCConservationPlanningServices@MyFWC.com. If you have specific technical questions regarding the content of this letter, please contact Laura DiGruttolo by phone at (352) 732-1225 or by email at Laura.DiGruttolo@MyFWC.com.

Sincerely,



Jennifer D. Goff
Land Use Planning Administrator
Office of Conservation Planning Services

jdg/ld

ENV 1-3-2

St Augustine Inlet and IWW North Placement Draft EA_21077_061615

cc: Paul Demarco, USACE, paul.m.demarco@usace.army.mil



FLORIDA DEPARTMENT *of* STATE

RICK SCOTT
Governor

KEN DETZNER
Secretary of State

Mr. Eric P. Summa
Jacksonville USACE, Planning & Policy Division
Environmental Branch
701 San Marco Boulevard
Jacksonville, Florida 32207-8175

June 2, 2015

Re: DHR Project: 2015-2095/ Received by DHR: May 4, 2015
Sponsor: Florida Inland Navigation District, St. Augustine Port, Waterway and Beach District
Project: U.S. Army Corp of Engineers, Maintenance Dredging for Proposed Cuts 27A to 30A of the IWW and the St. Augustine Inlet Channel and Settling Basins
Disposal Alternatives for Beach Placement above Mean High Water: St. Augustine Beach or Anastasia State Park (Between DEP Monuments R-131-A to R-148)
Nearshore Placement Alternatives below Mean Lower Low Water between DEP Monument R-141 to R-146
Additional Placement Areas for Critically Eroding Areas in South Ponte Vedra (SPV) and Vilano Beach (VB) St. Johns County

Dear Mr. Summa:

This office reviewed the referenced project for possible effects on historic properties listed, or eligible for listing, on the *National Register of Historic Places*. The review was conducted in accordance with Section 106 of the *National Historic Preservation Act of 1966*, as amended, and its implementing regulations in *36 CFR Part 800: Protection of Historic Properties*.

We note that a new cultural resource assessment survey will be conducted by the Corps of the South Ponte Vedra (SPV) Near Shore Placement Area. We look forward to receiving a copy of this survey for review. Regarding the above referenced maintenance dredging activities: our comment of May 8, 2015 (DHR Project File # 2015-1661 copy attached) still stand. We note that these concerns are addressed in the Draft Environmental Assessment (April 2015).

If the above conditions are met, we concur with the Corps' determination that the proposed undertakings will have no adverse effect on historic properties.

For any questions concerning our comments, please contact Robin Jackson, Historic Preservationist, Compliance and Review, by electronic mail at robin.jackson@dos.myflorida.com, or at 850.245.6333, or 800.847.7278.

Sincerely

Robert F. Bendus, Director
Division of Historical Resources
& State Historic Preservation Officer

Division of Historical Resources
R.A. Gray Building • 500 South Bronough Street • Tallahassee, Florida 32399
850.245.6300 • 850.245.6436 (Fax) flheritage.com
Promoting Florida's History and Culture VivaFlorida.org





FLORIDA DEPARTMENT *of* STATE

RICK SCOTT
Governor

KEN DETZNER
Secretary of State

Mr. Eric P. Summa
Jacksonville USACE, Permits Section
701 San Marco Boulevard. RM 372
Jacksonville, Florida 32207

May 08, 2015

Re: DHR No.: 2015-1661/ Received by DHR: April 09, 2015
Applicant: U.S. Army Corps of Engineers
Project: St. Augustine Maintenance Dredge – Cuts SJ 28, 29, 29A, 30 and 30A

Dear Mr. Summa:

Our office received and reviewed the project in accordance with Section 106 of the *National Historic Preservation Act of 1966*, as amended and the *National Environmental Policy Act of 1969*. The State Historic Preservation Officer is to advise and assist federal agencies when identifying historic properties (archaeological, architectural, and historical resources) listed, or eligible for listing, in the National Register of Historic Places, assessing the project's effects, and considering alternatives to avoid or minimize adverse effects.

- Maintain a 200 foot buffer from these four known targets (SA-T-5, SA-OS-2, SA-OS-3 & SA-OS-4)
- We would like to remind the applicant of our previous recommendation regarding dredging of the St. Augustine Inlet Channel. There are 20 magnetic anomalies (Cluster SR 1-6) within the South Reach Cuts SJ-29, 29A and 30. Our recommendation for a 100 foot buffer to be maintained still stands.
- Maintain a 150 foot buffer around site 8SJ4889, Target 1 (Dixie Crystal Wreck)
- We recommend that the applicant make contingency plans in the case of fortuitous finds or unexpected discoveries during ground disturbing activities within the project area:

If prehistoric or historic artifacts are encountered at any time within the project site area, the permitted project shall cease all activities involving subsurface disturbance in the immediate vicinity of the discovery. The applicant shall contact the Florida Department of State, Division of Historical Resources, Compliance Review Section at (850)-245-6333. Project activities shall not resume without verbal and/or written authorization. In the event that unmarked human remains are encountered during permitted activities, all work shall stop immediately and the proper authorities notified in accordance with Section 872.05, Florida Statutes.



Division of Historical Resources
R.A. Gray Building • 500 South Bronough Street • Tallahassee, Florida 32399
850.245.6300 • 850.245.6436 (Fax) flheritage.com
Promoting Florida's History and Culture VivaFlorida.org

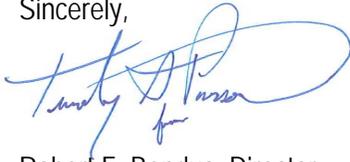


Mr. Summa
DHR No.: 2015-1661
May 08, 2015
Page 2

- Any anomalies that cannot be avoided by project activities will need to be subjected to diver investigation to determine if they represent significant cultural resources that may be impacted by the proposed undertaking.

For any questions concerning our comments, please contact Mary Berman, Historic Preservationist, Compliance and Review at 850.245.6333, or by electronic mail at Mary.Berman@dos.myflorida.com.

Sincerely,

A handwritten signature in blue ink, appearing to read "Robert F. Bendus" with a stylized flourish at the end.

Robert F. Bendus, Director
Division of Historical Resources
and State Historic Preservation Officer



RECEIVED

JUN 09 2015

DEP Office of
Intergov'tl Programs

Bringing Communities Together

Baker • Clay • Duval • Flagler • Nassau • Putnam • St. Johns

June 5, 2015

Lauren P. Milligan
Florida State Clearinghouse
Florida Department of Environmental Protection
3900 Commonwealth Boulevard, MS 47
Tallahassee, Florida 32399-3000

SAI # FL201505017280C

NEFRC # FSC-15-R004

Project Description: Department of the Army, Jacksonville District Corps of Engineers – Draft Supplemental Environmental Assessment, North Beach and Nearshore Placement, Maintenance Dredging St. Augustine Inlet and Adjacent Intracoastal Waterway – St. Johns County, Florida .

Attn: Florida State Clearinghouse

Pursuant to the provisions of Presidential Executive Order 12372, Governor's Executive Order 95-359 and Chapter 29E-6 Florida Administrative Code, the staff of the Northeast Florida Regional Council (NEFRC) has reviewed the above referenced project for dredging and nearshore replacement in St. Johns County. After review, staff at the Northeast Florida Regional Council has no comments.

All the best,

Eric B. Anderson, AICP
Senior Regional Planner
Intergovernmental Coordination & Review
Northeast Florida Regional Council
(904) 279-0885 x178
eanderson@nefrc.org



UNITED STATES DEPARTMENT OF COMMERCE

National Oceanic and Atmospheric Administration

NATIONAL MARINE FISHERIES SERVICE

Southeast Regional Office

263 13th Avenue South

St. Petersburg, Florida 33701-5505

<http://sero.nmfs.noaa.gov>

June 29, 2015

F/SER47:BH/pw

(Sent via Electronic Mail)

Colonel Alan M. Dodd, Commander
Jacksonville District Corps of Engineers
PO Box 4970
Jacksonville, Florida 32232-0019

Attention: Paul Demarco

Dear Colonel Dodd:

NOAA's National Marine Fisheries Service (NMFS) reviewed the Jacksonville District's public notice dated May 1, 2015, and Draft *Supplemental Environmental Assessment, Maintenance Dredging St. Augustine Inlet and Adjacent Intracoastal Waterway, St. Johns County, Florida* (SEA), dated April 2015. The Jacksonville District proposes to maintenance dredge approximately 200,000 cubic yards of material from Cuts 27A to 30A of the Intracoastal Waterway (IWW) and the St. Augustine Inlet entrance channel and settling basins. The IWW would be dredged to -12 feet mean lower low water (MLLW) plus 2 feet of allowable over dredge, and the inlet entrance channel and settling basins would be dredged to -16 feet MLLW plus 2 feet of allowable over dredge. Dredge material disposal alternatives include:

- Beach placement above mean high water on St. Augustine Beach or Anastasia State Park between Florida Department of Environmental Protection (FDEP) monuments R-131A to R148.
- Nearshore (subtidal) placement between FDEP monuments R-141 to R-146.
- Placement in FDEP-designated critically eroding areas in South Ponte Vedra and Vilano Beach between FDEP Monuments R-84 to R-98 and between R109 to R-117, respectively. Adding this disposal area is the primary reason for the SEA.

The initial determination by the Jacksonville District is the proposed maintenance dredging of sand from St. Augustine Inlet, which the South Atlantic Fishery Management Council designates a Habitat Area of particular Concern (HAPC) and the IWW and disposal onto the beach and into nearshore waters SAFMC designates essential fish habitat (EFH), would not have a substantial adverse impact on EFH or federally managed fishery species. As the nation's federal trustee for the conservation and management of marine, estuarine, and anadromous fishery resources, NMFS provides the following comments and recommendations pursuant to authorities of the Fish and Wildlife Coordination Act and the Magnuson-Stevens Fishery Conservation and Management Act (Magnuson-Stevens Act).

Consultation History

The Jacksonville District initiated EFH consultation by letter dated November 18, 2009, and provided a the Draft *Environmental Assessment, St. Augustine Inlet and Atlantic Intracoastal*



Waterway, Maintenance Dredging with Beach Placement, St. Johns County, Florida (EA), dated October 2009. By letter dated March 2, 2010, the NMFS provided three EFH conservation recommendations for the work, and the Jacksonville District responded to the EFH conservation recommendations by letter on May 10, 2010:

- The NMFS recommended Best Management Practices, such as restricting the time of year the dredging is done, be followed to reduce impacts to EFH and vulnerable life stages of federally managed fishery species. The Jacksonville District responded indicating it would follow to the extent practicable a schedule of seasonal sediment placement (August to March) to reduce these impacts.
- The NMFS requested the Final EA provide additional information supporting the District's contention that impacts to benthic communities at the nearshore disposal area would be minimal or, better, include a monitoring program to evaluate the impacts from nearshore disposal. The Jacksonville District provided additional citations of scientific reports concluding impacts to nearshore benthic communities may be minimal.
- The NMFS requested the Final EA provide additional information supporting the District's contention that benthic communities in the beach disposal areas would recover between dredging events, or better, include a monitoring program to evaluate the impacts from frequent disposal on the beach communities. The Jacksonville District provided additional citations of scientific reports concluding impacts to the beach communities may be minimal despite the frequent disposal events.

Due to staffing limitations, the NMFS did not further pursue the recommended monitoring programs, and the Jacksonville District released the Final EA and Finding of No Significant Impact (FONSI) on January 19, 2011.

Essential Fish Habitat in the Project Area

As is normal for an SEA, the discussion of impacts to EFH rely heavily on the discussion in the Final EA and focus on the areas not covered previously, i.e., the new disposal areas South Ponte Vedra Beach and Vilano Beach (Draft SEA Sections 3.5 and 4.3). Hardbottom habitat is not present near the new disposal area and the predominant EFH present is sandy bottom. Draft SEA Section 3.5 lists hard clams and menhaden as federally managed fishery species. While these species are important components of marine food webs in the project area, they are not federally managed. Additionally, this section identifies flounder (*Paralichthys* sp.) as a federally managed fishery species. Summer flounder (*Paralichthys dentatus*) is a federally managed species; however, it is not abundant in the area and could be removed from the EFH section of the Final SEA. Draft SEA Sections 4.3.2 and 4.3.3 affirm the Jacksonville District's commitment made in the Final EA to minimize impacts to vulnerable life stages of federally managed fishery species by restricting dredging to the fall and winter as funding and scheduling allow.

Recommendations

The NMFS affirms its earlier recommendations for monitoring programs to guide appropriate balancing of the timing and frequency of dredging needed for safe navigation with the time periods needed for recovery of foraging areas used by fishery species. In the absence of such monitoring to guide development of best management practices for this inlet, the proposed environmental window is acceptable.

Thank you for the opportunity to provide comments. Please direct related questions or comments to the attention of Brandon Howard at 400 N Congress Avenue, Suite 110, West Palm Beach, Florida 33401. He may be reached by telephone at 561-249-1652 or by e-mail at Brandon.Howard@noaa.gov.

Sincerely,

A handwritten signature in cursive script that reads "Poe Willa".

/ for

Virginia M. Fay
Assistant Regional Administrator
Habitat Conservation Division

cc: COE, Paul.M.Demarco@usace.army.mil
FWS, Ashleigh_Blackford@fws.gov
EPA, Eric.H.Hughes@usace.army.mil
SAFMC, Roger.Pugliese@safmc.net
F/SER4, David.Dale@noaa.gov, Brandon.Howard@noaa.gov



DEPARTMENT OF THE ARMY
JACKSONVILLE DISTRICT CORPS OF ENGINEERS
701 San Marco Boulevard
JACKSONVILLE, FLORIDA 32207-8175

REPLY TO
ATTENTION OF

Planning and Policy Division
Environmental Branch

FEB 17 2016

TO WHOM IT MAY CONCERN:

Pursuant to the National Environmental Policy Act (NEPA) and U.S. Army Corps of Engineers (Corps) regulation (33 CFR 230.11), this letter constitutes the Notice of Availability of the proposed Finding of No Significant Impact (FONSI) and integrated draft Feasibility Study and Environmental Assessment (EA) of a Coastal Storm Risk Management project in St. Johns County, Florida. The Tentatively Selected Plan includes the use of material from the St. Augustine Inlet system for placement on approximately three miles of shoreline in South Ponte Vedra and Vilano Beaches.

The draft Feasibility Study and EA is available for review online at:

<http://www.saj.usace.army.mil/About/DivisionsOffices/Planning/EnvironmentalBranch/EnvironmentalDocuments.aspx#St_Johns>.

We welcome your views and comments on the draft report, as well as information about resources and important features within the described project area. **Please provide any written comments by April 4, 2016 to:**

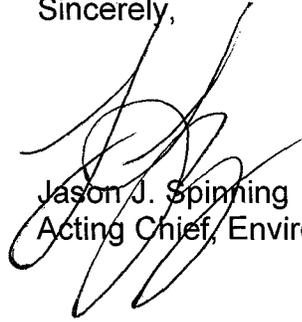
U.S. Army Corps of Engineers
Jacksonville District
Planning and Policy Division, Environmental Branch
Attn: Aubree Hershoin, Ph.D.
P.O. Box 4970
Jacksonville, FL 32232-0019

Or via email to:

Aubree.G.Hershoin@usace.army.mil

Questions concerning the EA and FONSI should be directed to Aubree Hershoin at (904) 232-2136 or via e-mail at Aubree.G.Hershoin@usace.army.mil.

Sincerely,

A handwritten signature in black ink, appearing to read "Jason J. Spinning". The signature is stylized and overlaps the printed name below it.

Jason J. Spinning
Acting Chief, Environmental Branch

Enclosure

COUNTY: ST. JOHNS

DATE: 2/22/2016

COMMENTS DUE DATE: 3/25/2016

CLEARANCE DUE DATE: 4/22/2016

SAI#: FL201602247563C

MESSAGE:

STATE AGENCIES	WATER MNGMNT. DISTRICTS	OPB POLICY UNIT	RPCS & LOC GOVS
ENVIRONMENTAL PROTECTION			
FISH and WILDLIFE COMMISSION			
STATE			
TRANSPORTATION			

The attached document requires a Coastal Zone Management Act/Florida Coastal Management Program consistency evaluation and is categorized as one of the following:

- Federal Assistance to State or Local Government (15 CFR 930, Subpart F). Agencies are required to evaluate the consistency of the activity.
- Direct Federal Activity (15 CFR 930, Subpart C). Federal Agencies are required to furnish a consistency determination for the State's concurrence or objection.
- Outer Continental Shelf Exploration, Development or Production Activities (15 CFR 930, Subpart E). Operators are required to provide a consistency certification for state concurrence/objection.
- Federal Licensing or Permitting Activity (15 CFR 930, Subpart D). Such projects will only be evaluated for consistency when there is not an analogous state license or permit.

Project Description:

DEPARTMENT OF THE ARMY - DISTRICT CORPS OF ENGINEERS - INTEGRATED DRAFT FEASIBILITY STUDY AND ENVIRONMENTAL ASSESSMENT OF A COASTAL STORM RISK MANAGEMENT PROJECT, ST. JOHNS COUNTY, FLORIDA.

To: Florida State Clearinghouse

AGENCY CONTACT AND COORDINATOR (SCH)
 3900 COMMONWEALTH BOULEVARD MS-47
 TALLAHASSEE, FLORIDA 32399-3000
 TELEPHONE: (850) 245-2161
 FAX: (850) 245-2190
 EMAIL: state.clearinghouse@dep.state.fl.us

EO. 12372/NEPA Federal Consistency

- | | |
|---|---|
| <input type="checkbox"/> No Comment | <input type="checkbox"/> No Comment/Consistent |
| <input type="checkbox"/> Comment Attached | <input type="checkbox"/> Consistent/Comments Attached |
| <input type="checkbox"/> Not Applicable | <input type="checkbox"/> Inconsistent/Comments Attached |
| | <input type="checkbox"/> Not Applicable |

From:

Division/Bureau: _____

Reviewer: _____

Date: _____



REPLY TO
ATTENTION OF

DEPARTMENT OF THE ARMY
JACKSONVILLE DISTRICT CORPS OF ENGINEERS
701 San Marco Boulevard
JACKSONVILLE, FLORIDA 32207-8175

RECEIVED
FEB 22 2016
DEP Office of
Intergovt'l Programs

Planning and Policy Division
Environmental Branch

FEB 17 2016

TO WHOM IT MAY CONCERN:

Pursuant to the National Environmental Policy Act (NEPA) and U.S. Army Corps of Engineers (Corps) regulation (33 CFR 230.11), this letter constitutes the Notice of Availability of the proposed Finding of No Significant Impact (FONSI) and integrated draft Feasibility Study and Environmental Assessment (EA) of a Coastal Storm Risk Management project in St. Johns County, Florida. The Tentatively Selected Plan includes the use of material from the St. Augustine Inlet system for placement on approximately three miles of shoreline in South Ponte Vedra and Vilano Beaches.

The draft Feasibility Study and EA is available for review online at:

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We welcome your views and comments on the draft report, as well as information about resources and important features within the described project area. **Please provide any written comments by April 4, 2016 to:**

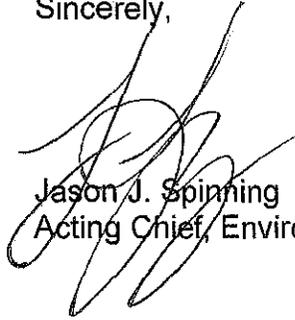
U.S. Army Corps of Engineers
Jacksonville District
Planning and Policy Division, Environmental Branch
Attn: Aubree Hershorin, Ph.D.
P.O. Box 4970
Jacksonville, FL 32232-0019

Or via email to:

Aubree.G.Hershorin@usace.army.mil

Questions concerning the EA and FONSI should be directed to Aubree Hershorin at (904) 232-2136 or via e-mail at Aubree.G.Hershorin@usace.army.mil.

Sincerely,

A handwritten signature in black ink, appearing to read "J. Spinning", written over the typed name and title.

Jason J. Spinning
Acting Chief, Environmental Branch

Enclosure



DEPARTMENT OF THE ARMY
JACKSONVILLE DISTRICT CORPS OF ENGINEERS
701 San Marco Boulevard
JACKSONVILLE, FLORIDA 32207-8175

REPLY TO
ATTENTION OF

PROPOSED FINDING OF NO SIGNIFICANT IMPACT

ST. JOHNS COUNTY COASTAL STORM RISK MANAGEMENT PROJECT SOUTH PONTE VEDRA BEACH, VILANO BEACH, AND SUMMER HAVEN REACHES

ST. JOHNS COUNTY, FLORIDA

I have reviewed the Environmental Assessment (EA) of the alternatives for providing coastal storm damage reduction to the South Ponte Vedra Beach, Vilano Beach, and Summer Haven reaches of the St. Johns County Coastal Storm Risk Management project in St. Johns County, Florida. The proposed activity includes sand placement from Florida Department of Environmental Protection (FDEP) reference monuments 102.5 to 117.5. The sand source is the St. Augustine Inlet system; however, the EA also evaluates offshore sand sources. The Draft EA for the project has been forwarded to the U.S. Environmental Protection Agency Region 4, the U.S. Fish and Wildlife Service, Vero Beach Field Office, the National Marine Fisheries Service, Southeast Region, the Florida Department of Environmental Protection, Florida Fish and Wildlife Conservation Commission, and the State Historic Preservation Officer, as well as all other known interested parties for review and comment.

This Finding incorporates by reference all discussions and conclusions contained in the EA enclosed hereto. Based on information analyzed in the EA, reflecting pertinent information obtained from agencies having jurisdiction by law and/or special expertise, I conclude that the proposed action will not significantly impact the quality of the human environment and does not require an Environmental Impact Statement. Reasons for this conclusion are in summary:

a. The work will be conducted in accordance with Biological Opinions issued by the US Fish and Wildlife Service for impacts to nesting sea turtles and endangered Piping Plovers and the Regional Biological Opinion issued by the National Marine Fisheries Service for impacts to sea turtles in the water. The U.S. Army Corps of Engineers, Jacksonville District (Corps), will take measures to minimize the effects to threatened and endangered species, including sea turtles. The project will not jeopardize the continued existence of any federally listed species or adversely modify designated critical habitat, and the Preferred Alternative will have beneficial effects to protected species habitat within the project area. Reasonable and prudent measures will be taken to substantially minimize the impact of incidental take to listed species.

b. I have determined that the Recommended Plan, as proposed, will have no adverse effect on significant historic properties. Coordination with the Florida State Historic Preservation Officer and appropriate federally recognized tribes has been initiated. As stated in the EA, identified targets will be buffered where possible; otherwise, additional investigations will be conducted prior to construction.

c. This project is being coordinated with the State of Florida, and all applicable water quality standards will be met. Water Quality Certification in the form of a Joint Coastal Permit will be obtained by the FDEP prior to construction.

d. The Corps has determined that the proposed project is consistent with the Florida Coastal Zone Management Program. The final concurrence from the State will be issued with the FDEP permit.

e. The proposed project has been evaluated pursuant to the Migratory Bird Treaty Act. The Jacksonville District's Migratory Bird Protection procedures will be implemented for this project. These procedures have been coordinated with the U.S. Fish and Wildlife Service (USFWS) and the State of Florida.

f. Benefits to the public will include the restoration of habitat for protected species, fish, and wildlife; protection of upland structures from storm damage; and enhanced opportunity for recreation.

g. Measures in place during construction to eliminate, reduce, or avoid adverse impacts to below the threshold of significance to fish and wildlife resources include the following:

1. Dredging and placement activities will occur within the template of authorized and permitted areas;
2. Water-based activities will follow standard sea turtle and smalltooth sawfish protection measures and the conditions of the National Marine Fisheries Service (NMFS) South Atlantic Regional Biological Opinion (SARBO);
3. Dredged material placement will comply with the shoreline protection measure conditions of any biological opinion issued by the USFWS; and
4. Any water based activity would follow standard manatee protection measures.

In consideration of the information summarized, I find that the proposed action will not significantly affect the human environment and does not require an Environmental Impact Statement. This document will be available to the public at the following website:

http://www.saj.usace.army.mil/About/DivisionsOffices/Planning/EnvironmentalBranch/EnvironmentalDocuments.aspx#St_Johns.

JASON A. KIRK
Colonel, Corps of Engineers
Commanding

Date



Florida Fish and Wildlife Conservation Commission

Commissioners

Brian Yablonski
Chairman
Tallahassee

Aliese P. "Liesa" Priddy
Vice Chairman
Immokalee

Ronald M. Bergeron
Fort Lauderdale

Richard Hanas
Oviedo

Bo Rivard
Panama City

Charles W. Roberts III
Tallahassee

Robert A. Spottswood
Key West

Executive Staff

Nick Wiley
Executive Director

Eric Sutton
Assistant Executive Director

Jennifer Fitzwater
Chief of Staff

Office of the
Executive Director

Nick Wiley
Executive Director

(850) 487-3796
(850) 921-5786 FAX

Managing fish and wildlife resources for their long-term well-being and the benefit of people.

620 South Meridian Street
Tallahassee, Florida
32399-1600
Voice: (850) 488-4676

Hearing/speech-impaired:
(800) 955-8771 (T)
(800) 955-8770 (V)

MyFWC.com

March 31, 2016

Chris Stahl, Coordinator
Florida State Clearinghouse
Florida Department of Environmental Protection
3900 Commonwealth Blvd, M.S. 47
Tallahassee, FL 32399-3000
Chris.Stahl@dep.state.fl.us

Re: SAI #FL201602247563C, Department of the Army, Jacksonville District Corps of Engineers, Draft Integrated Feasibility Study and Environmental Assessment, Coastal Storm Risk Management Project, St. Johns County

Dear Mr. Stahl:

Florida Fish and Wildlife Conservation Commission (FWC) staff has reviewed the above-referenced project, and provides the following comments and recommendations for your consideration in accordance with Chapter 379, Florida Statutes, and the Coastal Zone Management Act, Florida's Coastal Management Program.

Project Description

The U.S. Army Corps of Engineers (USACE) is conducting a feasibility study to investigate alternatives for coastal storm risk management of three reaches along the Atlantic coast of St. Johns County: 1) South Ponte Vedra from Florida Department of Environmental Protection (FDEP) monuments R-84 to R-104 (3.8 miles), 2) Vilano Beach from R-104 to R-117 (2.6 miles) and R-117 to the St. Augustine Inlet North Sand-trap Groin (1.1 miles), and 3) Summer Haven from R-197 to R-209 (2.3 miles). The USACE has prepared an interim Draft Integrated Feasibility Study and Environmental Assessment report that describes existing conditions of these three areas: projected conditions if a project is not implemented to address impacts from storm-induced beach erosion; formulation of plan alternatives; and environmental effects that may be associated with a plan.

The USACE has examined and conducted modeling of structural and non-structural management measures with the goal of arriving at a plan that would address erosion-related problems while maximizing benefits, including protection and enhancement of natural resources. The tentatively selected plan consists of:

- Construction of a 60-foot berm extension, a portion reflecting the average 2015 dune position, and tapers extending from monument R-102.5 to R-117.5.
- Dune construction material will consist of sand hydraulically dredged from the St. Augustine Inlet system, including the ebb, flood, Vilano Point Shoals, federal navigation channel, and associated shoals.
- Construction will include an initial event and four periodic nourishment events over 12-year intervals.

As discussed in Section 3.8 of the report, the USACE has eliminated the Summer Haven reach from further analysis based in part on the following:

- Major infrastructure, such as State Road A1A, has already been relocated landward due to erosion.
- The project's local sponsor, St. Johns County, has been purchasing properties within the Summer Haven beach area and is precluding them from development.
- With the number of structures in the area getting smaller, the USACE believes it unlikely that damages would justify a federal Coastal Storm Risk Management project.

Potentially Affected Resources

Section 2.3.3 of the draft report identifies the following as species for which the proposed project areas may provide habitat:

- Green sea turtle (*Chelonia mydas*, Federally Endangered [FE])
- Loggerhead sea turtle (*Caretta caretta*, Federally Threatened [FT])
- Leatherback sea turtle (*Dermochelys coriacea*, FE)
- Kemp's ridley sea turtle (*Lepidochelys kempii*, FE)
- Hawksbill sea turtle (*Eretmochelys imbricate*, FE)
- West Indian manatee (Florida manatee, *Trichechus manatus latirostris*, FE)
- Smalltooth sawfish (*Pristis pectinate*, FE)
- Piping plover (*Charadrius melodus*, FT)
- Red knot (*Calidris canutus*, FT)
- Anastasia Island beach mouse (*Peromyscus polionotus phasma*, FE)
- North Atlantic right whale (*Eubalaena glacialis*, FE)

In addition, portions of the proposed project area are known to provide habitat for least terns (*Sterna antillarum*, State Threatened).

Comments

Section 4 of the report addresses anticipated effects that may result from the tentatively selected plan. The USACE has determined that the tentatively selected plan "may affect but is not likely to adversely affect" sea turtles in the water, manatees, right whales, or the smalltooth sawfish. FWC staff recognizes that a number of measures for avoiding and minimizing potential impacts to these species are identified in the report, including:

- Adherence to the terms and conditions of the National Marine Fisheries Service (NMFS) South Atlantic Division Regional Biological Opinions (SARBO) that are intended to minimize incidental take of marine turtles.
- Adherence to the U.S. Fish and Wildlife Service's revised State Programmatic Biological Opinion, dated August 22, 2011, for the USACE planning and regulatory sand placement activities and their effects on sea turtles and beach mice.
- Specific protective measures for manatees and North Atlantic right whales.
- Implementation of USACE migratory bird protection measures if construction occurs in summer months.

FWC staff is available to assist in refining measures discussed in the report, as well as formulating additional avoidance and minimization measures for fish and wildlife resources as project specifications are developed.

While the Summer Haven reach has been excluded from further consideration, FWC staff provides the following information should this beach area be discussed at some future point in the

project study. FDEP issued Joint Coastal Permit (JCP) Number 0313002-001-JC to the St. Augustine Port, Waterway, and Beach District on February 6, 2014, for excavation of sand from the Summer Haven River, placement of the sand onto the adjacent beach for restoration of a dune system between monuments R-200 and R-208, and creation of least tern habitat. In 2008, a breach occurred on the south side of R-200 and natural coastal processes subsequently deposited sand into the river closing the breach in 2011. Since 2010 the beach area between R-200 and R-202 has provided habitat for a nesting colony of least terns. The project authorized by the JCP will result in "take" of the state-listed least tern (as defined in Chapter 68A-27, Florida Administrative Code), and therefore necessitated issuance of an Incidental Take Permit from FWC. Should a project be proposed by the USACE in the Summer Haven reach or any other area within least tern or other listed species habitat, the requirements of Chapter 68A-27 would apply.

We appreciate the opportunity to review the Draft Feasibility Study and EA and we look forward to further coordination during preparation of the final reports to ensure that potential impacts to fish and wildlife resources are minimized. We find the information submitted in this conceptual Draft Integrated Feasibility Study and Environmental Assessment consistent with FWC's authorities under Chapter 379, F.S. We will continue to work with the applicant as new information is incorporated into the Draft Integrated Feasibility Study and Environmental Assessment to help ensure the project remains consistent with Chapter 379, F.S. If you need any further assistance, please do not hesitate to contact Jane Chabre either by phone at (850) 410-5367 or by email at FWCConservationPlanningServices@MyFWC.com. If you have specific technical questions regarding the content of this letter, please contact Laura DiGruttolo by phone at (352) 732-1225 or by email at Laura.DiGruttolo@MyFWC.com.

Sincerely,



Jennifer D. Goff
Land Use Planning Administrator
Office of Conservation Planning Services

jdg/ld
ENV 1-3-2
Coastal Storm Risk Management Project EA_30540_033116

cc: Aubree Hershorin, Ph.D., USACE, Aubree.G.Hershorin@usace.army.mil



UNITED STATES DEPARTMENT OF COMMERCE

National Oceanic and Atmospheric Administration

NATIONAL MARINE FISHERIES SERVICE

Southeast Regional Office

263 13th Avenue South

St. Petersburg, Florida 33701-5505

<http://sero.nmfs.noaa.gov>

April 4, 2016

F/SER47:KR/pw

(Sent via Electronic Mail)

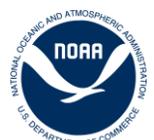
Colonel Jason A. Kirk, Commander
Jacksonville District Corps of Engineers
PO Box 4970
Jacksonville, Florida 32232-0019

Attention: Aubree G. Hershorin

Dear Colonel Kirk:

NOAA's National Marine Fisheries Service (NMFS) reviewed the draft *Integrated Feasibility Study and Environmental Assessment, Coastal Storm Risk Management Project, South Ponte Vedra Beach, Vilano Beach, and Summer Haven Reaches, St. Johns County, Florida (CSR)*M), dated February 2016, and the corresponding public notice dated February 17, 2016. The Jacksonville District proposes projects to increase beach and shoreline protection in the interest of hurricane protection, storm damage reduction, beach erosion control, and protection of public trust natural resources for three reaches along the Atlantic shoreline of St. Johns County. The St. Johns County shoreline is approximately 42 miles long, and the tentatively selected plan (TSP) would reduce the long-term risk of storm damage due to erosion, inundation, and wave damage for approximately 9.8 miles of beach. The study area for the draft CSR consisted of 3.8 miles of shoreline in South Ponte Vedra between Florida Department of Environmental Protection (FDEP) Monuments R84 and R104; 3.7 miles of shoreline in Vilano Beach between R104 to the St. Augustine North Sand-trap Groin; and 2.3 miles of shoreline in Summer Haven between R197 and R209. The District developed the draft CSR and TSP using a 50-year planning horizon with sea level rise considerations up to the year 2120. A significant component of the draft CSR addresses efforts to reduce shoreline erosion affecting Florida State Road A1A, the only north-south evacuation route for coastal communities.

