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By email: susan.i.rees@usace.army.mil mscip@us.army.mil

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RE: Comments on MsCIP Comprehensive Barrier Island Restoration for Hancock, Harrison and Jackson Counties Draft Supplemental Environmental Impact Statement, March 2014.

Dear Dr. Rees:

Gulf Restoration Network is committed to empowering people to protect and restore the natural resources of the Gulf of Mexico Region. GRN submits these comments on behalf of its members who live and work in Mississippi and on behalf of its members and supporters who use and enjoy the Mississippi barrier islands.

Comments cover points presented in the recent draft Supplemental Environmental Impact Statement for the Mississippi Coastal Improvements Program (MsCIP) project to replenish and restore portions of the barrier islands of the Gulf Islands National Seashore located in Mississippi state waters.

The National Park Service, in its stewardship of the Gulf Islands National Seashore, manages and has jurisdiction over the biological, physical and cultural resources found on the islands and in the waters within one mile of their terrestrial limits.

It is clear from my conversations with both National Park Service staff and Mobile Corps staff at the Corps' public information workshop in Biloxi in April 2014 that the restoration of Ship and Cat Islands is a matter on which the Corps of Engineers and the National Park Service have disagreed. The two agencies seem to have overcome their

differences which were substantially over location of borrow sites. This issue necessarily includes questions of the cost of obtaining suitable material (sand) for the repair of the islands.

The project has gone through several iterations and has been narrowed from many restoration areas to focus on rejoining the two halves of Ship Island (East and West Ship Island) and on replenishing sand on beaches facing the Gulf side on the eastern extremities of both East Ship Island and Cat Island.

A central point of dispute between the Corps and the National Park Service has been whether Sand Island should be dredged or dug out to provide sand for the replenishment and repair of Ship and Cat Islands. Sand Island, situated near the western tip of Petit Bois Island, is a Corps of Engineers spoil disposal site used to place materials produced through dredging the Pascagoula Ship Channel. Sand has been deposited in this site; known as Disposal Area 10 (DA-10) for many decades. The Pascagoula Ship Channel has been federally maintained for well over a century. Sand Island at DA-10 has been built by dredge spoil deposition at a site within the boundaries of the Gulf Islands National Seashore. The USACOE sought to rely on Sand Island as a borrow site for this barrier island restoration project. At the same time, the National Park Service has resisted any disturbance of it because Sand Island offers wildlife habitat, particularly terrestrial resting, feeding and nesting habitat for sea birds, and is used by recreational boaters in the Gulf Islands National Seashore. Sand Island contains established fresh water wetlands much like the wetlands found on the other nearby barrier islands such as Horn Island. The National Park Service relies on its regulations and agency operating procedures as authority for its insistence that Sand Island not be disturbed by dredging.

The present version of the SEIS for the MsCIP barrier island restoration and replenishment project avoids using any of Sand Island and leaves it undisturbed. The solution for finding suitable sand is to seek it in the territorial waters of both Mississippi and Alabama, and in the federal waters of the Outer Continental Shelf (OCS). A sizeable amount of sand of suitable size/grade has been located for this project in a number of places around the Mississippi barrier islands and in Alabama. At the time of publication of this SEIS in March 2014, sand from Alabama was relied upon for a substantial portion of the material needed for re-connecting the halves of Ship Island. However, other sites in Mississippi territorial waters and in the OCS are being studied that may provide suitable sand. The result of these studies were not available at the time of publication of the March 2014 SEIS for this project.

The current draft SEIS states that there will be purchases of sand from the State of Alabama for use in this Mississippi project. The SEIS also states that at the time of its publication, other sand borrow sites are being surveyed in the OCS south of Horn and Petit Bois Islands. If significant quantities of suitable sand material can be found in these areas, the sand purchases from Alabama may be reduced, producing welcome cost savings for the Corps of Engineers.

