

DRAFT**Memorandum – Coastal Engineering Review
GATE USACE Dredging EA
TAR 14342**

14 May 2021

REVIEW REQUEST SUMMARY

Maintenance Dredging of the Sandy Hook Channel - Coastal Engineering Review of Draft EA, Sandy Hook Channel, New York Harbor

- Review USACE Draft EA

REVIEW**Introduction**

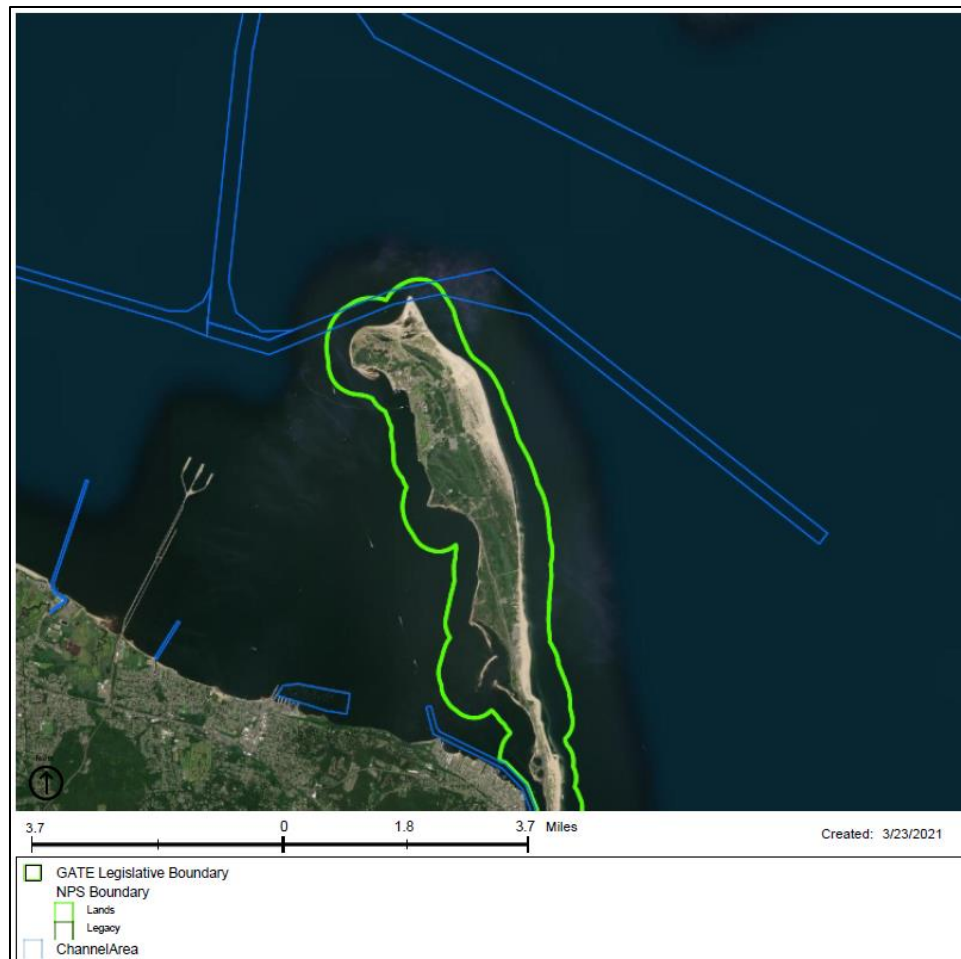
This memo presents comments based upon a preliminary review of the draft U.S. Army Corps of Engineers (USACE) environmental assessment (EA) for maintenance dredging of the Sandy Hook Channel, New York Harbor, for a 20-year planning horizon.

Background

The NPS is a cooperating agency for the development of the U.S. Army Corps of Engineers (USACE) environmental assessment (EA) for maintenance dredging of the Sandy Hook Channel, New York Harbor, for a 20-year planning horizon. Figure 1 shows the overlap of the Federal Navigation Channel on GATE's authorized boundary and the accreting "thumb" at Sandy Hook. All future USACE maintenance dredging of the Sandy Hook Channel would occur within 1,000 feet of the Mean Lower Low Water (MLLW) line of Sandy Hook, with the extent of intertidal and supratidal beach removed by each dredging action anticipated to vary over the life of the plan. The USACE is aiming to have a complete EA available in June 2021. Ensuring that the NPS finds it adequate would allow NPS to adopt the EA and issue our own Findings of No Significant Impact (FONSI) to authorize dredging, which is planned to occur in Fall 2021.

NPS is reviewing the draft EA but has concerns regarding its adequacy in addressing issues related to sediment transport and impacts from dredging (proposed to occur every 1-2 years) on natural processes, species, and visitor use. NPS has requested a review of the draft EA with specific comments made on its inadequacies and what would need to be done to rectify those inadequacies (e.g. data analysis, literature review, etc.), so that NPS can provide that feedback to USACE.

Figure 1. Overlap of the Federal Navigation Channel on GATE's authorized boundary and the accreting "thumb" at Sandy Hook (NPS 2021)



The comments from EA Engineering based upon an initial preliminary review are as follows:

Dredging Comments

- Sediment transport is based upon the 2009 analysis (Psuty) which is based upon the much older analysis from 1966 (Caldewell). Given that the 1966 analysis predates a significant amount of shoreline hardening in the region, is this budget accurate enough to describe current erosion patterns?
- What correlation does USACE have between the spit formation and beach nourishment activities?
- Given that some of the proposed "dredging" operations include material above MHW, provide further details/analysis to warrant the determination of "adverse, temporary, negligible impact" this will have upon wetlands.
- Provide a summary of the white paper analysis on why moving the shipping channel is not feasible

- What means and methods will be utilized to adequately remove up to 250,000 cy per year given that a clamshell bucket is stated to be the primary dredging mechanism?
- What is the preliminary phasing plan to minimize the adverse effects upon the shoreline and danger to the public from escarpment and other risks mentioned in the EA?
- How much is the dredging volume required to decrease after 2021? And given that this is the first year, why is so much planned for an initial year under a maintenance plan, rather than a separate one-time plan?

Resource Analysis Comments

- Is 2001 the most current fish data for the project area? Seems there should be more recent data. “Near shore and surf zone habitats contained a diverse and abundant assemblage of 33 seasonally present larval and juvenile fish species as well as other small forage species (USACE 2001).”
- Explain how impacts to fishing and recreation will be minimal when the proposed actions include the further closure of the park October and March, effectively removing the ability of the park to be utilized for these activities.
- Overall visitor experience section needs more details – impacts from noise, visual impacts, loss of opportunity, as noted for alts, a clear statement about when dredging would occur is needed to assess impacts to visitors.

General Comments

- Regarding the alternatives – four alternatives are described, is alternative 4 really an alternative? This should be a part of a complete alternative. Even so, only two alternatives (no action and preferred) are analyzed, why wasn’t alternative 3 analyzed? Is the dismissal language intended to address alt 3? If so, it should do so more clearly.
- USACE lists several alternatives discounted, could a table be provided that includes each alternative and the reason why it was discounted?
- Please provide the time of year/duration when dredging would occur in the alternatives description. This information in chapter 1 regarding public comment is very broad, can the window be narrowed? “With the dredging of the tip occurring at some time between October and March”.
- Does this plan include any potential increased depth requirements of SUPERMAX or other large container vessels that may require this route?
- A thorough edit is needed, as well as the missing sections.

Coastal Zone Consistency Comments

- Analysis is provided in Appendix D – which we do not have to review.