The Jacksonville District proposes to provide beach and dune nourishment within the Vilano Beach reach and the South Ponte Vedra Beach reach. The TSP also includes construction of a 60-foot equilibrated seaward berm extension from South Ponte Vedra (R103.5) to Vilano Beach (R116.5). The Jacksonville District has determined the TSP would require an initial construction event requiring 1.3 million cubic yards of sand material and four periodic nourishment events requiring 866,000 cubic yards of material each distributed at 12-year intervals. Sand material, meeting Florida's standards for beach compatibility, would be sourced from the St. Augustine Inlet system, Vilano Point Shoals, and the federal navigation channel. The Jacksonville District's initial determination is the environmental effects associated with the TSP would be temporary in nature and the proposed action would not have a substantial adverse impact on essential fish habitat (EFH) or federally managed species along the eastern coast of Florida. As the nation's federal trustee for the conservation and management of marine, estuarine, and anadromous fishery resources, the NMFS provides the following comments pursuant to authorities of the Fish and Wildlife Coordination Act and the Magnuson-Stevens Fishery Conservation and Management Act (Magnuson-Stevens Act).



Consultation History

The Jacksonville District initiated EFH consultation through a request for scoping comments dated August 17, 2005. The National Marine Fisheries Service (NMFS) provided initial comments on September 13, 2005, and requested any National Environmental Policy Act (NEPA) document associated with the project include a comprehensive EFH assessment noting the importance of nearshore waters in the study area as foraging habitat for federally managed fishery resources.

Similarly, the NMFS provided consultation by letter dated March 2, 2010, on a related project, *Environmental Assessment, St. Augustine Inlet and Atlantic Intracoastal Waterway, Maintenance Dredging with Beach Placement, St. Johns County, Florida*. The NMFS provided EFH conservation recommendations for the work, and several of these recommendations are pertinent to draft CSRM because the dredged areas are considered sources of material for beach and dune nourishment within the TSP. The EFH conservation recommendations pertinent to the draft CSRM include: (1) best management practices restricting the time of year for dredging to reduce impacts to EFH and vulnerable life stages of federally managed fishery species, and (2) development of a scientifically supported rationale and monitoring program to assess impacts of beach disposal (nourishment) to benthic shoreline communities.

Essential Fish Habitat within the Project Area

Pursuant to the Magnuson-Stevens Act, the South Atlantic Fisheries Management Council (SAFMC) has designated EFH within the study area to encompass nearshore hardbottom habitat, unconsolidated substrate, and high salinity ocean surf zones. Section 2.3.4 of the draft CSRM describes EFH within the project area.

The NMFS believes the draft CSRM minimally addresses EFH and Habitat Areas of Particular Concern (HAPC) considerations and the topic receives no focused discussion. Substantial review of these considerations should be included in preparation of materials to satisfy the NEPA and to assess the potential environmental impacts by proposed actions outlined in the draft CSRM. The EFH and HAPC characterizations should include a summary of designations for each federally managed species in the project area including habitats required during each life stage (including egg, larval, postlarval, juvenile, and adult stages) and time of year of occurrence. The draft CSRM fails to recognize the project area includes an HAPC for penaeid shrimp and species among the snapper-grouper complex. Additionally, coastal inlets are considered EFH and provide critical habitat functions for Coastal Migratory Pelagics, which include king mackerel (*Scomberomorus cavalla*), Atlantic Spanish mackerel (*Scomberomorus maculatus*), and cobia (*Rachycentron canadum*). The ecological function of tidal inlets (including their ebb and flood tide shoals) is widely recognized for its contributions to spawning, egg and larval dispersal, juvenile recruitment, and as foraging habitat. The SAFMC provides additional information on EFH and its support of federally managed fishery species in *Fishery Ecosystem Plan of the South Atlantic Region*, which is available at www.safmc.net.

In St. Johns County, the nearshore hardbottom habitats, such a coquina and worm reefs, occurring along the shoreline provide unique natural habitat and serving a variety of ecosystem functions (Lindemann et al. 2009¹). It is unclear if the CSRM project area includes nearshore natural hardbottom habitats, although reference is made to a neighboring shoreline reach with “a long and relatively significant headland feature” that extends from FDEP monuments R15 to R75. The draft CSRM suggests nearshore hardbottom habitats may exist in the vicinity of the project area as determined by the presence of coquina-derived shell along the shoreline. It is likely the subtidal nearshore hardbottom habitats are ephemeral, meaning they are periodically covered and uncovered by natural sediment transport, and mapping would

¹ Lindeman, K., D. McCarthy, K. Holloway-Adkins, and D. Snyder. 2009. Ecological Functions of Nearshore Hardbottom Habitat in East Florida: A Literature Synthesis. Florida Department of Environmental Protections Bureau of Beaches and Coastal Systems, Tallahassee, FL. 186 pages.

be required to determine the exact location of nearshore hardbottom habitats. The extent and complexity of these structural forms and their contributions to EFH within the project area should be described (*e.g.*, connectivity in recruitment from inshore areas to offshore hardbottom reefs).

The draft CSRSM does not adequately describe the technical details of the TSP and alternatives required for a comprehensive EFH assessment. Among the most notable omissions are technical analyses of individual and cumulative effects on EFH, federally managed fisheries, and associated species such as major prey species, including affected life stages. The final CSRSM and its environmental assessment (EA) should include these discussions.

Impacts to Essential Fish Habitat

The NMFS primary concern with the TSP is a comprehensive sand search and inventory was not performed to locate alternative sources of beach compatible sand within the region. The draft CSRSM largely focuses on mining sand from the St. Augustine Inlet, including the ebb and flood shoal complexes. Frequent mining of the inlet may have cumulative impacts on EFH when considered with the frequency of inlet dredging utilized in navigation projects and other shoreline protection projects in the region. Secondly, the NMFS is concerned about the impacts of beach nourishment on sand coverage of nearshore hard grounds and impacts of prey resources and foraging habitat provided by the beach shoreline complex.

St. Augustine Inlet Sand Sources: Inlets serve as migratory corridors for larvae entering nursery areas and for sub-adults leaving nursery areas for maturation and spawning offshore; there is no alternative location for this ingress or egress. Systematic mining of the inlet and the federal navigation channel may result in unanticipated changes in habitat quality, including increasing the concentration of suspended sediments that may clog gills in young, less mobile fish and invertebrates and thereby increasing their mortality rate². The extent of negative effects is dependent on the life history stages of the species present and the duration of exposure to high concentrations of suspended sediments. Adherence to the Florida State Water Quality Criteria for turbidity at the edge of a 150-meter mixing zone is normally sufficiently protective of fishery resources. The NMFS requests the Jacksonville District evaluate in the final CSRSM whether a seasonal restriction on mining and dredging would be a practicable way to minimize impacts to larvae entering the estuary areas and for juveniles leaving the estuary. Additionally, the NMFS requests the Jacksonville District survey and monitor mining activities along the southeast ebb-tidal shoal and bypassing bar. Surveys of hardbottom habitat indicate that hardbottom is present approximately 0.8 miles southeast of St. Augustine Inlet (SEAMAP-SA 2001³). If hardbottom is present, an appropriate buffer between it and dredging areas should be used.

Beach Nourishment: The Jacksonville District should continue to consult with the NMFS regarding sand placement templates as well as the downdrift areas for beach nourishment within the Vilano Beach reach and the South Ponte Vedra Beach reach. Intertidal and subtidal communities along the shoreline provide feeding, resting, and staging habitat for a variety of commercially, recreationally, and ecologically important fish species⁴. While beachfront and shoreline are subject to erosion caused by storms and

² Wilber, D., and D. Clarke. 2001. Biological effects of suspended sediments: A review of suspended sediment impacts on fish and shellfish with relation to dredging activities in estuaries. *North American Journal of Fisheries Management* 21:855-87.

³ Southeast Area Monitoring and Assessment Program - South Atlantic (SEAMAP-SA). 2001. Distribution of Bottom Habitat on the Continental Shelf from North Carolina through the Florida Keys. SEAMAP-SA Bottom Mapping Project, Atlantic States Marine Fisheries Commission, Washington, DC. 166 pages.

⁴ Hackney, C., M. Posey, S. Ross, and A. Norris (editors). 1996. A Review and Synthesis of Data on Surf Zone Fishes and Invertebrates in the South Atlantic Bight and the Potential Impacts from Beach Renourishment. Prepared for the U.S. Army Corps of Engineers Wilmington District, Wilmington, NC. 119 pages.

natural shoreline processes, the beachfront, intertidal, and surf zone are nonetheless established seascape features providing valuable habitat for fishery resources migrating between nearshore and offshore habitats as part of their life cycle. The NMFS requests the Jacksonville District evaluate in the final CSRSM whether a seasonal restriction on beach nourishment would be a practicable way to minimize impacts to larvae and juveniles migrating along the shoreline. If a seasonal restriction is not practicable, an evaluation of the duration the larvae and juvenile fish would be exposed to high levels of suspended sediments should be provided.

Benthic infaunal communities within beach shoreline communities are composed of populations of opportunistic invertebrates that may repopulate after sand nourishment if certain biotic and abiotic conditions exist. The NMFS requests the Jacksonville District evaluate and monitor long-term degradation of benthic habitats within the project area, especially along the 60-foot equilibrated seaward berm extension. While many studies of beach nourishment projects report benthic communities recover quickly, many of these studies are technically flawed or define recovery in overly simplistic manners (e.g., total abundance rather than community composition)⁵. The draft CSRSM was developed to address long-term shoreline stabilization and the TSP prescribes periodic nourishment events. Adverse environmental impacts at nourishment sites include desiccation of organisms, machinery crushing organisms, burial of habitat, and physical damage to the intertidal and surf zone from fill equilibrating over time. The NMFS requests the Jacksonville District evaluate the degree to which recovery of benthic communities are likely to occur or measures that may minimize impacts to shoreline communities.

Nearshore Hardbottom Habitat: Nearshore hardbottom habitats are present in the vicinity of the project area. The NMFS requests that the Jacksonville District complete a baseline environmental assessment of the project area, including an acoustic survey to produce a photo mosaic to detect the presence of nearshore hardbottom habitat. Fish assemblages at nearshore hardbottom habitats are not only biologically diverse and juvenile dominated, but they are also reef-species dominated. The NMFS requests the Jacksonville District avoid sand placement on nearshore hardbottom habitats to the extent practicable.

EFH Conservation Recommendations

Section 305(b)(4)(A) of the Magnuson-Stevens Act requires NMFS to provide EFH Conservation Recommendations for any federal action or permit which may result in adverse impacts to EFH. Therefore, NMFS recommends the following to ensure the conservation of EFH and associated fishery resources:

- A scientifically supported rationale should be provided for assessment of alternative sand sources not included in the TSP; preferably from offshore sources or upland dredged material management areas; and capable of providing the required beach compatible sand while reducing impacts to critically important EFH associated with tidal inlets.
- Best management practices, such as restricting the time of year that construction activities including sand mining, beach and dune nourishment, and berm erection, should be included to reduce impacts to EFH and vulnerable life stages of federally managed fishery species.
- A scientifically supported rationale should be provided for concluding impacts to benthic communities at beach nourishment sites would be minimal. Alternatively, best management practices should be included in the design of beach and dune nourishment and a monitoring program should be in place to evaluate the effectiveness of those best management practices.

⁵ Peterson, C., and M. Bishop. 2005. Assessing the environmental impacts of beach nourishment. *BioScience* 55:887-896. Wilber, D., D. Clarke, R. VanDolah, and G. Ray. 2009. Pages 262-274 in: Lessons learned from biological monitoring of beach nourishment projects. Proceedings of the Western Dredging Association's Twenty-Ninth Technical Conference, Tempe, Arizona.

- A scientifically supported rationale should be provided for concluding impacts to nearshore hardbottom communities within the project area would be minimal. Alternatively, environmental and geological surveys would assess the extent of nearshore hardbottom habitat that would be impacted and a monitoring program should be in place to avoid and minimize sand placement on nearshore hardbottom habitats.

Section 305(b)(4)(B) of the Magnuson-Stevens Act and implementing regulation at 50 CFR Section 600.920(k) require the Jacksonville District to provide a written response to this letter within 30 days of its receipt. If it is not possible to provide a substantive response within 30 days, in accordance with the “findings” with the Jacksonville District, an interim response should be provided to the NMFS. A detailed response then must be provided prior to final approval of the action. The detailed response must include a description of measures proposed by the Jacksonville District to avoid, mitigate, or offset the adverse impacts of the activity. If the response is inconsistent with the EFH conservation recommendations, the Jacksonville District must provide a substantive discussion justifying the reasons for not following the recommendations.

Thank you for the opportunity to provide these comments. Please direct related questions or comments to the attention of Dr. Ken Riley at our Beaufort Field Office, 101 Pivers Island Road, Beaufort, North Carolina 28516-9722, or at (252) 728-8750.

Sincerely,



/ for

Virginia M. Fay
Assistant Regional Administrator
Habitat Conservation Division

cc: COE, Aubree.G.Hershorin@usace.army.mil
EPA, Miedema.Ron@epa.gov
USFWS, John.Milio@fws.gov
SAFMC, Roger.Pugliese@safmc.net
F/SER4, David.Dale@noaa.gov
F/SER47, Ken.Riley@noaa.gov

**SEMINOLE TRIBE OF FLORIDA
TRIBAL HISTORIC PRESERVATION OFFICE
AH-TAH-THI-KI MUSEUM**

TRIBAL HISTORIC
PRESERVATION OFFICE

SEMINOLE TRIBE OF FLORIDA
AH-TAH-THI-KI MUSEUM

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LAVONNE ROSE

TREASURER
PETER HAHN

April 4, 2016

Aubree Hershorin, Ph.D
U.S. Army Corps of Engineers Jacksonville District
Planning and Policy Division, Environmental Branch
P.O. Box 4970
Jacksonville, FL 32232-0019
Aubree.G.Hershorin@usace.army.mil

Subject: St. Johns County Coastal Storm Risk Management Draft Feasibility Study and EA/FONSI, St. Johns County, Florida
THPO#: 0029084

Dear Ms. Hershorin:

Thank you for contacting the Seminole Tribe of Florida's Tribal Historic Preservation Office (STOF-THPO) regarding the St. Johns County Coastal Storm Risk Management Draft Feasibility Study and EA/FONSI in St. Johns County, Florida. This letter is to acknowledge that the STOF-THPO has reviewed EA and FONSI and has no immediate concerns regarding cultural or historic resources at this time. However, as specified in the document, STOF-THPO would like to be consulted prior to project implementation in accordance with Section 106 of the National Historic Preservation Act and as part of the Corps' trust responsibility to the Tribe. Thank you and we look forward to working with you throughout the course of this project.

Respectfully,

Andrew J. Weidman, MA, RPA
STOF-THPO, Compliance Review Section
30290 Josie Billie Hwy, PMB 1004
Clewiston, FL 33440
Office: 863-983-6549 x12216
Email: andrewweidman@semtribe.com



DEPARTMENT OF THE ARMY
JACKSONVILLE DISTRICT CORPS OF ENGINEERS
P.O. BOX 4970
JACKSONVILLE, FLORIDA 32232-0019

REPLY TO
ATTENTION OF

Planning Division
Environmental Branch

Mr. Mike Barnett
Bureau of Beaches and Coastal Systems
Department of Environmental Protection
5050 West Tennessee Street
Building B, Room 161
Tallahassee, Florida 32304

Dear Mr. Barnett:

Pursuant to Section III. B. 3. b. of the Interagency Coordination Agreement for Civil Works Projects (February 28, 2006), please designate a representative to the U.S. Army Corps of Engineers' Project Delivery Team for participation in the St. Johns County Shore Protection Project Feasibility Study. Various alternatives are currently being considered for beach construction in the South Ponte Vedra Beach, Vilano Beach, and Summer Haven Beach areas.

Also, the Department of Environmental Protection's participation during NEPA coordination would provide the opportunity for the early identification of potential environmental issues that could be associated with this project. Such participation early in the process would correspondingly allow for a timely resolution of such issues.

If you need additional information, please contact Mr. Mike Hollingsworth at 904-232-1687.

Sincerely,

A handwritten signature in black ink, appearing to read "BR Schwichtenberg".

Bradd R. Schwichtenberg
Acting Chief, Planning Division

Copy Furnished:

Mr. Marty Seeling, Florida Department of Environmental Protection, Bureau of Beaches and Coastal Systems, 5050 West Tennessee Street, Building B, Room 161, Tallahassee, Florida 32304



DEPARTMENT OF THE ARMY
JACKSONVILLE DISTRICT CORPS OF ENGINEERS
P.O. BOX 4970
JACKSONVILLE, FLORIDA 32232-0019

REPLY TO
ATTENTION OF

Planning Division
Environmental Branch

SEP 16 2008

To Whom It May Concern:

The U.S. Army Corps of Engineers, Jacksonville District, is gathering information to prepare either an Environmental Impact Statement or Environmental Assessment for evaluation of the feasibility of providing shoreline erosion protection, hurricane and storm damage reduction, and related purposes to the shores of St. Johns County, Florida. A reconnaissance report has been completed and resulted in the recommendation to continue the study into the feasibility phase. The most immediate and critical needs of the local communities are to address beach and dune erosion and protect State Highway A1A and environmental attributes. This study will determine the Federal interest in participating in a locally supported, cost-shared shore protection project to address St. Johns County's coastal issues. This scoping letter amends a previous scoping letter dated August 17, 2005 to include the South Ponte Vedra critically eroding area which was designated by the Department of Environmental Protection subsequent to that date.

The study area, enclosed, covers approximately 42 miles of shoreline, including 14 miles in two parks managed by the State of Florida. The entire coastline of St. Johns County is subject to storm damage and shoreline erosion but three of the four most critically eroding areas are located at South Ponte Vedra, Vilano Beach and Summer Haven Beach. The fourth critical erosion area, St. Augustine Beach, was addressed under a previously authorized Shore Protection Project and is not included in this study. Sand search areas to be investigated for potential borrow sources are also shown on the enclosure, however other sources may be developed.

We welcome your views, comments and information about Environmental and Cultural resources, study objectives and important features within the described project area, as well as any suggested improvements. Letters of comment or inquiry should be addressed to the letterhead address to the attention of Paul DeMarco (telephone number 904-232-1897 or email: Paul.M.DeMarco@usace.army.mil), Planning Division, Environmental Branch and received by this office within 30 days of the date of this letter.

Sincerely,

A handwritten signature in black ink, appearing to read "Eric P. Summa".

Eric P. Summa
Acting Chief, Environmental Branch

Enclosure



DEPARTMENT OF THE ARMY
JACKSONVILLE DISTRICT CORPS OF ENGINEERS
P.O. BOX 4970
JACKSONVILLE, FLORIDA 32232-0019

REPLY TO
ATTENTION OF

Planning Division
Environmental Branch

OCT 29 2008

Mr. Ric Ruebsamen
National Marine Fisheries Service Panama City
Habitat Conservation Division
3500 Delwood Beach Road
Panama City, Florida 32408

Dear Mr. Ruebsamen:

In accordance with regulations pertaining to the National Environmental Policy Act (Title 40 of the Code of Federal Regulations, part 1501.6), I am formally inviting your agency to become a cooperating agency for either an Environmental Impact Statement or Environmental Assessment for evaluation of the feasibility of providing shoreline erosion protection, hurricane and storm damage reduction, and related purposes to the shores of St. Johns County, Florida. Informal coordination with your agency was initiated via public notice dated September 16, 2008 (enclosed) and subsequent conversations between Habitat Conservation Division personnel and our staff.

Please note that cooperating agency status involves actions and responsibilities beyond that normally associated with a commenting or permitting agency. Your agency is being specifically requested to provide special expertise on natural resources in this area.

The formulation of the project, alternatives, and mitigation will be in accordance with Engineer Regulation ER 1105-2-100 and will fully consider a range of environmental, economic, and social factors. As a cooperating agency, you must fully consider the views, needs, and benefits of competing interests.

No cooperating agency will have "veto" over the selection of the project plan, alternatives, or mitigation measures. Under your status as a commenting agency, you may recommend actions not ultimately adopted or implemented by the lead agency. You may also impose requirements to the extent allowed under your legal authority as a permitting agency. Conflict with the lead agency may be resolved through mediation, placing a dissenting opinion in the EIS, withdrawing your cooperating agency status, or the Lead agency pursuing an EIS without you as a cooperating agency. For additional information see the enclosed "Rights and Responsibilities of Lead and Cooperating Agencies" (Forty Most Asked Questions Concerning CEQ's National Environmental Policy Act Regulations, Council on Environmental Quality, 1981).

Please indicate whether you accept this invitation to become a cooperating agency (as described above) within 30 days of the date of this letter. If you have any questions, please contact Mr. Paul DeMarco at 904-232-1897.

Sincerely,



for Eric P. Summa
Chief, Environmental Branch

Enclosure

Copies Furnished:

Mr. Miles Croom, NOAA Fisheries Service, Habitat Conservation Division, Southeast Regional Office, 263 13th Avenue South, St. Petersburg, Florida 33701-5511

Mr. Pace Wilbur, Atlantic Branch Supervisor, NOAA Fisheries Service, Habitat Conservation Division, 215 Fort Johnson Road, Post Office Box 12559, Charleston, South Carolina 29422

Dr. Roy Crabtree, NOAA Fisheries Service, Southeast Regional Office, 263 13th Avenue South, St. Petersburg, Florida 33701-5511

Mr. George Getsinger, NOAA Fisheries Service, Habitat Conservation Division, Northeast Florida Field Office, 9741 Ocean Shore Boulevard, St. Augustine, Florida 32080-8618



DEPARTMENT OF THE ARMY
JACKSONVILLE DISTRICT CORPS OF ENGINEERS
P.O. BOX 4970
JACKSONVILLE, FLORIDA 32232-0019

REPLY TO
ATTENTION OF

Planning Division
Environmental Branch

OCT 29 2008

Mr. Ric Ruebsamen
National Marine Fisheries Service Panama City
Habitat Conservation Division
3500 Delwood Beach Road
Panama City, Florida 32408

Dear Mr. Ruebsamen:

In accordance with regulations pertaining to the National Environmental Policy Act (Title 40 of the Code of Federal Regulations, part 1501.6), I am formally inviting your agency to become a cooperating agency for either an Environmental Impact Statement or Environmental Assessment for evaluation of the feasibility of providing shoreline erosion protection, hurricane and storm damage reduction, and related purposes to the shores of St. Johns County, Florida. Informal coordination with your agency was initiated via public notice dated September 16, 2008 (enclosed) and subsequent conversations between Habitat Conservation Division personnel and our staff.

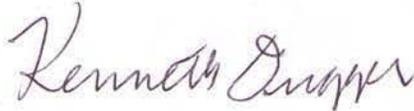
Please note that cooperating agency status involves actions and responsibilities beyond that normally associated with a commenting or permitting agency. Your agency is being specifically requested to provide special expertise on natural resources in this area.

The formulation of the project, alternatives, and mitigation will be in accordance with Engineer Regulation ER 1105-2-100 and will fully consider a range of environmental, economic, and social factors. As a cooperating agency, you must fully consider the views, needs, and benefits of competing interests.

No cooperating agency will have "veto" over the selection of the project plan, alternatives, or mitigation measures. Under your status as a commenting agency, you may recommend actions not ultimately adopted or implemented by the lead agency. You may also impose requirements to the extent allowed under your legal authority as a permitting agency. Conflict with the lead agency may be resolved through mediation, placing a dissenting opinion in the EIS, withdrawing your cooperating agency status, or the Lead agency pursuing an EIS without you as a cooperating agency. For additional information see the enclosed "Rights and Responsibilities of Lead and Cooperating Agencies" (Forty Most Asked Questions Concerning CEQ's National Environmental Policy Act Regulations, Council on Environmental Quality, 1981).

Please indicate whether you accept this invitation to become a cooperating agency (as described above) within 30 days of the date of this letter. If you have any questions, please contact Mr. Paul DeMarco at 904-232-1897.

Sincerely,



for Eric P. Summa
Chief, Environmental Branch

Enclosure

Copies Furnished:

Mr. Miles Croom, NOAA Fisheries Service, Habitat Conservation Division, Southeast Regional Office, 263 13th Avenue South, St. Petersburg, Florida 33701-5511

Mr. Pace Wilbur, Atlantic Branch Supervisor, NOAA Fisheries Service, Habitat Conservation Division, 215 Fort Johnson Road, Post Office Box 12559, Charleston, South Carolina 29422

Dr. Roy Crabtree, NOAA Fisheries Service, Southeast Regional Office, 263 13th Avenue South, St. Petersburg, Florida 33701-5511

Mr. George Getsinger, NOAA Fisheries Service, Habitat Conservation Division, Northeast Florida Field Office, 9741 Ocean Shore Boulevard, St. Augustine, Florida 32080-8618



DEPARTMENT OF THE ARMY
JACKSONVILLE DISTRICT CORPS OF ENGINEERS
P.O. BOX 4970
JACKSONVILLE, FLORIDA 32232-0019

REPLY TO
ATTENTION OF

Planning Division
Environmental Branch

SEP 16 2008

To Whom It May Concern:

The U.S. Army Corps of Engineers, Jacksonville District, is gathering information to prepare either an Environmental Impact Statement or Environmental Assessment for evaluation of the feasibility of providing shoreline erosion protection, hurricane and storm damage reduction, and related purposes to the shores of St. Johns County, Florida. A reconnaissance report has been completed and resulted in the recommendation to continue the study into the feasibility phase. The most immediate and critical needs of the local communities are to address beach and dune erosion and protect State Highway A1A and environmental attributes. This study will determine the Federal interest in participating in a locally supported, cost-shared shore protection project to address St. Johns County's coastal issues. This scoping letter amends a previous scoping letter dated August 17, 2005 to include the South Ponte Vedra critically eroding area which was designated by the Department of Environmental Protection subsequent to that date.

The study area, enclosed, covers approximately 42 miles of shoreline, including 14 miles in two parks managed by the State of Florida. The entire coastline of St. Johns County is subject to storm damage and shoreline erosion but three of the four most critically eroding areas are located at South Ponte Vedra, Vilano Beach and Summer Haven Beach. The fourth critical erosion area, St. Augustine Beach, was addressed under a previously authorized Shore Protection Project and is not included in this study. Sand search areas to be investigated for potential borrow sources are also shown on the enclosure, however other sources may be developed.

We welcome your views, comments and information about Environmental and Cultural resources, study objectives and important features within the described project area, as well as any suggested improvements. Letters of comment or inquiry should be addressed to the letterhead address to the attention of Paul DeMarco (telephone number 904-232-1897 or email: Paul.M.DeMarco@usace.army.mil), Planning Division, Environmental Branch and received by this office within 30 days of the date of this letter.

Sincerely,

A handwritten signature in black ink, appearing to read "Eric P. Summa".

Eric P. Summa
Acting Chief, Environmental Branch

Enclosure



Florida Department of Environmental Protection

Marjory Stoneman Douglas Building
3900 Commonwealth Boulevard
Tallahassee, Florida 32399-3000

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

November 14, 2008

Mr. Paul M. DeMarco
Jacksonville District, Planning Division
U.S. Army Corps of Engineers
Post Office Box 4970
Jacksonville, FL 32232-0019

RE: Department of the Army, Jacksonville District Corps of Engineers
Scoping Notice - Feasibility Study, St. Johns County Shore Protection
Project - St. Johns County, Florida.
SAI # FL200809194439C (Reference SAI # FL200508241461C)

Dear Mr. DeMarco:

The Florida State Clearinghouse, pursuant to Presidential Executive Order 12372, Gubernatorial Executive Order 95-359, the Coastal Zone Management Act, 16 U.S.C. §§ 1451-1464, as amended, and the National Environmental Policy Act, 42 U.S.C. §§ 4321, 4331-4335, 4341-4347, as amended, has coordinated a review of the subject scoping notice.

The Florida Department of Environmental Protection's (DEP) Bureau of Beaches and Coastal Systems is very supportive of the study and is participating in cost-sharing associated with the project. The South Ponte Vedra area was designated critically eroded in 2007, and several structures are threatened. Based on previous studies, DEP has no objection to investigating the offshore borrow areas for compatible sand. Geotechnical investigations should be conducted in accordance with the DEP Bureau's requirements for Quality Assurance and Quality Control, and comprehensive enough to document the compatibility of sand in the proposed borrow area(s) to the existing (natural) beach. The beaches in St. Johns County have high variability, and multiple borrow sites may be required. Use of nearshore borrow areas would require adequate numerical modeling supported by accurate data to provide "reasonable assurance" that the potential borrow area would not cause additional or relocated erosion to the shoreline. The Bureau has also requested to participate directly in formulating the Feasibility Study by including staff on the Project Delivery Team, as outlined in the Interagency Cooperative Agreement.

The Florida Department of State (DOS) has reviewed the Florida Master Site File and its records for information to be addressed in the proposed NEPA document and notes that a number of recorded shipwrecks are located directly within or in close proximity to the St.

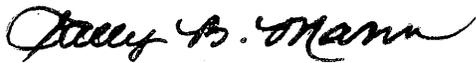
Mr. Paul M. DeMarco
November 14, 2008
Page 2 of 2

Augustine Inlet Ebb Shoal Borrow Area and Nearshore Sand Search Area. DOS staff strongly recommends that these areas be eliminated from consideration unless absolutely necessary. If it is necessary to use these areas, steps must be taken to relocate all sites within the area to provide the proper buffer. Once potential borrow areas have been determined, the DOS will comment on whether an underwater assessment survey must be conducted. Staff looks forward to reviewing the results of the study prior to the submission of an EIS/EA for the project and coordinating in the protection and preservation of significant cultural resources. Please refer to the enclosed DOS letter.

Based on the information contained in the notice and the enclosed state agency comments, the state has determined that, at this stage, the proposed federal action is consistent with the Florida Coastal Management Program (FCMP). The concerns identified by our reviewing agencies must, however, be addressed prior to project implementation. All subsequent environmental documents must be reviewed to determine the project's continued consistency with the FCMP. The state's continued concurrence with the project will be based, in part, on the adequate resolution of issues identified during this and subsequent reviews. The state's final concurrence of the project's consistency with the FCMP will be determined during the environmental permitting stage.

Thank you for the opportunity to review this project. Should you have any questions regarding this letter, please contact Ms. Lauren P. Milligan at (850) 245-2170.

Yours sincerely,



Sally B. Mann, Director
Office of Intergovernmental Programs

SBM/lm
Enclosures

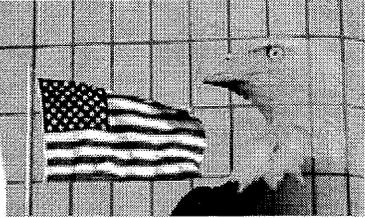
cc: Roxane Dow, DEP, BBCS
Laura Kammerer, DOS



Florida

Department of Environmental Protection

"More Protection, Less Process"



Categories

[DEP Home](#) | [OIP Home](#) | [Contact DEP](#) | [Search](#) | [DEP Site Map](#)

Project Information	
Project:	FL200809194439C
Comments Due:	10/24/2008
Letter Due:	11/03/2008
Description:	DEPARTMENT OF THE ARMY, JACKSONVILLE DISTRICT CORPS OF ENGINEERS - SCOPING NOTICE - FEASIBILITY STUDY, ST. JOHNS COUNTY SHORE PROTECTION PROJECT - ST. JOHNS COUNTY, FLORIDA.
Keywords:	ACOE - SCOPING NOTICE - ST. JOHNS COUNTY SHORE PROTECTION PROJECT
CFDA #:	12.101
Agency Comments:	
NE FLORIDA RPC - NORTHEAST FLORIDA REGIONAL PLANNING COUNCIL	
No Comments	
ST. JOHNS - ST. JOHNS COUNTY	
FISH and WILDLIFE COMMISSION - FLORIDA FISH AND WILDLIFE CONSERVATION COMMISSION	
No Comments Received	
STATE - FLORIDA DEPARTMENT OF STATE	
<p>The DOS has reviewed the Florida Master Site File and its records for information to be addressed in the proposed NEPA document and notes that a number of recorded shipwrecks are located directly within or in close proximity to the St. Augustine Inlet Ebb Shoal Borrow Area and Nearshore Sand Search Area. DOS staff strongly recommends that these areas be eliminated from consideration unless absolutely necessary. If it is necessary to use these areas, steps must be taken to relocate all sites within the area to provide the proper buffer. Once potential borrow areas have been determined, the DOS will comment on whether an underwater assessment survey must be conducted. Staff looks forward to reviewing the results of the study prior to the submission of an EIS/EA for the project and coordinating in the protection and preservation of significant cultural resources.</p>	
ENVIRONMENTAL PROTECTION - FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION	
<p>The DEP Bureau of Beaches and Coastal Systems is very supportive of the study and is participating in cost-sharing associated with the project. The South Ponte Vedra area was designated critically eroded in 2007, and several structures are threatened. Based on previous studies, DEP has no objection to investigating the offshore borrow areas for compatible sand. Geotechnical investigations should be conducted in accordance with the DEP Bureau's requirements for Quality Assurance and Quality Control, and comprehensive enough to document the compatibility of sand in the proposed borrow area(s) to the existing (natural) beach. The beaches in St. Johns County have high variability, and multiple borrow sites may be required. Use of nearshore borrow areas would require adequate numerical modeling supported by accurate data to provide "reasonable assurance" that the potential borrow area would not cause additional or relocated erosion to the shoreline. The Bureau has also requested to participate directly in formulating the Feasibility Study by including staff on the Project Delivery Team, as outlined in the Interagency Cooperative Agreement.</p>	
ST. JOHNS RIVER WMD - ST. JOHNS RIVER WATER MANAGEMENT DISTRICT	
SJRWMD has no comments.	