Gulf Restoration Network recognizes that the two federal agencies have worked to overcome their differences on the issue of cost and the sources of sand to be used in this island restoration project. Gulf Restoration Network supports the island restoration work proposed for Ship and Cat Island including the closing of Camille Cut between East and West Ship Islands.

Rejoining East and West Ship Islands will create new terrestrial habitat. The areas of the Mississippi Sound north of a restored Ship Island will benefit from the project by having salinities decreased, and by being sheltered from wave action from the open waters of the Gulf of Mexico. Hurricane Camille Cut, the breach opened by the storm in 1969 between East and West Ship Island, has for more than forty years allowed increased volumes of high salinity Gulf water to reach the Mississippi Sound, raising the salinity in the sound north of Ship island. Closing Camille Cut to make Ship Island whole should decrease these local salinity levels. Sea grass beds on the north side of Ship Island may re-colonize the bottom in calmer, lower salinity waters of the island's north (Sound) side after the work is complete. Increasing the coverage of sound-side sea grass beds would increase nursery habitat for estuarine fish and invertebrate species.

Avoiding disturbance of Sand Island preserves habitat utilized by shorebirds and seabirds and keeps freshwater wetlands intact on the island. Gulf Restoration Network supports the decision by the COE to avoid dredging Sand Island and to seek suitable sand elsewhere whether in the OCS or in Alabama.

In Mississippi's Coastal Zone Program document (MCP 1988), the stability of the barrier islands, their function in wave attenuation, and in protecting the mainland from the full force of Gulf waves and storms are discussed as being part of the national interest. MCP Ch. 8 Section 7 (G) provides the following: "consideration shall be given to protecting the physical integrity of Mississippi's barrier islands so that they may continue to shelter the coastal area from devastation." When development projects propose any changes to the barrier islands, the Mississippi Department of Marine Resources Coastal Zone Management Program must consider how the national interest might be affected, particularly if the height of the barrier islands or their stability is reduced.

Projects to restore and stabilize the Mississippi barrier islands are in the national interest. The projects to add sand to exposed and eroding faces of Cat or Ship Islands to restore their dimensions, and the larger project to fill Camille Cut and rejoin the East and West halves of Ship Island are protective of the same national interest as described by the state's Coastal Zone Management Program regulation document. These projects will help protect the mainland by keeping the barrier islands stable and functioning to attenuate waves from Gulf storms.

A feature of the tentatively selected plan (Option 4) is the alteration of the Pascagoula Ship Channel dredge spoil placement area (DA-10). The spoil drop area will be moved to a point farther southward of Sand Island so that the dredged material put there will be more likely to be captured by westward moving longshore currents and become part of

the littoral drift that builds the barrier islands. This is a good adjustment to COE dredge operations and is supported by Gulf Restoration Network.

The MsCIP draft Supplemental EIS discusses the restoration projects for these islands as the first line of defense in helping the Mississippi Coast resist the physical effects of future storms. Other lines of defense, all landward of the islands and on the mainland, include non-structural solutions, the rebuilding of levees and the purchase of wetlands to preserve them as flood water storage, among others. Gulf Restoration Network recognizes that the island restoration projects described in the MsCIP SEIS are part of a comprehensive suite of projects designed to make the coast more resistant to storms and flooding.

Gulf Restoration Network supports the MsCIP barrier island restoration project tentatively selected for the restoration of Ship and Cat Islands. This is also described as Option 4 in the draft SEIS. We support the decision to avoid disturbance of Sand Island because it maintains wildlife habitat within the boundary of the Gulf Islands National Seashore. We support the decision to explore other areas in Mississippi or the OCS for the availability of suitable sand for the Ship and Cat Island projects. If suitable material is found in these areas, then the purchases of Alabama sand can be reduced or avoided.

Gulf Restoration Network appreciates the opportunity to submit comments on the above project.

Sincerely,

Andrew Whitehurst
Water Policy Director
Gulf Restoration Network