For more information or to submit comments, please contact the Clearinghouse Office at:

3900 COMMONWEALTH BOULEVARD, M.S. 47
 TALLAHASSEE, FLORIDA 32399-3000
 TELEPHONE: (850) 245-2161
 FAX: (850) 245-2190

Memorandum

Florida Department of Environmental Protection

DATE: October 31, 2008

TO: Lauren P. Milligan, Office of Intergovernmental Programs

FROM: Roxane R. Dow, Bureau of Beaches and Coastal Systems

SUBJECT: U.S. Army Corps of Engineers – Scoping Notice – Feasibility Study, St. Johns County Shore Protection Project – St. Johns County, Florida.
SAI #: FL08-4439C

The Bureau of Beaches and Coastal Systems is very supportive of this study and is cost-sharing the non-federal costs associated with it. The South Ponte Vedra area was designated critically eroded in 2007, and several structures are threatened.

Based on previous studies, we have no objection to investigating the off shore borrow areas for compatible sand. Geotechnical investigations should be conducted in accordance with the Bureau's requirements for Quality Assurance and Quality Control, and comprehensive enough to document the compatibility of sand in the proposed borrow area(s) to the existing (natural) beach. The beaches in St. Johns County have high variability, and multiple borrow sites may be required.

Use of nearshore borrow areas would require adequate numerical modeling supported by accurate data to provide "reasonable assurance" that the potential borrow area would not cause additional or relocated erosion to the shoreline.

The Bureau would like to participate directly in formulating this Feasibility Study. We requested inclusion of members on the Project Delivery Team, as outlined in the Interagency Cooperative Agreement, but have not received an official request to appoint anyone.

cc: Robert Brantly
Michael Barnett
Guy Weeks
Paden Woodruff



RECEIVED

OCT 27 2008

DEP Office of
Intergov't Programs

FLORIDA DEPARTMENT OF STATE
Kurt S. Browning
Secretary of State
DIVISION OF HISTORICAL RESOURCES

Ms. Laura Milligan
Florida State Clearing House
3900 Commonwealth Boulevard, MS-47
Tallahassee, Florida 32399-3000

October 23, 2008

RE: DHR No.: 2008-06146 / Date Received: September 25, 2008
St. Johns County Shore Protection Project (SPP) Study Area
St. Johns County

Dear Ms. Milligan:

Our office is reviewing the referenced application in accordance with Section 106 of the *National Historic Preservation Act of 1966*, as amended, as well as with Chapters 267, *Florida Statutes*, and Florida's Coastal Zone Consistency Program. The purpose of our review is to identify possible impact to historic resources listed, or eligible for listing, in the *National Register of Historic Places*, or otherwise of historical, architectural or archaeological value. The State Historic Preservation Officer is to advise and assist state and federal agencies and applicants to identify historic resources, assess effects on them, and considerations of alternatives to avoid or minimize adverse effects.

We reviewed the Florida Master Site File and our records for information to be addressed in either an Environmental Impact Statement or Environmental Assessment for evaluation of the feasibility of providing shoreline erosion protection, hurricane and storm damage reduction, and related purposes to the shores of St. Johns County. We note that a number of recorded shipwrecks are located directly within or in close proximity to the St. Augustine Inlet Ebb Shoal Borrow Area, and the Nearshore Sand Search Area. This office strongly recommends that these areas be eliminated from consideration unless absolutely necessary. Furthermore, if it is a necessity to use these areas, steps will have to be undertaken to relocate all sites within the area in order to provide the proper buffer.

Once potential borrow areas have been determined, this office will comment on whether or not an underwater assessment survey must be conducted. We look forward to reviewing the results of the study prior to the submission of an *Environmental Impact Statement/Environmental Assessment* for the St. Johns County Shoreline Protection Project and coordinating in the protection and preservation of significant cultural resources.

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Director's Office
(850) 245-6300 • FAX: 245-6436

Archaeological Research
(850) 245-6444 • FAX: 245-6452

Historic Preservation
(850) 245-6333 • FAX: 245-6437

Ms. Milligan
October 20, 2008
Page 2

If there are any questions concerning our comments, please contact Michael Hart, Historic Sites Specialist, by electronic mail at mrhart@dos.state.fl.us, or by telephone at 850/245-6333. Thank you for your interest in protecting Florida's historic properties.

Sincerely,

A handwritten signature in black ink that reads "Frederick P. Gaske". The signature is written in a cursive style with a long horizontal line extending to the right.

Frederick P. Gaske, Director, and
State Historic Preservation Officer

Xc: Eric Summa/ Jacksonville District Army Corps of Engineers



UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
NATIONAL MARINE FISHERIES SERVICE

Southeast Regional Office
263 13th Avenue South
St. Petersburg, Florida 33701-5505
(727) 824-5317; FAX (727) 824-5300
<http://sero.nmfs.noaa.gov/>

June 24, 2009

F/SER4:GG/pw

(Sent via Electronic Mail)

Mr. Eric Summa
Chief, Environmental Branch, Planning Division
Jacksonville District, Corps of Engineers
P.O. Box 4970
Jacksonville, Florida 32232-0019

Attention: Paul DeMarco

Dear Mr. Summa:

NOAA's National Marine Fisheries Service (NMFS) reviewed your invitation, dated October 29, 2008, to become a cooperating agency for the development of either an Environmental Impact Statement or Environmental Assessment that will evaluate the feasibility of providing shoreline erosion protection and hurricane and storm damage reduction to the shores of St. Johns County, Florida. The invitation was extended in accordance with regulations pertaining to the National Environmental Policy Act (Title 40 of the Code of Federal Regulations, part 1501.6). We understand that acceptance of the cooperating agency status involves actions and responsibilities beyond those normally associated with a commenting agency and that NMFS is being asked to provide special expertise on the habitats used by estuarine and marine species in the area.

NMFS accepts the invitation to serve as a cooperating agency. Due to staffing constraints, our participation may be limited to technical reviews, development of short sections of environmental documents, and occasional project related travel. Mr. George Getsinger, at our Jacksonville Office, will be available for further consultation as needed. He may be reached at 9741 Ocean Shore Drive, St. Augustine, Florida 32080, by telephone at (904) 461-8674, or by email at George.Getsinger@noaa.gov.

Sincerely,

/ for

Miles M. Croom
Assistant Regional Administrator
Habitat Conservation Division

cc:

COE Eric.P.Summa@usace.army.mil, Paul.M.DeMarco@usace.army.mil
F/SER47 George.Getsinger@noaa.gov





FLORIDA DEPARTMENT OF STATE

Kurt S. Browning

Secretary of State

DIVISION OF HISTORICAL RESOURCES

Ms. Lainie Edwards
Department of Environmental Protection – MB 3700
Bureau of Beaches and Coastal Systems
3900 Commonwealth Boulevard, MS-300
Tallahassee, Florida 32399-3000

September 18, 2009

Re: DHR Project No.: 2009-5085 / Date Received: August 18, 2009
Applicant: USACE – Eric Summa
Application No.: 0295429-001-JC
St. Johns County Shore Protection Project – Beach Nourishment
St. Johns County

Dear Ms. Edwards:

Our office is reviewing the referenced application in accordance with Chapters 373 and 267, *Florida Statutes*, and Florida's Coastal Zone Consistency Program. The purpose of our review is to identify possible impact to historic resources listed, or eligible for listing, in the *National Register of Historic Places*, or otherwise of historical, architectural or archaeological value. The State Historic Preservation Officer is to advise and assist state and federal agencies and applicants to identify historic resources, assess effects on them, and considerations of alternatives to avoid or minimize adverse effects.

We reviewed the Florida Master Site File and our records for information. We note that a number of recorded shipwrecks are located directly within or in close proximity to the St. Augustine Inlet Ebb Shoal Borrow Area, and that previous remote-sensing surveys were conducted in the borrow area. However, our files indicate that during the 2005 St. Johns County beach nourishment e project monitoring, the dredge pumped artifacts from a specific area of the Ebb Shoal Borrow Area

It is the opinion of this office that this strongly suggests that previous remote-sensing surveys of the Ebb Shoal Borrow Area were not able to adequately identify all resources in the area. We concur with the recommendation of archaeologists that conducted the 2005 monitoring of the nourishment project for the Army Corps of Engineers (Corps) that this may be "due to several factors including the depth of the sediment covering older resources, and to out-dated methodologies for locating deeply buried wrecks.

Therefore, prior to any additional dredging from the Ebb Shoal Borrow Area the blocks which have a high potential of containing the shipwrecks that were encountered during the 2005

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FLORIDA DEPARTMENT OF STATE
Kurt S. Browning
Secretary of State
DIVISION OF HISTORICAL RESOURCES

Ms. Lainie Edwards
Department of Environmental Protection – MB 3700
Bureau of Beaches and Coastal Systems
3900 Commonwealth Boulevard, MS-300
Tallahassee, Florida 32399-3000

September 18, 2009

Re: DHR Project No.: 2009-5085 / Date Received: August 18, 2009
Applicant: USACE – Eric Summa
Application No.: 0295429-001-JC
St. Johns County Shore Protection Project – Beach Nourishment
St. Johns County

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(850) 245-6333 • FAX: 245-6437

Ms. Lainie Edwards
DHR Project No. 2009-5085
September 18, 2009
Page 2

monitoring project should be subjected to an underwater remote-sensing survey and diver identification efforts in order to locate the source of the artifacts. The location data of the areas of the borrow area that need to be investigated is available in our files and the files Corps Environmental Branch. Methodologies for the survey investigations should include smaller line spacing for the remote sensing, diver identification of larger number of medium-to-lower probability targets, and the use of a sub-bottom profiler.

Until these investigations are conducted this agency cannot provide final comment on this application.

Because this letter and its contents are a matter of public record, archaeological consultants who have knowledge of our recommendations may contact the applicant or their agent. This should in no way be interpreted as an endorsement by this agency. The Division of Historical Resources does not maintain a list of professional archaeologists who are qualified to work in the State of Florida and/or who meet the Secretary of the Interior's Standards for federally involved archeological projects as specified in 36 CFR 61, Appendix A. However, the Register of Professional Archaeologists (RPA) maintains a membership directory that may be useful in locating professional archaeological consultants (<http://www.rpanet.org/about.htm>) in your area. Many qualified archaeologists are not members of RPA, and omission from the list does not imply that an archaeologist does not meet the Secretary's Standards or that the resultant work would not be acceptable. Conversely, inclusion on the list is no guarantee that an archaeologist's work will automatically be acceptable. As with any contractor you should request and check references and recent work history. The American Cultural Resources Association also maintains a listing of professional consultants at (<http://www.acra-crm.org/southeast.html>). The same conditions above apply.

If you have any questions concerning our comments, please contact Laura Kammerer, Deputy State Historic Preservation Officer for Review and Compliance, at 850-245-6333 or lkammerer@dos.state.fl.us. Thank you for your interest in protecting Florida's historic properties.

Sincerely,



Laura A. Kammerer
Deputy State Historic Preservation Officer
For Review and Compliance

Pc: Eric Summa, Chief - Jacksonville District Army Corps of Engineers, Environmental Branch
Robin Moore, RPA - St. Johns County Planning Department
Florida Coastal Zone Management – FDEP



FLORIDA DEPARTMENT OF STATE
Kurt S. Browning
Secretary of State
DIVISION OF HISTORICAL RESOURCES

Ms. Laurie Milligan
Florida State Clearing House
3900 Commonwealth Boulevard, MS-47
Tallahassee, Florida 32399-3000

December 11, 2009

Re: DHR Project File No. 2009-06862/ Received by DHR: October 29, 2009
Applicant Name: U.S. Army Corps of Engineers
Application No.: FL200910284998C
Project Description: St. Augustine Inlet and Vicinity Maintenance Dredge
County: St. Johns

Dear Ms. Milligan:

Our office received and reviewed the above referenced project application in accordance with Section 106 of the National Historic Preservation and the National Environmental Policy Acts as amended, to assess possible adverse impacts to cultural resources (any prehistoric or historic district, site, building, structure, or object) listed, or eligible for listing, in the National Register of Historic Places.

Our office concurs with the USACE's recommendation for a cultural resource survey. The resultant survey report must conform to the specification set forth in Chapter 1A-46, *Florida Administrative Code*, and be forwarded to this agency in order to complete the reviewing process for this proposed project and its impacts.

If you have any questions concerning our comments, please contact Michael Hart, Historic Sites Specialist, by phone at (850) 245-6333, or by electronic mail at mrhart@dos.state.fl.us. Your continued interest in protecting Florida's historic properties is appreciated.

Sincerely,

Laura A. Kammerer
Deputy State Historic Preservation Officer
For Review and Compliance

Pc: Jim Jeffords, Jr. P.E./ Jacksonville District Corps of Engineers

500 S. Bronough Street • Tallahassee, FL 32399-0250 • <http://www.flheritage.com>

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DEPARTMENT OF THE ARMY
JACKSONVILLE DISTRICT CORPS OF ENGINEERS
P.O. BOX 4970
JACKSONVILLE, FLORIDA 32232-0019

REPLY TO
ATTENTION OF

Planning Division
Environmental Branch

OCT 19 2009

Barbara Mattick, Ph.D.
Division of Historical Resources
State Historic Preservation Officer
500 South Bronough Street
Tallahassee, Florida 32399-0250

Dear Dr. Mattick:

The U.S. Army Corps of Engineers (Corps), Jacksonville District, is studying the effects of maintenance dredging in the Intracoastal Waterway (IWW) in St. Johns County, Florida. Located near St. Augustine, Florida, the project consists of maintenance dredging along Cuts S-28 thru S-30 along the IWW. Shoaling within the IWW is causing hazards to navigation and requires maintenance dredging to bring the channel back to its authorized depths.

The Corps has determined that this project had a potential to affect historic properties and that a Phase I Archaeological Survey was needed. The purpose of the survey was to determine if any resources exist within the project area and evaluate their significance. The Jacksonville District contracted Southeastern Archaeological Research, Inc. (SEARCH) to conduct this survey, and enclosed is their draft report, "*Historic Assessment and Remote Sensing Survey of Intracoastal Waterway Near St. Augustine, Fl.*" SEARCH identified a total of 73 potential significant anomalies within 17 clustered areas within the project area. One cluster is represented by the previously recorded site 8SJ4889, the Dixie Crystal. Please note that upon preliminary review of the document by staff, it was determined that in addition to the recommended potential significant targets identified by the consultant, the Corps is recommending that Target SS-1 be re-evaluated as a potentially significant target as this side-scan target may represent a potential cultural resource.

I request your comments on the enclosed, "*Historic Assessment and Remote Sensing Survey of Intracoastal Waterway near St. Augustine, Florida*". If there are any questions, please contact Mr. Dan Hughes at 904-232-3028 or e-mail at daniel.b.hughes@usace.army.mil.

Sincerely,

Eric P. Summa
Chief, Environmental Branch

Enclosure

SEMINOLE TRIBE OF FLORIDA
TRIBAL HISTORIC PRESERVATION OFFICE

TRIBAL HISTORIC
PRESERVATION OFFICE
SEMINOLE TRIBE OF FLORIDA
AH-TAH-THI-KI MUSEUM
HC-61, BOX 21A
CLEWISTON, FL 33440
PHONE: (863) 983-6549
FAX: (863) 902-1117



TRIBAL OFFICERS
CHAIRMAN
MITCHELL CYPRESS
VICE CHAIRMAN
RICHARD BOWERS JR.
SECRETARY
PRISCILLA D. SAYEN
TREASURER
MICHAEL D. TIGER

Dan Hughes
Department of the Army
Jacksonville District Corps of Engineers
P.O. Box 4970
Jacksonville, FL 32232-0019

THPO: 005568

April 7, 2010

Subject: Assessment of Effects for the Proposed St. Johns County Shore Protection Project, St. Johns County, Florida

Dear Mr. Hughes,

The Seminole Tribe of Florida's Tribal Historic Preservation Office (STOF-THPO) has received the Corps of Engineers correspondence concerning the aforementioned project. The STOF-THPO has no objection to your findings at this time. However, the STOF-THPO would like to be informed if cultural resources that are potentially ancestral or historically relevant to the Seminole Tribe of Florida are inadvertently discovered during the construction process. We thank you for the opportunity to review the information that has been sent to date regarding this project. Please reference **THPO-005568** for any related issues.

We look forward to working with you in the future.

Sincerely,

Willard Steele,
Tribal Historic Preservation Officer
Seminole Tribe of Florida

Direct routine inquiries to:

Anne Mullins,
Compliance Review Supervisor
annemullins@semtribe.com



FLORIDA DEPARTMENT OF STATE
Dawn K. Roberts
Interim Secretary of State
DIVISION OF HISTORICAL RESOURCES

Mr. Eric Summa
Department of the Army
Jacksonville District Corps of Engineers
P.O. Box 4970
Jacksonville, Florida 32232-0019

September 24, 2010

Re: DHR Project File No.: 2010-04036
Received by DHR: September 3, 2010
1A-32 Permit No.: 0910.035
Addendum Report: Archaeological Diver Identification and Evaluation of Twenty-Eight Potentially Significant Submerged Targets, St. Johns County Beach Erosion Control Project, St. Johns County, Florida

Dear Mr. Summa:

Our office received and reviewed the above referenced survey report in accordance with Section 106 of the *National Historic Preservation Act of 1966* (Public Law 89-665), as amended in 1992, and *36 C.F.R., Part 800: Protection of Historic Properties*, and Chapter 267, *Florida Statutes*, for assessment of possible adverse impact to cultural resources (any prehistoric or historic district, site, building, structure, or object) listed, or eligible for listing, in the National Register of Historic Places (NRHP).

In March 2010, Southeastern Archaeological Research, Inc. (SEARCH) conducted an archaeological diver assessment of twenty-eight potentially significant targets identified during a previous remote sensing survey. The targets are within the proposed Ebb Shoal Borrow Area that will be used in association with the St. Johns County Beach Erosion Control Project. The survey was conducted on behalf of the US Army Corps of Engineers. SEARCH determined that most of the targets were either modern debris or too deeply buried to be identified or impacted by the proposed undertaking.

SEARCH determined that cluster 8 is the remains of the North Shoals Vessel (8SJ4784), which they consider potentially eligible for listing in the NRHP. SEARCH recommends that the site be avoided with a 100 meter protective buffer zone.

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Director's Office
850.245.6300 • FAX: 245.6436

Archaeological Research
850.245.6444 • FAX: 245.6452

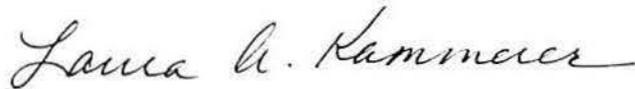
Historic Preservation
850.245.6333 • FAX: 245.6437

Mr. Summa
September 24, 2010
Page 2

Based on the information provided, our office finds the submitted report complete and sufficient in accordance with Chapter 1A-46, *Florida Administrative Code*. However, there is insufficient information about the historic shipwreck to assess its eligibility for listing in the NRHP. Contingent upon its avoidance, our office concurs with the US Army Corps of Engineers determination of no adverse effect on historic properties for the proposed undertaking.

For any questions concerning our comments, please contact Rudy Westerman, Historic Preservationist, by electronic mail at rjwesterman@dos.state.fl.us, or by phone at 850.245.6333. We appreciate your continued interest in protecting Florida's historic properties.

Sincerely,

A handwritten signature in cursive script that reads "Laura A. Kammerer".

Laura A. Kammerer
Deputy State Historic Preservation Officer
For Review and Compliance

Pc: Jason Burns, Southeastern Archaeological Research, Inc.



FLORIDA DEPARTMENT OF STATE
Dawn K. Roberts
Interim Secretary of State
DIVISION OF HISTORICAL RESOURCES

Mr. Eric Summa
Department of the Army
Jacksonville District Corps of Engineers
P.O. Box 4970
Jacksonville, Florida 32232-0019

September 24, 2010

Re: DHR Project File No.: 2010-04036
Received by DHR: September 3, 2010
1A-32 Permit No.: 0910.035
Addendum Report: Archaeological Diver Identification and Evaluation of Twenty-Eight Potentially Significant Submerged Targets, St. Johns County Beach Erosion Control Project, St. Johns County, Florida

Dear Mr. Summa:

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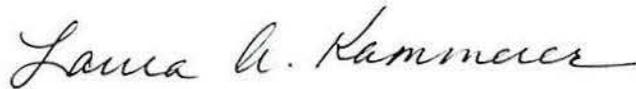
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Mr. Summa
September 24, 2010
Page 2

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For any questions concerning our comments, please contact Rudy Westerman, Historic Preservationist, by electronic mail at rjwesterman@dos.state.fl.us, or by phone at 850.245.6333. We appreciate your continued interest in protecting Florida's historic properties.

Sincerely,

A handwritten signature in cursive script that reads "Laura A. Kammerer".

Laura A. Kammerer
Deputy State Historic Preservation Officer
For Review and Compliance

Pc: Jason Burns, Southeastern Archaeological Research, Inc.



FLORIDA DEPARTMENT OF STATE
Kurt S. Browning
Secretary of State
DIVISION OF HISTORICAL RESOURCES

Mr. Robert Riddell
Operations Division
Jacksonville USACE
P.O. Box 4970
Jacksonville, Florida 32232-0019

January 19, 2010

Re: DHR Project File No. 2009-06415/ Received by DHR: October 28, 2009
Public Notice No.: PN-OD-IWW-287
Project: St. Augustine Inlet Maintenance Dredge
County: St. Johns

Dear Mr. Riddell:

Our office received and reviewed the above referenced project application in accordance with Section 106 of the National Historic Preservation and the National Environmental Policy Acts as amended, to assess possible adverse impacts to cultural resources (any prehistoric or historic district, site, building, structure, or object) listed, or eligible for listing, in the National Register of Historic Places.

Our office concurs with the recommendations of your agency for the necessity for cultural resource surveys of the area of potential effect for the proposed project. We look forward to reviewing the resultant survey report(s). The resultant survey report must conform to the specification set forth in Chapter 1A-46, *Florida Administrative Code*, and be forwarded to this agency in order to complete the review and consultation processes for this undertaking and its impacts to historic properties. The results of the analysis will determine if significant cultural resources would be disturbed by this development. In addition, if significant remains are located, the data described in the report and the consultant's conclusions will assist this office in determining measures that must be taken to avoid or minimize adverse impacts to archaeological sites and historical properties identified that are eligible for listing in the NRHP.

If you have any questions concerning our comments, please contact Michael Hart, Historic Sites Specialist, by phone at 850.245.6333, or by electronic mail at mrhart@dos.state.fl.us. Your continued interest in protecting Florida's historic properties is appreciated.

Sincerely,

Laura A. Kammerer
Deputy State Historic Preservation Officer
For Review and Compliance

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FLORIDA DEPARTMENT OF STATE
Kurt S. Browning
Secretary of State
DIVISION OF HISTORICAL RESOURCES

Mr. Eric Summa
Department of the Army
Jacksonville District Corps of Engineers
P.O. Box 4970
Jacksonville, Florida 32232-0019

March 29, 2010

Re: DHR Project File No.: 2010-00839 / Received by DHR: February 11, 2010
1A-32 Permit No.: 0809.094
Historic Assessment and Remote Sensing Survey of the St. Johns County Beach Erosion Control Project, St. Johns County, Florida

Dear Mr. Summa:

Our office received and reviewed the above referenced survey report in accordance with Section 106 of the *National Historic Preservation Act of 1966* (Public Law 89-665), as amended in 1992, and *36 C.F.R., Part 800: Protection of Historic Properties*, and Chapter 267, *Florida Statutes*, for assessment of possible adverse impact to cultural resources (any prehistoric or historic district, site, building, structure, or object) listed, or eligible for listing, in the National Register of Historic Places (NRHP).

In June 2009, Southeastern Archaeological Research, Inc. (SEARCH) conducted an archaeological and historical underwater remote sensing survey of the proposed Ebb Shoal borrow area near the St. Augustine entrance channel. The survey was conducted on behalf of U.S. Army Corps of Engineers. SEARCH identified one hundred nineteen (119) magnetic anomalies and twenty-eight (28) side-scan sonar targets within the project area during the investigation. SEARCH relocated the previously recorded North Shoals Vessel historic shipwreck (8SJ4784).

SEARCH recommends that sixty-seven (67) magnetic anomalies and three side-scan sonar anomalies contained in twenty-five (25) clusters and two isolated anomalies be avoided during project activities. The majority of these anomalies and clusters should be avoided with thirty (30) meter diameter buffer areas. Previously recorded archaeological site 8SJ4784, represented by anomalies M39, M41, M45, M48, M53, M56, and M59, needs to be avoided with a fifty (50) meter diameter buffer zone.

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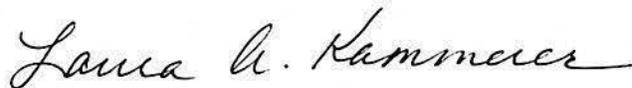
Mr. Summa
March 29, 2010
Page 2

Based on the information provided, our office concurs with these determinations and finds the submitted report complete and sufficient in accordance with Chapter 1A-46, *Florida Administrative Code*.

Please note that for future underwater survey projects, the Unanticipated Discoveries section should include language applicable to project for which the survey was conducted – in this case the sand borrow area and the erosion control project. This section should address the expected types of resources/artifacts/features associated with submerged sites, i.e., shipwrecks, like the North Shoal Vessel, 8SJ4784. In most cases, human remains discoveries would not be relevant to this type of project either. The purpose of this section of the report is to inform the project managers and other involved parties about the nature of the resources that could be encountered and the steps that must be taken in that situation. The point of contact regarding human remains discoveries, and new discoveries on state sovereign submerged lands is Dr. Wheeler, whose address is not correct in this document. For all discoveries in a federal or state project a second point of contact should be the State Historic Preservation Officer, Division Director and the Compliance and Review Section. Thank you for your attention to this matter.

For any questions concerning our comments, please contact Rudy Westerman, Historic Preservationist, by electronic mail at rjwesterman@dos.state.fl.us, or by phone at 850.245.6333. We appreciate your continued interest in protecting Florida's historic properties.

Sincerely,



Laura A. Kammerer
Deputy State Historic Preservation Officer
For Review and Compliance

Pc: Louis Tesar, Interoffice Mail Station 8B
Jason Burns, Southeastern Archaeological Research, Inc. – Pensacola, FL



FLORIDA DEPARTMENT OF STATE
Kurt S. Browning
Secretary of State
DIVISION OF HISTORICAL RESOURCES

Mr. Eric P. Summa
Department of the Army
Jacksonville District Corps of Engineers
Planning Division, Environmental Branch
P.O. Box 4970
Jacksonville, Florida 32232-0019

December 1, 2009

Re: DHR Project File No.: 2009-06256 / 1A-32 Permit No.: 0809.109
Received by DHR: October 22, 2009
Draft Report: *Historic Assessment and Remote Sensing Survey of the Intracoastal Water Way near St. Augustine, St. Johns County, Florida*

Dear Dr. Hoffman:

Our office received and reviewed the above referenced draft survey report in accordance with Section 106 of the *National Historic Preservation Act of 1966* (Public Law 89-665), as amended in 1992, and *36 C.F.R., Part 800: Protection of Historic Properties*, and Chapter 267, *Florida Statutes*, for assessment of possible adverse impact to cultural resources (any prehistoric or historic district, site, building, structure, or object) listed, or eligible for listing, in the National Register of Historic Places (NRHP).

In June 2009, Southeastern Archaeological Research, Inc. (SEARCH) conducted a remote sensing archaeological and historical survey of the proposed dredging areas within the Intracoastal Water Way. SEARCH identified seventy-five (75) magnetic anomalies within the North Reach, eighty-one (81) magnetic anomalies and five (5) sonar targets in the Mid Reach, and one hundred seventeen (117) magnetic anomalies within the South Reach. SEARCH recommends avoidance of seventy-three (73) anomalies.

Based on the information provided, it appears that the final report will be complete and sufficient in accordance with Chapter 1A-46 of the *Florida Administrative Code*. However, we recommend the following revisions for the final report:

- **Figures 55 and 56:** Both figures 55 and 56 are labeled as representing the location of anomalies MR-55 and MR-63. It appears that one figure may be for anomalies MR-62 and MR-67 instead.

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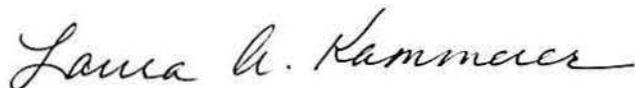
Mr. Summa
December 1, 2009
Page 2

- **Larger Figures:** The figures showing magnetic contours of the survey areas are too small to represent the data. For example, Figures 18, 19, 20, 41, 42, 70, and 71 would be more useful if they were included at a larger scale.

Our agency looks forward to the receipt and review of the final report for the above-referenced survey.

For any questions concerning our comments, please contact Rudy Westerman, Historic Preservationist, by electronic mail at rjwesterman@dos.state.fl.us, or by phone at (850) 245-6333. We appreciate your continued interest in protecting Florida's historic properties.

Sincerely,



Laura A. Kammerer
Historic Preservationist Supervisor
Compliance Review Section
Bureau of Historic Preservation

Pc: Louis Tesar, Interoffice Mail Station 8B
Michael Krivor, Southeastern Archaeological Research, Inc. – Jonesville office



FLORIDA DEPARTMENT OF STATE

Dawn K. Roberts

Interim Secretary of State

DIVISION OF HISTORICAL RESOURCES

Mr. Eric P. Summa
Department of the Army
Jacksonville District Corps of Engineers
P.O. Box 4970
Jacksonville, Florida 32232-0019

May 27, 2010

Re: DHR Project File No.: 2010-02392
Received by DHR: March 31, 2010
Cultural Resources Survey for the St. Johns County Shore Protection Project, St. Johns County, Florida

Dear Mr. Summa:

Our office received and reviewed the above referenced survey report in accordance with Section 106 of the *National Historic Preservation Act of 1966* (Public Law 89-665), as amended in 1992, and *36 C.F.R., Part 800: Protection of Historic Properties*, and Chapter 267, *Florida Statutes*, for assessment of possible adverse impact to cultural resources (any prehistoric or historic district, site, building, structure, or object) listed, or eligible for listing, in the National Register of Historic Places (NRHP).

In August and September 2009, New South Associates (NSA) conducted an archaeological and historical Phase I and remote sensing survey of the proposed project area for shoreline protection and dredge material disposal. NSA identified a deeply buried anomaly that may represent previously recorded archaeological site 8SJ3318. NSA did not relocate previously recorded site 8SJ4873 and determined it is unlikely to be present within the area of potential effect.

The U.S. Army Corps of Engineers determined that the proposed undertaking will have no adverse effect on cultural resources listed, or eligible for listing, on the NRHP. No further investigation is recommended in association with the proposed project.

Based on the information provided, our office concurs with the determinations of the U.S. Army Corps of Engineers and finds the submitted report complete and sufficient in accordance with Chapter 1A-46, *Florida Administrative Code*.

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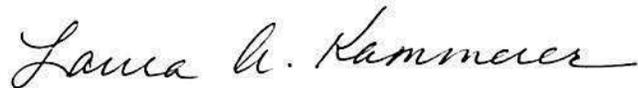
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Mr. Summa
May 27, 2010
Page 2

For any questions concerning our comments, please contact Rudy Westerman, Historic Preservationist, by electronic mail at rjwesterman@dos.state.fl.us, or by phone at 850.245.6333. We appreciate your continued interest in protecting Florida's historic properties.

Sincerely,

A handwritten signature in cursive script that reads "Laura A. Kammerer".

Laura A. Kammerer
Deputy State Historic Preservation Officer
For Review and Compliance

Pc: Greg Smith, New South Associates

SEMINOLE TRIBE OF FLORIDA
TRIBAL HISTORIC PRESERVATION OFFICE

TRIBAL HISTORIC
PRESERVATION OFFICE
SEMINOLE TRIBE OF FLORIDA
AH-TAH-THI-KI MUSEUM
HC-61, BOX 21A
CLEWISTON, FL 33440
PHONE: (863) 983-6549
FAX: (863) 902-1117



TRIBAL OFFICERS
CHAIRMAN
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PRISCILLA D. SAYEN
TREASURER
MICHAEL D. TIGER

Dan Hughes
Department of the Army
Jacksonville District Corps of Engineers
P.O. Box 4970
Jacksonville, FL 32232-0019

THPO: 005222

February 25, 2010

Subject: Historic Assessment and Remote Sensing Survey of the St. Johns County Beach Erosion Control Project, St. Johns County, Florida

Dear Mr. Hughes,

The Seminole Tribe of Florida's Tribal Historic Preservation Office (STOF-THPO) has received the Corps of Engineers correspondence concerning the aforementioned project. The STOF-THPO has no objection to your findings at this time, given that the conditions provided by SEARCH archaeologists will be met. The STOF-THPO would like to be informed if cultural resources that are potentially ancestral or historically relevant to the Seminole Tribe of Florida are discovered during the construction process. We thank you for the opportunity to review the information that has been sent to date regarding this project. Please reference **THPO-005222** for any related issues.

We look forward to working with you in the future.

Sincerely,

Willard Steele,
Tribal Historic Preservation Officer
Seminole Tribe of Florida

Direct routine inquiries to:

Anne Mullins,
Compliance Review Supervisor
annemullins@semtribe.com



REPLY TO
ATTENTION OF

CESAJ-PD-EC

DEPARTMENT OF THE ARMY
JACKSONVILLE DISTRICT CORPS OF ENGINEERS
P.O. BOX 4970
JACKSONVILLE, FLORIDA 32232-0019

MAR 26 2010

MEMORANDUM FOR Commander, U.S. Army Records Management and Declassification Agency, ATTN: AHRC-PDD-RP Casey Bldg., Rm. 102, 7701 Telegraph Road, Alexandria, Virginia 22315-3860

SUBJECT: Notice of Intent to Prepare a Draft Environmental Impact Statement

Enclosed for publication in the Federal Register are three signed original copies of the Notice of Intent to prepare a Draft Environmental Impact Statement for Hurricane and Storm Damage Reduction for South Ponte Vedra Beach, Vilano Beach, and Summer Haven Beach Reaches, St. Johns County, FL. The billing code is 3710-AJ.

FOR THE COMMANDER:

Encl

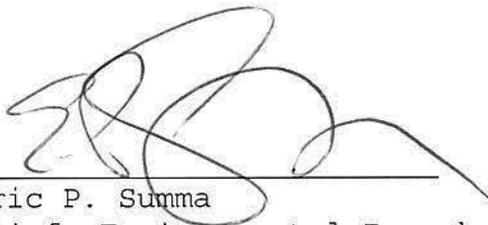

ERIC P. SUMMA
Chief, Environmental Branch

CF (w/encl):
CESAD-CM-P

e. *Agency Role:* As the cooperating agency, NMFS HCD and FDEP BBCS will provide information and assistance on the resources to be impacted, mitigation measures and alternatives. Other agencies having either regulatory authority or special expertise may also be invited to become a cooperating agency in preparation of the EIS. Specifically, as a Federal agency with jurisdiction to manage resources available on the Outer Continental Shelf (OCS), the U.S. Minerals Management Service would be invited should potential borrow areas be identified within Federal waters (outside the 3-mile State statutory limit).

f. *Draft Environmental Impact Statement Availability.* The study schedule is dependent upon Congressional funding and the current estimate is for the Draft Environmental Impact Statement to be available on or after 2012.

25 MAR 2010
DATE


Eric P. Summa
Chief, Environmental Branch



DEPARTMENT OF THE ARMY
JACKSONVILLE DISTRICT CORPS OF ENGINEERS
P.O. BOX 4970
JACKSONVILLE, FLORIDA 32232-0019

REPLY TO
ATTENTION OF

Planning Division
Environmental Branch

MAR 26 2010

Mr. David Hankla, Field Supervisor
U.S. Fish and Wildlife Service
7915 Baymeadows Way, Suite 200
Jacksonville, Florida 32256-7517

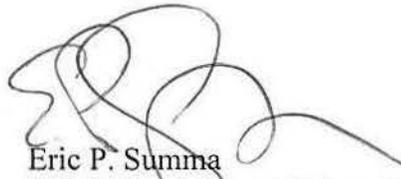
Dear Mr. Hankla:

The U.S. Army Corps of Engineers (Corps) and the Minerals Management Service (MMS) would like to initiate formal Endangered Species Act consultation for the Duval County Hurricane and Storm Damage Reduction project. The MMS is a cooperating agency during the National Environmental Policy Act process for this project and is also serving as a joint agency under this ESA consultation. The Corps will remain the lead agency. Approximately 1,500,000 cubic yards of shoal material would be dredged from the Duval borrow area and used to construct a protective beach berm between monuments V-501 to R-80. Consultation was previously completed for this project in 1993 and 2005.

Enclosed is our biological assessment. The Corps and MMS have determined that the proposed beach nourishment project may affect nesting sea turtles and would be not likely to adversely affect manatees with inclusion of the Service's standard manatee protection measures.

We request your concurrence in this matter pursuant to Section 7 of the Endangered Species Act. If you have any questions regarding this project, please contact Mr. Paul DeMarco at 904-232-1897.

Sincerely,



Eric P. Summa
Chief, Environmental Branch

Enclosures

by the IPHC between the commercial and charter vessel fisheries. If approved by the Secretary of Commerce, this new allocation program would not be effective before 2012.

Authority: 16 U.S.C. 773 *et seq.*

Dated: March 30, 2010.

Emily H. Menashes,

Acting Director, Office of Sustainable Fisheries, National Marine Fisheries Service.

[FR Doc. 2010-7626 Filed 4-2-10; 8:45 am]

BILLING CODE 3510-22-S

DEPARTMENT OF COMMERCE

Economic Development Administration

Notice of Petitions by Firms for Determination of Eligibility To Apply for Trade Adjustment Assistance

AGENCY: Economic Development Administration, Department of Commerce.

ACTION: Notice and opportunity for public comment.

Pursuant to Section 251 of the Trade Act of 1974 (19 U.S.C. 2341 *et seq.*), the

Economic Development Administration (EDA) has received petitions for certification of eligibility to apply for Trade Adjustment Assistance from the firms listed below. EDA has initiated separate investigations to determine whether increased imports into the United States of articles like or directly competitive with those produced by each firm contributed importantly to the total or partial separation of the firm's workers, or threat thereof, and to a decrease in sales or production of each petitioning firm.

LIST OF PETITIONS RECEIVED BY EDA FOR CERTIFICATION OF ELIGIBILITY TO APPLY FOR TRADE ADJUSTMENT

[3/23/2010 through 3/30/2010]

Firm	Address	Date accepted for filing	Products
Mansfield Plumbing Products, LLC	150 E. 1st St., Perrysville, OH 44864.	3/23/2010	Sinks and lavatories made of porcelain or china.
Hurst Manufacturing	1551 East Broadway, Princeton, NJ 47670.	3/24/2010	Electric Motors, Brushless DC, AC Induction, Step- per and Synchronous.
Adams USA, Inc	610 S Jefferson Avenue, Cookeville, TN 38501.	3/25/2010	The firm produces sporting goods equipment; primary materials include plastic and fabric.
Bailey Knit Corporation	1606 Sanders Ave, NE., Fort Payne, AL 35967.	3/25/2010	The firm produces socks; primary materials include cotton and synthetic fibers.
Development Associates, Inc	300 Old Baptist Road, North Kingston, RI 02852.	3/25/2010	Development Associates manufactures polyurethane Resin, clear polyurethane resin—auto grade, non-yellowing, uv stable, mercury free, urethane Adhesive, epoxy primer, wire and cable coating.
Hawaiian Sun Products, Inc	259 Sand Island Access, Honolulu, HI 96819.	3/25/2010	Hawaiian Sun produces tropical fruit juices, preserves, chocolate covered food products, macadamia nuts, and a variety of other food products.
Pierce Aluminum Company, Inc	34 Forge Park, Franklin, MA 02038.	3/25/2010	Pierce Aluminum specializes in aluminum products for use in the marine, transportation, defense, Architectural, and general manufacturing. They also provide finished aluminum products for first line production capabilities for the same industries.
Alpha Machining & Manufacturing, Inc.	1604 N. 161st East Avenue, Tulsa, OK 74116.	3/29/2010	Machined parts for the aircraft industry.

Any party having a substantial interest in these proceedings may request a public hearing on the matter.

A written request for a hearing must be submitted to the Trade Adjustment Assistance for Firms Division, Room 7106, Economic Development Administration, U.S. Department of Commerce, Washington, DC 20230, no later than ten (10) calendar days following publication of this notice.

Please follow the procedures set forth in section 315.9 of EDA's final rule (71 FR 56704) for procedures for requesting a public hearing. The Catalog of Federal Domestic Assistance official program number and title of the program under which these petitions are submitted is 11.313, Trade Adjustment Assistance.

Dated: March 30, 2010.

Bryan Borlik,

Program Director.

[FR Doc. 2010-7587 Filed 4-2-10; 8:45 am]

BILLING CODE 3510-24-P

DEPARTMENT OF DEFENSE

Department of the Army; Corps of Engineers

Intent To Prepare a Draft Environmental Impact Statement for Hurricane and Storm Damage Reduction for South Ponte Vedra Beach, Vilano Beach, and Summer Haven Beach Reaches, St. Johns County, FL

AGENCY: Department of the Army, U.S. Army Corps of Engineers, DoD.

ACTION: Notice of intent.

SUMMARY: The U.S. Army Corps of Engineers, Jacksonville District, intends to prepare a Draft Environmental Impact Statement (DEIS) for evaluation of the feasibility of providing hurricane and storm damage reduction (HSDR), and related purposes to the shores of St. Johns County, Florida. In cooperation with St. Johns County, the study will evaluate alternatives that will maximize HSDR while minimizing environmental impacts within three reaches designated critically eroded by Florida Department of Environmental Protection (FDEP): (1) South Ponte Vedra Beach (R84-R110/5 miles), (2) Vilano Beach (R110-R122/2.5 miles) and (3) Summer Haven Beach (R197-R209/2.3 miles).

ADDRESSES: U.S. Army Corps of Engineers, Planning Division, Environmental Branch, P.O. Box 4970, Jacksonville, FL 32232-0019.

FOR FURTHER INFORMATION CONTACT: Mr. Paul M. DeMarco, by e-mail Paul.M.DeMarco@usace.army.mil or by telephone at 904-232-1897.

SUPPLEMENTARY INFORMATION:

a. *Proposed Action.* The Rivers and Harbors Act of 1962 gave the Secretary of the Army broad authorization to survey coastal areas of the United States and its possessions in the interest of beach erosion control, hurricane protection and related purposes, provided that surveys of particular areas would be authorized by appropriate resolutions (Pub. L. 87-874, Section 110). As a result, portions of the St. Johns County shoreline experiencing severe erosion were studied extensively. The St. Johns County, Florida General Reevaluation Report (GRR) (USACE 1998), recommended beach nourishment along St. Augustine Beach. Initial fill was completed in January 2003.

Authority for the proposed study is House Resolution 2646 adopted June 21, 2000. A Reconnaissance Report completed in March 2004, by the Corps, concluded based on preliminary findings, there was a federal interest in pursuing HSDR for the Vilano Beach and Summer Haven Beach reaches. Subsequent to the completion of that report, South Ponte Vedra Beach experienced severe erosion, was designated as a critically eroded beach by FDEP, and therefore added to the scope of the Federal study.

b. *Alternatives.* Project's alternatives include no action and various levels of protection along approximately 9.8 miles of coastal shoreline along three reaches designated as critically eroded areas. In addition to various levels of beach nourishment and periodic renourishment, the Corps will consider other management measures such as nearshore placement of sand, breakwaters, submerged artificial reef, groins, revetments, seawalls, dunes/vegetation, change to the Coastal Construction Control Line, relocation of structures, moratorium on construction, establish a no-growth program, relocation of structures, flood proofing of structures, and condemnation of structures with land acquisition.

c. *Scoping Process.* The scoping process as outlined by the Council on Environmental Quality has been and will continue to be utilized to involve Federal, State, and local agencies, affected Indian tribes, and other interested persons and organizations. Scoping letters were sent to the appropriate parties requesting their comments and concerns on August 17, 2005, for the Summer Haven and Vilano

Beach reaches of the study area. After that time, FDEP designated the South Ponte Vedra Reach as critically eroding. A second scoping letter was sent out on September 16, 2008, to include the South Ponte Vedra Reach in the study area. Initial comments and concerns have been received. Any additional persons and organizations wishing to participate in the scoping process should contact the U.S. Army Corps of Engineers at the above address.

Significant issues to be analyzed in the DEIS would include effects on Federally listed threatened and endangered species, and Essential Fish Habitat. Other issues would be health and safety, water quality, aesthetics and recreation, fish and wildlife resources, cultural resources, and socio-economic resources. Issues identified through scoping and public involvement thus far include loss of land and property due to erosion, lack of protection from hurricanes, loss of recreational beach, concern over impacts to sea turtles and shore birds from renourishment, concern over impacts to benthic organisms from mining and fill, concern over protecting surfing spots and the revenue they generate, concern over wasting Federal tax dollars, too much time since the first studies without positive results, and concern that revetments and seawalls harm sea turtle nesting.

Any proposed action would be coordinated with the U.S. Fish and Wildlife Service and the National Marine Fisheries Service (NMFS) pursuant to Section 7 of the Endangered Species Act, and with the State Historic Preservation Officer. The NMFS Habitat Conservation Division (HCD) has accepted cooperating agency status on the study.

Any proposed action would also involve evaluation for compliance with guidelines pursuant to section 404(b) of the Clean Water Act; application (to the State of Florida) for Water Quality Certification pursuant to section 401 of the Clean Water Act; certification of state lands, easements, and rights of way; and determination of Coastal Zone Management Act consistency. The FDEP Bureau of Beaches and Coastal Systems (BBCS) has also accepted cooperating agency status on the study.

The U.S. Army Corps of Engineers and the non-Federal sponsor, St. Johns County, would provide extensive information and assistance on the resources to be impacted and alternatives.

d. *Scoping Meetings.* Public scoping meetings could be held. Exact dates, times, and locations would be published in local papers.

e. *Agency Role.* As the cooperating agency, NMFS HCD and FDEP BBCS will provide information and assistance on the resources to be impacted, mitigation measures and alternatives. Other agencies having either regulatory authority or special expertise may also be invited to become a cooperating agency in preparation of the EIS. Specifically, as a Federal agency with jurisdiction to manage resources available on the Outer Continental Shelf (OCS), the U.S. Minerals Management Service would be invited should potential borrow areas be identified within Federal waters (outside the 3-mile State statutory limit).

f. *Draft Environmental Impact Statement Availability.* The study schedule is dependent upon Congressional funding and the current estimate is for the Draft Environmental Impact Statement to be available on or after 2012.

Dated: March 25, 2010.

Eric P. Summa,

Chief, Environmental Branch.

[FR Doc. 2010-7598 Filed 4-2-10; 8:45 am]

BILLING CODE 3720-58-P

DEPARTMENT OF DEFENSE

Department of the Army

Draft Environmental Impact Statement (DEIS) for Training Range and Garrison Support Facilities Construction and Operation at Fort Stewart, GA

AGENCY: Department of the Army, DoD.

ACTION: Notice of Availability (NOA).

SUMMARY: The Department of the Army has prepared a DEIS to analyze the environmental and socioeconomic impacts resulting from the proposed construction of 12 range projects and 2 garrison support facilities at Fort Stewart, Georgia. Completion of these projects will better allow the Army to support Soldier training requirements and will support Fort Stewart's existing and future units. Construction of these projects will help to ensure Fort Stewart can meet unit training requirements if and when the pace of operational deployments slows.

DATES: The public comment period will end 45 days after the publication of an NOA in the **Federal Register** by the U.S. Environmental Protection Agency.

ADDRESSES: For further information regarding the EIS, please contact Mr. Charles Walden, Project Manager, Directorate of Public Works, Prevention and Compliance Branch, Environmental Division, 1550 Frank Cochran Drive, Building 1137-A, Fort Stewart, Georgia



**US Army Corps
of Engineers ®
Jacksonville District**

You are invited to attend a Feasibility Scoping Meeting (FSM) for the *St. Johns County Hurricane and Storm Damage Reduction Study (HSDR)*. This meeting will take place:

Where: Jacksonville District Office, located at 701 San Marco Blvd,
Jacksonville, FL, 32207 in the Executive Conference Room

When: March 15, 2011, 9:00 a.m. to 12:00 p.m.

Additionally, a Teleconference and Web Meeting will be established for remote attendance; the link for this conference site is below.

The purpose of the FSM is to collect input from affected resource agencies by discussion of:

- The “Future Without Project” anticipated conditions in the study area,
- Related issues on the affect to resources for moving the study forward, with specific reference to the alternatives identified in the Draft Feasibility Study Report
- Focus on the feasibility study tailored to the key alternatives
- Further definition of the required depth of analysis, as well as defined study constraints.

Please contact Paul DeMarco at (904)232-1897, or Matt Schrader at (904)232-2043, or by e-mail at Paul.M.DeMarco@usace.army.mil; Matthew.H.Schrader@usace.army.mil. We look forward to your participation; more details regarding this meeting will be provided soon.

AUDIO CONFERENCE ACCESS INFORMATION:

-
- * USA Toll-Free: (888)830-6260
 - * PARTICIPANT CODE: 383416

WEB MEETING ACCESS INFORMATION:

-
- * Web Meeting Address: <https://www.webmeeting.att.com>
 - * Meeting Number(s): (888)830-6260
 - * PARTICIPANT CODE: 383416



FLORIDA DEPARTMENT OF STATE
Sandra B. Mortham
Secretary of State
DIVISION OF HISTORICAL RESOURCES

July 11, 1997

Mr. Donald Fore
Construction-Operations Division
Jacksonville District, Corps of Engineers
P.O. Box 4970
Jacksonville, Florida 32232-0019

In Reply Refer To:
Scott B. Edwards
Historic Sites Specialist
Project File No. 973141

RE: Cultural Resource Assessment Request
Public Notice No. PN-IWW-216
Maintenance Dredging of the IWW in the St. Augustine Inlet and the Matanzas Inlet and
the placement of material along the beaches south of the inlets.
St. Johns County, Florida

Dear Mr. Fore:

In accordance with the procedures contained in 36 C.F.R., Part 800 ("Protection of Historic Properties"), we have reviewed the referenced projects for possible impact to historic properties listed, or eligible for listing, in the *National Register of Historic Places*. The authority for this procedure is the National Historic Preservation Act of 1966 (Public Law 89-665), as amended.

A review of the Florida Master Site File indicated that there are no underwater archaeological sites recorded within the above referenced inlet areas. However, it is the opinion of this agency, that there is a reasonable probability of project activities impacting unrecorded historic shipwreck sites that may be potentially eligible for listing in the *National Register of Historic Places*.

Since potentially significant historic shipwreck sites may be present, it is our recommendation that, prior to initiating any bottom disturbing activities within the project areas, it should be subjected to a professional magnetometer survey. In the event that significant submerged cultural resources are located during the course of the magnetometer survey, it will be the recommendation of this office that those sites be avoided. If avoidance is not possible, then other appropriate mitigation would be recommended to reduce adverse impacts on these cultural resources. The resultant survey report must be forwarded to this agency in order to complete the process of reviewing the impact of this project on cultural resources.

DIRECTOR'S OFFICE

R.A. Gray Building • 500 South Bronough Street • Tallahassee, Florida 32399-0250 • (850) 488-1480
FAX: (850) 488-3353 • WWW Address <http://www.dos.state.fl.us>

ARCHAEOLOGICAL RESEARCH
(850) 487-2299 • FAX: 414-2207

HISTORIC PRESERVATION
(850) 487-2333 • FAX: 922-0496

HISTORICAL MUSEUMS
(850) 488-1484 • FAX: 921-2503

Mr. Fore
July 11, 1997
Page 2

As for the beach disposal areas, because of the project locations and/or nature it is unlikely that any significant archaeological or historical sites will be affected. Therefore, it is the opinion of this office that the proposed projects will have no effect on historic properties listed, or eligible for listing, in the *National Register of Historic Places*.

If you have any questions concerning our comments please do not hesitate to contact us. Your interest and cooperation in helping to protect Florida's archaeological and historical resources are appreciated.

Sincerely,

Laura R. Kammerer

for

George W. Percy, Director
Division of Historical Resources
and
State Historic Preservation Officer

GWP/Ese



FLORIDA DEPARTMENT OF STATE
Sandra B. Mortham
Secretary of State
DIVISION OF HISTORICAL RESOURCES

July 18, 1997

Mr. Donald Fore
Construction-Operations Division
Jacksonville District, Corps of Engineers
P.O. Box 4970
Jacksonville, Florida 32232-0019

In Reply Refer To:
Scott B. Edwards
Historic Sites Specialist
Project File No. 973141B

RE: Cultural Resource Assessment Request
Public Notice No. PN-IWW-216
Maintenance Dredging of the IWW in the St. Augustine Inlet and the Matanzas Inlet and
the placement of material along the beaches south of the inlets.
St. Johns County, Florida

Dear Mr. Fore:

In our July 11 letter we were unclear in our recommendation as to the professional magnetometer survey. The survey applies only to the St. Augustine Inlet and all other projects associated with the permit are cleared by this office to proceed without any condition. If you have any questions concerning our comments please do not hesitate to contact us. Your interest and cooperation in helping to protect Florida's archaeological and historical resources are appreciated.

Sincerely,

George W. Percy, Director
Division of Historical Resources
and
State Historic Preservation Officer

GWP/Ese

DIRECTOR'S OFFICE

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FLORIDA DEPARTMENT OF STATE
Sandra B. Mortham
Secretary of State
DIVISION OF HISTORICAL RESOURCES

September 19, 1997

Mr. Dennis R. Duke
Planning Division, Environmental Branch
Jacksonville District, Corps of Engineers
P.O. Box 4970
Jacksonville, Florida 32232-0019

In Reply Refer To:
Scott B. Edwards
Historic Sites Specialist
Project File No. 973678

RE: Cultural Resource Assessment Review Request
Final Draft Report - *Submerged Properties Survey, St. Johns County, Florida*
By Mid-Atlantic Technology, July 1997.

Dear Mr. Duke:

In accordance with the procedures contained in 36 C.F.R., Part 800 ("Protection of Historic Properties"), we have reviewed the referenced draft historic properties survey and find it sufficient. Please forward a Survey Log sheet with the final survey report.

We have reviewed the above referenced project and note that twelve anomalies Target Inlets A-L, were identified during the course of the marine magnetometer and side scan sonar survey. Of the twelve anomalies, six (Inlet B, E, F, G, H, and I) were determined to have the potential to be significant and five (Inlet C, D, J, K, and L) appear to be single objects. Finally, Target Inlet A has positively been identified as a modern wreck of a shrimp boat and requires no further investigations. It is our understanding that diver investigations will be conducted on the eleven potentially significant targets and that the results from these diver investigations will be forwarded to this office in order to complete our review. We concur with the Corps with these determinations and look forward to receiving the results of the investigations.

If you have any questions concerning our comments, please do not hesitate to contact us. Your interest in protecting Florida's historic properties is appreciated.

Sincerely,

George W. Percy, Director
Division of Historical Resources
and

State Historic Preservation Officer

GWP/Ese

DIRECTOR'S OFFICE

R.A. Gray Building • 500 South Bronough Street • Tallahassee, Florida 32399-0250 • (850) 488-1480
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FLORIDA DEPARTMENT OF STATE
Sandra B. Mortham
Secretary of State
DIVISION OF HISTORICAL RESOURCES

September 19, 1997

Mr. Dennis R. Duke
Planning Division, Environmental Branch
Jacksonville District, Corps of Engineers
P.O. Box 4970
Jacksonville, Florida 32232-0019

In Reply Refer To:
Scott B. Edwards
Historic Sites Specialist
Project File No. 973678

RE: Cultural Resource Assessment Review Request
Final Draft Report - *Submerged Properties Survey, St. Johns County, Florida*
By Mid-Atlantic Technology, July 1997.

Dear Mr. Duke:

In accordance with the procedures contained in 36 C.F.R., Part 800 ("Protection of Historic Properties"), we have reviewed the referenced draft historic properties survey and find it sufficient. Please forward a Survey Log sheet with the final survey report.

We have reviewed the above referenced project and note that twelve anomalies Target Inlets A-L, were identified during the course of the marine magnetometer and side scan sonar survey. Of the twelve anomalies, six (Inlet B, E, F, G, H, and I) were determined to have the potential to be significant and five (Inlet C, D, J, K, and L) appear to be single objects. Finally, Target Inlet A has positively been identified as a modern wreck of a shrimp boat and requires no further investigations. It is our understanding that diver investigations will be conducted on the eleven potentially significant targets and that the results from these diver investigations will be forwarded to this office in order to complete our review. We concur with the Corps with these determinations and look forward to receiving the results of the investigations.

If you have any questions concerning our comments, please do not hesitate to contact us. Your interest in protecting Florida's historic properties is appreciated.

Sincerely,

for

George W. Percy, Director
Division of Historical Resources
and

State Historic Preservation Officer

GWP/Ese

DIRECTOR'S OFFICE

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(850) 488-1484 • FAX: 921-2503

Ent D (FMSF only) 1/1

Survey Log Sheet

Florida Master Site File
Version 2.0 9/97

Survey # (FMSF only) _____

Consult *Guide to the Survey Log Sheet* for detailed instructions.

Identification and Bibliographic Information

Survey Project (Name and project phase) ST JOHNS COUNTY SHORE PROTECTION PROJECT BORROW AREA
DIVER INVESTIGATION & EVALUATION

Report Title (exactly as on title page) ARCHEOLOGICAL DIVER INVESTIGATION & EVALUATION OF ELEVEN
POTENTIALLY SIGNIFICANT SUBMERGED TARGETS IN THE PROPOSED BORROW AREA, ST. JOHNS
COUNTY FL

Report Author(s) (as on title page—individual or corporate; last names first) WES HALL, Mid-Atlantic Technology

Publication Date (year) 1998 Total Number of Pages in Report (Count text, figures, tables, not site forms) 23

Publication Information (If relevant, series and no. in series, publisher, and city. For article or chapter, cite page numbers. Use the style of *American Antiquity*; see *Guide to the Survey Log Sheet*.) _____

Supervisor(s) of Fieldwork (whether or not the same as author(s); last name first) HALL, WES

Affiliation of Fieldworkers (organization, city) Mid-Atlantic Technology, Castle Hayne NC

Key Words/Phrases (Don't use the county, or common words like *archaeology, structure, survey, architecture*. Put the most important first. Limit each word or phrase to 25 characters.) _____

Survey Sponsors (corporation, government unit, or person who is directly paying for fieldwork)

Name U.S. Army Corps of Engineers

Address/Phone P.O. Box 4970, Jacksonville FL 32202 904-232-2016

Recorder of Log Sheet _____ Date Log Sheet Completed 8/19/98

Is this survey or project a continuation of a previous project? No Yes: Previous survey #(s) (FMSF only) _____

Mapping

Counties (List each one in which field survey was done - do not abbreviate; use supplement sheet if necessary) St. Johns Co.

USGS 1:24,000 Map(s) : Map Name/Date of Latest Revision (use supplement sheet if necessary): St. Augustine FL

Description of Survey Area

Dates for Fieldwork: Start 5/30/98 End 6/2/98 Total Area Surveyed (fill in one) _____ hectares _____ acres

Number of Distinct Tracts or Areas Surveyed 1

If Corridor (fill in one for each): Width _____ meters 4780 feet Length _____ kilometers 7260 feet 7260 miles

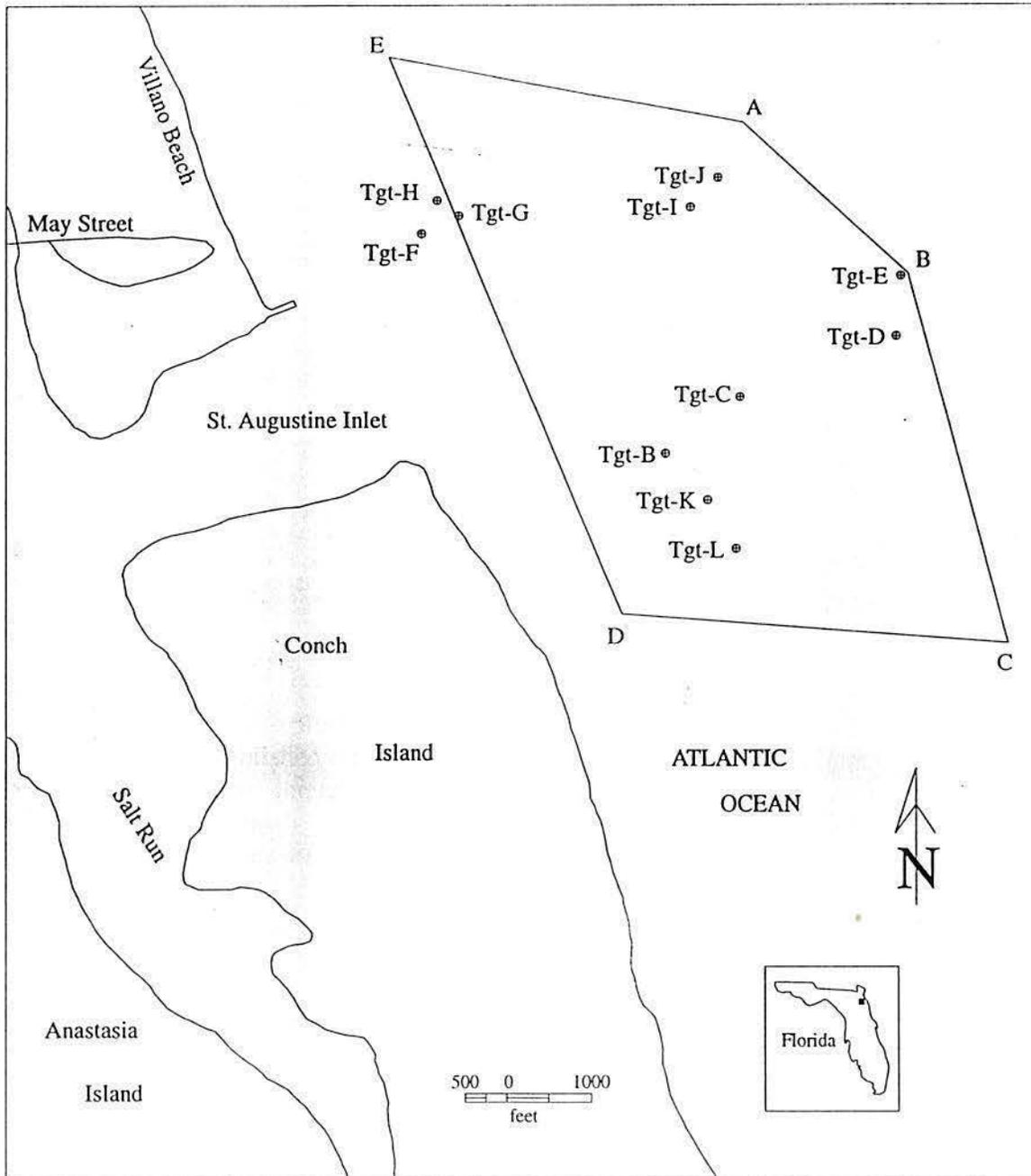


Figure 1. Study area and target location map.

Planning Division
Environmental Branch

Mr. George W. Percy
State Historic Preservation Officer
Division of Historical Resources
500 South Bronough Street
Tallahassee, Florida 32399-0250

Dear Mr. Percy:

The U.S. Army Corps of Engineers (Corps), Jacksonville District, is studying the environmental effects of a shore protection project in St. Johns County, Florida.

Environmental studies have included archival research and a remote sensing survey to locate potentially significant historic properties in the proposed borrow area. Results of these investigations are included in the draft final report *Submerged Properties Survey, St. Johns County, Florida*, prepared by Mr. Wes Hall, Mid-Atlantic Technology. Investigations for this report were conducted under the direct supervision of a qualified marine survey archeologist. A copy of the draft report is enclosed.

During the field investigations, 12 targets were identified through use of a magnetometer and side scan sonar. Of those targets, six have the potential to be significant historic properties. Five of the targets appear to be single objects. Target A has been positively identified as the 1997 wreck of a modern shrimp boat and requires no further investigation.

We intend to conduct archeological diver investigation of identified targets. Because the potentially significant targets are spread throughout the borrow area, establishment of "no effect" buffer zones would make the borrow area difficult to use efficiently.

We are aware of the research being conducted by Southern Oceans Archeological Research (SOAR) and the historic properties that have recently been identified near the Federal project. We are also concerned about the effects of dredging in the St. Augustine vicinity. Removal of large volume of sand may affect the dynamics of the inlet and cause erosion of historic sediments from buried portions of shipwrecks. Fragile artifacts and organic features now protected might then be exposed and lost to wave action, currents, and marine organisms.

July 24, 1997

Planning Division
Environmental Branch

Mr. George W. Percy
State Historic Preservation Officer
Division of Historical Resources
500 South Bronough Street
Tallahassee, Florida 32399-0250

Dear Mr. Percy:

The U.S. Army Corps of Engineers (Corps), Jacksonville District, is studying the environmental effects of a shore protection project in St. Johns County, Florida.

Environmental studies have included archival research and a remote sensing survey to locate potentially significant historic properties in the proposed borrow area. Results of these investigations are included in the draft final report *Submerged Properties Survey, St. Johns County, Florida*, prepared by Mr. Wes Hall, Mid-Atlantic Technology. Investigations for this report were conducted under the direct supervision of a qualified marine survey archeologist. A copy of the draft report is enclosed.

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We intend to conduct archeological diver investigation of identified targets. Because the potentially significant targets are spread throughout the borrow area, establishment of "no effect" buffer zones would make the borrow area difficult to use efficiently.

We are aware of the research being conducted by Southern Oceans Archeological Research (SOAR) and the historic properties that have recently been identified near the Federal project. We are also concerned about the effects of dredging in the St. Augustine vicinity. Fragile artifacts and organic features now protected might then be exposed and lost to wave action, currents, and marine organisms.

It is the Corps' determination that dredging within the borrow area may affect significant historic properties, therefore we intend to conduct diver investigations prior to dredging in this borrow area. Diver investigations will be conducted by qualified marine survey archeologists. Results of diver investigations will be coordinated with your office according to normal procedures.

We request your concurrence with our determination of effect. Your comments on the enclosed draft report are also requested. A response within 30 calendar days would be appreciated. Please contact Ms. Janice Adams at 904-232-2016 if you have any questions.

Sincerely,

Dennis R. Duke
Acting Chief, Planning Division

Enclosure

bcc (wo/encl):
CESAJ-DP-I (McMillen)
CESAJ-PD-PC (Smith)

JW
Schmidt
DP
Jr 7/21
Adams/CESAJ-PD-ER/2016/mw
Dugger/CESAJ-PD-ER
Smith/CESAJ-PD-E
Strain/CESAJ-PD-P
Duke/CESAJ-PD

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NOV 19 1997

Planning Division
Environmental Branch

Mr. George W. Percy
State Historic Preservation Officer
Division of Historical Resources
500 South Bronough Street
Tallahassee, Florida 32399-0250

Dear Mr. Percy:

The U.S. Army Corps of Engineers (Corps), Jacksonville District, is studying the environmental effects of the St. Johns County shore protection project. These studies have included historic property investigations to locate and identify potentially significant historic properties which may be located in proposed borrow area.

Enclosed is a copy of the final report *Submerged Historic Properties Survey Shore Protection Project, St. Johns County, Florida* prepared by Mr. Wes Hall, Mid-Atlantic Technology and Environmental Research. A draft of this report was coordinated with your office earlier this year in accordance with the requirements established in 36 CFR Part 800 and Section 106 of the National Historic Preservation Act of 1966, as amended.

If there are any questions regarding this matter, please contact Ms. Janice Adams at 904-232-2016.

Sincerely,

John R. Hall
Acting Chief, Planning Division

Enclosure

Jan 11/18
Adams/CESAJ-PD-ER/2016/ljd
Dugger/CESAJ-PD-ER
Smith/CESAJ-PD-E
Strain/CESAJ-PD-P
Hall/CESAJ-PD

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FLORIDA DEPARTMENT OF STATE
Sandra B. Mortham
Secretary of State
DIVISION OF HISTORICAL RESOURCES

August 19, 1998

Mr. George M. Strain
Planning Division, Environmental Branch
Jacksonville District Corps of Engineers
P.O. Box 4970
Jacksonville, Florida 32232-0019

In Reply Refer To:
Frank J. Keel
Historic Preservation Planner
Project File No. 985460

RE: Cultural Resource Assessment Review Request
Archeological Diver Identification and Evaluation of eleven Potentially Significant Submerged Targets in the Proposed Borrow Area, St. Johns County, Florida. By Mid-Atlantic Technology and Environmental Research, Inc. July 22, 1998

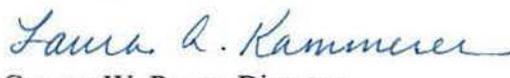
Dear Mr. Strain:

In accordance with the procedures contained in 36 C.F.R., Part 800 ("Protection of Historic Properties"), as well as with the provisions contained in Chapter 1A-46, *Florida Administrative Code*, we have reviewed the results of the investigations for the referenced project and find them to be complete and sufficient.

We note that diver investigations of Targets B, F, G, H, and K represents remains of modern wrecks, or debris associated with modern navigational aids or fishing. Therefore, it is the opinion of this agency that because of the proposed undertaking will have no effect on any sites listed, or eligible for listing, in the *National Register of Historic Places*.

If you have any questions concerning our comments, please do not hesitate to contact us. Your interest in protecting Florida's historic properties is appreciated.

Sincerely,

for 
George W. Percy, Director
Division of Historical Resources
and
State Historic Preservation Officer

GWP/Kfk

DIRECTOR'S OFFICE

R.A. Gray Building • 500 South Bronough Street • Tallahassee, Florida 32399-0250 • (850) 488-1480
FAX: (850) 488-3353 • WWW Address <http://www.dos.state.fl.us>

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HISTORIC PRESERVATION
(850) 487-2333 • FAX: 922-0496

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AUG 4 1998

Planning Division
Environmental Branch

Mr. George W. Percy
State Historic Preservation Officer
Division of Historical Resources
500 South Bronough Street
Tallahassee Florida 32399-0250

Dear Mr. Percy:

The U.S. Army Corps of Engineers (Corps), Jacksonville District, is conducting environmental investigations of a proposed borrow area for the St. Johns County Shore Protection Project.

These investigations have included a 1997 remote sensing survey to identify potentially significant submerged historic properties and diver investigation and evaluation of 11 identified targets. The results of the diver investigations are included in the draft report *Archeological Diver Identification and Evaluation of Eleven Potentially Significant Submerged Targets in the Proposed Borrow Area, St. Johns County*. A copy of Mid-Atlantic Technology's 1998 draft report is enclosed.

Each of the targets were identified, evaluated, and determined to be the remains of modern fishing vessels or navigation aids. These remains do not meet the criteria for nomination to the National Register of Historic Places. It is the Corps' determination that the proposed dredging within this borrow area for the St. Johns County Shore Protection Project will have no effect on significant historic properties.

We request your concurrence with the no effect determination. We also request comments on the enclosed draft report. A response would be appreciated within 30 calendar days. If there are any questions regarding this matter, please contact Ms. Janice Adams at 904-232-2016.

Sincerely,

George M. Strain
Acting Chief, Planning Division

Enclosure

bcc (w/encl): CESAJ-DP-I (McMillen)
CESAJ-PD-PC (Peterson)
CESAJ-PD-ER (Lang)

\

7/2/98
Adams/CESAJ-PD-ER/2016/ljd
Dugger/CESAJ-PD-ER
Smith/CESAJ-PD-E
Strain/CESAJ-PD
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DIVISIONS OF FLORIDA DEPARTMENT OF STATE
Office of the Secretary
Office of International Relations
Division of Elections
Division of Corporations
Division of Cultural Affairs
Division of Historical Resources
Division of Library and Information Services
Division of Licensing
Division of Administrative Services



MEMBER OF THE FLORIDA CABINET
State Board of Education
Trustees of the Internal Improvement Trust Fund
Administration Commission
Florida Land and Water Adjudicatory Commission
Siting Board
Division of Bond Finance
Department of Revenue
Department of Law Enforcement
Department of Highway Safety and Motor Vehicles
Department of Veterans' Affairs

FLORIDA DEPARTMENT OF STATE
Katherine Harris
Secretary of State
DIVISION OF HISTORICAL RESOURCES

Mr. James C. Duck
Jacksonville District Corps of Engineers
Planning Division, Environmental Branch
P. O. box 4970
Jacksonville, FL32232-0019

November 19, 1999

RE: DHR Project File No. 994884
Archaeological Diver Identification and Evaluation of Eleven Potentially Significant Submerged Targets in the Proposed Borrow Area, St. Johns County, Florida. By Mid-Atlantic Technology and Environmental Research, Inc., July 22, 1999.

Dear Mr. Duck:

Thank you for forwarding the final copy of the above referenced report. As you noted in your letter, this survey report has been previously coordinated with this office and found to be satisfactory. If you have any questions concerning our comments, please contact Ms. Robin Jackson, Historic Sites Specialist at (850) 487-2333 or 1-(800) 847-7278. Your interest in protecting Florida's historic properties is appreciated.

Sincerely,

Laura R. Kammerer

JSM
Janet Snyder Matthews, Ph.D.
State Historic Preservation Officer

JSM/Jrj

Planning Division
Environmental Branch

JUL 02 1999

Mr. George W. Percy
State Historic Preservation Officer
Division of Historical Resources
500 South Bronough Street
Tallahassee, Florida 32399-0250

Dear Mr. Percy:

We have enclosed a copy of the final report *Archaeological Diver Identification and Evaluation of Eleven Potentially Significant Submerged Targets in the Proposed Borrow Area, St. Johns County, Florida*. Mid-Atlantic Technology and Environmental Research prepared this report for the U.S. Army Corps of Engineers, Jacksonville District.

Earlier this year, we coordinated a draft of this report with your office in compliance with 36 CFR Part 800 and Section 106 of the National Historic Preservation Act of 1966, as amended. If there are any questions regarding the final report, please contact Ms. Janice Adams at 904-232-2016.

Sincerely,


James C. Duck
Chief, Planning Division

Enclosure

Jx
Adams/CESAJ-PD-ES/2016/als *als 7/1/99*
Kurzbach/CESAJ-PD-ES
Smith/CESAJ-PD-E
Jm McMillen/CESAJ-DP-I
Strain/CESAJ-PD-P
Duck/CESAJ-PD

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Mailed out 7/2/99.

Planning Division
Environmental Branch

JUN 04 1999

Mr. Wes Hall
Mid-Atlantic Technology
and Environmental Research, Inc.
441 Blossoms Ferry Road
Castle Hayne, North Carolina 28429

Dear Mr. Hall:

The U.S. Army Corps of Engineers (Corps), Jacksonville District, has reviewed and accepted the revised draft report *Archeological Diver Identification and Evaluation of Eleven Potentially Significant Submerged Targets in the Proposed Borrow Area, St. Johns County, Florida*.

Request that you submit a camera-ready copy and 15 bound copies of the revised draft report to the Corps within 21 calendar days. A final invoice for the balance of the contract should also be prepared and submitted according to the terms of the contract.

If there are any questions regarding this, please contact Ms. Janice Adams at 904-232-2016.

Sincerely,

James C. Duck
Chief, Planning Division

JCB
Adams Adams/CESAJ-PD-Es/2016/pjo *PSJ*
Kur Kurzbach/CESAJ-PD-ES *BR 6/03/99*
St St. Johns/CESAJ-PD-E
Mc McMillen/CESAJ-DP-I
D Duck/CESAJ-PD

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DIVISIONS OF FLORIDA DEPARTMENT OF STATE
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FLORIDA DEPARTMENT OF STATE
Katherine Harris
 Secretary of State
 DIVISION OF HISTORICAL RESOURCES

Mr. James C. Duck
 Jacksonville District Corps of Engineers
 Planning Division, Environmental Branch
 P. O. box 4970
 Jacksonville, FL32232-0019

November 19, 1999

RE: DHR Project File No. 994884
Archaeological Diver Identification and Evaluation of Eleven Potentially Significant Submerged Targets in the Proposed Borrow Area, St. Johns County, Florida. By Mid-Atlantic Technology and Environmental Research, Inc., July 22, 1999.

Dear Mr. Duck:

Thank you for forwarding the final copy of the above referenced report. As you noted in your letter, this survey report has been previously coordinated with this office and found to be satisfactory. If you have any questions concerning our comments, please contact Ms. Robin Jackson, Historic Sites Specialist at (850) 487-2333 or 1-(800) 847-7278. Your interest in protecting Florida's historic properties is appreciated.

Sincerely,

Laura R. Kammerer

for

Janet Snyder Matthews, Ph.D
 State Historic Preservation Officer

JSM/Jrj

FLORIDA DEPARTMENT OF STATE
Office of the Secretary
Office of International Relations
Division of Administrative Services
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FLORIDA DEPARTMENT OF STATE
Sandra B. Mortham
Secretary of State
DIVISION OF HISTORICAL RESOURCES

August 19, 1998

Mr. George M. Strain
Planning Division, Environmental Branch
Jacksonville District Corps of Engineers
P.O. Box 4970
Jacksonville, Florida 32232-0019

In Reply Refer To:
Frank J. Keel
Historic Preservation Planner
Project File No. 985460

RE: Cultural Resource Assessment Review Request
Archeological Diver Identification and Evaluation of eleven Potentially Significant Submerged Targets in the Proposed Borrow Area, St. Johns County, Florida. By Mid-Atlantic Technology and Environmental Research, Inc. July 22, 1998

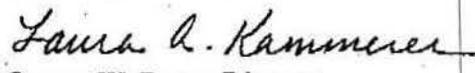
Dear Mr. Strain:

In accordance with the procedures contained in 36 C.F.R., Part 800 ("Protection of Historic Properties"), as well as with the provisions contained in Chapter 1A-46, *Florida Administrative Code*, we have reviewed the results of the investigations for the referenced project and find them to be complete and sufficient.

We note that diver investigations of Targets B, F, G, H, and K represents remains of modern wrecks, or debris associated with modern navigational aids or fishing. Therefore, it is the opinion of this agency that because of the proposed undertaking will have no effect on any sites listed, or eligible for listing, in the *National Register of Historic Places*.

If you have any questions concerning our comments, please do not hesitate to contact us. Your interest in protecting Florida's historic properties is appreciated.

Sincerely,

for 
George W. Percy, Director
Division of Historical Resources
and
State Historic Preservation Officer

GWP/Kfk

DIRECTOR'S OFFICE

R.A. Gray Building • 500 South Bronough Street • Tallahassee, Florida 32399-0250 • (850) 488-1480
FAX: (850) 488-3353 • WWW Address <http://www.dos.state.fl.us>

ARCHAEOLOGICAL RESEARCH
(850) 487-2299 • FAX: 414-2207

HISTORIC PRESERVATION
(850) 487-2333 • FAX: 033-0407

HISTORICAL MUSEUMS
(850) 487-2333 • FAX: 033-0407

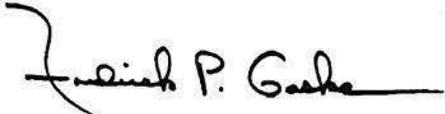
Mr. McAdams
March 24, 2008
Page 2

However, in order to be complete and sufficient under 1A-46, *Florida Administrative Code*, the report must be revised to include the following:

- **Historical Narrative:** Revise the historical narrative to include a specifically maritime history of the St. Augustine area, including known vessel losses nearby.
- **Unexpected Discoveries:** Include a statement outlining the procedures for dealing with unexpected discoveries.
- **Errata:** Page 2 cites Section 276.12, *Florida Statutes*, which should be Chapter 267.12

For any questions concerning our comments, please contact April Westerman, Historic Preservationist, by electronic mail at amwesterman@dos.state.fl.us, or by phone at (850) 245-6333. We appreciate your continued interest in protecting Florida's historic properties.

Sincerely,

A handwritten signature in black ink that reads "Frederick P. Gaske". The signature is written in a cursive style with a long horizontal line extending to the right.

Frederick P. Gaske, Director, and
State Historic Preservation Officer

Xc: Andrew Lydecker, Panamerican Consultants, Inc. (Memphis TN)



FLORIDA DEPARTMENT OF STATE
Kurt S. Browning
Secretary of State
DIVISION OF HISTORICAL RESOURCES

Mr. James J. McAdams
Jacksonville District Corps of Engineers
P.O. Box 4970
Jacksonville, Florida 32232-0019

March 24, 2007

Re: DHR No.: 2008-00887 / Received by DHR: February 25, 2008
Final Report: Remote Sensing Survey, Historic Assessment and Diver Evaluations of Suspected Submerged Resources Near St. Augustine, St. Johns County, Florida

Dear Mr. McAdams:

Our office received and reviewed the above referenced survey report in accordance with Section 106 of the *National Historic Preservation Act of 1966* (Public Law 89-665), as amended in 1992; *36 C.F.R., Part 800: Protection of Historic Properties*; and Chapter 267, *Florida Statutes*, for assessment of possible adverse impact to cultural resources (any prehistoric or historic district, site, building, structure, or object) listed, or eligible for listing, in the *National Register of Historic Places (NRHP)*, or otherwise of historical, architectural or archaeological value.

In March 2007, Panamerican Consultants, Inc. (PCI) conducted a remote sensing survey of an offshore borrow area used in a beach renourishment project at St. Augustine that produced historic artifacts during dredging. PCI also conducted diver evaluations of twelve targets identified in the remote sensing survey. Both investigations were conducted on behalf of the U.S. Army Corps of Engineers (Corps). PCI identified 55 magnetic anomalies, seven sidescan sonar targets, and 21 subbottom feature targets during the investigation and consolidated these into twelve dive targets. PCI divers did not identify any historic resources during the evaluation of the dive targets.

PCI recommends no further investigation of any of the targets located during the survey. However, if sand removal operations are to occur in the vicinity of the collapsed navigation tower, PCI recommends that a possible midden feature located in the subbottom data be investigated.

Based on the information provided, our office concurs with these determinations.

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Historical Museums
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South Florida Regional Office
(561) 416-2115 • FAX: 416-2149

North Florida Regional Office
(850) 245-6445 • FAX: 245-6435

Central Florida Regional Office
(813) 272-3843 • FAX: 272-2340

Planning Division
Environmental Branch

FEB 12 2007

Ms. Andrea White
Division of Historical Resources
500 South Bronough Street
Tallahassee, Florida 32399-0250

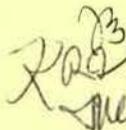
Dear Ms. White:

This letter is in response to your request for information regarding planned cultural resources investigations offshore of St. Augustine in St. Johns County. We have contracted with Panamerican Consultants, Inc. to investigate four sites located during the recent St. Johns County Shore Protection Project. Great Lakes Dredge and Dock Company impacted the sites during their dredging operations to place sand on the beach. The Jacksonville District, COE is fulfilling its responsibilities according to the National Historic Preservation Act and the Advisory Council's implementing regulations to identify and evaluate these unanticipated discoveries impacted during construction activities. Two of the sites are located in the borrow area and two in near shore areas. Construction activities occurred between June and November 2005 and there was approximately 2,750,000 cubic yards of sand dredged during the project and placed on the beach. The borrow area was dredged to a depth of -30 MLW. We, therefore, request preclusion for the need for a DEP permit to conduct cultural resources investigations.

If you have any questions regarding this report, please contact Mr. Tommy Birchett, RPA, at (904)232-3834.

Sincerely,

Marie G. Burns
Chief, Environmental Branch

 Birchett/CESAJ-PD-EC/3834/
Dugger/CESAJ-PD-EC
Burns/CESAJ-PD-E

NOV 26 2007

Planning Division
Environmental Branch

Mr. Andrew D. W. Lydecker
Panamerican Consultants, Inc.
91 Tillman Street
Memphis, Tennessee 38111

Dear Mr. Lydecker:

The U.S. Army Corps of Engineers, Jacksonville District, has reviewed the draft report, *Remote Sensing Survey, Historic Assessment and Diver Evaluations of Suspected Submerged Resources Near St. Augustine, St. Johns County, Florida.*

Overall, the draft report is thorough and informative. Please make the appropriate editorial corrections to the final report as referenced in the enclosed draft. Also, address the SHPO comments as referenced in their letter of November 6, 2007. Once corrections have been made, request that you submit 35 bound copies and 3 CDs of the Final Technical Report as per the Scope of Work.

If there are any questions regarding the comments, please contact Mr. Thomas Birchett at 904-232-3834.

Sincerely,

Kenneth R. Dugger
Acting Chief, Environmental Branch

Enclosure

 Bivens/CESAJ-PD-P 11/26
Birchett/CESAJ-PD-EC/3834
Dugger/CESAJ-PD-EC

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Department of Law Enforcement
Department of Highway Safety and Motor Vehicles
Department of Veterans' Affairs

FLORIDA DEPARTMENT OF STATE
Katherine Harris
Secretary of State
DIVISION OF HISTORICAL RESOURCES

Mr. James C. Duck
Attn: Mr. Tommy Birchett
Jacksonville District US Army Corps of Engineers
P.O. Box 4970
Jacksonville, Florida 32232-0019

August 10, 2001

RE: DHR No. 2001-321
Date Received by DHR: January 3, 2001
Agency: United States Army Corps of Engineers
Project Name: *Cultural Resources Marine Remote Sensing Survey and Terrestrial Survey at St. Augustine Entrance Channel*
St. Johns County, Florida

Dear Mr. Duck:

Our office has received and reviewed the above referenced project in accordance with Section 106 of the *National Historic Preservation Act of 1966* (Public Law 89-665), as amended in 1992, and *36 C.F.R., Part 800: Protection of Historic Properties*. The State Historic Preservation Officer (SHPO) is to advise and assist federal agencies when identifying historic properties (listed or eligible for listing, in the National Register of Historic Places), assessing effects upon them, and considering alternatives to avoid or reduce the project's effect on them.

Results of the investigations revealed that a total of six magnetic anomalies not previously identified. It is the opinion of the project archaeologist that targets SA-OS-1 and SA-T-6 have limited potential to be associated with significant cultural resources. However, targets SA-OS-2, -3, -4, and -6 are recommended for avoidance by establishing a 200-foot buffer zone around the anomalies, or additional investigation should be conducted.

Based on the information provided, this agency concurs with these determinations and finds the submitted report complete and sufficient. Please note that future submissions to our office for review and comment must adhere to the Division of Historical Resources' recently revised Performance Standards for Submerged Remote Sensing Surveys.

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(850) 245-6333 • FAX: 245-6437

Historical Museums
(850) 245-6400 • FAX: 245-6

Palm Beach Regional Office
(561) 279-1475 • FAX: 279-1476

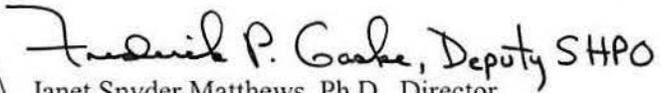
St. Augustine Regional Office
(904) 825-5045 • FAX: 825-5044

Tampa Regional Office
(813) 272-3843 • FAX: 272-2340

Mr. James C. Duck
August 10, 2001
Page 2

If you have any questions concerning our comments, please contact Brian Yates, Historic Sites Specialist, at byates@mail.dos.state.fl.us. Your interest in protecting Florida's historic properties is appreciated.

Sincerely,


Janet Snyder Matthews, Ph.D., Director
Division of Historical Resources
State Historic Preservation Officer

JSM/Yby



FLORIDA DEPARTMENT OF STATE
 Glenda E. Hood
 Secretary of State
 DIVISION OF HISTORICAL RESOURCES

Ms. Lizbeth Meigs
 Bureau of Beaches & Coastal Systems
 3900 Commonwealth Blvd., M.S. 300
 Tallahassee, Florida 32399-3000

February 16, 2005

Re: DHR No. 2005-775/ Received by DHR: January 21, 2005
 Application No. 0158721-004
 Applicant: St. Johns County
 Project: St. Johns County Shore Protection Project
 St. Johns County

Dear Ms. Meigs:

Our office received and reviewed the referenced project in accordance with Chapters 267 and 373, *Florida Statutes*, Florida's Coastal Management Program, and implementing state regulations, for possible impact to historic properties listed, or eligible for listing, in the *National Register of Historic Places*, or otherwise of historical, architectural or archaeological value. The State Historic Preservation Officer is to advise and assist state and federal agencies when identifying historic properties, assessing effects upon them, and considering alternatives to avoid or minimize adverse effects.

Our review of the location for proposed borrow area indicates that portions of the area fall outside of any previously survey location (See Enclosures). A submerged properties survey was performed in 1997 along with subsequent diver investigation in 1998 by Mid-Atlantic Technology (FMSF SV# 5214 & 5376). The survey resulted in the identification of twelve anomalies which were all later confirmed by divers to be the remains of modern fishing vessels or debris associated with modern navigational aids or the fishing industry. The 1997 and 1998 surveys appear to be the only investigations specifically intended to research the area for potential borrow usage. The specific location of the previous borrow area is not known at this time, but should have been within the specific survey boundaries.

The current proposed borrow area also has portions entering into two other previous survey areas. In 1998 a maritime survey of St. Augustine was performed by Southern Oceans Archaeological Research and resulted in the identification of a 19th century steam vessel and an 18th century British sailing vessel (FMSF SV#5095). In addition, multiple other magnetic targets were investigated, for which the source of the anomaly was could not determine. A cultural resource marine remote sensing survey at the St. Augustine Entrance Channel was

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Historical Museums
 (850) 245-6400 • FAX: 245-6433

Southeast Regional Office
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Northeast Regional Office
 (904) 825-5045 • FAX: 825-5044

Central Florida Regional Office
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Ms. Meigs
February 16, 2005
Page 2

conducted in 2000 by Mid-Atlantic Technology (FMSF SV#6565) identified six magnetic anomalies; however all appears to well outside of the current proposed borrow location. Further consultation with individuals more familiar with the St. Augustine area revealed that during the original borrow action; artifacts dating to the 16th Century were being recovered at the site of the dredge deposition. The origin of these artifacts is unclear, but historical information indicates a strong potential for historic shipwrecks occurring in the vicinity of the proposed borrow area.

Since potentially significant archaeological or historical sites may be present, it is the recommendation of this office that all portion of the proposed project lying outside of these previously survey areas should be subjected to a professional, underwater cultural resource survey. This survey shall include the usage of a magnetometer, sidescan sonar, and sub-bottom profiler of the area. The purpose of this survey will be to locate and assess the significance of historic properties present. The resultant survey report should conform to the specifications set forth in Chapter 1A-46, *Florida Administrative Code*, and will need to be forwarded to this agency in order to complete the process of reviewing the impact of this proposed project on historic properties. The results of the investigations will determine if significant historic properties would be disturbed by this project. In addition, if significant remains are located, the data described in the report and the consultant's conclusions will assist this office in determining measures that must be taken to avoid, minimize, or mitigate adverse impacts to historic properties listed, or eligible for listing in the *National Register of Historic Places*, or otherwise of historic or archaeological significance.

Because this letter and its contents are a matter of public record, consultants who have knowledge of our recommendations may contact the project applicant. This should in no way be interpreted as an endorsement by this agency. The Registry of Professional Archaeologists (RPA) is the national certifying organization for archaeologists. A listing of archaeologists who are RPA Certified Professional Archaeologists is available at www.rpanet.org. It should be noted that not all archaeologists listed on the RPA website are trained to perform the underwater investigations recommended in this letter.

If there are any questions concerning our comments or recommendations, please contact Neal Engel, Historic Sites Specialist, by phone at (850)245-6371, or by electronic mail at nengel@dos.state.fl.us. We appreciate your continued interest in protecting Florida's historic properties.

Sincerely,



for Frederick Gaske, Director and
State Historic Preservation Officer

Xc: Kenneth Craig- Taylor Engineering, Inc.

Enclosures

Planning Division
Environmental Branch

SEP 19 2006

Mr. Frederick P. Gaske
State Historic Preservation Officer
Division of Historical Resources
500 South Bronough Street
Tallahassee, Florida 32399-0250

Dear Mr. Gaske:

We have enclosed a revised copy of the draft report, *Submerged Cultural Resources Monitoring Report for the 2005 St. Augustine Beach Renourishment Project* by Lighthouse Archeological Maritime Program. Please review the report and provide us your comments, in accordance with the procedures contained in 36 CFR, Part 800 ("Protection of Historic Properties").

If you have any questions regarding this report, please contact Mr. Tommy Birchett, Archaeologist, at 904-232-3834. A response within 30 days after receipt of this letter would be appreciated.

Sincerely,

Marie G. Burns
Chief, Environmental Branch

Enclosure

Birchett/CESAJ-PD-EC/3834/als 18 Sep 06
RR Dugger/CESAJ-PD-EC
MB Burns/CESAJ-PD-E

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Planning Division
Environmental Branch

AUG 24 2006

Mr. Frederick P. Gaske
State Historic Preservation Officer
Division of Historical Resources
500 South Bronough Street
Tallahassee, Florida 32399-0250

Dear Mr. Gaske:

We have enclosed a single copy of the draft report, *Submerged Cultural Resources Monitoring Report for the 2005 St. Augustine Beach Renourishment Project* by Lighthouse Archeological Maritime Program. Please review the report and provide us your comments, in accordance with the procedures contained in 36 CFR, Part 800 ("Protection of Historic Properties").

If you have any questions regarding this report, please contact Mr. Tommy Birchett, Archaeologist, at (904)232-3834. A response within 30 days after receipt of this letter would be appreciated.

Sincerely,

Marie G. Burns
Chief, Environmental Branch

Enclosure

 Birchett/CESAJ-PD-EC/3834/
 Dugger/CESAJ-PD-EC
 Burns/CESAJ-PD-E

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Planning Division
Environmental Branch

NOV 13 2006

Mr. Robin E. Moore
St. Johns County Planning Division
4020 Lewis Speedway
St. Augustine, Florida 32084

Dear Mr. Moore:

The U.S. Army Corps of Engineers, Jacksonville District, has reviewed the draft report, *Submerged Cultural Resources Monitoring Report for the 2005 St. Augustine Beach Renourishment Project*.

Overall, the draft report is very thorough and informative. Please make the appropriate editorial corrections to the final report as referenced in the enclosed draft. Once corrections have been made, request that you submit 3 copies of the final report to this office.

If there are any questions regarding the comments, please contact Mr. Thomas Birchett at 904-232-3834.

Sincerely,

Marie G. Burns
Chief, Environmental Branch

Enclosure

B Birchett/CESAJ-PD-EC/3834/108 12 Oct 06
Res Dugger/CESAJ-PD-EC
MB Burns/CESAJ-PD-E
3 Oct 06

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Dugger
PD-E

FLORIDA DEPARTMENT OF STATE
Glenda E. Hood
Secretary of State
DIVISION OF HISTORICAL RESOURCES

Mr. Stuart Appelbaum
Jacksonville District Corps of Engineers
Planning Division, Environmental Branch
P.O. Box 4970
Jacksonville, Florida 32232-0019

September 28, 2005

RE: DHR No.: 2005-9151 / Date Received: August 25, 2005
St. Johns County Shore Protection Project (SPP) Study Area
St. Johns County

Dear Appelbaum:

Our office received and reviewed the above referenced project in accordance with Section 106 of the *National Historic Preservation Act* of 1966, as amended, and 36 *C.F.R.*, Part 800: *Protection of Historic Properties*. The State Historic Preservation Officer is to advise and assist federal agencies when identifying historic properties (archaeological, architectural, and historical) listed, or eligible for listing, in the *National Register of Historic Places*, assessing the project's effects, and considering alternatives to avoid or minimize effects.

We reviewed the Florida Master Site File and our records for information to be addressed in either an Environmental Impact Statement or Environmental Assessment for evaluation of the feasibility of providing shoreline erosion protection, hurricane and storm damage reduction, and related purposes to the shores of St. Johns County. We note that a number of recorded shipwrecks are located within the designated study area. This office recommends that these shipwrecks be avoided by all project activities. Therefore, the Florida Master Site File should be contacted at 850/245-6440, in order to obtain information about shipwrecks recorded within the study area's 42 miles of shoreline.

Our review further indicates that the location of the potential sand borrow areas are not identified, other than being shown on the *Enclosure St. Johns County SPP Study Area* as sources A6, A7 and B8. The other source areas that may be developed are unidentified as well. Because the borrow areas have not been surveyed previously, they should be investigated. Therefore, this office recommends that a standard systematic remote sensing survey be performed for the offshore borrow areas in order to avoid potential adverse effect to unrecorded shipwrecks.

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<input type="checkbox"/> Director's Office (850) 245-6300 • FAX: 245-6436	<input type="checkbox"/> Archaeological Research (850) 245-6444 • FAX: 245-6436	<input checked="" type="checkbox"/> Historic Preservation (850) 245-6333 • FAX: 245-6437	<input type="checkbox"/> Historical Museums (850) 245-6400 • FAX: 245-6433
<input type="checkbox"/> Southeast Regional Office (954) 467-4990 • FAX: 467-4991	<input type="checkbox"/> Northeast Regional Office (904) 825-5045 • FAX: 825-5044	<input type="checkbox"/> Central Florida Regional Office (813) 272-3843 • FAX: 272-2340	

Mr. Appelbaum
September 28, 2005
Page 2

Should the borrow areas that may be developed occur on land, we recommend that they be subjected to the standard professional cultural resource survey to avoid possible impact to unrecorded sites. This office looks forward to coordinating with the Jacksonville District Corps of Engineers in the management and protection of historic properties associated with this project.

If there are any questions concerning our comments, please contact Janice Maddox, Historic Sites Specialist, by electronic mail at jmaddox@dos.state.fl.us, or by telephone at 850/245-6333. Thank you for your interest in protecting Florida's historic properties.

Sincerely,

A handwritten signature in black ink that reads "Frederick P. Gaske". The signature is written in a cursive style with a long horizontal line extending to the right.

Frederick P. Gaske, Director, and
State Historic Preservation Officer



DEPARTMENT OF THE ARMY
JACKSONVILLE DISTRICT CORPS OF ENGINEERS
P.O. BOX 4970
JACKSONVILLE, FLORIDA 32232-0019

REPLY TO
ATTENTION OF

AUG 17 2005

Planning Division
Environmental Branch

TO THE ADDRESSEES ON THE ENCLOSED LIST:

The U.S. Army Corps of Engineers, Jacksonville District, is gathering information to prepare either an Environmental Impact Statement or Environmental Assessment for evaluation of the feasibility of providing shoreline erosion protection, hurricane and storm damage reduction, and related purposes to the shores of St. Johns County, Florida. A reconnaissance report has been completed and resulted in the recommendation to continue the study into the feasibility phase. The most immediate and critical needs of the local communities are to address beach and dune erosion and protect State Highway A1A and environmental attributes. This study will determine the Federal interest in participating in a locally supported, cost-shared shore protection project to address St. Johns County's coastal issues.

The study area, enclosed, covers about 42 miles of shoreline, including approximately 14 miles in two parks managed by the State of Florida. The entire coast of St. Johns County is subject to storm damage and shoreline erosion but two of the three most critically eroding areas are located at Vilano Beach (Reach 1) and Summer Haven Beach (Reach 2). The third critical erosion area is St. Augustine Beach, which was addressed under a previously authorized Shore Protection Project and is not included in this study. Potential sand borrow areas to be investigated are also shown on the enclosure as sources A6, A7 and B8 but other sources may be developed.

We welcome your views, comments and information about Environmental and Cultural resources, study objectives and important features within the described project area, as well as any suggested improvements. Letters of comment or inquiry should be addressed to the letterhead address to the attention of Paul DeMarco at telephone number 904-232-1897, Planning Division, Environmental Branch and received by this office within 30 days of the date of this letter.

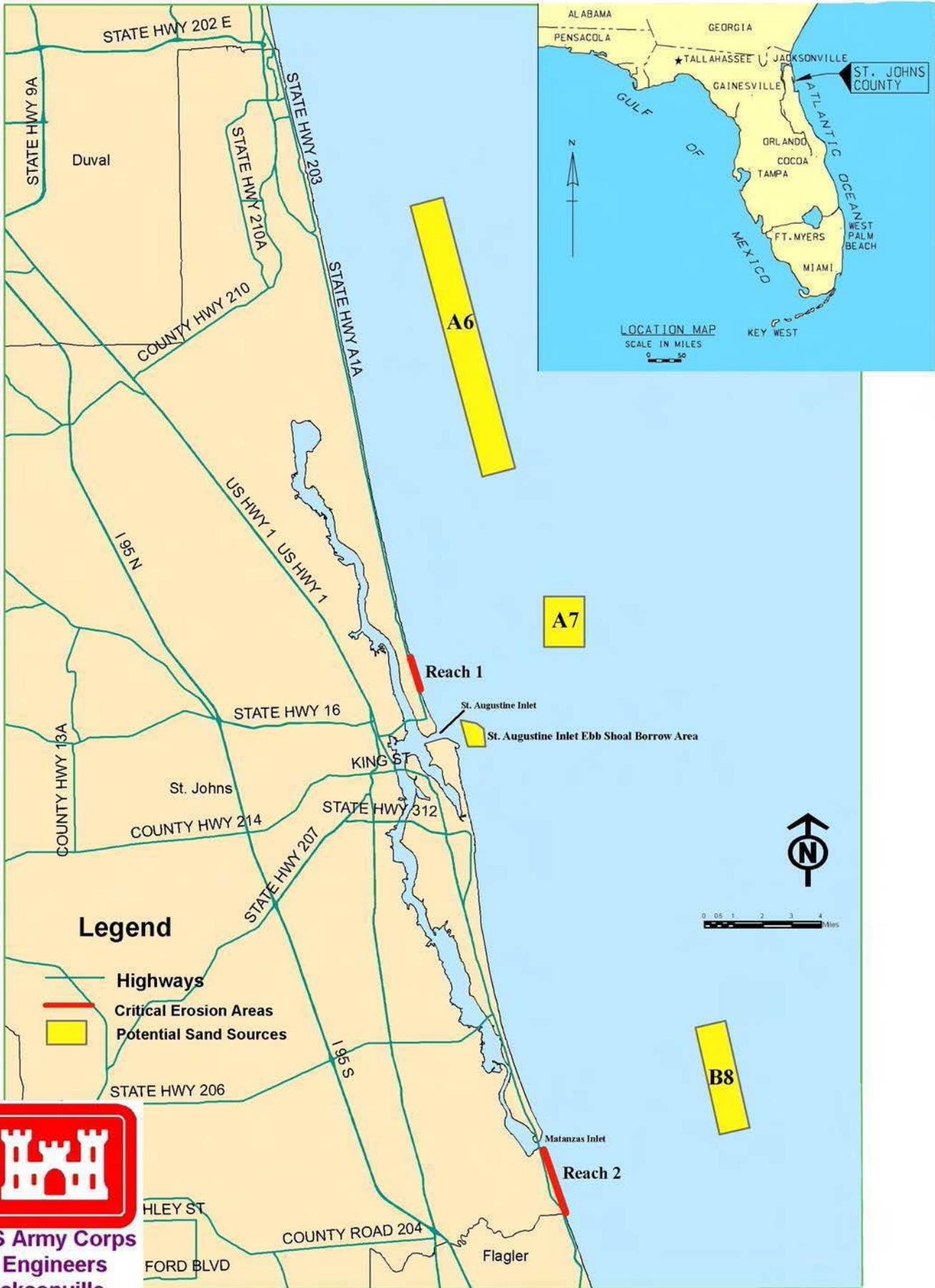
Sincerely,

A handwritten signature in black ink, appearing to read "Stuart J. Appelbaum".

Stuart J. Appelbaum
Chief, Planning Division

Enclosure

ENCLOSURE St. Johns County SPP Study Area



**US Army Corps
of Engineers
Jacksonville
District**



UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
NATIONAL MARINE FISHERIES SERVICE

Southeast Regional Office
263 13th Avenue S.
St. Petersburg, Florida 33701

September 13, 2005

Mr. Stuart J. Appelbaum
Chief, Planning Division
Jacksonville District, Corps of Engineers
P.O. Box 4970
Jacksonville, Florida 32232-0019

Dear Mr. Appelbaum:

NOAA's National Marine Fisheries Service (NMFS) has reviewed the August 17, 2005, scoping letter regarding plans to prepare an Environmental Impact Statement or Environmental Assessment for evaluation of the feasibility providing shoreline erosion protection in St. Johns County, Florida. The study area includes 42 linear miles of shoreline, including 14 miles of public parks. The purpose of the proposed study is to determine federal interest in a cost-sharing project designed to address critical erosion of beaches and dunes, State Highway A1A, and environmental attributes.

General comments

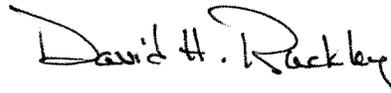
The nearshore waters of St. Johns County supports essential fish habitat (EFH). Sand dredging and placement of sand on beaches would adversely impact these habitats and associated fishery resources. Categories of EFH in the project vicinity include the marine water column, submerged bottom, and marine nearshore and offshore habitats. Federally managed fishery resources associated with these habitats include postlarval and juvenile red drum (*Sciaenops ocellatus*), white shrimp (*Litopenaeus setiferus*), pink shrimp (*Farfantepenaeus duorarum*), and brown shrimp (*Farfantepenaeus aztecus*). Detailed information concerning federally managed fisheries and their EFH is provided in the 1998 comprehensive amendments of the Fishery Management Plans for the South Atlantic Fishery Management Council (SAFMC). The 1998 amendment was prepared in accordance with the requirements of the Magnuson-Stevens Fishery Conservation and Management Act (Magnuson-Stevens Act) (P.L. 104-297). The project area also serves as nursery and forage habitat for other species including black drum (*Pogonias cromis*), Atlantic menhaden (*Brevoortia tyrannus*), and blue crab (*Callinectes sapidus*) which serve as prey for other species (e.g., mackerels, snappers, and groupers) that are managed by the SAFMC, and for highly migratory species (e.g., billfishes and sharks) that are managed by NMFS.



Given the ecological importance of habitats found in the project area, any documents prepared in accordance with the National Environmental Policy Act should include an EFH assessment. At a minimum, the EFH assessment should include a detailed analysis of potential direct, secondary, and cumulative impacts of the proposed action on EFH, managed species, and associated species by life history stage; the Corps of Engineers' views regarding the effects of the proposed project on EFH; a description of all practicable and appropriate measures taken to first avoid and then minimize adverse impacts to EFH and managed species; and an evaluation of potential on-site and off-site compensatory mitigation options. If, during project planning and development, you determine that design features may adversely impact EFH, those impacts and any related mitigation should be fully described in the environmental assessment for the project. Specific requirements concerning activities that may affect EFH are found at 50 CFR 600.920, the regulation to implement the EFH provisions of the Magnuson-Stevens Fishery Conservation and Management Act. Descriptions and locations of EFH found along the south Atlantic seaboard can be viewed by going to the website for the South Atlantic Fishery Management Council at www.safmc.net/.

Thank you for providing the opportunity to provide comments early in the planning process. Mr. George Getsinger, at our Marineland Office, is available if further assistance is needed. He may be reached at 9741 Ocean Shore Drive, St. Augustine, Florida 32080, or by telephone at (904) 461- 8674.

Sincerely,



Miles M. Croom
Assistant Regional Administrator
Habitat Conservation Division

cc:
EPA, ATL
FWS, JAX
DEP, JAX
FFWCC, TAL
F/SER4
SAFMC

*Thomas M. Schmidt
9179 Old A1A South
St. Augustine, FL 32080*

September 14, 2005

Mr. Paul DeMarco
Planning Division
Environmental Branch
Department of the Army
Jacksonville District Corps of Engineers
P.O. Box 4970
Jacksonville, FL 32232-0019

Re: St. Johns County Shoreline Protection
Summer Haven Beach (Reach 2)

Dear Mr. DeMarco:

Thank you for inviting comments on this project. My homesteaded residence is 9179 Old A1A South, just to the north of the Reach 2 project area. My house was built in 1895; my great-grandfather bought it in 1899, so my family has witnessed this beach under all sorts of conditions. My comments are as follows:

1. Do not extend the rock revetment.
 - a) This is the best remaining turtle nesting site in the County. This key ancient environmental asset should not be sacrificed to the special interests of a few lot and homeowners.
 - b) Public beach recreation would disappear – the beach in front of the existing revetment disappears entirely at high tide. The accessible beach to the south of the revetment has been popular since the 1950's. Why should private special interests take this away from the public and other local beach users?
2. There is no entitlement to a road.
 - a) by way of background, as you know, after A1A washed away in the 1960's, the state abandoned this location and the county now owns the right of way. The narrow strip of land between the ocean and Summer Haven river was platted early in the 1900's. About 20 houses have been built at the South end of the the Reach 1 area, served by the surviving remnant of old A1A, which joins new A1A near Marineland.
 - b) About half a dozen lot owners in the "gap" area without a road have chosen to build houses there. My opinion is that they all should have been denied building permits from the beginning. This is a classic narrow

barrier island, and they built in front of the coastal setback line. They took their chances. The public should not have to bail them out (literally!)

- c) Rather than accessing their properties by boat from the river, or by ATVs from the beach at low tide, they selfishly drove heavy vehicles on the dunes, gradually killing the beach grasses, causing erosion that has led directly to the breakthroughs of the Ocean into the Summer Haven River.
 - d) Driving over protected grasses and dunes is illegal by county, state and federal laws, but despite repeated complaints to the county by me and other residents, no law enforcement action was taken.
 - e) Driving to the north end of the Reach 2 area was also a trespass, not only over other private lots but also over four lots owned by the county. These lots were donated to the in the 1980s by my mother with the understanding that they would be held for conservation.
 - f) There is no ancient right of way here. Apparently there was one from the south to the Washington Oaks area. If people wanted to go from there north to Matanzas Inlet, they would have traveled on the beach, which was a half mile wide until the 1920's. My family has known Summer Haven since the 1880's, and have told me that there was no road on the dunes. This makes sense, because there was no road from Anastasia Island to the north until a bridge was built over Matanzas Inlet in 1920.
 - g) There is no way of necessity. As a lawyer, I know that this common law doctrine will not permit a land-locked owner to cross another owner's land unless there is no other possible access. The cases are quite strict about this. Here there are two possible alternative means of access. There is access by boat from the Summer Haven River. Most homeowners we are concerned with here have already built decks. Secondly, access is possible by ATV over the public right-of-way below mean high water on the beach.
3. There are alternate solutions, much cheaper and more environmentally friendly than building a revetment.
- a) Public safety access for ambulance service can be by A.T.V. Each affected homeowner can park at their cottage an A.T.V., which can travel on the beach. Rescue vehicles have gotten stuck. The ATVs can navigate soft sand. Fire trucks also have gotten stuck. Homeowners can plan for self protection with alarms, fire extinguishers and sprinkler systems. They can also buy generators and pumps to move water from the river in hoses to fight fire. (I note that at my property at the southern end of Summer Haven, the nearest hydrant is over 1,000 feet away, so even houses on the paved road face some of the same issues.)
 - b) Beach erosion. The beach renourishments of the last few years have washed away because beach grasses have not been planted immediately in the spring, and irrigated, so that the roots can be established to help hold the sand during the Fall Storms. Nor have "snow fence" drift barriers been set up. The technology and the techniques are known to stabilize beach renourishments. However, the efforts are totally uncoordinated so

that millions in tax dollars are wasted because one agency does its part of the plan and leaves. Unbelievable! The beach can be stabilized to protect the houses.

- c) Buy up the vacant lots. I believe in private property rights. Owners should be able to get out what they paid (not "fair market value!") I understand the majority of the vacant lots affected are owned by Mr. McMillan, and some others are available for about \$1 million. Southern Realty (904-471-5903) has the details. It would be much cheaper to buy up the lots than build a revetment.

5. Government lack of Co-ordination should not cause loss of this very important environmental and public recreational asset to the special interests of a few property owners. The federal government didn't enforce its barrier island and setback legislation. The state government didn't enforce its dune and beach grasses laws. The county government is finally ordering a building moratorium in this area, when it should have done so long ago. However, the county assessor continues to value lots as if they were available and had road access, which is not fair. I understand there is support from elements of the county government which wish to use its equipment and to grant contracts to build revetments, etc.

6. Conclusion. The very important and significant environmental and public recreational benefits of the existing barrier island should not be ruined by extending a rock revetment and road from Summer Haven to Marineland, at a huge cost in tax money for the benefit of a few homeowners, who built with knowledge of existing conditions. We should heed the lessons of Hurricane Katrina.

Sincerely,

A handwritten signature in cursive script that reads "Tom Schmidt".

Thomas M. Schmidt



Department of Environmental Protection

Jeb Bush
Governor

Marjory Stoneman Douglas Building
3900 Commonwealth Boulevard
Tallahassee, Florida 32399-3000

Colleen M. Castille
Secretary

October 14, 2005

Mr. Paul DeMarco
Planning Division, Jacksonville District
U. S. Army Corps of Engineers
P. O. Box 4970
Jacksonville, FL 32232-0019

RE: Department of the Army, Jacksonville District Corps of Engineers – Scoping Notice –
Feasibility Study, St. Johns County Shore Protection Project – St. Johns County, Florida.
SAI # FL200508241461C

Dear Mr. DeMarco:

The Florida State Clearinghouse, pursuant to Presidential Executive Order 12372, Gubernatorial Executive Order 95-359, the Coastal Zone Management Act, 16 U.S.C. §§ 1451-1464, as amended, and the National Environmental Policy Act, 42 U.S.C. §§ 4321, 4331-4335, 4341-4347, as amended, has coordinated a review of the referenced scoping notice.

The Florida Department of Environmental Protection (DEP) notes that construction of the shore protection project will require state water quality certification in the form of a Joint Coastal Permit (JCP) from the DEP Bureau of Beaches and Coastal Systems. The Bureau is very supportive of the feasibility study and is participating in non-federal project cost-sharing. Additionally, initiation of the study is recommended in the 2004 Hurricane Recovery Plan for Florida's Beach and Dune System.

Based on previous studies, the Bureau has no objection to investigating borrow areas A6, A7 or B8 for compatible sand. Geotechnical investigations should be conducted in accordance with the Bureau's requirements for Quality Assurance and Quality Control and comprehensively document the compatibility of sand in the proposed borrow area(s) relative to the existing (natural) beach. Staff is concerned that use of the St. Augustine Inlet ebb shoal as source material for the project may have adverse impacts on the shoreline or the inlet. Prior to permitting use of the shoal as a potential borrow area, "reasonable assurance" must be provided in the form of extensive numerical modeling supported by accurate data.

The beaches at Reach 1 (Vilano Beach shoreline) are comprised of shelly materials, indicating the possible presence of hardbottom communities in the vicinity. A thorough investigation of the nearshore area will be required, as well as an evaluation of alternatives that will protect (or mitigate for unavoidable impacts) those habitats. In addition, the area is sand starved, indicating that structural alternatives would not be particularly effective. There are also rock outcrops on the emergent portion of the beaches and in the nearshore zone south of Reach 2

"More Protection, Less Process"

Printed on recycled paper.

Mr. Paul DeMarco
October 14, 2005
Page 2 of 2

(Summerhaven). An investigation into the importance of the biological communities surrounding these rock outcroppings, and an analysis of longshore spreading of any fill material, should be conducted in order to evaluate alternatives. Bureau data indicates a mean tidal range of 1.4 m, a longshore transport variation from 112,000 m³/yr to 336,000 m³/yr, and the existence of a revetment between R140.5 and R146.

The Bureau would like to participate directly in formulating this feasibility study. They request that Mr. Michael R. Barnett, P.E., be officially placed on the Project Delivery Team. Please continue to coordinate with the Bureau and the Florida Fish and Wildlife Conservation Commission to resolve the above concerns and any outstanding issues regarding listed species protection measures and biological monitoring. For further information on JCP permitting requirements, please contact Mr. Martin Seeling at (850) 414-7728.

Based on the information contained in the notice and the enclosed comments provided by our reviewing agencies, the state has determined that, at this stage, the proposed activity is consistent with the Florida Coastal Management Program (FCMP). The applicant must, however, address the concerns identified by our reviewing agencies prior to project implementation. All subsequent environmental documents must be reviewed to determine the project's continued consistency with the FCMP. The state's continued concurrence with the project will be based, in part, on the adequate resolution of issues identified during this and subsequent reviews. The state's final concurrence of the project's consistency with the FCMP will be determined during the environmental permitting stage.

Thank you for the opportunity to review the proposed project. If you have any questions regarding this letter, please contact Ms. Lauren P. Milligan at (850) 245-2170.

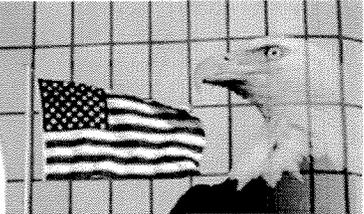
Sincerely,



Sally B. Mann, Director
Office of Intergovernmental Programs

SBM/lm
Enclosures

cc: Roxane Dow, DEP, BBSC



Project Information	
Project:	FL200508241461C
Comments Due:	09/23/2005
Letter Due:	10/14/2005
Description:	DEPARTMENT OF THE ARMY, JACKSONVILLE DISTRICT CORPS OF ENGINEERS - SCOPING NOTICE - FEASIBILITY STUDY, ST. JOHNS COUNTY SHORE PROTECTION PROJECT - ST. JOHNS COUNTY, FLORIDA.
Keywords:	ACOE - SCOPING NOTICE - ST. JOHNS COUNTY SHORE PROTECTION PROJECT
CFDA #:	12.101
Agency Comments:	
NE FLORIDA RPC - NORTHEAST FLORIDA REGIONAL PLANNING COUNCIL	
The project is generally consistent with the NEFRC's policies, plans, and programs.	
ST. JOHNS - ST. JOHNS COUNTY	
COMMUNITY AFFAIRS - FLORIDA DEPARTMENT OF COMMUNITY AFFAIRS	
FISH and WILDLIFE COMMISSION - FLORIDA FISH AND WILDLIFE CONSERVATION COMMISSION	
No Comments Received	
STATE - FLORIDA DEPARTMENT OF STATE	
No Comment	
ENVIRONMENTAL PROTECTION - FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION	
<p>DEP notes that construction of the shore protection project will require Joint Coastal Permit from the DEP Bureau of Beaches and Coastal Systems. The Bureau is very supportive of the feasibility study and is participating in non-federal project cost-sharing. Additionally, initiation of the study is recommended in the 2004 Hurricane Recovery Plan for Florida's Beach and Dune System. Based on previous studies, the Bureau has no objection to investigating borrow areas A6, A7 or B8 for compatible sand. Geotechnical investigations should be conducted in accordance with the Bureau's requirements for Quality Assurance and Quality Control and comprehensively document the compatibility of sand in the proposed borrow area(s) relative to the existing (natural) beach. Staff is concerned that use of the St. Augustine Inlet ebb shoal as source material for the project may have adverse impacts on the shoreline or the inlet. Prior to permitting use of the shoal as a potential borrow area, "reasonable assurance" must be provided in the form of extensive numerical modeling supported by accurate data. The beaches at Reach 1 (Vilano Beach shoreline) are comprised of shelly materials, indicating the possible presence of hardbottom communities in the vicinity. A thorough investigation of the nearshore area will be required, as well as an evaluation of alternatives that will protect (or mitigate for unavoidable impacts) those habitats. In addition, the area is sand starved, indicating that structural alternatives would not be particularly effective. There are also rock outcrops on the emergent portion of the beaches and in the nearshore zone south of Reach 2 (Summerhaven). An investigation into the importance of the biological communities surrounding these rock outcroppings, and an analysis of longshore spreading of any fill material, should be conducted in order to evaluate alternatives.</p>	
ST. JOHNS RIVER WMD - ST. JOHNS RIVER WATER MANAGEMENT DISTRICT	
No comments. The project appears to be located seaward of the Coastal Construction Control Line and would be outside of SJRWMD purview.	

For more information please contact the Clearinghouse Office at:

3900 COMMONWEALTH BOULEVARD MS-47
 TALLAHASSEE, FLORIDA 32399-3000
 TELEPHONE: (850) 245-2161



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September 26, 2005

Lauren Milligan
Florida State Clearinghouse
Department of Environmental Protection
3900 Commonwealth Blvd.
Douglas Building - Mail Station 47
Tallahassee, Florida 32399-3000

SAI# FL200508241461C
NEFRC# SJ0001

Program title: Department of the Army, Jacksonville District Corps of Engineers-
Scoping Notice- Feasibility Study, St. Johns County Shore Protection Project- St. John's
County, Florida.

The Northeast Florida Regional Council has reviewed the above Activity. Response sheets were sent out to notify potentially affected agencies concerning project intentions. There were no endorsements received regarding this application.

This project is generally consistent with the Northeast Florida Regional Council's policies, plans and programs. This letter signifies that the Northeast Florida Regional Council has no objection to the above-cited activity.

Sincerely,

Audrey Smith
Regional Planner

Cc: Stuart J. Appelbaum, Planning Division Chief, Department of the Army, Jacksonville
District Corps of Engineers, P.O. Box 4970, Jacksonville, Florida 32232-0019

RECEIVED

SEP 28 2005

OIP / OLGA

APPENDIX G-4

MAILING LIST

Name	Title	Organization	Address 1	Address 2	City, State, Zip
FEDERAL AGENCIES					
	Executive Director	Advisory Council on Historic Preservation	The Old Post Office Bldg Suite 801 1100 Pennsylvania Ave NW		Washington, DC 20004
	Eastern Regional Office	Bureau of Indian Affairs	545 Marriott Drive	Suite 700	Nashville, TN 37214
Mr. Doug Piatkowski	Bureau of Ocean Energy Management	Department of the Interior	45600 Woodland Road, VAM-OEP		Sterling, VA 20166
Director of Federal Activities	Chair	Council on Environmental Quality	722 Jackson Place NW		Washington, DC 20006
Mr. Bryant L. Vanbrakle		Federal Aviation Administration	P.O. Box 20636		Washington, DC 20590
Magalie Roman Salas		Federal Emergency Management Administration	500 C Street SW, Room 714		Washington, DC 20472
Regional Director	Insurance & Mitigation Division	Federal Emergency Management Administration	3003 Chamblee-Tucker Rd		Atlanta, GA 30341
DOT Inspector General		Federal Highway Administration	1200 New Jersey Ave. SE		Atlanta, GA 30320
Mr. Douglas Murphy		Federal Highway Administration	227 N. Bronough St.		Tallahassee, FL 32301
Mr. David Vela	Regional Director	National Park Service	100 Alabama Street, SW	1924 Building	Atlanta, GA 30303
Canaveral National Seashore	Superintendent	National Park Service	212 S. Washington Ave.		Titusville, FL 32796-3521
Mr. David Bernhart		NOAA/NMFS - PRD	263 13th Avenue South		St. Petersburg, FL 33701
Mr. Andrew Strelcheck	Deputy Regional Administrator	NOAA/NMFS	263 13th Ave. S.		St. Petersburg, FL 33701
	Office of Constituent Services	NOAA/NMFS - Recreational Fisheries Branch	1315 East West Highway		Silver Spring, MD 20910
Mr. Ryan Hendren	Protected Resources Division	NOAA/NMFS SE Regional Office	263 13th Ave S		St. Petersburg, FL 33701
Mr. Pace Wilber	Atlantic Branch Supervisor	NOAA/NMFS-HCD	217 Fort Johnson Rd		Charleston, SC 29412
		SEC Federal Energy Rd. Comm	888 First St. NE		Washington, DC 20426
		SEC Federal Maritime Commission	800 North Capitol St. NW		Washington, DC 20573
Commander (OAN)		Seventh Coast Guard District	909 SE 1st Ave	Brickell Plaza Federal Building	Miami, FL 33131-3050
Nancy Sutley		U.S. Department of Commerce	HCHB SP Room 6117	14th & Constitution Ave. NW	Washington, DC 20230
		Office of Environmental Policy and Compliance, Atlantic Region	75 Spring Street, SW	Suite 1144	Atlanta, GA 30303
	Office of Environmental Policy and Compliance	U.S. Department of the Interior	1849 C Street, NW	Main Interior Building, MS 2462	Washington, DC 20240
	Environmental Protection Agency	Office of Policy 1804A	1200 Pennsylvania Avenue NW		Washington, DC 20460
Mr. Richard Harvey	South Florida Office	U.S. Environmental Protection Agency	400 N. Congress Ave	Ste 120	West Palm Beach, FL 33401
Mr. Paul Gagliano	Environmental Policy Section	U.S. Environmental Protection Agency, Region 4	61 Forsyth Street SW		Atlanta, GA 30303
Mr. Jay Herrington	North Florida Field Office	U.S. Fish & Wildlife Service	7915 Baymeadows Way	Suite 200	Jacksonville, FL 32256
Regional Director		U.S. Fish & Wildlife Service	1875 Century Blvd	Suite 400	Atlanta, GA 30345-3319
Ms. Cindy Fury	Wildlife Biologist	U.S. Fish & Wildlife Service	7915 Baymeadows Way	Suite 200	Jacksonville, FL 32256
	Southern Region Forester	U.S. Forest Service	1720 Peachtree Road NW		Atlanta, GA 30309
Marge Davenport	Regional Director, Southeast (Atlantic)	U.S. Geological Survey	1770 Corporate Drive	Suite 500	Norcross, GA 30093
STATE/LOCAL GOVERNMENT					
Mr. Robert Bendus	Director	Div of Historical Resources - SHPO	500 South Bronough St		Tallahassee, FL 32399
	FFWCC - FMRI	Division of Marine Resources	100 Eighth Ave SE		St. Petersburg, FL 33701
BOT IITF		FDEP, Division of State Lands	3900 Commonwealth Blvd.	Mail Stop 100	Tallahassee, FL 32399
Office of the Secretary		FDEP	3900 Commonwealth Blvd.	Mail Station 49	Tallahassee, FL 32399
Mrs. Sally B. Mann		FDEP - Office of Intergovernmental Programs	3900 Commonwealth Blvd.	Mail Station 47	Tallahassee, FL 32399
Mr. Chris Stahl		FDEP - State Clearinghouse	3900 Commonwealth Blvd.	Mail Station 47	Tallahassee, FL 32399
Ms. Jane Herndon	Deputy Division Director	FDEP Div. of Water Resource Management	2600 Blair Stone Road	Mail Station 3500	Tallahassee, FL 32399

Ms. Lainie Edwards	Program Administrator	FDEP, Beaches, Inlets & Ports Permitting	2600 Blair Stone Road	Mail Station 3500	Tallahassee, FL 32399
Ms. Carmen Monroy	Director	FDOT	605 Suwannee St.		Tallahassee, FL 32399
Mr. Bob Emerson	State Seaport Manager	FDOT	605 Suwannee St.		Tallahassee, FL 32399
Ms. Nancy Douglass	Migratory Bird Coordinator	FFWCC	3900 Drane Field Rd		Lakeland, FL 33811-1299
Ms. Lisa Gregg	Div. of Marine Fisheries Manager	FFWCC	2590 Executive Center Circle East Ste 203		Tallahassee, FL 32301
Director		FFWCC - Imperiled Species Management	620 South Meridian Street	Mail Station 6A	Tallahassee, FL 32399
Robbin N. Trindell		FFWCC - Office of Environmental Services	620 South Meridian Street		Tallahassee, FL 32399
		FL Dept of Agriculture & Consumer Services	3125 Conner Blvd. RM 269		Tallahassee, FL 32399
		Florida Coastal Management Program	3900 Commonwealth Blvd.	Mail Station 47	Tallahassee, FL 32399
John Stevely		Florida Cooperative Extension	1303 17th St. West		Palmetto, FL 34221
Mr. David Roach	Executive Director	Florida Inland Navigation District	1314 Marcinski Road		Jupiter, FL 33477-9498
Mr. Press Tompkins			2740 Industry Center Rd.		St. Augustine, FL 32084

ELECTED OFFICIALS

Honorable Marco Rubio		US Senate	316 Hart Senate Office Bldg.		Washington, DC 20510
Honorable Bill Nelson		US Senate	716 HART SENATE OFFICE BUILDING		Washington, DC 20510
Honorable Vern Buchanan		U.S. House of Representatives, Dist. 16	1051 Manatee Ave. West	Suite 305	Bradenton, FL 34205
Hon Kathy Castor		U.S. House of Representatives, Dist. 14	4144 N Armenia Ave	Suite 300	Tampa, FL 33607
Honorable Travis Hutson		Florida Senate, Dist. 6	4875 Palm Coast Parkway, NW	Suite 5	Palm Coast, FL 32137
Rep. Paul Renner		Florida House, Dist. 24	4877 Palm Coast Parkway, NW	Suite 1	Palm Coast, FL 32137
Rep. Cyndi Stevenson		Florida House, Dist. 17	3000 N. Ponce De Leon Blvd.	Suite 1	St. Augustine, FL 32084
Gov. Rick Scott	Office of the Governor	The Capitol	400 S. Monroe St.		Tallahassee, FL 32399

STAKEHOLDERS/SPECIAL INTEREST GROUPS

Ms. Victoria Tschinkel	Florida Program Director	1000 Friends of Florida	926 East Park Ave.	PO Box 5948	Tallahassee, FL 32314
		Defenders of Wildlife	233 Third Street North	Suite 201	St. Petersburg, FL 33701
		Dredging Contractors of America (DCA)	503 D Street NW	Suite 150	Washington, DC 20001
	Director of the Southeast Office	Environmental Defense Fund	4000 Westchase Blvd.	Suite 510	Raleigh, NC 27607
Thomas Hawkins	Executive Director	Florida Defenders of the Environment	P.O. Box 357086		Gainesville, FL 32635
	Executive Director	Florida Shore & Beach Preservation Assoc	PO Box 13146		Tallahassee, FL 32317
		Florida Wildlife Federation	PO Box 6870		Tallahassee, FL 32314
Mr. John Hammond	Regional Executive Director	National Wildlife Federation	730 Peachtree St. NE	Suite 1000	Atlanta, GA 30308
Alberto Tamayo		OSAT International Cooperation	6550 NW 77th Ct.		Miami, FL 33166
Mr. George Isiminger	Sr. Director of Engineering, Main	Port Manatee	300 Tampa Bay Way	#1	Palmetto, FL 34221
		Reefkeeper International	2829 Bird Ave.	Suite 5, PMB 162	Miami, FL 33133
Mr. Patrick Rose		Save the Manatee Club	500 N. Maitland Ave		Maitland, FL 32751
		Sea Turtle Conservancy	4424 NW 13th St.	Suite B-11	Gainesville, FL 32609
	Director	Sierra Club - Florida Regional Office	1990 Central Avenue		St. Petersburg, FL 33712
	The Ocean Conservancy	Florida Office	600 1st Ave. North	Suite 301	St. Petersburg, FL 33701
Mr. Robert Dendick		The Nature Conservancy - Florida Chapter	222 S. Westmonte Dr.	Suite 300	Altamonte Springs, FL 32714
		Florida Public Interest Research Group	310 N Monroe St		Tallahassee, FL 32301

TRIBAL/CULTURAL RESOURCE CONTACTS

Tribal Historic Preservation Office	Poarch Creek Indians - Environmental Dept.	5811 Jack Springs Rd.	Atmore, AL 36502
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Ms. Jennifer Johnson		Seminole Nation of Oklahoma	P.O. Box 1489		Wewoka, OK 74884
Dr. Paul N. Backhouse, Ph.D.	Museum Director and Tribal Historian	Seminole Tribe of Florida	Ah-Tah-Thi-Ki Museum	30290 Josie Billie Hwy, PMB 1004	Clewiston, FL 33440
Dr. Brent Weisman		Department of Anthropology	4202 East Fowler Ave.	SOC 104	Tampa, FL 33620
Mr. Bernie Roman		Miccosukee Tribe of Indians	Post Office Box 440021	Tamiami Station	Miami, FL 33144
Mr. Steve Terry		Miccosukee Tribe of Indians	P.O. Box 440021	Tamiami Station	Miami, FL 33144
Mr. Fred Dayhoff	NAGPRA Representative	Miccosukee Tribe of Indians	HC 61 SR 68 Old Loop Road		Ochopee, FL 34141
Mr. Curtis Osceola		Miccosukee Tribe of Indians	P.O. Box 440021	Tamiami Station	Miami, FL 33144
Mr. Rory Feeney		Miccosukee Tribe of Indians	P.O. Box 440021	Tamiami Station	Miami, FL 33144
Mrs. Joyce Bear	Muscogee (Creek) Nation of Oklahoma	Cultural & Historical Tribal Complex	P.O. Box 580		Okmulgee, OK 74447
Mr. Ted Isham	Muscogee (Creek) Nation of Oklahoma	Cultural & Historical Tribal Complex	P.O. Box 580		Okmulgee, OK 74447
The Honorable Roy Cypress	Chairman	Miccosukee Tribe of Indians of Florida	P.O. Box 440021	Tamiami Station	Miami, FL 33144
James M. Erskine	Acting Water Resources Director	Miccosukee Tribe of Indians of Florida	P.O. Box 440021	Tamiami Station	Miami, FL 33144
Guintas	Acting, Fish and Wildlife Director	Miccosukee Tribe of Indians of Florida	P.O. Box 440021	Tamiami Station	Miami, FL 33144
Council of Original Miccosukee	Simanolee Nation Aboriginal People		P.O. Box 1452		Lake Placid, Florida 33862
Chairman James Billie		Seminole Tribe of Florida	6300 Stirling Road		Hollywood, FL 33024
Cherise Maples	Director, Environmental Resources	Seminole Tribe of Florida	6300 Stirling Road		Hollywood, FL 33024
Patricia Powers	Bose Public Affairs Group		2000 M Street, N.W.	Suite 520	Washington, D.C. 20036

PUBLIC LIBRARIES/MEDIA OUTLETS

St Johns County Public Library - Main Branch	1960 N. Ponce De Leon Blvd.	St. Augustine, FL 32084
St Johns County Public Library - Ponte Vedra Beach	101 Library Blvd	Ponte Vedra Beach, FL 32082

PROPERTY OWNERS

Gary Freeman			
Resident		3801 Woodmere Ln	Middleburg, FL 32068
Resident		3498 Coastal Hwy	Saint Augustine, FL 32084
Resident		20 Ocean Way	Saint Augustine, FL 32080
Resident		3942 A1A S	Saint Augustine, FL 32080
Resident		38662 Chrisholm Pl	Fremont, CA 94536
Resident		11512 Lake Mead Ave #523	Jacksonville, FL 32256
Resident		1324 Tall Maple Loop	Oviedo, FL 32765
Resident		3490 Coastal Hwy	Saint Augustine, FL 32084
Resident		4651 Salisbury Rd Ste 255	Jacksonville, FL 32256
Resident		Po Box 3143	Saint Augustine, FL 32085
Resident		9064 Regina Rd	Jacksonville, FL 32257
Resident		500 San Sebastian View	Saint Augustine, FL 32084
Resident		3358 Jordan Rd	Oakland, CA 94602
Resident		896 Shore Dr	Miramar Beach, FL 32550
Resident		201 Gull Circle	Ponte Vedra Beach, FL 32082
Resident		1125 S Marsh Wind Way	Ponte Vedra Beach, FL 32082
Resident		3109 S Ponte Vedra Blvd	Ponte Vedra Beach, FL 32082
Resident		Po Box 5292	Hollywood, FL 33083
Resident		6962 Almours Dr	Jacksonville, FL 32217
Resident		3885 Saint Johns Ave	Jacksonville, FL 32205
Resident		Po Box 444	Melrose, FL 32666
Resident		4125 Coastal Hwy	Saint Augustine, FL 32084
Resident		4370 Coastal Hwy	Saint Augustine, FL 32084

Resident	77 Almeria St	Saint Augustine, FL 32084
Resident	4800 Beach Blvd Ste 2	Jacksonville, FL 32207
Resident	4382 Coastal Highway	Saint Augustine, FL 32084
Resident	524 Stockton St	Jacksonville, FL 32204
Resident	4348 Coastal Hwy	Saint Augustine, FL 32084
Resident	1124 Nw 107Th Ter	Gainesville, FL 32606
Resident	4430 Coastal Hwy	Saint Augustine, FL 32084
Resident	4336 Coastal Hwy	Saint Augustine, FL 32084
Resident	5640 La Moya Ave	Jacksonville, FL 32210
Resident	1031 St James Crossing Ne	Atlanta, GA 30319
Resident	Po Box 5538	Saint Augustine, FL 32085
Resident	132 Zamora St	Saint Augustine, FL 32084
Resident	4312 Coastal Hwy	Saint Augustine, FL 32084
Resident	45 Last Resort Rd	Black Mountain, Nc 28711
Resident	3574 Waterchase Way	Jacksonville, FL 32224
Resident	1891 Park Ave	New York, NY 10035
Resident	4406 Coastal Hwy	Saint Augustine, FL 32084
Resident	161 Ginger Cake Trl	Fayetteville, GA 30214
Resident	4250 Coastal Hwy	Saint Augustine, FL 32084
Resident	Po Box 51247	Jacksonville Beach, FL 32240
Resident	4150 Coastal Hwy	Saint Augustine, FL 32084
Resident	4240 Coastal Hwy	Saint Augustine, FL 32084
Resident	4170 Coastal Hwy	Saint Augustine, FL 32084
Resident	10 Brookfield Cv	Little Rock, AR 72205
Resident	1107 Lido Rd	Jacksonville, FL 32216
Resident	830 A1A N Ste 13	Ponte Vedra Beach, FL 32082
Resident	3101 Colgan Ct	Saint Johns, FL 32259
Resident	63 Bay View Dr	Saint Augustine, FL 32084
Resident	3834 94Th Ave Ne	Yarrow, Wa 98004
Resident	2809 Forest Cir	Jacksonville, FL 32257
Resident	3978 Coastal Hwy # B	Saint Augustine, FL 32084
Resident	3912 Coastal Hwy	Saint Augustine, FL 32084
Resident	11955 Little Creek Ln	Jacksonville, FL 32223
Resident	1149 Morvenwood Rd	Jacksonville, FL 32207
Resident	2225 Miller Oaks Ct	Jacksonville, FL 32217
Resident	4130 Coastal Hwy	Saint Augustine, FL 32084
Resident	1801 Wedemeyer St Apt 223	San Francisco, CA 94129
Resident	4510 W Dale Ave	Tampa, FL 33609
Resident	3604 E Amanda Ct	Saint Johns, FL 32259
Resident	3890 Coastal Hwy	Saint Augustine, FL 32084
Resident	3870 Coastal Hwy	Saint Augustine, FL 32084
Resident	3860 Coastal Hwy	Saint Augustine, FL 32084
Resident	4617 Ortega Blvd	Jacksonville, FL 32210
Resident	C/O 331 San Juan Dr	Ponte Vedra Beach, FL 32082
Resident	4324 Coastal Hwy	Saint Augustine, FL 32084
Resident	3830 Coastal Hwy	Saint Augustine, FL 32084
Resident	4364 Coastal Hwy	Saint Augustine, FL 32084
Resident	19 Old Mission Ave	Saint Augustine, FL 32084
Resident	2737 Forest Mill Ln	Jacksonville, FL 32257
Resident	3003 Riverside Ave	Jacksonville, FL 32205
Resident	3910A Coastal Hwy	Saint Augustine, FL 32084
Resident	80 N Saint Andrews Dr	Ormond Beach, FL 32174
Resident	1898 S Clyde Morris Blvd Ste 500	Daytona Beach, FL 32119

Resident	3790 Coastal Hwy	Saint Augustine, FL 32084
Resident	2246 Tivoli Ln	Saint Johns, FL 32259
Resident	3840 Coastal Hwy	Saint Augustine, FL 32084
Resident	1217 Coral Way	Coral Gables, FL 33134
Resident	9399 Old A1A	Saint Augustine, FL 32080
Resident	7750 E Misty Ln	Inverness, FL 34450
Resident	Po Box 17705	Jacksonville, FL 32245
Resident	7709 Watermark Ln S	Jacksonville, FL 32256
Resident	9691 Nw 53Rd Dr	Gainesville, FL 32653
Resident	4232 Ortega Forest Dr	Jacksonville, FL 32210
Resident	1680 Tidewater Ln	Navarre, FL 32566
Resident	240 Southland Rd	Palm Beach, FL 33480
Resident	12611 Mission Hills Cir N	Jacksonville, FL 32225
Resident	Beachcomber Resorts	Tallahassee, FL 32399
Resident	3304 Coastal Hwy	Saint Augustine, FL 32084
Resident	6170 A1A S Unit 223	Saint Augustine, FL 32080
Resident	2133 Sw 70Th Ave	Gainesville, FL 32608
Resident	441 E Woodhaven Dr	Ponte Vedra Beach, FL 32082
Resident	10104 Sw 17Th Pl	Gainesville, FL 32607
Resident	7403 Carmine St	Annandale, Va 22003
Resident	12305 Sw 38Th St	Ocala, FL 34481
Resident	10 W Adams St	Jacksonville, FL 32202
Resident	9337 Old A1A	Saint Augustine, FL 32080
Resident	9745 Touchton Rd Unit 524	Jacksonville, FL 32246
Resident	6349 A1A S	Saint Augustine, FL 32080
Resident	1175 State Road 206 E	Saint Augustine, FL 32086
Resident	2902 Sw 1St Ave	Gainesville, FL 32607
Resident	Hauptstr 95	63931 Kirchzell, Germany 0
Resident	Po Box 2821	Ponte Vedra Beach, FL 32004
Resident	Po Box 600435	Jacksonville, FL 32260
Resident	9349 Old A1A	Saint Augustine, FL 32080
Resident	701 W Broad St Ste 200	Bethlehem, PA 18018
Resident	411 Walnut St Pmb 4194	Green Cove Springs, FL 32043
Resident	3813 Wahoo Dr	Saint Augustine, FL 32084
Resident	5725 Laurel Oak Dr	Suwanee, GA 30024
Resident	4570 Coastal Hwy	Saint Augustine, FL 32084
Resident	4464 Rheims Pl	Dallas, TX 75205
Resident	1548 The Greens Way Ste 4	Jacksonville Beach, FL 32250
Resident	4576 Coastal Hwy	Saint Augustine, FL 32084
Resident	12977 S Highway 475	Ocala, FL 34480
Resident	Po Box 156	Meredith, NH 3253
Resident	4480 Coastal Hwy	Saint Augustine, FL 32084
Resident	12826 W Camelia Bay Dr	Jacksonville, FL 32223
Resident	9121 Old A1A	Saint Augustine, FL 32080
Resident	13054 Mandarin Rd	Jacksonville, FL 32223
Resident	2708 Shawnee Way	Saint Johns, FL 32259
Resident	6916 W University Ave	Gainesville, FL 32607
Resident	420 Lawrence Blvd	Keystone Heights, FL 32656
Resident	1 S Castillo Dr	Saint Augustine, FL 32084
Resident	Po Box 735	Fairburn, GA 30213
Resident	C/O Craig Coffey, County Adm.	1769 East Moody Blvd, Suite 302 Bunnell, FL 32110
Resident	Po Box 780	FLagler Beach, FL 32136
Resident	7853 Hunters Grove Rd	Jacksonville, FL 32256

Resident	Po Box 3402		Saint Augustine, FL 32085
Resident	3105 S Ponte Vedra Blvd		Ponte Vedra Beach, FL 32082
Resident	Guana River State Park	C/O Dep 3900 Commonwealth Bl	Tallahassee, FL 32399
Resident	2735 S Ponte Vedra Blvd		Ponte Vedra Beach, FL 32082
Resident	11869 Remsen Rd		Jacksonville, FL 32223
Resident	1105 Ponte Vedra Blvd		Ponte Vedra Beach, FL 32082
Resident	1143 W Roanoke Dr Ext		Fitzgerald, GA 31750
Resident	8406 Kim Rd		Jacksonville, FL 32217
Resident	C/O Pds Tax Services	Po Box 13519	Arlington, TX 76094
Resident	2733 S Ponte Vedra Blvd		Ponte Vedra Beach, FL 32082
Resident	3522 Loch Ct		Snellville, GA 30039
Resident	2837 S Ponte Vedra Blvd		Ponte Vedra Beach, FL 32082
Resident	Po Box 1172		Ponte Vedra Beach, FL 32004
Resident	4507 Gleneagles Dr		Boyton Beach, FL 33426
Resident	1292 Edgewood Ave S		Jacksonville, FL 32205
Resident	4206 Stacey Rd W		Jacksonville Beach, FL 32250
Resident	2789 S Ponte Vedra Blvd		Ponte Vedra Beach, FL 32082
Resident	Po Box 23627		Jacksonville, FL 32241
Resident	1708 Shoreline Pl		Orange Park, FL 32073
Resident	2783 S Ponte Vedra Blvd		Ponte Vedra Beach, FL 32082
Resident	1851 Woodmere Dr		Jacksonville, FL 32210
Resident	14600 Sw 136Th St		Miami, FL 33186
Resident	8795 Torrington Dr		Roswell, GA 30076
Resident	1467 Heritage Estates Trce		Jacksonville, FL 32220
Resident	Po Box 10339		Jacksonville, FL 32247
Resident	4623 Empire Ave		Jacksonville, FL 32207
Resident	20270 Nw 100 Avenue Rd		Micanopy, FL 32667
Resident	225 E Church St		Jacksonville, FL 32202
Resident	4841 River Point Rd		Jacksonville, FL 32207
Resident	1100 S Marsh Wind Way		Ponte Vedra Beach, FL 32082
Resident	2759 S Ponte Vedra Blvd		Ponte Vedra Beach, FL 32082
Resident	2954 Old Orchard Rd		Jacksonville, FL 32257
Resident	12778 Fenwick Island Ct W		Jacksonville, FL 32224
Resident	2753 S Ponte Vedra Blvd		Ponte Vedra Beach, FL 32082
Resident	24543 Deer Trace Dr		Ponte Vedra Beach, FL 32082
Resident	2749 S Ponte Vedra Blvd		Ponte Vedra Beach, FL 32082
Resident	7 Bayberry Rd		West Islip, NY 11795
Resident	8954 Regina Rd		Jacksonville, FL 32257
Resident	Le Moulin Dr Beauvoir	La Rue Du Moulin A Vent	Grouville Jersey JE3 9AL, UK
Resident	2741 S Ponte Vedra Blvd		Ponte Vedra Beach, FL 32082
Resident	313 Porpoise Point Dr		Saint Augustine, FL 32084
Resident	199 Oakmont Ct		Sherman, TX 75092
Resident	Wellington Shields & Co	140 Broadway	New York, NY 10005
Resident	D R Repass PA	111 Solana Rd, Unit B	Ponte Vedra, FL 32082
Resident	1724 Ocean Dunes Ter		Daytona Beach, FL 32118
Resident	9097 Old A1A		Saint Augustine, FL 32080
Resident	336 Amelia Ct		Saint Augustine, FL 32080
Resident	6391 Sw 85Th St		Miami, FL 33143
Resident	6730 Strawberry Ln		Jacksonville, FL 32211
Resident	C/O Storage Systems Midwest Inc N16W23430 Stone Ridge Dr		Waukesha, WI 53188
Resident	271 East River Rd		E Palatka, FL 32131
Resident	8864 Old A1A Hwy		Saint Augustine, FL 32080
Resident	C/O Mark Smith	Po Box 191526	Atlanta, GA 31119

APPENDIX G-5
PUBLIC COMMENTS

Public Comments
St. Johns CSRM Feasibility Study and EA - DRAFT report

#	Commenter	Email	Address	Public comment	Date Received	SAJ Response	Response Date	Action Taken
1	Jim Bonnette	bonnette@aol.com		60-foot berms are only a temporary solution; a large storm could introduce saltwater into the GTMNERR and damage SR A1A; recommends building a jetty on the north side of the St. Augustine Inlet, and possibly a smaller jetty at the north end of South Ponte Vedra Beach. These would cut future maintenance dredging costs. Offered to meet with us to discuss.	2/28/16-3/1/16	The 60-foot berm design was selected because it maximizes net benefits over a 50 year period. The berm will need to be re-nourished every 12 years on average, although the time of re-nourishments may vary depending on the timing of storms and erosion. The design is based on a suite of probable storms that could impact the study area. There is always a residual risk that an unprecedented storm will still cause damages along the coast regardless of the measures implemented. Groins were considered as part of the study, however they were not found to be cost effective in the study area.	08/04/16	no changes made to the report
2	Jack Peter	jpeter@wghof.org	World Golf Hall of Fame & Museum 1 World Golf Place St. Augustine, FL 32092	Does "non-federal" mean that funding outside of the federal government would be the exclusive responsibility of St. Johns County? Or, would the State of Florida be required to supply funding; as State Road A1A is the primary road affected by both the erosion and the beach re-nourishment plan? What entity is ultimately responsibly for nonfederal funding?	02/29/16	The non-fed sponsor is ultimately responsible for the non-federal portion. That said, they are typically able to cost share their portion with the State of Florida along shorelines that the state has designated "critically eroded." The shoreline within the TSP area is critically eroded, as determined by the state.	02/29/16	no changes made to the report
3	Thomas McAtee	mcateert@bellsouth.net	1823 Fruit Cove Woods Dr. St Johns, Florida, 32259	Generally opposed to the project as a waste of taxpayer dollars; suggests that a better use of these funds would be to move at-risk infrastructure, enact polices to remove at-risk dwellings at the owner's expense, and prevent future development on beaches.	03/02/16	Non-structural methods, including a moratorium on construction and relocation of structures, were evaluated in the study. Please see the Preliminary Screening Matrix included in Chapter 3 for a summary of all measures considered.	07/18/16	no changes made to the report
4	Karen Shields	karenshields7@gmail.com	2849 Ponte Vedra Blvd. Ponte Vedra, FL	Noticed erosion for the last 5 years, which seems to be tied to the dredging of the St. Augustine Inlet and the disruption of the sand bar that acting as a barrier to protect the shoreline; recently installed a retainer wall; supportive of project.	03/05/16	The latest studies conducted on St. Augustine Inlet, ERDC/CHL-TR-12-14: Reports 1, 2, & 3, indicate that inlet maintenance and dredging of the ebb shoal has not caused increased erosion north of the inlet. This analysis in these studies was eventually adopted by the State in the form of the Inlet Management Plan.	08/04/16	no changes made to the report
5	Dorothy Shelley		1724 Ocean Dunes Terrace Daytona Beach, FL 32118	Has owned property at 9033 Old A1A. Remembers rock placed at Summer Haven in 1963. Was a restaurant and parking lot prior to 1967 in front of her home that were washed away. Feels that sand just washes away, and is not a permanent solution to erosion. Notes that she does not recall any sea turtle nests in front of the rocks. Would prefer that permanent and enhanced rock infrastructure is the best solution.	03/08/16	See page 2-1 of Feasibility Study: "Such structures often protect one property while causing accelerated erosion to adjacent, unarmored properties, while cutting off the vital exchange of sand from dunes to the beach during storm events. By accelerating erosion and cutting off the dunes, the structures also negatively impact habitat of species such as nesting sea turtles." See also the section describing the Beach-FX modeling (Rough Order Costs can be found on pg 3-32).	08/04/16	no changes made to the report

6	Barbara Jenness	barbara@barbarajenness.com	313 Porpoise Point Drive St. Augustine, FL 32084	<p>1) Can you tell me if either of these are in the TSP as there is so much to read to determine the location of the 3 miles of shoreline in South Ponte Vedra and Vilano.</p> <p>2) What are the cost ramifications to the owners?</p> <p>3) What are the timeframes for placement of sand?</p>	03/28/16	<p>1) Provided a map of the two properties in relation to the proposed beach placement area. Both properties are well north of the placement area in the Recommended Plan.</p> <p>2) There are no direct cost ramifications to the property owners related to the project (i.e., property owners within the placement area are not asked individually to cost-share in the project, and USACE is not aware of any additional tax assessments).</p> <p>3) The study is in the feasibility stage. It would need to be approved by USACE and the Assistant Secretary of the Army, and funding would need to be allocated by Congress, before the project could move forward. The base year for initial sand placement used in the report is 2020 (see section 2.4.4 on page 2-54 for more information on this).</p>	03/28/16	no changes made to the report
7	FFWCC			Recognizing that the Summer Haven reach was screened out, commented for awareness that the breached area is now least tern nesting habitat. An FDEP permit issued in 2014 for sand placement on the beach required an ITP from FFWCC for take of these least terns. Any placement in the Summer Haven area would similarly require conditions for the protection of these species.	03/31/16	As the Summer Haven reach was screened out, it is no longer proposed for sand placement.	08/04/16	no changes made to the report
8	John Mark Nolan	jmarknolan@aol.com	Carcaba Road	Long-time resident; concerns about erosion to A1A and recommended beach nourishment as the best alternative compared to relocating A1A.	04/03/16	Noted	08/04/16	
9	John Mark Nolan	jmarknolan@aol.com	Carcaba Road	Concern about ongoing erosion to public beach areas set up at Mussallem Beachfront Park at the end of Carcaba Road, and at North Beach Park. Supports nourishment to protect these public parks.	04/03/16	Noted (unsure if benefits of protecting the wetlands was included in BC Ratio)	08/04/16	
10	Seminole Tribe of Florida	andrewweidman@semtribe.com	30290 Josie Billie Hwy, PMB 1004 Clewiston, FL 33440	No immediate concerns regarding cultural or historic resources. STOF-THPO would like to be consulted prior to project implementation.	04/04/16	Noted	08/04/16	
11	South Ponte Vedra - Vilano Beach Preservation Association, Inc. (SPVVB)	tturnage@turnageco.com		Desires federal relief along South Ponte Vedra. Recognizes that they do not meet the requirements for public beach access and parking but argues that the erosion is due to federal projects (St. Aug. Inlet and dredging of shoals). References 1979 Corps study that indicates that 50% of the erosion occurring 5 miles south of the inlet was inlet-induced and that the inlet caused a diversion of sand from both the north and south shorelines.	04/04/16	The latest studies conducted on St. Augustine Inlet, ERDC/CHL-TR-12-14: Reports 1, 2, & 3, indicate that inlet maintenance and dredging of the ebb shoal has not caused increased erosion north of the inlet. This analysis in these studies was eventually adopted by the State in the form of the Inlet Management Plan.	08/04/16	no changes made to the report
12	South Ponte Vedra - Vilano Beach Preservation Association, Inc. (SPVVB)	tturnage@turnageco.com		Concern about the designation of the north inlet jetty as a "sand trap groin". The comment states that there is no historical reference that describes the purpose of the north jetty as a sand trap. The jetty is also 75 years old and in poor condition (including leaks).	04/04/16	The 1947 Survey Review Report on St. Augustine Harbor and Vicinity, Florida states "The ocean shore north of the new inlet receded after the channel was cut through. This recession was checked by construction of the sand-trap groin in 1941. The groin impounded sand on its north side from the time of its construction until its impounding capacity was reached in 1943."	08/04/16	no changes made to the report

13	South Ponte Vedra - Vilano Beach Preservation Association, Inc. (SPVVB)	tturnage@turnageco.com		The study does not consider the need and benefits of tightening and lengthening the north jetty. The structure is in poor condition but improving the jetty is not considered in the management alternatives. It is an obvious means by which to retain sand upon the Vilano Beach shoreline.	04/04/16	Groins were considered as part of the study, however they were not found to be cost effective in the study area. Sand tightening and lengthening the sand-trap groin on the north side of the inlet could impound additional sediment along the beach immediately north of the structure. However, the shoreline immediately north of the structure has been historically stable and infrastructure in this area is set back well landward of the beach, making modifications to this groin unlikely to be justified by storm damage reduction benefits that it would provide.	08/04/16	no changes made to the report
14	South Ponte Vedra - Vilano Beach Preservation Association, Inc. (SPVVB)	tturnage@turnageco.com		The study concludes that the shoreline erosion rates are "consistent" between periods of time but that is due to the periods of time that are selected for comparison.	04/04/16	The 'Historical Volume Change' section on page 22 of the Engineering Appendix shows the variability of volume change over time along the length of the study area. It is understood that the rates of volume change are variable over time and that the rates presented are specific to the periods that were analyzed. The modeling of future erosion in the study area is based on the long term average shoreline change across the entire period from 1972 to 2015. Using a long record provides a better estimate of long-term average trends and minimizes fluctuations that can be induced by high frequency storm events over short analysis periods.	08/04/16	no changes made to the report
15	South Ponte Vedra - Vilano Beach Preservation Association, Inc. (SPVVB)	tturnage@turnageco.com		The study does not consider the use of the inlet as a sand source for St. Johns County. The sand that is dredged from the inlet is always placed to the south. The IMP recognizes that one-third of the inlet's impact accrues to the north shoreline but the sand is not placed there.	04/04/16	This study uses the inlet system as a sand source, and will address the erosion observed in the placement area north of the inlet.	08/04/16	no changes made to the report
16	South Ponte Vedra - Vilano Beach Preservation Association, Inc. (SPVVB)	tturnage@turnageco.com		The study does not specify where the sand from the inlet would be dredged from.	04/04/16	The sand source is described in Section 4.2. Material would be obtained from the inlet system, which includes the ebb, flood, and Vilano Point shoals as well as the Federal navigation channel.	08/04/16	no changes made to the report
17	South Ponte Vedra - Vilano Beach Preservation Association, Inc. (SPVVB)	tturnage@turnageco.com		A 12-year nourishment interval is "physically improbable" given the severity of the erosion since 2003. The St. Augustine Beach SPP has exhibited a 6-year re-nourishment cycle. Also, bypassing the sand to the north at half the frequency as to the south (12-years vs 6-years) is not in keeping with the principles in the IMP (2/3 - 1/3 rule)	04/04/16	The average re-nourishment interval associated with the TSP is based on the Beach-fx lifecycle modeling. It is understood that this interval could vary significantly depending on the timing of erosion and storm events. The selection of the TSP was based on maximizing net storm damage reduction benefits. Section 3.10.1 of the main report describes how the TSP volume requirements are consistent with the IMP. The TSP was formulated using the latest economic model which was different from that used for St. Augustine Beach. The site conditions of the TSP in Vilano, a relatively straight shoreline, differ from the protruding headland in St. Augustine, which also factors into the planned average nourishment interval.	07/19/16	no changes made to the report

18	South Ponte Vedra - Vilano Beach Preservation Association, Inc. (SPVVB)	tturnage@turnageco.com		The study's cost analysis does not clarify if costs of dredge mobilization etc are shared with St. Johns County SPP. What cost efficiencies are gained to both the Vilano Beach and St. Augustine Beach projects if both share the same contract and dredge an offshore borrow source?	04/04/16	Costs of dredge mobilization are not shared with the St. Johns County SPP. Since these projects are not authorized together, USACE cannot guarantee that they would receive funding at the same time thereby capturing the cost savings. However, a rough value added is presented in Chapter 5, Recommendations, if they could be constructed together.	08/16/16	Revisions made to Chapter 5, Recommendations
19	South Ponte Vedra - Vilano Beach Preservation Association, Inc. (SPVVB)	tturnage@turnageco.com		Would the overall total and federal costs be reduced if use of an offshore borrow area reduced the erosion from both project segments, and if occasional dredging of the navigation channel by small dredge, or by small hopper and nearshore disposal was undertaken to supplement renourishment of both projects?	04/04/16	we considered initial dredging with the offshore borrow area followed by periodic nourishment from the ebb shoal/inlet for both segments (South Ponte Vedra and Vilano) for several sizes of nourishments. These options were not less costly than using the ebb shoal/inlet as the sole borrow area. We did not model nearshore placement.	08/16/16	no changes made to the report
20	South Ponte Vedra - Vilano Beach Preservation Association, Inc. (SPVVB)	tturnage@turnageco.com		It appears there are numerous opportunities for Regional Sand Management that have not been considered in the study. It is not clear why RSM principles are not included within alternatives considered in the study.	04/04/16	The use of the inlet system as a sand source for the Recommended Plan is a method of implementing Regional Sediment Management (RSM). RSM promotes using sediment already in the system, rather than obtain sediment from outside of the sediment system.	08/04/16	no changes made to the report
21	South Ponte Vedra - Vilano Beach Preservation Association, Inc. (SPVVB)	tturnage@turnageco.com		SPVVB is concerned that the proposed project does not address the erosion problems along South Ponte Vedra and that the federal cost share is modest along Vilano Beach due to public beach access and parking. We note that the potential federal (and State) cost-share could be increased by providing some public beach parking at the public street-ends which qualify as public access but otherwise provide no cost-share benefit due to lack of parking.	04/04/16	Concur.	08/04/16	no changes made to the report
22	South Ponte Vedra - Vilano Beach Preservation Association, Inc. (SPVVB)	tturnage@turnageco.com		SPVVB is mostly concerned that the proposed project seeks to address beach erosion north of the inlet by continuing the inlet dredging practices that are largely responsible for causing the erosion in the first place. The SPVVB believes that dredging the inlet shoals as a sand source (beyond maintaining the navigation channel) is contributing to the erosion of the adjacent shores.	04/04/16	The latest studies conducted on St. Augustine Inlet, ERDC/CHL-TR-12-14: Reports 1, 2, & 3, indicate that inlet maintenance and dredging of the ebb shoal has not caused increased erosion north of the inlet. This analysis in these studies was eventually adopted by the State in the form of the Inlet Management Plan.	07/19/16	no changes made to the report
23	South Ponte Vedra - Vilano Beach Preservation Association, Inc. (SPVVB)	tturnage@turnageco.com		The IMP is not a directive to use the inlet as a sediment source. Instead it specifies maximum limits for dredging and describes the requisite distribution to the adjacent shores of sand that is ultimately dredged from the inlet, including for purposes of navigation. The IMP also requires investigation of alternate sand sources and north jetty improvements. If the project using offshore sand is not economically favorable by federal standards, then this cannot serve as the justification to use inlet sand that may ultimately lead to further shoreline damage or an endless cycle of costly dredging and renourishment.	04/04/16	The effects of the Future Without-Project Conditions are included in the study in Section 2. As the project at St. Augustine Beach is already authorized, the Future Without-Project Conditions include the use of the inlet system as a sand source for that project.	08/04/16	no changes made to the report

Hershorin, Aubree SAJ

From: Jim Bonnette <bonnette@aol.com>
Sent: Sunday, February 28, 2016 12:32 PM
To: Hershorin, Aubree SAJ
Cc: Jim Bonnette
Subject: [EXTERNAL] South Ponte Vedra Beach/Vilano Beach Florida beach erosion.

Hi Aubree:

I want to comment on the beach erosion. I live on the opposite side of State road A1A in South Ponte Vedra Beach for 17 years. I overlook Guana State preserve and will actually gain from any erosion or water level increase for kayaking, etc. But this does not change my opinion. I care about the people and the long term cost for the Corps. I come from an engineering family and currently have a brother lawyer/engineer in the EPA.

First, we both agree that there is massive erosion in this area. Within ten years homes will fall into the ocean. When you see it for 17 years you get good info. And with a few hurricanes this could be much sooner as you know.

Second, why is this happening. The dredging of the St. Augustine inlet for years has caused the sand to move south away from the affected area. And this will continue. But what we all worry about is how fast with storms. And how do we stop it.

Third, the suggestion of adding 60 foot berms will only be temporary solution. I will get into that later. But with the Corps as you know a solution could take years to start.

Fourth, something only a few people are thinking about. A new storm now could break through to State Road A1A and Salt water would enter into one of Americans best preserves. The EPA can tell you a lot about this Guana preserve that could be ruined. Massive oyster and animal life would be lost forever. The cost to repair this State road and damage would be in the billions as you know with maintenance if storms hit.

Fifth. My solution. Here is come and don't fall off your seat. I have changed a lot of what is done in the US in other areas.

1. Yes we need to fill in the erosion areas. That is simple. 2. But where does all that fill go over years? Into the St Augustine inlet and the Corps then digs that out. 3. We must have a long term solution. To keep the fill and stop the movement of the sand into the St Augustine inlet.

A. A large stone jetty must be built before the St Augustine inlet to hold the fill from moving into the inlet. This was done for the US Navy base Mayport just north of us and many other areas throughout the US. Another smaller jetty my be needed just at the north end of South Ponte Vedra Beach.

B. Land fill in the hundreds of tons must be only filled in after the Jetty is complete.

Aubree, this may at first sound expensive, but it will be a lot less expensive if we do nothing.

Best regards.

Jim Bonnette

145 Yellow Bill Lane

South Ponte Vedra Beach, Florida 32082

Bonnette@aol.com

904-808-8475

Sent from my iPad

From: [Hershorin, Aubree SAJ](#)
To: [Jack Peter](#)
Cc: [Burch, Brandon S SAJ](#); [Schrader, Matthew H SAJ](#)
Subject: RE: [EXTERNAL] St. Johns County Shoreline Erosion (UNCLASSIFIED)
Date: Monday, February 29, 2016 4:39:13 PM

CLASSIFICATION: UNCLASSIFIED

Jack,

The non-fed sponsor is ultimately responsible for the non-federal portion. That said, they are typically able to cost share their portion with the State of Florida along shorelines that the state has designated "critically eroded." The shoreline within the TSP area is critically eroded, as determined by the state.

If you have any further questions, please don't hesitate to contact me.

Best,
Aubree

~~~~~  
Aubree Hershorin, Ph.D.  
Environmental Branch, Coastal Section  
Planning and Policy Division  
U.S. Army Corps of Engineers  
701 San Marco Blvd.  
Jacksonville, FL 32207  
Office: (904) 232-2136

-----Original Message-----  
From: Jack Peter [<mailto:jpeter@wghof.org>]  
Sent: Saturday, February 27, 2016 1:53 PM  
To: Hershorin, Aubree SAJ <[Aubree.G.Hershorin@usace.army.mil](mailto:Aubree.G.Hershorin@usace.army.mil)>  
Subject: [EXTERNAL] St. Johns County Shoreline Erosion

Aubree,

I've read the draft study on the plan to protect portions of St. Johns County shoreline and have a question.

The plan states, "Cost sharing for initial construction is 22 percent federal and 78 percent non-federal. The cost sharing for periodic nourishments is 17.7 percent federal and 82.3 percent non-federal."

Does "non-federal" mean that funding outside of the federal government would be the exclusive responsibility of St. Johns County? Or, would the State of Florida be required to supply funding; as State Road A1A is the primary road affected by both the erosion and the beach re-nourishment plan? What entity is ultimately responsible for non-federal funding?

Thank you in advance for your help.

Jack

Jack Peter, Chairman, St. Johns County Tourism Development Council

Jack Peter  
President

World Golf Hall of Fame & Museum  
1 World Golf Place  
St. Augustine, FL 32092  
904-940-4029 O.  
904-612-7877 C.  
Blockedwww.worldgolfhalloffame.org  
jpeter@wghof.org

CLASSIFICATION: UNCLASSIFIED

**From:** [bonnette@aol.com](mailto:bonnette@aol.com)  
**To:** [Hershorin, Aubree SAJ](mailto:Hershorin,Aubree.SAJ)  
**Subject:** Re: [EXTERNAL] South Ponte Vedra Beach/Vilano Beach Florida beach erosion. (UNCLASSIFIED)  
**Date:** Tuesday, March 01, 2016 4:41:30 PM

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Thanks Aubree; the only thing I would like to add to the below is this Jetty would cut a lot of the future channel dredging for the Corps and cut future cost.

I do know of other ideas like natural reefs off the coast that could help. All of you are welcome to meet at my home to discuss any time. I travel around the world at least ten times per year so would need a good notice. All I want is it to be done right.

Best regards.

Jim B

Bonnette@aol.com

Sent from my iPhone

> On Feb 29, 2016, at 4:41 PM, Hershorin, Aubree SAJ <[Aubree.G.Hershorin@usace.army.mil](mailto:Aubree.G.Hershorin@usace.army.mil)> wrote:

>

> CLASSIFICATION: UNCLASSIFIED

>

> Mr. Bonnette,

>

> Thank you for your comments. They will be included in the record and addressed in the final report.

>

> If you have any further questions/comments, please do not hesitate to contact me.

>

> Best,

> Aubree

>

> ~~~~~

> Aubree Hershorin, Ph.D.

> Environmental Branch, Coastal Section

> Planning and Policy Division

> U.S. Army Corps of Engineers

> 701 San Marco Blvd.

> Jacksonville, FL 32207

> Office: (904) 232-2136

>

>

>

> -----Original Message-----

> From: Jim Bonnette [<mailto:bonnette@aol.com>]

> Sent: Sunday, February 28, 2016 12:32 PM

> To: Hershorin, Aubree SAJ <[Aubree.G.Hershorin@usace.army.mil](mailto:Aubree.G.Hershorin@usace.army.mil)>

> Cc: Jim Bonnette <[bonnette@aol.com](mailto:bonnette@aol.com)>

> Subject: [EXTERNAL] South Ponte Vedra Beach/Vilano Beach Florida beach erosion.

>

> Hi Aubree:

>

> I want to comment on the beach erosion. I live on the opposite side of State road A1A in South Ponte Vedra Beach for 17 years. I overlook Guana State preserve and will actually gain from any erosion or water level increase for kayaking, etc. But this does not change my opinion. I care about the people and the long term cost for the Corps. I come from an engineering family and currently have a brother lawyer/engineer in the EPA.

> First, we both agree that there is massive erosion in this area. Within ten years homes will fall into the ocean.

> When you see it for 17 years you get good info. And with a few hurricanes this could be much sooner as you know.

> Second, why is this happening. The dredging of the St. Augustine inlet for years has caused the sand to move south away from the affected area. And this will continue. But what we all worry about is how fast with storms. And how do we stop it.

> Third, the suggestion of adding 60 foot berms will only be temporary solution. I will get into that later. But with the Corps as you know a solution could take years to start.

> Fourth, something only a few people are thinking about. A new storm now could break through to State Road A1A and Salt water would enter into one of Americans best preserves. The EPA can tell you a lot about this Guana preserve that could be ruined. Massive oyster and animal life would be lost forever. The cost to repair this State road and damage would be in the billions as you know with maintenance if storms hit.

> Fifth. My solution. Here is come and don't fall off your seat. I have changed a lot of what is done in the US in other areas. 1. Yes we need to fill in the erosion areas. That is simple. 2. But where does all that fill go over years? Into the St Augustine inlet and the Corps then digs that out. 3. We must have a long term solution. To keep the fill and stop the movement of the sand into the St Augustine inlet.

> A. A large stone jetty must be built before the St Augustine inlet to hold the fill from moving into the inlet. This was done for the US Navy base Mayport just north of us and many other areas throughout the US. Another smaller jetty my be needed just at the north end of South Ponte Vedra Beach.

> B. Land fill in the hundreds of tons must be only filled in after the Jetty is complete.

> Aubree, this may at first sound expensive, but it will be a lot less expensive if we do nothing.

>

> Best regards.

> Jim Bonnette

> 145 Yellow Bill Lane

> South Ponte Vedra Beach, Florida 32082

> Bonnette@aol.com

> 904-808-8475

>

> Sent from my iPad

> CLASSIFICATION: UNCLASSIFIED

>

**From:** [Thomas McAteer](#)  
**To:** [Hershorin, Aubree SAJ](#)  
**Subject:** [EXTERNAL] St John's County Shoreline Project Concerns  
**Date:** Wednesday, March 02, 2016 11:30:06 AM

---

To the Corps of Engineering,

As a long time resident of St John's County (33 years) I am opposed to spending any County, State or federal money on nourishing the beaches of this county or in this state. It is pure fact and part of nature the shorelines and beaches shift and change by normal tides, wind and weather. It is both fruitless and irresponsible to spend any more time or money thinking we can change this.

The homeowners who built so close to the ocean knew the risks of doing so. It should not be the rest of the states' responsibility to fix their problems of an eroding beach front. If your abode is at risk, it should be condemned and the state should help them remove the dwelling and restore that portion of the beach to natural settings. We SHOULD NOT spend our tax money dredging, building walls or anything else to put sand back where nature has moved it.

As far as the infrastructure is concerned, move it. Relocate the roads (A1A) more inland away from the encroachment of the ocean. Use the money allotted for nourishing beach front homes toward moving the infrastructure. Do the studies on longer term erosion to determine which infrastructure locations are at risk and where it is the best place to relocate it for the near and long term. Put a multi-year plan in place that will relocate at-risk infrastructure, monitor the erosion progression, and continue this cycle spending tax money to keep the state/county safe.

Spending any more money on trying to correct or prevent beach erosion is the same as building sand castles on the beach. Looks nice for a while but it won't be very long before you have to do it again. Stop allowing building on the beaches. Enact building codes and policy that will remove dwellings at risk from erosion at the owners expense.

I am opposed to any beach nourishment project from the study ([Blockedwww.saj.usace.army.mil/Missions/CivilWorks/ShoreProtection/StJOhns.aspx](#)). It is almost laughable to even call it a "ShoreProtection" project. The only thing this project needs to "protect" is the state/count infrastructure currently at risk of the public safety. This should be a short term solution with the long term goal of relocation to safer locations from erosion. Homeowners on the beach should be told they can not build, erect or change the shorelines in any way. If there abode is at risk, be prepared for it to be condemned and for the shoreline to be restored to it's natural setting.

Sincerely,  
Mr. Thomas J McAteer  
1823 Fruit Cove Woods Dr.  
St Johns, Florida, 32259

**From:** [Karen Shields](#)  
**To:** [Hershorin, Aubree SAJ](#)  
**Subject:** [EXTERNAL] Erosion South Ponte Vedra Beach  
**Date:** Saturday, March 05, 2016 8:47:54 AM

---

Hello

We are homeowners at 2849 Ponte Vedra Blvd Ponte Vedra Fl ,, we had experienced severe erosion for about the last 5 years and had to put up a retainer wall.

The erosion is moving south , but it seems to be tied to the dredging of the inlet and the disruption of the natural sand bar that use to act as a barrier to protect the shoreline.

We had a thick vegetated dune and now we have a sparse dune ,, its so sad to see.

I hope the Army Corp can do something to stop and prevent this ,,,,

The negative impact of this dredging really needs to be reassessed and some type of re nourishment needs to be in place for help !

Regards  
Karen Shields  
904 343 0089

Dorothy D. Shelley  
9033 Old A1A  
Summer Haven, Florida 32080

March 8, 2016

Aubree Hershorin, Ph.D  
U.S. Army Corps of Engineers  
Jacksonville District  
Planning and Policy Division, Environmental Branch  
PO Box 4970  
Jacksonville, FL 32232-0019

Dear Doctor Hershorin:

My name is Dorothy Shelley, and I have lived at Summer Haven located at Matanzas Inlet since 1963. Over the years, I've seen many changes. The oceanfront rocks at the south end of Summer Haven were installed in 1963. This process involved initial excavation and then a layer of small pea rock was placed underneath before placing layers of larger rock. These are the ones that show more than the others at the north end where I live.

My home is at 9033 Old A1A. In front of my house, there used to be a restaurant and parking lot which were washed away. This was before 1967 when I built my house. Several years ago, they pumped sand over from the Intracoastal Waterway and other areas in a beach renourishment project. This sand lasted one season, and then the current washed it into the inlet or some other unexpected location.

As far as the turtles, I haven't seen a turtle nest on the beach in front of the rocks for a long time. Fortunately, we had high numbers of turtle nests all along the Florida coast this year. In front of these rocks, however, it is not a desirable location for nesting turtles. Over time, these heavy rocks have recessed into the sand and I believe have formed a good solid foundation for enhancements. When we have our next storm, I hope the water doesn't come over the rocks and wash away the road. I respectfully request that you do not use sand or other loose material alone to correct the situation. As we have learned, it just doesn't stay, but rather fills up the inlet.

I hope these thoughts will help in your decision-making process. Please use the history of sand movement in the Matanzas Inlet as a guide. Permanent and enhanced rock infrastructure is the only thing that will stand the test of time.

Sincerely,



Dorothy D. Shelley

PS: As I was driving by Marineland the other day, I noticed rocks have recently been added to enhance the durability of the shoreline. Please also consider this. In addition, should you need to contact me, **my mailing address is: 1724 Ocean Dunes Terrace, Daytona Beach, FL 32118.**

**From:** [Barbara Jenness](#)  
**To:** [Hershorin, Aubree SAJ](#)  
**Subject:** RE: [EXTERNAL] St. Johns County Coastal Storm Risk Management Project  
**Date:** Monday, March 28, 2016 2:45:37 PM

---

Thank you for your prompt responses!

<Blockedhttp://BarbaraJenness.com>  
Barbara Jenness <Blockedhttp://BarbaraJenness.com> - Licensed Real Estate Broker  
ABR, CDPE, CRS, e-PRO, GRI, PMN, TRC  
Barbara B. Jenness, P.A.  
313 Porpoise Point Drive  
St. Augustine, FL 32084

Phone: 904-823-0027 | Fax: 904-823-0028  
<Blockedhttp://www.zillow.com/profile/BarbaraJenness/?scrnm=BarbaraJenness>

Search for Homes: Blockedhttp://www.staugustinemls.com/

Website:Blockedhttp://BarbaraJenness.com  
HousingTrends Newsletter <Blockedhttp://BarbaraJenness.housingtrendsenewsletter.com>  
Follow Me: <Blockedhttp://www.facebook.com/pages/Barbara-B-Jenness-PA/193566380680967>  
<Blockedhttp://linkedin.com/in/BarbaraJenness> <Blockedhttp://www.twitter.com/BarbaraJenness>

----- Original Message -----

From: Aubree.G.Hershorin@usace.army.mil <<mailto:Aubree.G.Hershorin@usace.army.mil>>  
To: Barbara@BarbaraJenness.com <<mailto:Barbara@BarbaraJenness.com>>  
CC: Brandon.S.Burch@usace.army.mil;  
Sent: 3/28/2016 2:13:00 PM  
Subject: RE: [EXTERNAL] St. Johns County Coastal Storm Risk Management Project

The full template would be from approximately 3200 S. Ponte Vedra Blvd. to 3280 Coastal Hwy. There are 1000 foot tapers at either end, which extend from approximately 3175 S. Ponte Vedra Blvd. to 3216 Coastal Hwy.

From looking at Google Earth, it seems like the full template stops at the southern end of the Serenata Beach Club, and the taper extends north to about where the pool is located.

-----Original Message-----

From: Barbara Jenness [<mailto:barbara@barbarajenness.com>]  
Sent: Monday, March 28, 2016 1:32 PM  
To: Hershorin, Aubree SAJ <[Aubree.G.Hershorin@usace.army.mil](mailto:Aubree.G.Hershorin@usace.army.mil)>  
Subject: RE: [EXTERNAL] St. Johns County Coastal Storm Risk Management Project

Thank you! Do you have the approximate street numbers for the north and south end of the TSP? Trying to see if Serenata is in the TSP.

<Blockedhttp://BarbaraJenness.com> <Blockedhttp://BarbaraJenness.com >>

Barbara Jenness <Blockedhttp://BarbaraJenness.com> - Licensed Real Estate Broker  
<Blockedhttp://BarbaraJenness.com >>  
ABR, CDPE, CRS, e-PRO, GRI, PMN, TRC  
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<Blockedhttp://www.zillow.com/profile/BarbaraJenness/?scrnnm=BarbaraJenness>  
<Blockedhttp://www.zillow.com/profile/BarbaraJenness/?scrnnm=BarbaraJenness>>

Search for Homes: Blockedhttp://www.staugustinemls.com/

Website:Blockedhttp://BarbaraJenness.com  
HousingTrends Newsletter <Blockedhttp://BarbaraJenness.housingtrendsnewsletter.com>  
<Blockedhttp://BarbaraJenness.housingtrendsnewsletter.com >>  
Follow Me: <Blockedhttp://www.facebook.com/pages/Barbara-B-Jenness-PA/193566380680967>  
<Blockedhttp://linkedin.com/in/BarbaraJenness> <Blockedhttp://www.twitter.com/BarbaraJenness>  
<Blockedhttp://www.facebook.com/pages/Barbara-B-Jenness-PA/193566380680967 >>

----- Original Message -----

From: Aubree.G.Hershorin@usace.army.mil <<mailto:Aubree.G.Hershorin@usace.army.mil>>  
To: barbara@barbarajenness.com <<mailto:barbara@barbarajenness.com>>  
CC: Brandon.S.Burch@usace.army.mil;  
Sent: 3/28/2016 12:06:00 PM  
Subject: RE: [EXTERNAL] St. Johns County Coastal Storm Risk Management Project

Ms. Jenness,

Thank you for letting me know about the misdirected link. Appendix G1 is attached for your reference. We will hopefully be able to correct the link in the next few days.

In response to your questions:

- 1) I've attached a map of the two properties you reference in relation to the proposed beach placement area (shown in green). Both properties are well north of the TSP.
- 2) If I'm understanding your second question correctly, there are no direct cost ramifications to the property owners related to the project (i.e., property owners within the TSP location are not asked individually to cost-share in the project, and I am not aware of any additional tax assessments).
- 3) The study is in the feasibility stage. It would need to be approved by USACE and the Assistant Secretary of the Army, and funding would need to be allocated by Congress, before the project could move forward. The base year for initial sand placement used in the report is 2020 (see section 2.4.4 on page 2-54 for more information on this).

I hope that answers your questions. If you have any further questions, please don't hesitate to contact me.

Very respectfully,  
Aubree

~~~~~  
Aubree Hershorin, Ph.D.
Environmental Branch, Coastal Section
Planning and Policy Division

U.S. Army Corps of Engineers
701 San Marco Blvd.
Jacksonville, FL 32207
Office: (904) 232-2136

-----Original Message-----

From: Barbara Jenness [<mailto:barbara@barbarajenness.com>]
Sent: Monday, March 28, 2016 9:28 AM
To: Hershorin, Aubree SAJ <Aubree.G.Hershorin@usace.army.mil>
Subject: [EXTERNAL] St. Johns County Coastal Storm Risk Management Project

I received a letter from you and went to the link. I am unable to download Appendix G1---it brings up Appendix F. Please let me know when this is corrected.

I own 2729 S. Ponte Vedra Blvd (vacant lot) and have 2423 S. Ponte Vedra Blvd (vacant lot) listed for sale.
1) Can you tell me if either of these are in the TSP as there is so much to read to determine the location of the 3 miles of shoreline in South Ponte Vedra and Vilano.
2) What are the cost ramifications to the owners?
3) What are the timeframes for placement of sand?
If you can point me to the specific places this is shown in your study I would appreciate it.
Thanks!

Barbara B. Jenness, P.A. <BlockedBlockedhttp://BarbaraJenness.com> <Blockedhttp://BarbaraJenness.com >>
<Blockedhttp://BarbaraJenness.com >>
313 Porpoise Point Drive
St. Augustine, FL 32084

Phone: 904-823-0027 | Fax: 904-823-0028

e-mail: Barbara@BarbaraJenness.com <<mailto:Barbara@BarbaraJenness.com>>
Website: BarbaraJenness.com <BlockedBlockedhttp://BarbaraJenness.com> <Blockedhttp://BarbaraJenness.com >>
<Blockedhttp://BarbaraJenness.com >>

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<Blockedhttps://www.avast.com/sig-email?utm_medium=email&utm_source=link&utm_campaign=sig-email&utm_content=emailclient&utm_term=oa-2115-v2-b>

From: [Mark](#)
To: [Hershorin, Aubree SAJ](#)
Subject: [EXTERNAL] In favor Comment on Vilano Beach Renourishment plan.
Date: Sunday, April 03, 2016 2:45:41 PM

I am a resident of St. Johns County and I have owned property for almost forty years on Carcaba Road which is near the center of the proposed Vilano Beach Renourishment. I have witnessed firsthand the erosion of the seashore towards A1A over those decades. There is some urgency in undertaking this project because it is not a matter of whether the erosion will reach A1A, but how soon. At this time, a large storm probably would compromise about a half mile stretch of current A1A. It is therefore economical and sensible to pursue beach renourishment as a cheaper alternative to rebuilding or relocating the A1A highway. Relocation of A1A to the west in that area would also compromise a fragile coastal wetland environment that the State of Florida, St. Johns County and the Federal Government have sought for decades to preserve.

There is also a great public interest to be served, because of the beach areas that have been set aside for public access and recreation at Mussallem Beachfront Park, at the end of Carcaba Road, and at North Beach Park. Renourishment will preserve and protect these beaches for public use, so once again it makes economic sense to preserve these non-private public beaches, rather than have them continually degrade due to erosion.

I see a lot of positives for implementing the proposed Vilano Beach Renourishment Plan. For the sake of brevity in my remarks I have only focused on the economic sensibility of protecting A1A and the public's access to beaches.

Thank you,
John Mark Nolan



April 4, 2016

U.S. Army Corps of Engineers, Jacksonville District
Planning and Policy Division, Environmental Branch
Attn: Aubree Hershorin, Ph.D.
P.O. Box 4970
Jacksonville, FL 32232-0019
Aubree.G.Hershorin@usace.army.mil

RE: St. Johns County FL – South Ponte Vedra Beach, Vilano Beach, and Summer Haven Beaches.
Coastal Storm Risk Management Project.
Draft Integrated Feasibility Study and Environmental Assessment. February 2016.

Dear Dr. Hershorin:

The following comments are provided on behalf of the South Ponte Vedra – Vilano Beach Preservation Association, Inc. (SPVVB) in regard to the above-referenced Study, and with particular regard to the South Ponte Vedra and Vilano Beach shoreline segments. SPVVB is an association of property owners with homes, lands, and related interests along the St. Johns County shoreline north of St. Augustine Inlet, within the Study area. This shoreline has suffered significant, unprecedented beach erosion beginning about 12 years ago – resulting in substantial property damage, land loss, and resultant coastal armoring.

The Tentatively Selected Plan (TSP) addresses Vilano Beach but provides no federal project recommendation or relief along South Ponte Vedra. We recognize that this finding reflects federal requirements for public beach access and parking. However, this finding fails to recognize that the beach erosion is due, in significant part to prior federal projects; i.e., the relocation of St. Augustine Inlet in 1940 to its present location, the resultant inherent formation of inlet shoals that diverted sand from both inlet-adjacent shorelines, and the over-dredging of the inlet shoals to nourish the St. Johns County (St. Augustine Beach) federal shore protection project since 2003. The Corps' 1979 study concluded that 50% of the erosion occurring 5 miles south of the relocated inlet was inlet-induced. A comparable finding appears relevant to the north shoreline. The formation of the extensive shoals in the new inlet, after 1940, clearly came from the diversion of sand from both adjacent shorelines, without respect to public beach parking.

The Study describes the greatest density of property value and predicted damages are from about R95 to R102. This is immediately north of and excluded from the proposed project limits, presumably owing to public beach access and parking considerations.

The Study repeatedly refers to the inlet's north jetty as a "sand trap groin". We are unaware of any historical reference that describes the north jetty as such. To our knowledge, the north jetty was never intended as a weir-groin, and the inlet was never designed to feature a sand trap nor regular

bypassing there from. It seems unlikely that the north jetty was “designed” to allow sand to deposit in the inlet and create what is now the anthropogenic landform of Porpoise Point. Instead, the north jetty is/was a simple terminal structure, now over 75 years old, derelict, and leaky. If it were to act as a “sand trap groin” then the sand which it leaks would need to be returned to the north shoreline. It seems to make little physical or economic sense to allow sand to pass into the inlet from the north shoreline -- through a “sand trap groin” -- only so that it can be dredged and placed back to the north shoreline from which the sand came.

The Study does not consider the need for -- and the physical, economic and environmental benefit of -- sand-tightening and lengthening the St. Augustine Inlet north jetty. Fundamental observation from the beach and aerial photographs indicate that the structure is almost wholly transparent: increasing both shoreline erosion of Vilano Beach and the shoaling of the navigation channel. Improvement to the north jetty is never listed in the considered management alternatives nor considered in the Study; but it is described in the Inlet Management Plan as an alternative to be studied. It is an obvious means by which to retain sand upon the Vilano Beach shoreline that is otherwise lost to the inlet and Porpoise Point and shoals the navigation channel -- thereby potentially reducing renourishment requirements of the updrift shoreline, reducing maintenance dredging requirements, and reducing overall project costs.

The Study concludes that the shoreline erosion rates are “consistent” between periods of time, but that is largely a function of the periods of time that are selected for comparison. In contrast, it is evident that shoreline erosion became problematic along South Ponte Vedra and Vilano Beach after 2003, when large-scale dredging of the inlet ebb shoal began; and erosion appears to peak after inlet dredging events.

The Study does not consider that the use of the inlet as a sand source for the St. Johns County (St. Augustine Beach) federal shore protection project is a potential, principal cause of the beach erosion along South Ponte Vedra and Vilano Beach. To wit, the Corps has dredged St. Augustine Inlet three times in one decade and placed the sand to the south beach for that project: in January 2003 (4.2 mcy), September 2005 (2.8 mcy), and August 2012 (2.2 mcy). That is a total of 9.2 mcy of sand removed from the inlet and placed to the south. Since 2003, and projected to 2017, that equates to 657,100 cubic yards per year. Assuming a 5-year life, the last dredging in August 2012 equates to 440,000 cubic yards per year. Those dredging volumes grossly exceed the IMP’s *total* estimated sink effect and bypassing quantities (278,100 cy/yr) by a factor of 2.4 and 1.6, respectively. All of that sand removed from the inlet was placed to the south, and none to the north. Noting that the IMP recognizes that one-third of the inlet’s impact accrues to the north shoreline, it is little wonder that the SPVVB beaches -- north of the inlet -- have exhibited extraordinary increases in beach erosion since 2003 and a consequent proliferation of shoreline armoring.

The Study does not specifically describe where the sand from the inlet would be dredged for purposes of constructing the Vilano Beach project. And, the Study does not include the results of the contemporary monitoring data that are to describe how the inlet (and its borrow areas) have responded to the prior dredging, particularly since the 2012 dredging event.

A 12-year renourishment interval, described for the TSP, appears physically improbable given the severity of the observed erosion since 2003 and the fact that the St. Augustine Beach shore protection project has exhibited a 6-year renourishment requirement. Further, bypassing sand to the north at half the frequency as to the south (i.e., 12-years versus 6-years) is not in keeping with the principles of the Inlet Management Plan. It would ostensibly allow a sand deficit to accrue along the north shoreline at twice the duration as along the south shoreline.

The Study’s cost analysis does not clarify if costs of dredge mobilization etc. are shared with the St. Johns County (St. Augustine Beach) shore protection project. What cost efficiencies are gained to

both the Vilano Beach and St. Augustine Beach projects if both share the same contract and dredge, and/or an offshore borrow source? Would the overall total and federal costs be reduced, particularly if use of an offshore borrow area (in lieu of an inlet borrow area) reduced the erosion from both project segments – and if occasional dredging of the navigation channel by small dredge, or by small hopper & nearshore disposal was undertaken to supplement renourishment of both projects? It appears that there are numerous opportunities for Regional Sand Management (RSM) that have not been considered in the Study. It is not clear why RSM principles are not included within the alternatives considered in the Study.

SPVVB is concerned that the proposed project does not address the erosion problems along South Ponte Vedra and that the federal cost share is modest (22% for initial construction and 17% for renourishments) along Vilano Beach, principally because of public beach access and/or parking. We note that the potential federal (and State) cost-share could be increased by providing some public beach parking at the public street-ends which qualify as public access but otherwise provide no cost-share benefit due lack of parking (though we recognize that this is not within the scope of federal actions).

Overall, SPVVB is mostly concerned that the proposed project seeks to address beach erosion north of the inlet by continuing the inlet dredging practices that are largely responsible for causing the erosion in the first place. We believe that continued use (dredging) of the inlet shoals as a sand source – beyond that fundamentally necessary to maintain the navigation channel – is substantially contributing to the erosion of the adjacent shores. It therefore appears to make little physical sense to address a problem by exacerbating its root cause; i.e., by continuing to dredge the inlet beyond the navigation requirements.

The Inlet Management Plan is not, or should not be, a directive to use the inlet as a sediment source. Instead, it specifies maximum limits for dredging and describes the requisite distribution to the adjacent shores of sand that is ultimately dredged from the inlet; i.e., including for purposes of navigation. The IMP also requires investigation of (i) alternate sand sources and (ii) north jetty improvements. Both features would benefit the Study area shoreline. If a project using offshore sand is not economically favorable by federal standards, then this cannot serve as the justification to use inlet sand that may ultimately lead to further shoreline damage or an endless cycle of costly dredging and renourishment. Offshore sand sources of at least 30 million cubic yards (developed) are available, as described in the Study. The ultimate, overall least cost solution is to simply stop using the inlet as a sand source; viz., to reduce the influx of sand past the north jetty and to stop dredging the inlet beyond that which is necessary for maintenance of the navigation channel.

Please do not hesitate to contact me at tturnage@turnageco.com if you have any questions regarding these observations, and thank you for the opportunity to offer these comments.

Sincerely,



Tom Turnage
South Ponte Vedra-Vilano Beach Preservation Assn., Inc.



DEPARTMENT OF THE ARMY
U.S. ARMY CORPS OF ENGINEERS
441 G STREET, NW
WASHINGTON, DC 20314-1000

DEC 01 2016

The Honorable Marco Rubio
United States Senate
201 S. Orange Avenue, Suite 350
Orlando, Florida 32801

Dear Senator Rubio:

This is in response to your letter, dated October 31, 2016, relaying concerns of your constituents, Mr. and Mrs. Guy Rasch of Ponte Vedra Beach, St. John's County, Florida. Mr. and Mrs. Rasch expressed concern about the impact of Hurricane Matthew on the northeast coast of Florida in the South Ponte Vedra beach area.

The Jacksonville District of the U.S. Army Corps of Engineers is currently conducting the St. Johns County Coastal Storm Risk Management feasibility study. The study is examining the feasibility of providing a project to address erosion problems and reduce the potential storm damage susceptibility of structures along the Atlantic Coast shoreline in St. Johns County.

The tentatively selected plan for this project includes beach and dune nourishment within the Vilano Beach reach and a small portion of the South Ponte Vedra Beach reach. The design includes construction of a 60-foot equilibrated berm extension along 2.6 miles of shoreline. The project template will also include a dune feature varying in height between 14 and 20 feet, reflecting the average dune position from the year 2015. One thousand foot tapers will extend from the northern and southern ends of the berm extension, connecting the extension to the existing shoreline. The addition of tapers results in sand placement along three miles of shoreline. The tentatively selected plan does not include armoring.

The feasibility study is currently scheduled to be completed and a Chief of Engineers Report signed in May 2017. Once the Corps completes the report, funding will be needed to design the project and Congress will need to authorize construction of the project. Funds to design and construct the recommended plan are subject to future congressional appropriations.

I hope this response has adequately addressed your concerns and questions related to this matter. If you have additional questions, please contact me or a member of your staff may contact Ms. Stacey Brown, Deputy Chief, South Atlantic Division Regional Integration Team, at (202) 761-4106.

Sincerely,

A handwritten signature in black ink, appearing to read "J. Dalton".

James C. Dalton, P.E.
Director of Civil Works